

Consultation Statement Plan:MK

November 2017



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Plan:MK

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1 . Introduction

1 Introduction

1.1 This document reports on the comments received in response to the draft consultation of Plan:MK that was published in March 2017.

What is Plan:Mk?

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

Consultation Period

1.3 Consultation ran for a period of a twelve weeks between 17 March - 9 June 2017, and received around 1,500 responses.

1.4 A broad range of stakeholders views were sought and they were categorised into the following groups, refer to Appendix 1 for the full list of stakeholders:

- Members of the Public
- Town and parish Councils
- Milton Keynes Council Ward Councillors
- Neighbouring and other Local Authorities
- Milton Keynes Council Departments, Development industry (e.g. landowners, developers, agents)
- National and Statutory Organisations
- Local organisations and interest groups

1.5 The Draft Plan:MK was published online with a link to an online portal, which was the recommended method for stakeholders to provide comments. A designated email address (PlanMK@milton-keynes.gov.uk) was provided whereby stakeholders could express feedback on the Plan.

1.6 Furthermore, the Council explored a number of engagement methods which intended to gain a broad range of opinions and views from a holistic range of stakeholders and to increase the awareness of Plan:MK (refer to Appendices 2-3). This included:

- **Public Events:** Invitations were sent out by email, public letters and posters were displayed on notices boards in public buildings, for example, libraries, leisure facilities and the Council offices.
- **Drop in Sessions:** Held between 27 March - 5 June in public and prominent locations in Milton Keynes such as libraries and shopping centres.
- **Parish Forums:** The Council attended parish forums to listen to local concerns and to engage with the local community and parish Councillors.
- **Publicly Available Access to Hard Copies:** Each library in Milton Keynes (Central Milton Keynes Library, Bletchley Library, Kingston Library, Newport Pagnell Library, Olney Library, Stony Stratford Library, Westcroft Library, Woburn Sands Library, Wolverton Library, MKC Mobile Library) received a hard copy of Plan:MK. This ensured that anyone without access or availability to a computer or the Internet had the opportunity to read and comment on the plan.

- **Briefing Sessions:** The Council held a number of high level briefing sessions with Parish Councillors. A presentation of the plan was presented along with a question and answer session.
- **Letters:** The Council identified a number of statutory consultees and local organisations (e.g. Developers, National and Statutory Organisations, Local organisations and interest groups). They each received a letter and email to inform and alert them of the consultation procedure and opportunity to provide feedback on the draft plan.
- **Disabled, visually impaired or help for an individual whose first language is not English:** The council was determined to ensure everyone had the opportunity to comment on Plan:MK. A helpline was provided for stakeholders to access the plan by: audio, large print, braille or a language other than English.
- **Local Media, Posters, leaflets:** To raise awareness of the consultation locally (e.g. Regional News and Radio programmes, Twitter, MK News and a Fred Roche Foundation talk in MK gallery which was free to attend), the council displayed posters in public buildings and via local media to inform stakeholders of when the consultation was taking place and how they could express their opinions and views on the plan. In terms of newspaper adverts the Council paid for two adverts about Plan: MK in MK News.
- **Audio-visual film:** We put an audio-visual film about the Plan: MK consultation on Youtube and on the Council Plan: MK website.
- **Website:** Officers created a website where people could access Plan: MK Topic papers, seeing what public consultation events we are running where and when and accessing information about the consultation.
- **Civic Offices Poster:** A special Plan: MK poster is on display at the front of the Civic Offices.

How the comments will be used

1.7 As we progress with the preparation of the proposed submission of Plan:MK, the responses will help us to develop the detail of the plan. Please note, this reports provides a summary of the comments received and does not detail responses in full.

1.8 This report does not provide a response to any of the comments or views presented by respondents, or debate what policy approach will be taken forward in the light of the comments received.

2 . Overall Summary

2 Overall Summary

2.1 A brief summary of the purpose and key findings that were received from each chapter is summarised below.

Chapter 1: Introduction

2.2 Chapter 1, provides a working timescale and outlines the purpose of Plan:MK. This report evaluates the planning policies which will be most pertinent to achieve the Borough's needs until 2031. Although, the proposed plan period was considered to be insufficient and should be extended in order to provide a detailed plan and long term visions and ambitions for Milton Keynes. The importance of collaboration between neighbouring authorities was encouraged to ensure a joined up and lateral approach for the development of planning policy.

Chapter 2: Vision and Objectives

2.3 This chapter recognises the ambition of MK to become a truly international city that attracts a diverse population, providing a wide range of opportunities and qualities that connects MK to key employment and residential areas such as, Oxford, Cambridge and London. A broad range of responses were received, commenting on the viability of the existing highway infrastructure and the importance to promote a plan for the whole borough and not to a primary focus towards CMK.

Chapter 3: Sustainable Development Strategy

2.4 The purpose of this chapter is to outline the provision of new housing and jobs, relevant infrastructure and facilities that promote sustainable development in the Borough. The overwhelming response was supportive for the policies proposed in this chapter. Nevertheless, it was recognised further refinement of the policies will be required throughout the consultation process. It was advocated to be essential to understand and evaluate the travel patterns from a regional perspective to promote regional sustainable spatial and transport strategies to improve journeys made by low carbon forms of transport.

Chapter 4: Development Strategy for Homes, Employment, Retail and Leisure

2.5 This Chapter details the Council's proposed strategies to deliver homes, employment, retail and leisure development within the Borough. Concerns regarding the ability of the existing highway infrastructure if new development is permitted were noted albeit it was acknowledged future scenario testing would be conducted to safeguard the capacity of the local highway network. The projected housing and employment targets were considered unrealistic and there appeared to be a preference for development in urban compared to rural areas to protect and enhance the Borough's green spaces.

Chapter 5: Spatial Delivery of Growth: Strategic Site Allocations

2.6 The intention of this Chapter was to outline policies which aimed to guide new development over the plan period. Details regarding site specific locations are provided, for example, the new urban extensions to the South East Milton Keynes and Lane East of the M1 as well as the new strategic employment site allocation to the south of Milton Keynes. Due to the nature and scale of the proposals engagement amongst stakeholders at the earliest opportunity was encouraged. Cross boundary collaboration and the protection of the local historic characteristics and environments were outlined as essential components

when aiming to deliver future growth. It was recommended that future development should be focused towards existing transport hubs to promote low carbon travel and away from designated floodplains.

Chapter 6: Economy and Retail

2.7 This Chapter explores the sites which have been allocated to ensure that the Borough achieves its employment, retail and leisure needs and targets for the plan period. The influence of market change and demand was recognised to be a potential affect towards the identified policy and thus a level and awareness of flexibility would be required for each policy. Opportunities for expansion within rural areas were promoted although, proposed polices should be mindful to incorporate the relevant Neighbourhood Plan. A wide range of comments were received with the majority of comments either in support or providing general comments towards the polices detailed in this chapter.

Chapter 7: Sustainable Construction and Renewable Energy

2.8 It was widely acknowledged amongst stakeholders the importance to deliver sustainable construction and renewable energy to achieve local and national climate change targets and provide development which endeavours to promote a resilient future for the Borough. In order to ensure that the polices are reflective of the current demand and wider political requirements/targets it was advised that they should be regularly reviewed and updated. However, some responses indicated that some polices appeared onerous and potentially might restrict future development and growth. To ensure robust development is delivered, it would be beneficial for specific sustainable and renewable targets to be included into future policy.

Chapter 8: Managing and Reducing Flood Risk

2.9 The main intentions of this chapter were to identify how the council intends to mitigate the potential flood risk for the borough, which has been at the forefront of planning since MK's original inception. In the main, responses were supportive of the objectives of the proposed policies detailed in this chapter. It would be worthwhile to consider the wider implications of the proposed policies in terms of business, and to revise aspects of this chapter to ensure they reflect the most relevant national and local policy that relate to flood risk.

Chapter 9: Biodiversity and Geodiversity

2.10 The purpose of this chapter is to outline the Council's position on Biodiversity and Geodiveristy. The main aim is to ensure that new development moves away from a net loss of biodiversity and achieves net gains for nature. The general response amongst respondents appeared to be supportive for the proposed policy. The Biodiversity and Geodiversity of the borough were suggested to be an essential ingredient for future development, and extending theses areas of nature beauty and wildlife were encouraged. It would therefore be worthwhile for policy to specify habitats and species which the Council intends to prioritise and provide detailed maps to visually the council's ambition and vision.

2 . Overall Summary

Chapter 10: Milton Keynes' Heritage

2.11 The general principles and intentions of this chapter were broadly supported by respondents. This chapter outlines the intended policies for conserving heritage assets and the historic environment of Milton Keynes. As written, some respondents indicated that a greater awareness of the NPPF and historic environments were required, and the plan should refer specially to the influence of the characteristics of listed buildings, archaeological sites, conservation areas and registered historic parks and gardens have to the public realm.

Chapter 11: Open Space, Leisure and Recreation

2.12 This chapter has been developed based on previous feedback from consultations on Plan:MK, with available evidence to set out the Council's preferred policies regarding open space, sport and leisure. Respondents either provided general or supportive comments for the plan. It was recognised that further clarification would be required to limit areas considered to be inconsistent and further refinement of policies will be required to ensure changes in demand and behavioural attitudes are accurately reflected.

Chapter 12: Design

2.13 Chapter 12, recognises that the Borough currently enjoys a general high quality environment both in its urban and open areas. The intention of the Council is to maintain this and deliver this into future design. Despite the principles of the policies appearing to be supported by respondents a wide range of general comments and suggestions were provided:

- Key terms need to be clearly defined and set in the context for this chapter.
- As written, the policies are too vague and subjective and thus widely exposed to personal interpretation.
- Lack of reference to policy which support or reflect the importance of design in order to guide future development within the Borough.

Chapter 13: Homes and Neighbourhoods

2.14 The intention of this Chapter indicates the council's desire to provide a wide range of housing to support the needs and requirements of different housing facilities in MK. It is the intention this will help to maintain or expand the existing housing stock within the Borough. Detailed throughout this chapter are a number of expectations/targets for new development such as affordable, specialist to self build or custom housing. A wide and broad range of responses were achieved. Policies which work towards achieving the council's housing target were recognised to be a critical criteria of the plan, however, it was acknowledged the importance to create communities and development that was led by local knowledge to ensure their needs and aspirations are met.

Chapter 14: Culture and Community

2.15 The Council is committed to building healthy and inclusive communities and this is outlined in this chapter. The importance to learn from previous success or failures was suggested by some respondents as critical to deliver effective policy. Further lessons should be learnt from outside the borough in order to provide an all encompassing plan which meets a broad range of individuals' needs and requirements. It would be worthwhile to provide reference to specific national policy to validate the proposals in the plan.

Chapter 15: Connectivity

2.16 The chapter outlines the Councils policies on sustainable transport network, walking and cycling, public transport, low emission vehicles, freight, the grid network and digital communications. In general, all respondents were actively supportive of the principles of this chapter either supporting or providing general comments and suggestions to promote a low carbon MK future. The importance to facilitate transport links to London, Oxford and Cambridge for employment, social and leisure purposes was recognised and considered to be an essential component to deliver the ambitions stated in this chapter. A number of suggestions were received to how the Councils ambitions might be achieved.

Chapter 16: Infrastructure Delivery

2.17 The purpose of this chapter is to ensure the demand for infrastructure, facilities and resources are being achieved for new developments. Also, it identifies the circumstances where planning obligations will be sought for their provision. A wide range of general comments and suggestions were received. There were a number of concerns regarding highways mitigation schemes which have been implemented following development. It was therefore suggested that adequate infrastructure should be implemented prior to first occupation of any new development. All infrastructure policies must be developed to safeguard the future of MK to ensure it continues to be an attractive place to live and work.

3 . General Comments on Plan:MK

3 General Comments on Plan:MK

3.1 In total, 70 responses were received, of which 23 supported, 12 objected, and 35 of them were general comment.

3.2 What members of the public said:

- Broadly support the direction of Plan:MK and particularly its commitment to maintaining low density housing, green spaces, and the grid system in Milton Keynes.
- Accept new housing developments, but would like to be consulted about their allocation.
- Suggest creating a simplified version of Plan:MK to reach wider audience.
- Suggest creating a management guide for Plan:MK about how and by whom is the Plan:MK be led, progressed and controlled, high quality design guidance established and delivered upon, Briefs formulated, voted adopted and commenced.
- Suggest future plans for expansions to include aspects of architecture and urban design.
- Generally support the policies in Plan:MK, particularly policy SD4, ER2, ER4, ER5, ER7, ER9, ER13, ER18, SC1, SC4, FR2, FR3, NE1, NE2, L1, L2, L3, L6, D2, D3, D5, D6, HN1, HN2, HN9, HN10, HN11, HN12, CC3, CC10, CT2, CT3, CT5, CT8, ER12, D4, CC2, CT1, CT4, but object to policy D1
- Support Plan:MK because it protects new planned estates and existing villages with grid road.
- Appreciate Plan:MK's vision to develop and expand CMK as a centre for businesses.
- Think Plan:MK the redway system has provided safe and convenient routes for travelling within MK by bicycle or on foot.
- Suggest MKC to propose and promote the infrastructure concepts of MK to neighbouring local Authorities.
- Would like to be informed about the timescale of publishing the representations. Hope the MKC would actively implement the representations of this consultation.
- Think continuous house building without population growth control is unsustainable.
- Support redevelopment in some older residential and commercial areas in MK as well as some brownfield sites.
- Object to any destruction of the rural environment surrounding MK.
- Concern about rapid urban expansion could lead to problems like traffic congestions and air pollution in villages and the countryside.
- Hope that Plan:MK can incorporate the opposite views from the consultation.

3.3 What Town and Parish Council said:

- Worry that Plan:MK has overly emphasised 'expansion'.
- Broadly support Plan:MK and appreciate that it takes into account the Parish Council's concerns over Northern Expansion Area, satellite settlements and the rural area East of the M1.
- A proper population projection is required to assess the future demand for housing.
- Think the ultimate plan of 400,000 populations in MKC area is optimistic, but at the same time, concern about the supply of supporting facilities and infrastructure, and the costs involved.
- Suggest that a tighter CMK would help the development of an integrated transport system.

3 . General Comments on Plan:MK

- Suggest including all new housing built within approximately 8 miles from CMK as part of the population of Milton Keynes. As they largely rely on MKC area for healthcare, social and leisure facilities.
- Generally support the plan and hope to be informed about the progress and the final Pre-Submission document.
- There is a need to better engage with the parishes and residents of Central Bedfordshire.
- Think Plan:MK and the SHLAA need to be updated as it is premature to allocate sites for development which is proposed to be carried out by the end of the plan period.
- Wish to see co-ordinated approach to development between councils in the future.
- Think the draft Plan:MK is consistent with the 2005 Local Plan, South East Plan of 2009 and Core Strategy of 2013.
- Plan:MK should propose a trajectory of housing, employment and infrastructure growth from 2016 to 2050, and how they can be achieved in the current plan period to 2031. This can enable local communities, investors and other stakeholders to have better planning.

3.4 What Ward Councillors said:

- Find contradictions between Plan:MK and the CMK Business Neighbourhood Plan. Think development in CMK should be guided by the Business Neighbourhood Plan or otherwise explain the need for a change in policy direction.
- Plan:MK lacks policies that protect public realm and infrastructure in CMK.
- Evidence base assessments are absent from Plan:MK, in particular the Retail Capacity Study and Transport Assessment.
- Plan:MK should cover how its policies that is found in the Core Strategy and the 2005 Local Plan will be applied.
- Structure of the plan is difficult to follow. For instance, retail is split into Chapter 4 and 6.
- Definitions are needed for specific terms, such as Open Space Network and Grid Road Network.
- The plan should distinguish between homes build for organic growth in household numbers and the additional homes build to attract more people to the city.
- Plan:MK should protect the characteristics of the city, which make the place distinctly successful.

3.5 What neighbouring and other local authorities said:

- Appreciate MKC's consultation on Plan:MK.

3.6 What the development industry (e.g. Landowners, developers, agents...) said:

- Recommend MKC to consult with housebuilders and developers regarding how the policies are affecting them and how to complete the forecast and 5 year land supply.
- Concerned about the policies' implications on existing planning application and their initial costs involved.
- Think the residential-led mixed use developments are able to meet future needs for housing and related development sustainably. However, hope MKC is aware of the social and healthcare facilities needs and that they should be delivered timely.

3 . General Comments on Plan:MK

- The plan period up to 2031 comprises only 12 years from the date of adoption, which is not accord with the requirements in national policy.
- The housing provision rate of 26,500 homes / 1,766 dpa does not reflect the ambition of the MK Futures 2050 commission. It is supported by the Housing Need Technical Review, which suggests that there is an under-estimate of the jobs growth potential of the area.
- Flexibility is needed in the plan for any delays in housing delivery.
- As North Milton Keynes Vision Document demonstrates, North MK is the most appropriate location for the longer-term strategy growth of MK.
- Concerned about housing requirement/OAN evidence, the scale of housing proposed for the rural areas and the mechanisms for its delivery. MKC should develop an OAN that is compatible with NPPF and PPG national policies.
- MKC should carefully assess the spatial strategy that forms the basis of the spatial distribution of growth across the district.

3.7 What national/statutory organisations said:

- Support the MKC's general approach to ensure developers will meet the needs of community arise from growth, and in particular would like to note the importance of delivering sufficient additional school places.

3.8 What local organisation/interest groups said:

- Clarification is needed regarding which document and policy Plan:MK is intending to replace. Also, Draft Site Allocation Plan requires further explanation within Plan:MK.
- Unhappy with the west of Bow Brickhill employment site allocation and the post-2026 housing allocation in north of Bow Brickhill Road. And think there is a failure of process, without going through a 5-year extension on the existing Core Strategy.
- Suggest including a Proposals Map in Plan:MK.
- Think Plan:MK should include a section addressing the housing need of young persons. It should also review the housing mix in MK in terms of numbers, size and tenure.
- Suggest Plan:MK to maintain the 6 Goals contained in the original plan for MK.
- Suggest MKC to work with adjacent local authorities regarding: directions of growth, Development Corporation, and drawing up a 50-year plan. Think the Duty to Cooperate is not strong enough for cross-boundary co-ordinated development.
- The draft Plan:MK lacks the understanding of MK's long-term challenges, an adequate evidence base, an overall Proposal Map, and consistency in text and proposed policies.

4 Introduction

Chapter 1 - Summary of Comments

4.1 This chapter explains the purpose and structure of the plan, and what it will replace once it has been adopted. It also includes a section on the statutory Duty to Cooperate in local plan-making. There were a number of concerns raised, related to the lack of awareness and evidence for heritage within the Borough, the time period does not reflect background evidence such as the MK Futures 2050 Commission report and further collaboration between neighbouring Boroughs is required to ensure a robust plan is delivered.

4.2 In total, 18 responses were received to this chapter albeit that some of them were more relevant to chapter 4 on the Development Strategy and have been summarised under that chapter.

4.3 What members of the public said:

- N/A

4.4 What Town and Parish Councils said:

- Walton Community Council welcomed the comment that Plan:MK will provide the strategic context for neighbourhood plans.

4.5 What Ward Councillors said:

- Cllr John Bint requested that the Council's current suite of supplementary planning documents should be retained and that the status of these should be clarified in the plan.

4.6 What Milton Keynes Council departments said:

- N/A

4.7 What neighbouring and other local authorities said:

- Central Bedfordshire and South Northamptonshire Councils both made reference to the Duty to Cooperate and expressed their readiness to work with Milton Keynes Council on cross-boundary strategic planning issues such as growth along the Oxford - Cambridge corridor.

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

- Rey Construction was concerned about what it perceived as an inadequate time horizon for the plan and that it has not taken full account of the available background evidence such as the MK Futures 2050 Commission report.
- The South West Milton Keynes Consortium raised an objection, requesting that the requirements of the Duty to Cooperate be met for Plan:MK and that evidence should be published to demonstrate that these requirements have been fulfilled. It commented that the Duty to Cooperate process and outcomes for Plan:MK will need

4 . Introduction

to be consistent with those of the draft Vale of Aylesbury Local Plan for cross-boundary matters.

- Wavendon Residential Properties and Merton College Oxford considered that the proposed plan duration, 2016-2031, is insufficiently short and that the draft plan should be considering a plan period to at least 2034 based on an end of 2018 forecasted adoption date.
- The Hayfield Consortium maintained the view that the plan period needs to extend further than 2031. Based on the Council's plan-making track record and the recognition of timescales associated with major infrastructure projects proposed within Milton Keynes Borough (including East-West Rail and the Oxford to Cambridge Expressway), it considers that an end date of 2033 is an appropriate minimum requirement in order to have a chance of being consistent with the preference within the National Planning Policy Framework for a 15-year time horizon (paragraph 157). The Consortium also remained very concerned by the lack of ambition, and lack of joint-working in this area, and therefore requested that a proper exercise be undertaken by the adjoining authorities to assess the potential for development to the south-east of Milton Keynes and how this could be delivered on an integrated basis with existing, committed and proposed new infrastructure in this area.

4.9 What national/statutory organisations said:

- Historic England considered that, whilst there is much to be welcomed in the draft Plan:MK, as currently drafted, it does not quite meet all the requirements of the National Planning Policy Framework as regards heritage in local plans. They also considered that this is easily rectifiable and have suggested how.

4.10 What local organisations/interest groups said:

- N/A

5 Vision and Objectives

Chapter 2 - Summary of Comments

5.1 This chapter sets out the next phases of development and the visions for 2031 within the Borough. MK has ambitions to become a truly internationally leading city, in turn, providing opportunities and qualities for its expanding population that has made it an attractive and unique place. A greater emphasis needs to be placed on innovation and how MK aims to connect to key employment and residential areas such as Oxford, Cambridge and London.

5.2 There were concerns that current development proposals do not conform to existing policies and thus housing targets should be set lower and more realistic. Furthermore, it is vital that transport policies are clearly stated to ensure that new development will not have a negative affect on the capacity of the existing road network infrastructure. It was recommended that the plan should ensure the visions and objectives are for a city wide region in turn, taking an holistic approach and not a restrictive approach by focusing solely on CMK.

5.3 In total, 72 responses were received. Of that, 29 supported, a further three supported with general comment and suggestion, 26 provided general comment and suggestion and 13 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

5.4 What members of the public said:

- Needs to make more of the link to Oxford, Cambridge London links.
- No mention of museums galleries etc. in vision to enhance cultural ties.
- One of the strategic objectives needs to focus on high growth.
- Assumption that homes will mean more resident workers need to address other infrastructure factors, roads, schools etc.
- The housing strategy needs to take into account how it will use new innovation in the building sector.
- No objective to conserve and enhance key landscapes ad habitats and preserve and enhance heritage assets.
- Should do more to leverage Cambridge MK Oxford corridor.

5.5 What Town and Parish Councils said:

- Agrees that the plan should only cover 2016 to 2031 due to future uncertainties such as East West Rail and the Express way
- Housing target set out is seldom achieved which means developers are proposing schemes which do not conform to policies
- Housing target should be set lower and more realistic with a hope to achieve higher figure.
- Needs a clear trajectory of growth, employment, housing and infrastructure for 2016 to 2050 2031 should be a milestone for planning.
- Plan MK should identify areas which form strategic reserve sites.
- Parish Questions the number of homes which have permission as other data indicates 28000 rather than 2000 homes.

5 . Vision and Objectives

- Housing decision in the south needs to be made in conjunction with the transport corridors.
- 26000 houses is a mile stone to 57000 houses in 2050
- Objectives should reflect NIC report to develop travel corridors
- Travel corridor could lead to growth and opportunities should be looked at east of the M1
- Both AVDC and CBC have 20 year plans to 2033 and 2035 respectively, it might be prudent to have a plan which covers this time period instead of falling short at 2031.
- Plan: MK should discourage the northern Growth Area Proposal.
- Pleased to note the reference of A Great City within a Thriving Rural -City Region and recognition of these villages and the parts they play.

5.6 What Ward Councillors said:

- Difficult to see how the objectives are covered in the policies.
- No site allocation for the university and subsequent unit accommodation
- There are no transport policies
- The Housing Policies don't provide enough affordable housing.
- No considerations of the opportunities of the Cambridge to Oxford Travel corridors will provide
- in Plan MK it is described as a City when MK should describe the Borough as the Plan covers the whole areas not just CMK
- Strategic Objective don't follow on from what has been said in the earlier chapter

5.7 What Neighbouring Local Authority said:

- ADVDC would like development outside of the Borough to integrate with the city and contribute to the character
- Supports Transport Objectives including east west rail and Aylesbury spur.
- Number of cross boarder issue which need to be addressed
- Need to ensure infrastructure needs and joint interests are appropriately planned
- Wish to collaborate on Sustainable Transport projects
- High levels of commuters have an impact on surrounding Parishes causing Traffic implications

5.8 What Council Departments said:

- None

5.9 What the Development Industry said:

- Plan Mk should review a longer period and take in to consideration more of MK50 futures plan.
- Council is adopting an inconsistent approach in the formulation and implementation of its Vision.
- Not considered that the Plan promotes sufficient development of the scale and type which can deliver.
- significant concerns that the Plan will not meet the Borough's housing needs
- strategic objects don't reflect the big 6 projects
- draft plan doesn't deliver on the strategic objectives
- Plan:MK doesn't support development of MK in the Growth/Transport Corridor

- plan doesn't reflect current situation with neighbouring authorities so does not reflect 'duty to co-operate'
- the plan once adopted will only cover 12 years
- Question the absence of new strategic development areas.
- Milton Keynes should be considered a City-Region not just a City.
- recognise the potential challenges for securing agreement to cross-boundary growth
- Grid road reserve corridors are important measure for future proofing and should link to A421
- Night time Economy is paramount to ensure CMK offers an experience to visitors and create a visitor
- Vision should refer to the whole of Milton Keynes
- Objective reinforce Milton Keynes as a Major City
- The MK plan should, though, ensure that infrastructure improvements occur alongside growth, and do not become an artificial pre-requisite to it
- Some objectives are not carried forward into specific policies for delivery.
- Inconsistencies between Plan:MK and other Councils local Plans.
- SEMLEP could form foundation for new working on the Oxford to Cambridge Arc
- Under delivery of 1million homes across the Arc and need to be redressed with strong economic growth
- The Council should recognize that transport to and from work, leisure and shopping is a key factor in the functionality of MK
- Scale of development currently proposed in Draft Plan:MK lacks ambition, and needs to more clearly reflect the vision of the MK Futures Commission Report and the findings of the NIC Interim Report.
- No new P&R facilities have yet been delivered.
- The housing requirement figure should remain as a minimum delivery figure.

5.10 What National Statutory Organisations said:

- Welcomed MKC's intention to ensure that transport solutions should give full consideration to the smart and sustainable mobility opportunities.
- A site next to an M1 junction could attract an increased number of trips to that junction and increase congestion and queuing.
- The first paragraph is really a vision for Milton Keynes rather than for the Plan:MK.
- Disappointed that there is not greater reference to the original design principles and architecture that characterises Milton Keynes.

5.11 What Local Organisations said

- Does not provide a coherent overview to deliver environmental enhancement.
- Welcomes recognition of green infrastructure and biodiversity development.
- MKC needs to maximise benefits from Biodiversity and Green Infrastructure.
- We would expect map should set out what MK aims to protect, provide for or improve and where and how this contributes overall to the Buckinghamshire-wide Vision for the Improvement of GI by 2030.
- Please add into the vision the importance that green spaces must be connected and planned.
- Would like to see in the Vision and objectives something regarding reduction of CO2 Emissions.

5 . Vision and Objectives

- Re-instate sentence from CS: "Implementing higher than national requirements for sustainable homes and buildings"
- Parks Trust has a vital role to play in advising on and guiding the planning and designing of new green spaces and parks.
- Feel the role and importance of Campbell Park should be given more prominence in the policies that relate to Central Milton Keynes.
- The plan period up to 2031 is too short and does not reflect the longer period up to 2036 advocated by the MK Futures 2050 Commission
- We urge that explicit mention is made of the Ancient Woodlands in Milton Keynes as well as the Linear Parks. To prevent loss of biodiversity
- No mention of the energy needs of a growing city in the vision - just vague references to "high standards of design" and "high environmental standards"
- Point 13 should be split to focus more on reduction of CO2 and other greenhouse gasses and supporting community lead renewable energy.
- It is suggested that the Vision could be reworked to include the six guiding principles for the original Plan for Milton Keynes, which are as valid today as they were in 1970.
- A wheelchair friendly city: A suggestion was made that the redways should be marked out to differentiate cycle lanes from pedestrians (for safety reasons).
- Group members were keen to find out more about the proposed Mobility Consultation to address questions about parking and public transport.

6 Sustainable Development Strategy

Chapter 3 - Summary of Comments

6.1 The chapter is the overarching strategy of Plan:MK, which sets out the approach to development in the Borough. It outlines Plan:MK's overall approach to addressing the provision of new housing and jobs, relevant infrastructure and facilities, and towards sustainable development.

6.2 Overall, the majority of respondents agreed and supported Plan:MK's presumption in favour of sustainable development, which aims at achieving economic, environmental and social progress. Nevertheless, it is recognised that the strategy requires further refining. 16 responses were received, of which 6 supported, 2 objected, and 7 of them are general comments.

6.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

6.4 What members of the public said:

- Para 3.3. There is a need to clarify the definition of the term 'sustainable development' by NPPF.

6.5 What Town and Parish Council said:

- Support the objective of achieving sustainable development, and in particular building sustainable properties in Milton Keynes.
- Policy MK1. Concerned about the inclusion at paragraph 3 and believes that Milton Keynes Council (MKC) should always ensure that all appropriate development control policies are included as part of Plan:MK and that all those policies are fit for purpose.
- Policy MK1. Support the presumption in favour of sustainable development in areas that offer greater economic opportunities.

6.6 What Ward Councillors said:

- Para 3.1. Plan:MK should aim at the 1.5 new jobs per new home ratio, rather than the proposed 27,200 new jobs for 26,500 new homes.
- Policy MK1. Suggests the policy be replaced by some less formal language, which states Plan:MK will comply with the NPPF and all amendments, clarifications, court rulings or successor legislation in the determination of planning applications.

6.7 What neighbouring and other local authorities said:

- N/A

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

- Policy MK1. Support the inclusion of the presumption in favour of sustainable development.
- Welcome the Council's commitment in achieving sustainable development and giving favourable consideration to proposals that are working towards the objective.

6 . Sustainable Development Strategy

- As proposed in the plan, the adoption of Plan:MK in Winter 2018 might not be able to comply with the requirements of the NPPF for a plan to cover at least a 15-year time horizon from adoption. Suggest Plan:MK to extend the period to at least 2036.
- An 11/12 year strategy with the potential for a review within 5 years is not an appropriate timescale to take account of longer term requirements of Milton Keynes. It does not constitute an approach that plans positively for future development and is not consistent with national policy. This is particularly relevant in a key growth location like Milton Keynes, and taking account of the 2050 aspirations for the city to become a truly internationally leading city.
- Suggest Policy MK1 to be incorporated in Chapter 4 as it is a single policy for the presumption in favour of sustainable development rather than a 'strategy'.
- Plan:MK should respond to any amendment made to the NPPF by the Housing White Paper in February 2017.
- Milton Keynes Council should work in collaboration with Central Bedfordshire Council regarding issues like sustainable spatial and transport strategies in order to deal with unsustainable commuting patterns in the area.

6.9 What national/statutory organisations said:

- Welcome the Council's commitment in Para 3.5 to giving favourable consideration to proposals that will contribute to delivering the protection and enhancement of the historic environment, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.

6.10 What local organisations/interest groups said:

- There is a need for a better definition of 'sustainable development' in Para 3.3 as referencing the NPPF provides an open goal for developers.
- Welcome reference to the need to protect and enhance the natural and historic environment and address issues of climate change in achieving 'sustainable development'
- Suggest to replace 'favourable consideration to' by 'actively seek' in Para 3.5.

7 Development Strategy for Homes, Employment, Retail and Leisure

Chapter 4 - Summary of Comments

7.1 The chapter is the overarching strategy of Plan:MK, which sets out the approach to development in the Borough. It outlines Plan:MK's overall approach to provide a strategy for housing, employment, retail and leisure for the planned period (2016-2031). In order to understand the future impacts on the road infrastructure a number of potential options will be tested and investigated. In turn, a number of open green space, wild green space and green infrastructure to create connected green spaces will be promoted, with a focus towards the Oxford Cambridge Expressway.

7.2 There is concern regarding the projected housing target and some respondents recommended this should be revised. The predicted jobs growth is considered unrealistic in comparison to the housing target over the same period, and a greater need to demonstrate the interaction between homes, jobs, retail and leisure is required. There is support for more growth in urban areas in comparison to green fields areas. A revision to the methodology is required to more accurately reflect the growth demands in MK.

7.3 In total, 370 responses were received. The majority of respondents supported the proposals. 370 responses were received, of which 193 supported, 90 objected, and 68 provided general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

7.4 Statutory consultees

- Important to engage Highways England fully in the modelling process which MK have commissioned and are consulted on the model outputs and infrastructure improvements
- To understand the potential impact on the Strategic Road Network, a cumulative impact should be presented which considers current adopted allocations and commitments plus additional development proposed in Plan:MK.
- Highways England understand that testing is being undertaken, and recommended that a number of alternative options are tested to identify any mitigation required for the SRN at an early stage.
- Plan does meet all the NPPF requirements in regards to heritage, but this is easily rectifiable via the suggested changes
- Removal of green space for development may have serious impacts on biodiversity and connected habitat.
- Plan should designate open green space, wild green space and green infrastructure to create connected green space suitable for species adaptation to climate change.
- Development sites should be assessed for Best and Most Versatile agricultural land, or have policies guiding development in this regards. Loss of BMV must be avoided.

7.5 Neighbouring and other Local Authorities

- In appropriate to base the strategy on an expectation about the route of Oxford Cambridge Expressway. Local Plan should provide certainty, but there isn't any certainty over the route. Suggest that potential routes and development sites are

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protected and brought forward if required or not once the route of Expressway is clarified.

- Welcome not directing growth to areas outside of the borough in Aylesbury Vale, and welcome directing growth to the urban area and east of the M1 is supported.

7.6 Parish and Town Council

- Welcome meeting housing needs within the borough and not looking to areas adjacent to the city but outside the borough.
- Agree plan should be reviewed within 5 years to take account of strategic infrastructure decisions
- Support the view that growth to the south east needs time to become established before more growth can be supported.
- Will not be able to achieve the per annum housing target and therefore not be able to demonstrate a five year housing land supply, resulting in more speculative development. Consider a smaller target of 1500.
- Support housing being accommodated in CMK, infilling in urban areas, Eaton Leys, and Land East of MK.
- Housing supply figure appears to be out of date - includes 2,000 in Campbell Park but this permission has now lapsed.
- Concerns about the Urban Capacity Study and the figures cited therein.
- Project growth over the next 15 years is cited as 27,500 which when compared to the 50,000 for the 2011-2031 period indicates job growth has decreased by two thirds.
- Jobs growth of 23,000 in the last five years seems exceptionally large compared to 7,00 homes over the same period
- Disagree with the obstacles to job growth in CMK that are cited, in particular parking standards. These are maximum, not minimum, standards and occupiers typically demand parking spaces to be provided. Low rental rates for office space are more of an obstacle to refurbishment of existing office space.
- Section needs to show clearly the interaction between homes, jobs, retail and leisure.
- The university will create its own housing challenges. A high proportion of housing should be suitable for single occupancy or purpose built student occupation.
- Support recognition that the SHLAA needs to be updated.
- A road transport strategy for the south of MK needs to be established with AVDC and CBC before further development to the south of MK is considered
- Suggest MKC and neighbouring authorities work jointly regarding the Oxford Cambridge Expressway proposal
- Support focussing the bulk of development within the existing urban area or adjacent to it and around the proposed east-west transport links.
- Object to development that directly impacts our rural villages (Hulcote and Salford) without due consideration to the impact upon the lives of residents.
- MKC proposes further development that has significant impact without any cooperation with ourselves or infrastructure schemes to protect our residents.
- Milton Keynes should maintain the visionary ideals and planning strategy of the new town rather than the myopic developments that have been allowed to happen in recent years such as those at Broughton and Brooklands.
- No further growth in the south east should be considered until the impact of the current developments (e.g. around Wavendon) has been assessed and a comprehensive deliverable traffic strategy for the area produced. There is no deliverable and

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affordable traffic scheme for the southern edge of Milton Keynes that could handle the increase in traffic associated with proposals in the draft plan.

- More appropriate for growth to be in and around the urban area than the south east. Prioritise completion/redevelopment of Central Milton Keynes; regeneration of older estates; use underutilised brownfield employment land; infill and redevelopment of other sites, including Site Allocations Plan sites; densification of sections of the centre. If expansion is needed, consider land to the west of the WEA , land to the north of the existing urban area, selected development around rural settlements, and land between Newport Pagnell and the M1.
- Need to avoid the coalescence of the new town with traditional villages, which is a long established principle. Development of new housing areas should respect the character of the existing historic settlements including Aspley Guise, Woburn Sands, Bow Brickhill, Aspley Heath, Wavendon, Husborne Crawley, Hulcote and Salford, Ridgmont, Brogborough and Cranfield.
- Believe that the current borough boundary is the most appropriate 'final extent' of development.

7.7 Members of the public:

- Should prioritise land to the north east over further development in the south east/Woburn Sands area which has had significant development in recent years that has not been fully absorbed.
- Existing infrastructure (health, schools, roads, parking) in the south east is not sufficient to support further development.
- Preferred route for the Oxford Cambridge Expressway is yet to be announced. The proposed south east housing site may become untenable if the route goes through this area.
- EWR will mean more downtime for level crossings with impacts on congestion around Woburn Sands.
- Whilst the plan would be reviewed within 5 years, there are better options already available and identified compared to the south east.
- Broadly support the draft plan and decision not to expand to the north east
- Support the regeneration of Bletchley and older city grid squares
- Ouse valley should be formally designated as a natural barrier to growth to the north east
- Area north of the MK should be protected as a highly valued area for informal recreation, wildlife and biodiversity.
- Support growth to the south of urban area to make the most of Oxford Cambridge Expressway and EWR.
- Growth up to 400,000 must be supported by investment in infrastructure
- Strategy for growth in knowledge intensive sectors needs to be supported by investment in education and skills providers. This is missing in the draft plan.
- Need to explore with whether the Council can work with the knowledge intensive universities to develop an on-campus Innovation Centre.
- Setting up a new university will be a long term plan, but existing providers can provide up skilling now.
- Closer engagement with universities would help to develop a more active and vibrant creative and cultural experience.
- Support decision not to expand to the north as this would result in loss of natural habitat, increased traffic and pollution, flood risk, cost and provision of infrastructure.

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- Should not complete infill the urban area and risk losing green spaces
- Further development of 1,000 homes, and potentially just the beginning of a much larger development, around Wavendon seems too quick off the back of the SLA which hasn't yet started in earnest.
- Would prefer the large growth in the SE to the series of speculative developments being proposed which would not provide any infrastructure.
- Plan does not reflect earlier consultation consensus for new satellite settlements in the rural area and at Winslow and Cranfield.
- Should include an objective of seeking a wider MK region plan for the next plan period to be prepared with adjoining authorities.
- Premature to be setting a long-term growth strategy before work has concluded on other strategic planning such as the Oxford Cambridge Expressway, MK2050 and EWR.
- Changes suggested in Housing White Paper will enable the Core Strategy growth to be delivered in a timely fashion
- Must work with neighbours and Government to plan growth and explore governance and delivery mechanism for growth in the wider region.
- A421 from J13 of the M1 is a bottleneck which the majority of commuters into MK use. Further growth in CMK and the city will make this worse. J13 needs to be significantly improved.
- Why include land to the west of Woburn but not the land to the north. No logic in this.
- Plan:MK should not be unduly influenced by external matters (Expressway and EWR) which may never occur.
- East of M1 makes sense as it has direct access onto the M1, whereas south east MK, south caldecotte and Eaton Leys do not and the nearest junction is J13 which has serious issues.
- MKC should not be unduly swayed by local opposition in Woburn Sands and instead do what is best for MK.
- Support development in CMK, including higher rise buildings, and urban infilling.

7.8 Milton Keynes Council Ward Councillors

None

7.9 Development industry

4.6.1 Amount of Housing and Employment

- Housing target should reflect the Milton Keynes Futures 2050 Commission recommendation of between 1750-2000. Whilst it is within this range, we consider that it is too low when considered against the Commission's recommendations and overall aspirations for the city. MKC has adopted a negative approach towards supporting the delivery of new housing. Recommend higher target to support these ambitions.
- Potential agreement between the seven LPAs in the Oxford Cambridge Corridor to that supports the MK Future 2050 Commission's aims suggests that land should be identified for a minimum 30,000 homes over the 15 year plan period.
- Object to the housing target as is does not reflect Milton Keynes' role for strategic growth at the heart of the SEMLEP area.
- In light of the potential for Milton Keynes to create employment opportunities, the target for 27,500 jobs is not aspirational.

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- Uplift in development requirements arising from new strategic infrastructure should be provided over and above the OAN and jobs forecasts currently predicated on current growth levels i.e. there should be genuine additionality.
- Milton Keynes is a growth location that should accommodate unmet need from elsewhere, including Luton and Greater London. Unmet need and uncertainty surrounding the level of housing required across the Housing Market Area means Milton Keynes should be helping nearby authorities to meet their housing needs under the Duty to Cooperate.
- Propose that the OAN should be 47,188 dwellings (2,359 pa) between 2011-2031, which incorporates an uplift to accommodate unmet need from London, an additional 500 dwellings to meet projected economic growth, and balancing jobs and homes to reduce in-commuting.
- Housing target should be 34,650 homes to be planned for to maximise the chances of delivering the need for our a preferred target of 31,500 homes between 2016-2031 (in excess of 2,100 dwellings per year).
- OAN for MK should be 30,000 to 2031 or 40,000 to 2036. Based on the stated supply, Plan:MK would meet the 26,500, but the surplus is limited and does not allow for inevitable delays or barriers to sites. MK east would provide headroom. When compared to an OAN of 30,000 dwellings, Plan:MK would have a shortfall of 9%.
- Affordability problem is more than 'moderate'. Suggest a larger uplift of 15% to address the significant housing market pressure.
- Identified figure of 26,500 homes should be increased and provided through site allocations in MK's rural settlements. This would also help support rural communities.
- SHMA underestimates the OAHN as it fails to fully investigate and address projected suppressed household formation, is underpinned by a conservative assumption of future job growth, and there is an insufficient uplift in response to worsening market signals. Recommend an increased level of housing provision to meet identified needs.
- Evidence base and methodology used to identify allocations and housing need across the housing market area is inadequate and not up-to-date and does not conform to the NPPF.
- SHMA is untested and utilises a single source of economic data for projecting the level of housing, does not take into account realistic rates of in-migration and the need to support the creation of 27,500 new jobs, no appropriate consideration of past underperformance, the impact on household formation rates (particularly two-three adult households), overcrowding and affordability.
- The full number of concealed households with a household representative aged under 65 in 2011 (1,047 households) should be added to the total of households in need, rather than just the increase since 2001 and with a household representative aged under 55. Figure in 2011 is a more accurate reflection of the actual number of households in need than the figure representing the increase during 2001-2011, as these needs have not been met.
- SHMA recognises that health of older people is improving and state pension age is increasing. The threshold should therefore be 65.
- There is an imbalance between jobs and workforce in MK with adverse environmental effects it (congestion and pollution). Greater housing provision would increase the availability of a resident workforce. This housing provision would need to be collocated with employment provision.
- Employment strategy does not embrace the concept of Milton Keynes at the heart of the 'brain belt'.

4.6.2 Plan period

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- Deferring decision to a Local Plan review does not provide certainty for business
- Support early review of the plan, but should include a policy commitment or trigger mechanism to ensure this happens by at least 2021 as Council cannot be relied on to review the plan given experience with the Core Strategy. Suggest using the approach used at Maidstone (policy with target adoption date) to provide certainty and avoid further under supply
- Proposed plan period up to 2031 will be less than fifteen years from adoption. There is no basis for curtailing the plan period.
- Recommend extending the plan period for Plan:MK up to 2036
- Plan period should be extended to 2033
- The plan should be brought forward in a timely manner, but should not attempt to prejudge the outcome of the NIC work. The strategy of not committing to strategic growth until more is known is supported in this regard. Allocation at South Caldecotte would not affect the NIC work or decisions.
- Rationale for a shorter plan period is not supported. Infrastructure projects and MK's position at the heart of the growth corridor strengthen the role of MK in the region, so better to plan for a longer period and take the strategic approach to planning

4.6.3 Delivery of strategy

- Larger strategic sites are more likely to produce housing towards the end of the plan period due way these sites are planned and brought forward which will delay delivery. This is already occurring in Milton Keynes. Reliance on large sites will mean MKC will not be able to demonstrate a five year land supply.
- We note from Tables 4.1 and 4.3 in the plan that MKC is reliant on the full capacity from existing commitments being delivered. No further evidence is provided as part of the consultation to demonstrate that this is realistic, having regard to potential lapses in planning permissions or the number of homes coming forward on large sites being overestimated
- we have concerns that the supply of housing will be insufficient to meet even the low housing requirement proposed in the Plan:MK and maintain a sufficient five (and 6-10) year supply of housing in Milton Keynes
- To meeting higher housing target of 34,650 and ensure delivery, need to make significant additional allocations with a focus on small / medium sized sites
- Housing figures apportioned to the various areas typologies will need to be amended to reflect a more realistic assessment of housing need. The number should be increased to allow a greater element of flexibility and contingency for under-performance to make sure the strategy is effective
- To meeting higher housing target of 34,650 and ensure delivery, need to make significant additional allocations with a focus on small / medium sized sites
- Strongly question the deliverability of the 1,000 dwellings before the expiration of the Plan and raise concern that the Council are relying on the progress of a large, infrastructure scheme that is just at consultation stage.
- The implications of the emerging strategies and infrastructure projects, along with the level of provision being made, are equally relevant to employment growth as they are to housing.
- Support not over allocating development land within the strategy as it is important that the deliverability of key sites is not diluted by the allocation of too many strategic sites.

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- The failure to improve housing delivery at a time of improving market conditions can only be a function of a failure to deliver an adequate supply of consented land that is deliverable.
- Considerable doubt over whether the level of committed and proposed development in the eastern area of MK is sustainable and deliverable.

4.6.4 Spatial distribution of growth

- There is no certainty attached to the employment strategy. Plan should have flexible allocation to support either housing or employment based on current needs and best locations for meeting them
- There is an over concentration of development within MK and Key settlements rather than dispersing development to sustainable locations both urban and rural.
- Welcome reference to the need to allocate small and medium sites
- Plan:MK should support sustainable urban extensions to the south west of the city where growth is already committed rather than new areas to the east. This would take advantage of improved transport connectivity offered by EWR, facilitate the Bletchley Southern Relief Road, and is capable of being delivered sooner than growth to the east due to necessary infrastructure investment.
- Level of growth to the southeast is too small and does not take full advantage of recent infrastructure investment in this area and EWR to come.
- Growth to the south east is line with the previous Regional Spatial Strategy, as well as the Local Plan and Core Strategy
- Growth to the South East should not be unnecessarily delayed and should come forward as early as possible.
- Allocation of 1,000 to the south east would result in coalescence of villages with Milton Keynes, a significant impact on the Brickhills Area of Attractive Landscape, and congestion issues. Delivery of 200 dwellings per annum is not considered achievable
- Support the outward expansion of the urban area
- Urban extensions will place demands on the highway network, whilst development in Bletchley provide opportunities for more sustainable living.
- Endorse the principle of regenerating Bletchley Town Centre.
- The Plan and a proposed Bletchley Town Centre Masterplan offer an opportunity to regenerate Bletchley Town Centre and ensure that the area is able to realise its potential as being a key link in the strategic East-West rail link.
- Suggest a site specific policy for Bletchley Town Centre is required due to the regeneration challenges involved and to avoid restrictive policies that may hinder or preclude regeneration
- Draft Plan remains unclear on the potential for the regeneration of Bletchley Town Centre to include residential development as part of a mixed use approach. NPPF promotes use of PDL and Government seeks to encourage greater residential development around transport hubs, which Bletchley will become through EWR
- Remitone Properties happy to engage in preparation of Bletchley Town Centre Masterplan.
- Draft Plan should draw on a number of areas to meet its housing needs. Urban extensions may be unresponsive to short to medium term housing needs. Redevelopment sites in Bletchley Town Centre can meet short - medium term housing need, and provide a range of housing as opposed to more suburban, family sized units associated with urban extensions.
- Support focussing growth in and adjacent to the urban area of Milton Keynes.

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- Raise concern regarding the deliverability of homes in regeneration areas and through neighbourhood plans.
- Growth in CMK, Campbell Park and the urban area would require very high density development which has not traditionally been delivered in Milton Keynes and may not be feasible. No information on how the 3,500 has been arrived at or how deliverable it is.
- Development East of the M1 would necessitate a massive infrastructure upgrade, particularly highways related. With the lack of technical evidence to support the site selection process at this stage, the identification of this site as a Preferred Option is premature.
- Better to allocate land in different areas of the city to provide market choice. Western side is the obvious choice given the boundary constraints to the south and the floodplain to the north.
- Support the approach to discounting other development directions including the potential expansion of Milton Keynes to the north and the delivery of satellite settlements in the rural area on the basis that they do not have the potential to deliver the benefits MKE can.
- The Council should seek to allocate further larger employment sites - such as MK East - capable of accommodating larger floorplate premises to meet market requirements that are not suited to central locations, rather than rely upon the small scale and fragmented employment sites original designated in the New Town.
- Land east of the M1 does not have the potential to integrate with or benefit from East-West Rail or the Oxford to Cambridge Expressway. Integration is a key benefit of land to the south east of Milton Keynes.
- MK East site should be allocated for development within the plan period.
- Plan fails to explain the strategy for 'Key Settlements' in terms of the amount of development here compared to other rural settlements. Plan MK should provide a strategic steer for growth/apportion out numbers for Key Settlements including Olney to inform the creation or review of Neighbourhood Plans and to provide a reasonable level of confidence of their delivery.
- The Taylor Review, NPPF and recent appeal cases indicate that authorities should support rural communities by directing development to rural settlements to improve affordability and widen the choice of homes.
- Relying on Neighbourhood Plans to deliver 1,000 homes in rural settlements is not appropriate or reliable as there is no imperative to prepare plans, no control over numbers or allocations, and timescales/resource to produce them may be inadequate. This has resulted in a lack of a five year land supply elsewhere an speculative development in rural areas.

4.6.5 Evidence

- Evidence associated with the Draft Plan (transport modelling; strategic site assessment; Sustainability Appraisal; retail capacity and leisure study) evidence should have been produced in advance in order to inform Plan:MK, rather than simply reflect its contents or provide a post-hoc justification for decisions already made. Evidence needs to consider cross-boundary issues of strategic importance as identified in the NPPF.
- Proximity to urban area and service centres by itself is inadequate. The key measurement is accessibility to services and facilities.
- Not convinced that the draft plan has been 'Positively prepared' and is 'Effective', in terms of working jointly with other authorities on cross-boundary issues.

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- Need Landscape, Transport and Strategic Site Assessment work to have been completed before Preferred Options are selected.
- In the absence of a detailed Strategic Sites Assessment we are unable to determine why these options have been chosen in preference to the alternatives.

7.10 Local organisations and interest groups

- Aim of encouraging Neighbourhood Plans is laudable but unlikely to be fulfilled based upon the experience at Bow Brickhill
- Proposed housing target is too high. Should be reduced to 1250 pa
- Existing infrastructure would not be able to cope with proposed levels of growth
- Building on greenfield land is undesirable
- Will not be able to achieve the per annum housing target and therefore not be able to demonstrate a five year housing land supply, resulting in more speculative development
- Should consider including ZedPods (dwellings above car parking spaces) within CMK
- Housing target does not take account of London commuters and projected jobs growth of 48,000 between 2011 and 2031, which would require 44,500 home to be built. Lower housing target will result in housing costs inflation making it harder for young people to access housing
- Education and training need to be made available those in their mid-20s and beyond, not just for school leavers
- No reference in the plan to the role that Powered Two Wheel vehicles can play in support younger people in employment and education. Provision for them should be made
- The rate of growth in jobs in Milton Keynes shows that it remains an excellent location for business and the consequential provision of housing, public services and other facilities
- Growing the city must be taken within a long-term strategy, at least for fifty years, and cover parts of Aylesbury Vale, Central Bedfordshire and perhaps South Northants. Growth areas that might be deferred or dropped altogether as a result of the adoption of the fifty-year plan and the route of the Oxford to Cambridge expressway should be resolved now to enable the longer term strategy. Proposed urban extensions are deferred to 2026 and beyond, therefore long-term Strategy can be prepared and adopted without interrupting the intended supply of new housing
- It is essential that a Development Corporation be established with the fifty year strategy and the route of the expressway settled within the first few years of Plan:MK, that is to say by 2020.
- Prefer new development to relate to the East - West development corridor (East - West rail link and expressway) rather than the West Coast mainline and the M1 motorway.
- High level jobs (e.g. science parks) need to be distributed in the corridor along with housing to avoid growth areas becoming dormitory settlements for London, Oxford and Cambridge
- Quantity, timing, quality and location of new housing is critical to a longer term strategy. Essential local community are involved in their delivery.
- Reliance upon and the failure of strategic house builders to deliver the necessary number of homes is undermining five year housing land supply. A new approach is needed, including a range of different procurement methods and establishing a Development Corporation

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- Strategic house builders are not building a large enough stock of genuinely affordable homes or creating places of character and quality.
- We do not understand how the proposed housing allocation totals have been arrived or how and where the allocations to Central Milton Keynes, the rest of Milton Keynes City and the rural areas have been determined.

7.11 National organisations

None

Policy DS1 Settlement Hierarchy

7.12 Policy DS1 provides an overview of the measures that the Council will undertake over the plan period, which will seek to grow and develop the Milton Keynes economy and capitalise on its geographical location to major employment and residential areas such as London and Birmingham and Oxford and Cambridge.

7.13 Overall, the planned period is considered logical and the principles of the policy appeared to be supported with revision by the respondents . It is recognised that green field areas can be used to enhance, protect and preserve rural and historic characteristics within local communities and this should be endeavoured throughout the whole plan. There is support for development within rural communities in collaboration with the pertinent neighbourhood plan to ensure local demands and needs are achieved. The policy needs to be revised to be more place specific and less open to debate. There are concerns regarding the wider political consequences, for example, proposed population and thus revisions might be required to reflect the future political status quo.

7.14 In total, there were 30 representations to this policy, all of which provided general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

7.15 Statutory Consultees:

- N/A

7.16 Neighbouring and other Local Authorities

- N/A

7.17 Town and Parish Councils

- Support the proposed settlement hierarchy. The decision to limit the planning horizon to 2031 is a sensible one, pending final decisions on E-W routes, delivery against existing permissions and evidence of the impact of BREXIT on population growth/housing need projections.
- Whole of the south-east growth area requires a masterplan linking all the elements of homes, employment, retail and leisure together with the proposed expressway, rail links and grid roads.
- We note that Policy DS1 limits development in rural settlements to within defined settlement boundaries, precluding significant development in the open countryside and maintaining green and open areas of attractive landscape which prove a great attraction to the growing residents of the City. We accept that villages need to grow in order to remain vital, however development should be on the terms of the local

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community. The proposal in DS1 that sites in villages should be allocated within Neighbourhood Plans is very well received.

- Settlement Hierarchy should more clearly recognise the contribution that the Corridor will play in extending the city to the south alongside the EWR and Expressway, requiring the allocation of land by one or both the adjoining planning authorities.
- Should recognise the functional relationship between the towns of Newport Pagnell and Olney and their surrounding rural villages and hinterlands. The Plan should define rural sub-areas comprising each of the towns and their lower order villages, to enable the communities within each sub area to agree how best growth and the necessary supporting infrastructure should be shaped and delivered. Ideally, this will be done through clustered or individual neighbourhood plans, though neighbourhood planning will remain voluntary. This will encourage and enable rural communities to identify and plan together for the improvement of shared services and infrastructure and the new homes that will help deliver them. We accept that this approach requires the Parishes to the north of the city to form a sub-area, even though they do not form the functional hinterland of a higher order town.
- Propose that the 'key village' of Woburn Sands is deleted and no sub-area defined for that part of the rural borough given the close proximity of the village and its surrounding area to the proposed Strategic Growth Corridor. There should be no requirement for the villages to grow any more than they wish to
- The focus of Plan:MK should be on establishing an effective green wedge between the villages and the new developments within the Corridor to protect as much of their rural and historic character as possible.

7.18 Members of the Public

- Campbell Park should remain a mixed use development area in line with SPD, the outline planning permission, and the made CMK Business Neighbourhood Plan ("Alliance Plan")
- Suggest to remove the phrase "Stockley Park with housing" or a "Smart mixed use campus" as it is repeated in DS2.
- Support PLAN:MK and decision not to expand across the Ouse valley and north of MK
- Should enhance the parkland near Haversham once the aggregates working ceases to make the area outstanding for nature and residents
- The Ouse is a natural inhibitor to development and this needs to be recognised under PLAN:MK.
- Urge that 1,000 allocation be through neighbourhood plans so that this expansion suits the locality and is proportionate.
- Now we are leaving the EU, the significance of the country's ability to feed itself and the desire to cut down "food delivery" miles will become more important and hence farm land to the north of MK has an even greater contribution to make.
- Agree with the designated corridor for the rail line between Oxford and Cambridge and the Expressway as this will draw business expansion and MK has so much to offer to the significance of this new infrastructure..
- Increasing the overall number of dwellings to 400,000 will necessitate an adequate expansion of the current infrastructure, communications, schools and hospital facilities.
- The brown field areas as in Bletchley and the older parts of MK, merit special consideration in terms of the improvement to the quality of their housing stock.

7.19 Milton Keynes Council Ward Councillor

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Policy as currently worded is entirely permissive, which is pointless in the context of a presumption in favour of development. One or both of DS1 or DS2 need a very short additional statement added such as 'Planning applications for housing falling outside these various categories will normally be refused.'

7.20 Development industry (e.g. landowners, developers, agents)

- Support the 'Key Settlement' second tier in the Hierarchy and the inclusion of the market town of Olney.
- Object to the omission of 'Land south west of Milton Keynes' from the 'New Strategic Growth Areas' in Policy DS1 and Table 4.
- Strategy relies on a small number of larger strategic sites to deliver housing growth over the plan period. Appears to be an over concentration of development within Milton Keynes, Newport Pagnell and Woburn Sand rather than a more dispersed approach directing development to sustainable locations both urban and rural. Should allocate additional housing sites in rural locations to meet the needs arising from across the Borough and the Housing Market Area, and to support existing village communities and remove the reliance on Neighbourhood Plans to provide a significant portion of the OAN.
- Support the inclusion of 'South-East Milton Keynes' but remove reference to 'post 2026'.
- Support the inclusion of 'infill, brownfield, regeneration and redevelopment opportunities'; however, the word 'selective' should be removed so as not to restrict suitable, but currently unidentified, infill and brownfield sites coming forward to boost the supply of housing. Other proposed policies within Plan:MK would then direct the suitability, density and design of such a development.
- We support the Settlement Hierarchy as set out in Table 4.2.

7.21 Local organisations and interest groups

- Object to specifying CMK "including Campbell Park residential area" at the top of the hierarchy when the Neighbourhood Plan does not define Campbell Park as a "residential area" but an area for mixed use development with a strategic vacant block (F1) reserved for a new University or educational institution.
- Reference to "uncompleted City estates" is too vague. Identifying these estates by name, including cross-reference to a list of specific sites, would enable an informed response.
- Why is it only the 'Villages and Rural Settlements' where development will take place "within defined settlement boundaries" and "in compliance with Neighbourhood Plans". Surely the same principles should be applied and spelled out regarding CMK, Newport Pagnell, and every other area referred to higher up the table.
- Support Policy DS1 SETTLEMENT HIERARCHY and, in particular, the New Strategic Growth Area on Land East of the M1 motorway (post 2031) - or earlier should this become necessary.

7.22 National Organisations

- N/a

Policy DS2 Housing Strategy

7.23 Policy DS2 identifies the new housing strategy for the Borough, with a focus towards land adjacent to the existing urban fabric of MK. Overall support for housing in rural areas which conforms to the relevant Neighbourhood Plan. However, all development should be reviewed against the proposed highway mitigation works to ensure there is sufficient capacity on the existing road infrastructure for any new development. There is a greater need and preference to focus development towards the centre of MK in order to control urban sprawl and it would be beneficial for lessons to be learnt from other local authorities. It was suggested by keeping development together, for example, homes, work and leisure with an efficient and modern transit system allows access to (i) surrounding areas outside of CMK; (ii) neighbouring retail and leisure hubs e.g. Stadium MK, reducing the impact on greenfields. Therefore green edges should be used to promote and protect local communities and enrich neighbourhoods.

7.24 Some of the allocated residential targets are considered unrealistic and should be revised to reflect more accurate forecasts. There should be a focus to understand travel attitudes and needs in order to meet local and national targets and in turn, promote low carbon transport modes.

7.25 In total, 264 responses were received. Of that, 176 supported, 59 objected and a further 23 provided general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

7.26 What members of the Public said:

- Strong support (over 160 responses) for the deletion of the northern expansion area. Ouse Valley should provide a natural barrier to development north of the city.
- Strong support for 1000 homes across rural areas in line with neighbourhood plans, to enable sustainable growth of rural towns and villages. Albeit some would like clarity on where these will go.
- The M1 motorway should formally be stated within the Plan as a natural barrier to development east of the M1.
- Clarification is required over when the 'land to the East of M1' is to be used and there should be more specific detail regarding the road and transport network for this expansion.
- Strong Support for Plan:MK's direction of growth along the East-West Rail Corridor and the Oxford to Cambridge Expressway
- Development to the south and west has a number of benefits, which could be maximised if MKC and AVDC work together. Existing villages in the AVDC area should be protected by a green belt.
- Future development of the city towards "400,000" by the MK Futures 2050 Commission must be supported by appropriate infrastructure
- Strong support for regeneration in Bletchley and older city grid squares to improve the housing stock within these urban areas.
- In favour of intensification and redevelopment in the urban areas because: CMK is losing its identity as a city because of its sprawl - greater density and city centre identity connected to MKC railway station is desperately needed to satisfy the need of the commuter both to and from MK.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- People want good commercial office accommodation, with adjacent retail and leisure facilities all within walking distance from their home - this can only be achieved by redeveloping the centre of MK around the railway station to deliver 21st century needs to the growing population of MK.
- Regeneration and invigoration of MK will attract young professionals to live and work in MK, which will have a positive effect on the local economy. Young commuters are best served by affordable residential accommodation within walking distance of the railway station, with the option of high-quality build to rent development.
- Keeping homes, work and leisure together with an efficient and modern transit system allows access to (i) surrounding areas outside of CMK; (ii) neighbouring retail and leisure hubs e.g. Stadium MK. It reduces the amount of potential Greenfield development. Developing under-used and run-down urban areas improves environment, attractiveness and appearance.
- Urban regeneration supports more sustainable communities and associated benefits such as public transport, green transport initiatives and lowers car use especially single occupancy vehicle movements.
- The Plan needs to work in concert with the complete range of initiatives for the borough including 2050 Futures, City of Culture applications, competing with cities such as London, Birmingham and Manchester.
- Objection to south east urban extension as it is contrary to Woburn Sands Neighbourhood Plan, provides concerns regarding facilities, infrastructure and pollution, and conflicts with MKC principle of maintaining countryside between Milton Keynes and older settlements.
- Suggestion to delay south east until 2031 due to uncertainty around transport routes.
- Question as to whether 3500 homes target is achievable because of flaws in the UCS. UCS is not sound because:
 - Does not relate to assessments in the recent Site Allocations Plan.
 - Ignores planning policy consents (e.g. alliance plan approach to Station square)
 - No assessment of car parking if car parks are built on.
 - Presumption of a housing yield for regeneration estates despite Council assurances that no assumptions have been made;
 - Picks green space without an assessment of standards relating to MK;s unique design and sustainability
 - Consumes reserve sites without rationale for removing future-proofing.
- UCS list of 117 infill sites is unacceptable, they should be reviewed and any sites previously removed from the SAP or flagged as unsuitable should be removed. Many are highly valued green open spaces.
- Concern about development of amenity and green open spaces identified in Urban Capacity Study and feels this contradicts with Plan:MK's desire to protect those which are used for recreation and of biodiversity value.
- Specific mention of protection of sites in Stantonbury (UCS099 - UCS102) (3 responses).
- SHMA has overestimated number of dwellings required; questions methodology.

7.27 What Town and Parish Councils said:

- Support for the concepts in Policy DS2. The North of the Ouse valley, should appear in the Plan as a natural barrier to development north of the city.
- The M1 motorway should formally be stated within the Plan as a natural barrier to development east of the M1

7 . Development Strategy for Homes, Employment, Retail and Leisure

- MKC should accept development of 1,000 houses across rural areas in line with neighbourhood plans and resist pressure for expansion to the east of the M1.
- Improved transport links provided by the East-West railway and the Oxford to Cambridge Expressway make development in the southern parts of MK much more sensible than building east of the M1.
- Development to the south and west has a number of benefits, which could be maximised if MKC and AVDC work together. Existing villages in the AVDC area should be protected by a green belt.
- Future development of the city towards “400,000” by the MK Futures 2050 Commission must be supported by appropriate infrastructure
- Support for regeneration in Bletchley and older city grid squares to improve the housing stock within these urban areas.
- To summarise, in favour of intensification and redevelopment in the urban areas because: CMK is losing its identity as a city because of its sprawl - greater density and city centre identity connected to MKC railway station is desperately needed to satisfy the need of the commuter both to and from MK.
- People want good commercial office accommodation, with adjacent retail and leisure facilities all within walking distance from their home - this can only be achieved by redeveloping the centre of MK around the railway station to deliver 21st century needs to the growing population of MK.
- Regeneration and invigoration of MK will attract young professionals to live and work in MK, which will have a positive effect on the local economy. Young commuters are best served by affordable residential accommodation within walking distance of the railway station, with the option of high-quality build to rent development.
- Keeping homes, work and leisure together with an efficient and modern transit system allows access to (i) surrounding areas outside of CMK; (ii) neighbouring retail and leisure hubs e.g. Stadium MK. It reduces the amount of potential Greenfield development. Developing under-used and run-down urban areas improves environment, attractiveness and appearance.
- Urban regeneration supports more sustainable communities and associated benefits such as public transport, green transport initiatives and lowers car use especially single occupancy vehicle movements.
- The Plan needs to work in concert with the complete range of initiatives for the borough including 2050 Futures, City of Culture applications, competing with cities such as London, Birmingham and Manchester.
- Concerns about potential development of sites identified in the Urban Capacity study identified by four Council's.
- Objections to sites identified within the Urban Capacity Study in Newport Pagnell. Land off Chicheley Street (25 dwellings) and land off Dulwich Close (54 dwellings). Two further sites in NP are identified, land off Little Linford Lane (14 dwellings) and the land off Richmond Way (8 dwellings). These sites are not allocated for housing development in the Newport Pagnell Neighbourhood Plan (NPNP).
- Draft Plan:MK is much better than proposals previously consulted on. Support the approach of expanding along the Oxford to Cambridge expressway corridor and intensification in the urban part of the Borough, in a way that maintains city's character. Proposals for expanding the settlement of Olney to 10,000 dwellings is not sustainable, and satellite settlements are opposed. Support the approach of devolving to Neighbourhood Plans the allocation of sites in the rural area and to deliver necessary infrastructure in the rural area, introduction of CIL charging.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Concerns about the scale of development east of the M1 any such proposals should only be considered if the necessary infrastructure provided before development takes place. Welcome the increase in affordable housing to 33%, but wants some flexibility on the social rent / shared cost split, particularly in neighbourhood plan areas
- Concern regarding references to the regeneration of Bradville made in the Urban Capacity Study. Refers to work of Neighbourhood Plan Steering group considering use of sites identified in the Urban Capacity Study, UCS11, UCS12 and CS034 for housing development. Considering alternative uses for UCS20 , UCS033, UCS099, UCS100 and UCS102. Objects to the inclusion of the following sites in West Bletchley in Urban Capacity study: UCS055 UCS108, UCS109 UCS057, UCS058 and UCS107
- Do not accept the wording of point 3, specifically I. to the idea that the additional dwellings should extend the boundary of the urban area; II. to the suggestion that 1000 dwellings within the plan period is realistic before 2031; III. to that current wording since it is insufficiently explicit. Points (i) and (ii) are discussed in greater detail below; as far as Point (iii) is concerned WPC proposes the following amended wording: "Additional housing will be provided in the South East of the currently developed area but no planning permissions will be given in this area until the route of the proposed expressway has been agreed and the road constructed and the impacts of SLA's on the surrounding areas have been properly and fully assessed. Therefore the South East area will therefore make no contribution to the housing target in Plan:MK until a date beyond 2031 and held as Strategic Reserve to be considered in the revision of the Plan:MK for the period beyond 2031"
- Encouraged Plan:MK is recognising neighbourhood plans. Development of any small to medium sized non-strategic site for housing should reflect the character, density and open space requirements of the surrounding area
- Focus of new housing development on, or adjacent to, existing urban areas set out in Policy DS2 is welcomed. Concerned at impact of development east of the M1, combined with adjacent the housing allocations in the Newport Pagnell Neighbourhood Plan . Traffic congestion should be assessed and a robust infrastructure plan produced to support this development
- Support for bringing forward development east of the M1 once the route of the east-west expressway is known.
- The specification that the rural housing target should be delivered through allocations in neighbourhood plans is supported
- Permitting development within settlement boundaries where they comply with Local and neighbourhood plan policies may not provide sufficient protection to open spaces in villages. Perhaps strengthened wording to "supporting development within settlement boundaries where these are allocated by Neighbourhood Plans"
- Many of the Parish Council's to the north of the city support the development strategy in policy DS2. They oppose major housing development on land north of the River Great Ouse and remain concerned that the 'Northern Growth Area', or a significant part of it, may return as land interests will continue to promote its alleged benefits during the current consultation at the examination of the Plan next year. The Parish Councils are also mindful of the Milton Keynes Futures 2050 Commission proposals to grow the city/borough to a population of 400,000 by 2050 and of the possibility that MKC may be required by the Plan:MK Inspector to extend the plan period to 2036. These Parish Councils will welcome the opportunity to work with others on plans for the long term growth of the area.

7.28 Milton Keynes Council Ward Councillors

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Appreciates uncertainty over east-west expressway is causing problems, generally support the new proposed directions of growth and feels that the CMK numbers will invigorate CMK. Concerned about the Urban Capacity Study, feels that the numbers projected are not supportable and all projections should be consistent with policies elsewhere in Plan:MK and other strategic Council policies. Individual sites should only be brought forward with the support of local residents or as part of a properly consulted on Council strategy elsewhere (eg for education or sheltered accommodation.)
- Policies DS1 & DS2 (page 18-19) These policies as currently worded are entirely permissive. However permissive policies are pointless in the context of a presumption in favour of development. If these policies are to actually serve any purpose, one or both of them needs a very short additional statement adding at the end, saying something like 'Planning applications for housing falling outside these various categories will normally be refused.'

7.29 What Neighbouring and other Local Authorities said:

- Aylesbury Vale District Council refer to Table 4.3 Plan: MK Housing Land Supply, 3,500 of the 7,600 new supply will be derived from Brownfield development, infill, regeneration and redevelopment opportunities. However the information set out at 4.22 appears to indicate that the justification for this level of delivery is not sufficient to confirm the level of delivery expected. To avoid the need to potentially find more land for housing the capacity available from these sources should be confirmed as soon as possible.
- Central Bedfordshire Council: Support the approach to allocations within or adjacent to existing urban areas and the identification of opportunities for urban infilling that will complement large scale strategic growth identified within Milton Keynes and ensure delivery of the annual housing requirements.
- South Northamptonshire Council (SNC) In respect of 'Direction of Growth 1 - Development to the west, south west and/or south east of the city. The Council raised no objection in principle to this potential direction of growth, previously, but remains concerned at the additional traffic generation that would likely arise on routes through its district, and how such an impact would be mitigated.
- In respect of 'Direction of Growth 2 - Development East of the M1 motorway' and Direction of Growth 4 - Intensification and Redevelopment in the urban area', SNC raised no objection, previously, and continues to support these directions of growth.
- In respect of 'Direction of Growth 3'- One or more satellite settlements in the rural area' it is noted that this option has been deleted, and is not included in the preferred options draft Plan. SNC considered this option to be the least sustainable, given the dispersed and unspecified locations of the satellite settlements, and is therefore pleased to see that this potential direction of growth (ie 'satellite settlements') has been removed from the draft Plan..

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Part of the proposed Strategic Greenspace designation in Plan:MK, includes land within South Northamptonshire. SNC wishes to refer to the importance of maintaining the substantial green edge to the north of Milton Keynes along the Great Ouse valley.

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

- Policy DS2 should include a strategy for the Rural Area as set out in Policy CS9 of the adopted Core Strategy
- The sixth bullet point is not satisfactory. It only requires 'small scale' development within rural settlements and fails to articulate the role of Key Settlements. Strategic growth appropriate to the size and function of each Key Settlement should be specified, instead.
- Expectation that individual Neighbourhood Plans deliver growth puts onus on Plan:MK to address the different sizes and functions of settlements.
- Rural areas should not be restricted in the extensive manner proposed and question how this element of the policy will be applied in a consistent manner through the development management process.
- Query the rationale behind the 1,000 dwelling figure allocated to this tier of settlements. It is not clear that the proposed 1000 dwellings for the rural area is evidence based or will truly meet the needs of the rural area. Can only assume that it is an arbitrary figure identified to help make up the numbers and provides a token scale of development across the rural areas of the borough.
- Question what would happen if neighbourhood plans do not come forward successfully within the five years. Believe a more flexible approach should be applied to the delivery of dwellings on sustainable sites in the rural settlements. Greenfield sites on the edge of settlements but outside the currently built up area/settlement boundaries offer opportunities for sustainable development which could help to meet the housing needs of Milton Keynes and significantly boost the supply of housing.
- Believe that the rural allocation element of Policy DS2 requires significant amendments in order to ensure that it provides for the needs of these rural areas and is capable of being found sound through the examination process.
- Olney is a market town with a range of economic activities, services and amenities and is a sustainable place for growth. Plan:MK should indicate what additional growth might be needed in relation to a review of the current Olney Neighbourhood Plan. Site E which is safeguarded in the neighbourhood plan is available for consideration when the plan is reviewed.
- Object to the omission of 'Land south west of Milton Keynes' from the schedule of 'New Housing Development' in Policy DS2.
- It does not appear that the existing shortfall of 2,681 has been considered in the SHMA or in setting a housing target for the plan period. If not, then Plan:MK will not be meeting housing needs of the area. Including the shortfall would require the delivery strategy to be reconsidered with further sources of land supply to be found.
- Further allocations are required as current assumptions on land supply are not robustly justified given the persistent failure of the Council to deliver their housing requirement over the past number of years
- We question the amount of housing that could be delivered through brownfield, infill, redevelopment and regeneration. The overall figure of 3,500 identified is not robustly justified.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- The identification of sites to meet the plan target should be dealt with more comprehensively as opposed to a short-term approach which appears to be conceived to secure some quick consents on a number of sites.
- Do not consider the Council has a five year housing land supply and disagrees with using the Liverpool method.
- Plan needs to identify additional housing allocations that are immediately deliverable in the first 5 years of the plan.
- Over concentration of development within Milton Keynes, Newport Pagnell, Woburn Sands and Olney rather than a more dispersed approach directing development to sustainable locations both urban and rural.
- Larger strategic sites are more likely to produce housing towards the end of the plan period due to how these sites are brought forward, as evidenced by experience with existing large sites.
- Concerns in relation to the evidence base and methodology used to identify the draft strategic allocations and the housing need across the Housing Market Area. Urban Capacity Study and the Plan: MK Sustainability Appraisal do not evidence or justify the Council's methodology and approach towards allocating the strategic sites outlined in the plan.
- Draft Local Plan does not indicate how any cross-boundary issues are to be dealt with or how this will be reflected in Milton Keynes' OAN figure. Evidence used to calculate the OAN and inform the Local Plan is not up-to-date and is in direct conflict with guidance within the NPPF. Number and distribution of housing across the HMA is yet not fully resolved.
- Luton's unmet need and uncertainty surrounding the level of housing growth required across the Housing Market Area means the identified figure of 26,500 homes is inaccurate and not based on an up to date evidence base. Further sites in suitable rural settlements in the Borough should be allocated to remedy this.
- The Taylor Review, NPPF and recent appeal cases indicate that authorities should support rural communities by directing development to rural settlements to improve affordability and widen the choice of homes.
- Relying on Neighbourhood Plans to deliver 1,000 homes in rural settlements is not appropriate or reliable as there is no imperative to prepare plans, no control over numbers or allocations, and timescales/resource to produce them may be inadequate. This has resulted in a lack of a five year land supply elsewhere an speculative development in rural areas.
- Support the South-East Growth Area. However, the 1,000 dwellings should not be an upper limit and or limited to post 2026. Should come forward at the earliest possible opportunity.
- Development within rural settlements is supported; however, the wording should be altered to "at least 1,000 dwellings" (rather than "a total" of approximately 1,000 dwellings).
- Redevelopment of brownfield sites, vacant or underused sites is supported. This should not be limited to Milton Keynes urban area but to all settlements within the Borough.
- Support the principle of permitting new housing development proposals within settlement boundaries.
- Local Plans need to be drawn up over a 15-year time horizon (from the anticipated date of adoption). Plan period should cover a minimum of 3 additional years with at least an additional 5,298 dwellings to meet development needs.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Should consider extending plan period to 2036 for the plan to be more robust and reflect the MK2050 Futures Commission ambition for higher growth.
- Regard the delivery of the 3,000 homes around Campbell Park as being unlikely within the plan period, due to viability of developing this type of mixed use scheme and attracting the type of occupiers envisaged without significant infrastructure investment.
- Over reliance on brownfield development, infill, regeneration and redevelopment to deliver the majority of growth in the period to 2026. No split of the 3,500 figure between regeneration, infill, brownfield and redevelopment sites. No clarity on how realistic the delivery of such sites is, which are often more complex to bring forward, so therefore little confidence in how achievable this is.
- Support allocation of the land at “ South-East Growth Area ” (third bullet of Policy DS2) although suggest wording reflects the wording in SD13. No merit in restricting development within the South East MK Strategic urban extension until after 2026.
- Should make clear that both the overarching housing target and all figures are minima - in line with Strategic Objective 2 - so that growth is not unnecessarily restricted.
- South East MK is a critical location for significant growth over the next 15 years. Need to allocate and safeguard the areas required for proposed growth now due to the risk that the area’s suitability for development and MKC’s inability to demonstrate a five year land supply means the area is susceptible to speculative development that would prejudice comprehensively planned new communities, e.g. land north of Cranfield Road risks terminating potential extensions to the grid road network and the protection of the character of existing villages through strategic green buffers.
- Housing target is unsound, as seeking to precisely meet Objectively Assessed Need does not provide sufficient flexibility to ensure this minimum requirement will be met particularly if the housing target does not include an appropriate buffer to take account of potential lapses/ non-implementation and non-delivery.
- Housing target would not make Milton Keynes the hub of the Cambridge-Milton Keynes-Oxford growth corridor, and instead represents a significant loss of ambition.
- Any unmet needs within the wider Milton Keynes Housing Market Area would need to be accommodated in Milton Keynes as it is the most sustainable location (services, regional role, lack of constraints) and can improve affordability across the corridor.
- It would be beneficial to plan for additional housing in excess of the Objectively Assessed Need in order to achieve a sustainable balance between homes and jobs
- Support general principle of development at southeast Milton Keynes but object to the limited scale and extent and the lack of appropriate co-ordination with future infrastructure projects such as East-West Rail and the Oxford-Cambridge Expressway.
- The SHMA makes a fundamental error in failing to include a response to market signals and backlog of housing provision. This would result in an OAN of 28,750, with a need to allocate 9,025 dwellings as opposed to the 6,775. Once employment growth is properly accounted for, the Full Objective Housing Need is 37,676, meaning Plan:MK needs to allocate 18,025 dwellings in the plan. Accepting the Council’s assertion that there is a need for 8,200 affordable dwellings, this would equate to 28.5% in the corrected MK SHMA calculation but would drop to 21.7% in the advocated true Objective Assessment in Housing Need.
- Gavin Barwell, Housing Minister made clear that Local Authorities had a clear choice to either pause their Local Plans and wait until the new Objectively Assessed Needs methodology is fixed or carry on with the preparation of their new Plans and have a very early review to reflect any changes. This could have an impact on the Housing Needs and Housing Strategy within Plan:MK.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Shenley Park is consistent with, and complements, the approach of allocating growth in a spatially balanced way, on different sides of the city, including significant 'greenfield' sites.
- Lacks clarity and is somewhat confusing, in particular what the 3,500 supply to be brought forward on brownfield development, infill, regeneration and redevelopment opportunities refers to, whether this is a borough wide figure for windfall development or something different.
- Query whether MKC are double counting the 1500 homes coming forward in CMK as part of this 3,500 to be brought forward on brownfield development.
- There is no specific policy which sets out the total housing requirement. It should at the very least be incorporated within this policy.
- The SHMA's approach to assessing overall housing need is compliant with the PPG methodology. However, a number of shortcomings underestimate housing need in the SHMA: fails to fully investigate and address suppressed household formation; a conservative assumption of future job growth; insufficient uplift in response to worsening market signals.
- Note paragraph 4.13 refers to further work required to understand the demand for city centre and 'peripheral' city centre living, so as to confirm the housing figure of 3,500 dwellings is achievable. This evidence and detailed understanding is critical in order for the plan to be considered 'effective' and therefore capable of being found sound through the examination process.
- Strategic Developments within Existing Urban Area would see the completion of the existing city grid squares and the Eastern and Western expansion areas. The Council need to be satisfied that these locations will deliver the scale of housing proposed during the course of the plan period.
- The text within PL: MK regarding Eaton Leys will need to be updated as the situation progresses
- Do not believe Land east of the M1 should be identified as a mixed use strategic allocation within Draft Plan: MK as it is beyond the plan period. Rather should be included as a safeguarded site for delivery post 2031 and removed from Table 4.3
- There is no available evidence to suggest that land east of Milton Keynes is deliverable, particularly with regard to crossing the
- It is unclear whether the small/medium non-strategic sites will only be within the MK urban area or whether the Council will be proposing some non-strategic housing sites in other settlements within the borough. Recommend that these should be borough wide.
- Support the intention to undertake an early review of Plan: MK however submit that in order to ensure this become a reality the Plan needs to include some form of policy commitment or trigger mechanism for the Local Plan Review, given the failure to review the Core Strategy within the original timescales.

7.31 What National and Statutory Organisations said:

7.32 N/A

7.33 What Local organisations and interest groups said:

- Satellite settlements in the rural area are not appropriate
- Support decision to not expand to the north of urban area
- Requested that the Ouse Valley be designated in Plan:MK as a natural boundary/barrier to growth further north.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Support growth of 1,000 in the rural area through Neighbourhood Plans
- Supports expansion in line with the East-West Infrastructure and the proposals from the MK Future 2050 Commission
- Consider SHMA overestimates housing needs. This should be revisited.
- Support significant regeneration in Bletchley and the older city grid squares
- Plan:MK should do more to address the growing problem of homelessness in MK by driving the development of affordable housing close to the city's amenities.
- Concerned that large developers or landowners will continue to lobby and put pressure on the Council and the Planning Inspectorate to accept large scale northern expansion as this aligns with their own landownership and or land option status and their drive for profit.
- Development should be focussed in the urban area wherever possible
- Support deferring growth east of M1
- Do not support including Eaton Leys as a suitable site as it is speculative piecemeal development. Decisions on this site should be deferred until more is known about EWR and the Expressway.
- Should take account of the long term impact on the AAL in Bow Brickhill
- There should be a redway from railway to the woods around Bow Brickhill and promoted as a tourist destination.
- Urban infill sites have not been consulted on, many of which are green open space and were removed from the Site Allocations Plan. These should be removed from any allocation
- Expansion should not be led by developers
- A Development Corporation should be set up to support delivery
- Expansion areas should continue linear parks and grid roads/squares
- Unclear whether the 1,500 proposed for CMK is in addition to the those within the CMK Alliance Plan or the 5,000 requirement within the Core Strategy. Further allocations in CMK are likely in conflict with the CMK Alliance Plan.
- Do not consider the urban allocation is possible without causing significant impact upon valuable open space.
- Eight bullet point should be amended to "The regeneration of some existing city housing estates as brought forward by the Your:MK regeneration programme, subject to the policies of made Neighbourhood Plans, local Referendums and consideration of the design and heritage value of these new town estates".
- Likely to be significant opposition to regeneration of estates, based upon experience of EDAW and Grimley study in 2006.
- There is no evidence of any cooperation with neighbouring authorities regarding housing and infrastructure.
- It is not apparent in the sites within the Site Allocation Plan are contributing toward meeting housing needs identified in Plan:MK
- SHMA does not take account of the lower jobs to homes ratio set out in para 3.1 of Plan:MK, instead using a ratio of 1.7.
- Source of the 19,725 is not clear as the June 2016 trajectory had 22,536 dwellings in the supply.
- Proposed target of 1,766 dwellings is not achievable. Such delivery rates have not been delivered since the 2007 crash, and the sites within the Site Allocations Plan will not offer much support to increase delivery in the next five years.
- There is no evidence to support the assumption that housing delivery rates will increase, thereby building up a shortfall and failing to demonstrate a five year housing land supply

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Little confidence that Plan:MK is sound since the south east allocation cannot come forward given uncertainty surrounding the Expressway, and there are no numbers attributed to the East of M1 site.
- Has the trend for increased new build leasehold and flatted development been taken into account? This will have repercussions in terms of affordability and the ownership and management of public open space.
- Fully support DS2 and the fourth bullet regarding the expressway route.
- Object to allocation of East of M1, South East MK and Eaton Leys individually and cumulatively because of detrimental impact on the rural environment.

Policy DS3

7.34 Policy DS3 details the measures that the Council will undertake over the plan period to seek to grow and develop MK's economy and capitalise on its location between London and Birmingham and Oxford and Cambridge. It was suggested by some respondents that CMK does not require or has a limited appetite for a Central Business District (CBD) as businesses can locate in any part of CMK under the CMK Alliance Business Neighbourhood Plan and the proposed plan was not versatile and flexible to meet future demands in technology and individual behaviour change. There is a requirement for the plan to specify the importance of the proposed employment areas and further consideration would be worthwhile investigate/analyse the wider political impacts (e.g. BREXIT) which might affect the proposals of the plan.

7.35 There were 16 representations to this policy, 7 general comments, 3 representations in support and 4 objections, two by agents proposing land for additional warehousing and three objections to the allocation of Caldecotte South. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

6.36 What Members of the Public said:

- CMK does not need a Central Business District (CBD) as businesses can locate in any part of CMK under the CMK Alliance Business Neighbourhood Plan. Two members of the public objected to the allocation of Caldecotte South.

6.37 What Town and Parish Councils said:

- Disproportionate amount of employment space for warehousing. Milton Keynes should be more aspirational in its approach to ensure economic growth in areas other than warehousing.
- Lack of information in this policy about how Milton Keynes will attract and aid the development of high tech companies.
- Reliance on retail and warehousing is not the future now that more people are inclined to shop on-line. There should be a strategy to encourage and attract manufacturing.
- The employment strategy should provide a flexible supply of land for employment interspersed over the whole of the city.
- The proposal to create a CBD with major mixed-use office development reverses the aspiration for mixed-use development throughout CMK.

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6.38 What Milton Keynes Council Ward Councillors said:

- Concern at apparent emphasis on warehousing in the plan, chapter should emphasise the amount of land allocated for other types of employment uses and the number of jobs generated by them.
- Lack of understanding in policy of what makes a good location for several types of business. CMK is a great place for businesses that are part of, or suppliers to, the accountants, solicitors and estate agents but has very little to offer most other types of business (Creatives, IT firms especially startups etc). We should encourage businesses for whom CMK is not an appropriate business location.
- Further justification needed on why we should concentrate “office-led development” around the railway station
- Paragraph should be re-written to emphasise our influence over what happens rather than making the Council look passive, proximity to motorway junctions should be mentioned!

6.39 What Neighbouring and other Local Authorities said:

- Central Bedfordshire Council support the need for a flexible supply of sites and the identification of land off the A5 at South Caldecotte for B2/B8 employment .
- There needs to be a balance between homes and jobs within MK and the wider FEMA.
- CBC and MKC must continue to work together in relation to future job projections and locations for new employment land in the order to take a co-ordinated approach to future employment provision across the FEMA, and ensure existing employment commitments can be delivered in a timely manner.

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

- Two representations consider that the policy does not provide a sufficient level of quantitative and qualitative B8 employment land for the large-scale logistics sector within the Borough. One submission proposes that 20 ha of B8 employment land should be allocated on land at Caldecote Farm site (east of the M1) and the other that 25 ha site should be allocated on land north-east of Newport Pagnell.
- Support the reference within Policy DS3 to maximising the potential of the Oxford to Cambridge Corridor, and encourage the Council to ensure that the delivery of infrastructure, housing and economic growth is properly aligned in a more joined-up, strategic approach across the Corridor.
- Support the general thrust of the policy and CMK becoming the primary focus for knowledge- based businesses including the densification of development in this area through the increase of high quality office floorspace and the number of businesses.
- There is a disconnect between this policy and the CMK Alliance Plan. That plan encourages active ground floor frontages in office developments and that a proportion of employment space is provided for start-up business etc.
- Questions how a shift away from the private car is to be funded. To provide ‘greater’ amounts of floorspace envisaged by the policy, there must be a concerted emphasis on the development of surface level car parks, with the provision of any car parking associated with new or redevelopment schemes within multi storey or basement car parking areas whichever is commercially viable. A possible conflict between protection of ‘classic infrastructure’ and ‘building lines’ as identified in the CMK Alliance Plan and achieving the aims of Policy DS3 is acknowledged.
- Policy should provide some focus on market demand and viability considerations although knowledge based industries are supported, CMK must be open to business

7 . Development Strategy for Homes, Employment, Retail and Leisure

to all employment generating uses (with the exception of those falling within B2 and B8).

- Amend policy and add an additional point that explicitly states Milton Keynes Council would seek to encourage the growth and expansion of existing employment uses (where it does not conflict with other policies in plan).

6.41 What National and Statutory Organisations said:

- N/A

6.42 What Local Organisations and Interest Groups said:

- Not clear how other categories of employment (e.g. retail) fit into the three categories of 'B' use class employment referred to in Plan:MK .
- Concerned about the potential high land take for warehousing and the appropriateness of allocating land for such a use.
- MK needs to attract the kinds of innovative businesses that are flourishing in and around Cambridge and Oxford.
- Refers to forecasts on future job numbers being less than in the past. Milton Keynes should plan for 45,000 to 100,000 extra jobs for the 26,500 new homes proposed. Growth in jobs growth over the last few years not explained sufficiently. Sceptical about projections for future land requirements or the implications for transport. No analysis, or even discussion, of the impact of Brexit.
- Lack of recognition of the significance and economic benefits of the creative industries. Plan:MK should identify those areas where retention or conversion of existing buildings is feasible or where there may be potential, including through planning obligations, to provide appropriate new facilities.
- An interest group objects to the identification of nearly 57ha of land for B2/B8 development south of the Bletchley to Bedford railway line (south of Caldecotte) arguing this will have a significant detrimental impact on the rural environment that provides part of the setting for Milton Keynes.

Policy DS4

7.36 Policy DS4 describes the measures that the Council proposes to undertake over the plan period to grow and develop the Borough's retail, leisure entertainment and cultural offer with main town centre uses being developed within town centres; including working on the CMK Renaissance Investment programme and the Bletchley Master Plan, now the Central Bletchley Urban Design Framework (CBUDF). Improvements to signage (e.g. for Information about tourist attractions, leisure facilities, bus services) and to facilitate the usage of empty facilities was pro-actively supported. Better reflection of the NNPF is required to assess retail proposals, to ensure that the Primary Shopping Area remains the key location for comparisons retail and other town centre uses.

7.37 There were 9 representations to this policy, 6 general comments, 1 representation in support and 1 objection, 1 representation contained a mixture of comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

6.44 What Members of the Public said:

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- Concerned that draft plan did not detail amount of retail floorspace required in the Borough as the retail study had not been concluded by the time Plan:MK was produced.
- Criticism of CMK's 'edge of centre' around the PSA at para 4.52 which differed from the Alliance Plan.

6.45 What Town and Parish Councils said:

- More should be done to reduce the number of empty facilities within the shopping area and encourage smaller retailers. Seeks better access needed to reasonably priced parking, reliable bus services and better promotion of park and ride facilities. Consideration must be given to how local facilities will handle any additional demands students will put on local businesses and if they are appropriately priced for student use.
- Sign posting and way markings are generally poor in Milton Keynes and this needs to be addressed. Information about tourist attractions, leisure facilities, bus services etc is key and should be available to visitors exiting Milton Keynes train stations. There should be an emphasis on 'master planning' and the early provision of new shops, services and facilities in areas of new development.

6.46 What Milton Keynes Council Ward Councillors said:

- Consider amending the boundaries of the PSA and redraft this policy in terms of a Primary Shopping & Leisure Area.
- More detail needed about retail development outside CMK and provision of "local centre" facilities in most new residential areas; Supports proposals to further develop the retail and café/restaurant offer within all other existing retail areas as well as the older towns. etc
- Amend policy DS4 with the addition of a final statement saying that 'proposals that conflict with the objective of this policy, or that undermine the coherence of the CMK pedestrian or vehicular infrastructure, will be refused'
- Is there any way of arranging further consultation on retail study once it is concluded?

6.47 What Neighbouring and other Local Authorities said:

- N/A

6.48 What Milton Keynes Council Departments said:

- N/A

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

- Supports for Plan's approach towards town centre uses and the Primary Shopping Area (PSA) between Silbury and Avebury Boulevard, Saxon Gate and Marlborough Gate, where additional comparison retail floorspace will be concentrated.
- Supports recognition of the long-standing definition of 'edge-of-centre' sites, i.e. those within 300 metres of the primary shopping area. Acknowledges the CMK Alliance Plan designates a significantly larger area as edge-of-centre, thus potentially diluting confidence in the Primary Shopping Area. Suggests text makes it clear that the aforementioned definition will apply to developments at edge-of-centre locations, and that any site/s falling outside this area, will be considered as out-of-centre.

7 . Development Strategy for Homes, Employment, Retail and Leisure

- Plan should set a significantly lower threshold than the 2,500 sq m guidance in NPPF to assess retail proposals, to ensure that the Primary Shopping Area remains the key location for comparisons retail and other town centre uses.
- Plan should make clear: 1) What Plan (the Local Plan or the CMK Alliance Plan) takes precedent for decision making, with the NPPF being the ultimate policy guidance note; 2) Will development proposals be considered on merit with a strong emphasis on the presumption of sustainable development and the vision for CMK as set out in Plan:MK. In relation to paragraph 4.56, the outcome of the CMK Renaissance Investment programme and the Council's Retail Capacity and Leisure Study should form the basis of any policy contained within Plan:MK.
- Paragraph 4.57 highlights committed additional retail development for the Primary Shopping Area and edge-of-centre sites. The Plan should recognise that these developments have not yet come forward in any meaningful way and address the reasons for this. Outside CMK there are concerns regarding replicating past approvals for large-scale comparison retail floorspace schemes in out-of-centre or other town centre locations that have impacted the vitality and viability of the Primary Shopping Area.
- Support for the 5 aims of the policy, more emphasis should be provided for the 'In CMK' section of the policy, as follows: 1) The status and relationship between Plan:MK, the CMK Alliance Business Neighbourhood Plan and CMK Renaissance Investment Programme and any future Inset Area Plans must be clearly set out. 2) The policy should recognise the difficulties in delivering additional comparison retail floorspace within the PSA on vacant sites or through redevelopment of existing sites due a) the scale of the Grade II listed shopping building, the width of Midsummer Boulevard East and the protection of building lines and surface level car parks, and should formulate specific and realistic policies to address these longstanding constraints.
- Support for the Council taking the lead role in organising international design/development competitions for major strategic sites in Central Milton Keynes. This work should address the inherent constraints of bringing forward development along the southern portion of Midsummer Boulevard East, due to the width of the boulevard and the lack of any clear and legible linkages to centre:mk Shopping Building. This in our view can only be achieved through a narrowing of the boulevard width, partial pedestrianisation of the boulevard, a legible, rationalised and enhanced home for the market, and ultimately by bringing respective building lines forward on either side of the Boulevard to provide a more domestic and visible street scene, more akin to traditional high streets.
- We do have further concerns at: a) another added layer of policy and guidance, in addition to the CMK Renaissance Investment programme and any Area Inset for Midsummer Boulevard East, and b) the timescales involved in bringing such work forward. In respect of the latter point, this in our view provides further uncertainty to landowners and investors when making their investment decisions. As stated earlier, any masterplan for other town centres within the retail hierarchy, must bear in mind the impact on vitality and viability the regional centre of CMK when apportioning comparison retail floorspace, so as not to undermine it.
- Supports the development of Central Milton Keynes "as the vibrant cultural centre of the region by making it the main location within the city for retail, leisure, cultural and larger office developments"
- Support for the contents of Table 4.4.

6.50 What National and Statutory Organisations said:

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- N/A

6.51 What Local organisations and interest group said:

- Welcome a commitment to prepare a Master Plan for Bletchley Town Centre but residents' associations want an opportunity to become involved in its formulation. Developments within the Town have failed to take into account the cumulative impacts on infrastructure.
- Amend fourth bullet point for CMK in DS4 to "Take the lead role in ensuring the appointment of exceptional architects for significant sites by, for example, holding international design competitions, to ensure that high standards of design are achieved in CMK and elsewhere in the expanded Milton Keynes".

8 Spatial Delivery of Growth: Strategic Site Allocations

Chapter 5 - Summary of Comments

8.1 This Chapter sets out the policies that will guide how new development takes place over the plan period. It includes site specific allocation policies for the new urban extensions to the South East Milton Keynes and Lane East of the M1 as well as the new strategic employment site allocation, which is proposed to the south of Milton Keynes.

8.2 There appeared to be general support amongst stakeholders to be consulted at the earliest opportunity. It is recognised that each policy will need to be reviewed to ensure longevity for the benefit of the future communities. Further consideration for historic characteristics and environments is required throughout the plan in order, to protect and enhance local heritage areas. Some of the allocated development sites are considered unreasonable as they fall within Flood Zones 2 & 3. Cross boundary engagement to deliver infrastructure is considered as a key component and development should be focused towards existing transport hubs to promote the usage of low carbon travel. The use and adoption of the place making principles will be critical to ensuring the planned growth will be sustainable and aligns with the Council's ambition for journey travel. Knowledge could be extracted from the local community to support and development relevant policies.

8.3 In total, 287 responses were received, of which the majority objected and or provided general comments. 60 respondents supported the proposals, 118 provided general comments and a further 101 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.4 Statutory and National Consultees

- ESFA support explicit references to new school provision in policies SD6, SD7, SD8, SD9, SD14 and SD15. Similarly, the emphasis of policies SD11 and SD12 on infrastructure provision to meet needs arising from the proposed development, including schools, is also supported.
- The next version of the Local Plan should identify specific sites (existing or new) which can deliver the school places needed to meet the identified need and demand, including that arising from the anticipated new development. The ESFA would like to be included as early as possible in discussions on potential site allocations, as there are pipeline school projects in Milton Keynes which may be appropriate for specific designation. We would welcome the opportunity to meet with the council to discuss these projects.
- In light of the strategic allocations in the draft Local Plan, emerging ESFA proposals for forward funding schools as part of large residential or mixed use developments may be of interest to the council. We would be happy to meet to discuss this opportunity at an appropriate time.
- Note that different SD policies refer to slightly different terms relating to flood risk management (from 'linear parks', to 'strategic and integrated', to 'strategic, integrated and maintainable'), such as SD5, 6, 7, 8, 11, 15 and 16. We recommend that Milton Keynes Council review the text in each policy to make it consistent and make sure it is fully inclusive to cover the whole life of the infrastructure, to ensure it continues to operate in the future for the benefit of the future communities.
- No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.

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- The Council's evidence base webpage does not identify any heritage evidence documents, but note paragraph 10.3 indicates there is an extensive list of historic environment evidence sources. Also note that Landscape Sensitivity Assessment and Strategic Site Assessment are currently underway (or were when the Plan was published). These should include a consideration of the historic environment, with reference to historic landscape character assessment and the Historic Environment Record. Reference could be made to the Historic England Heritage at Risk Register, unless this is included in the MK Heritage at Risk Register.
- Overall satisfied that, if the Landscape Sensitivity Assessment and Strategic Site Assessment do include consideration of the historic environment, the Plan has an adequate, up-to-date and relevant historic environment evidence base. We will, however, look to see that the Council demonstrates in the Local Plan how that historic evidence base has informed and influenced the Plan's policies and site allocations.
- Welcome references to place-making, but we would like to see a further reference to place-making in the context of conserving and enhancing the historic environment, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.
- A number of the allocated sites within this Plan fall within Flood Zone 2 and 3 (medium to high probability of flooding) on our Flood Map for Planning. These include: 1. Policy EA1 - Eastern Expansion Area. 2. Policy SD9 - Newton Leys. 3. Land East of M1 (Milton Keynes East). 4. Policy SD14 (Milton Keynes East) - land at Easton Leys, Little Brickhill. Of the sites listed above we consider that any development proposal at sites 1, 2 and 3 should be accompanied by detailed modelling of the ordinary watercourses in the FRA to accurately define the flood risk at the site and to ensure a sequential approach is taken to the location of development within this site.
- Much of the area is underlain by Principal and Secondary aquifers that exhibit high permeability, provide a high level of water storage, and support water supply and river base flow on a strategic scale. The use of groundwater in the area makes the site vulnerable to pollution. The central and southern areas of this Plan area are located within groundwater Source Protection Zones (SPZs) designated for the protection of drinking water abstractions. SPZs are associated with licensed abstractions for public water supply. There are also numerous industrial and agricultural licensed abstractions across the area, and some active landfills, specifically in Willington, Elstow, Bedford, Brogborough, Bletchley, Milton Keynes, Sundon and Buckingham. There are also several historic landfill sites interspersed across the area.
- It is important to note that areas may be susceptible to more frequent, more severe flooding in future as a result of climate change. The SFRA states that 'it is essential therefore that the development control process (influencing the design of future development within the Borough) carefully mitigates against the potential impact that climate change may have upon the risk of flooding to properties'. We consider that it would be beneficial to reiterate this importance in this Plan.
- To avoid development of sites that are inappropriate on flood risk grounds, the sequential approach should be applied to these sites. Every effort should be made to locate new developments (except Water Compatible) in areas of little or no flood risk. If no other sites are available and it is not feasible to locate new development outside of Flood Zones 2 and 3, lower vulnerability development which is compatible with the Flood Zone should be explored.
- Should through the Plan document recognise the requirements of the Waste Planning Authority in identifying potential sites for facilitating waste management operations.

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This will assist in good waste management for the benefit of Milton Keynes Council and their environment.

8.5 Neighbouring and other Local Authorities

- The Bedford to Milton Keynes Waterway is key piece of cross boundary infrastructure and every opportunity should be sought to secure its delivery. A consistent policy and delivery approach is needed across local authorities. The Strategic Site Allocations should seek to secure its delivery by requiring routes and associated land to be safeguarded as the plan progresses.

8.6 Town and Parish Councils

- Support Policy SD1 but raise slight concern about points 1 & 16.
- Never satisfactorily solved MK public transport issues and problems, which remain woefully unused and unpopular with many residents. Should continue to test and develop the 'city street' concept.
- WPC are particularly keen to ensure traffic impact are fully assessed and improvements to the road network (urban, extensions, rural) are identified. This should include proper and full consultation with those communities that have to endure the consequences of poor transport planning or no planning at all. There should be much better traffic and transport assessments for all those communities that may be affected by major residential growth, wherever they may be.
- Walton Community Council acknowledges that the sites identified in the Urban Capacity Study may only have the potential to come forward for residential development as a means of limiting the number of dwellings which would need to be developed on greenfield sites and that the identification of sites within the study does not allow the site any planning status or determine that the site will be allocated for development.
- Regarding Land off Monellan Crescent, Caldecotte object to including this in the Urban Capacity Study as removing the parking spaces would be counter-productive to expansion of nearby community facilities.
- Regarding Land off Highgate Over, Walnut Tree strongly object to the inclusion of this site in the Urban Capacity Study. The proximity of the land to the H9 and the associated access routes from the triangular junction would make this land inappropriate for development.
- Regarding Land off Shuttleworth Grove, Wavendon Gate strongly object to the inclusion of this site in the Urban Capacity Study. The Walton Neighbourhood Plan includes a policy on Public Open Space which specifically refers to the protection of play areas within the parish and so any development for housing would be against the current policy within the plan

8.7 Members of the Public

- Supports Draft Plan:MK and welcome decision not to identify a Northern Urban Expansion Area.
- Note that development of 1000 houses across the rural area in line with neighbourhood plans.
- Land allocated to Oxford-Cambridge Corridor is adequate.
- Ouse Valley should be a natural barrier to development north of the city.
- Concern about increasing stress on traffic and infrastructure in the area.

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- Milton Keynes East is supported together with the proposed land uses, but should be brought forward sooner.
- Suggest a full consultation for any changes made on the route of Expressway. Particularly if it goes through Bow Brickhill and Woburn Sands.
- Support for 5.26, but if the intention is to delay the start of development in this area until after 2031 then I cannot support such a delay.

8.8 Milton Keynes Council Ward Councillors

- N/a

8.9 Development industry (e.g. landowners, developers, agents)

- Growth strategy should be deliverable and the policies effective. As it is currently written, there is no certainty of delivery or a clear strategy for the future proofing beyond a general policy.
- Site-specific policies should be clear on the how each one will safeguard the vision. consider that the plan lacks clarity within its site-specific policies to demonstrate certainty on the delivery of the identified sites during this plan period.
- Policies for South East MK SUE and MK East SUE are inadequate and fail to define the long-term vision, in contrast to the other two SUEs which do contain an appropriate level of detail for the respective allocations.
- Policies should not include a site-specific upper limit on development and substituted for 'approximately' or similar wording.
- Should the delivery of the strategic sites become delayed or completions fall below what is anticipated within the housing trajectory, allocated sites should be flexible to deliver more growth earlier without breaching adopted policy, to reduce the amount of unplanned development via speculative applications.
- SMV objects to the allocation of land to the East of the M1 in this Plan as the site cannot to be brought forward until after the Plan period. It would therefore fail to assist in delivering housing numbers should under delivery from identified supply occur.
- Support south east as a strategic direction of growth for Milton Keynes which was one of those identified in the revoked South East Plan, the examination of which concluded "Weighing all these criteria our view is that the development to the south east is likely to be the most sustainable."
- Designation of the 'Milton Keynes Growth Area' in the adopted Central Bedfordshire Core Strategy provides a sound policy basis for undertaking comprehensive planning of the area on an integrated, cross-boundary basis.
- Growth here would be well located to take advantage of East-West Rail; strengthen connections to existing transport corridors and services; and large enough to provide additional facilities and infrastructure to meet the needs of new residents.
- Hayfield Park can be delivered whilst safeguarding the integrity of existing settlements (protecting the setting of Aspley Guise and Woburn Sands); the eastern part of Milton Keynes contains a concentration of employment activity and so would provide homes close to existing jobs; proximity to the motorway means that the east is particularly attractive as a focus for future employment-generating activity and so the scheme can deliver a sustainable mix of uses, facilitating the co-location of jobs and homes; capable of safeguarding the route of the Bedford & MK Waterway extending from the A421 to M1, junction 13; it would deliver a P&R site in this key route into Milton Keynes, thereby facilitating modal transfer to sustainable modes essential to the

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future success of the city; and it is of a scale that is capable of integrating a range of community facilities to create a sustainable new community, including schools, local shops, sports / leisure facilities, local services and open space.

- MK Futures 2050 Commission Report notes that “It would be desirable to accommodate much of the growth to 2050 in new developments adjacent to the city and/or elsewhere in its functional economic area. We have a clear view, in broad terms, on where this growth should be accommodated. Government’s commitment to investing in significant improvements to the rail and road linkages between Oxford, Milton Keynes, and Cambridge is an exceptional opportunity for Milton Keynes. The most sustainable and financially prudent approach would be to use these two major infrastructure projects to link new expansion locations with the existing city. Each of these views needs to be tested before they are embedded in statutory policies.”
- MKC and Central Bedfordshire Councils should be working closely together to realise the best possible outcomes for the delivery of economic and housing growth. MKC will need to co-operate with CBC to ensure that the future spatial strategy is delivered in its entirety (in line with Strategic Objective 4). The past lack of co-operation with adjoining authorities was identified as a failing in the examination of the draft Development Strategy for Central Bedfordshire.
- Support the continued allocation of SR1, SR2, SR3 and SR4, as it accords with the wider identification of a growth areas to the south east of Milton Keynes, within the extant Core Strategy; however, further acknowledgement of their potential to link to growth areas to the east is required within Policy SD8. This would ensure that the emerging policy complies with the extensive evidence which was produced to support the identification of the growth area to the south east of Milton Keynes.
- The failure of the Council to provide sufficient evidence to justify its Preferred Options casts considerable doubt over the soundness of the Draft Plan, with serious deficiencies being evident under the ‘Justified’ and ‘Effective’ tests of soundness.

8.10 Local organisations and interest groups

- We support some densification of development within the existing urban area to aid viability of public transport, especially near to locations well served by public transport, but only with the consent of residents of the affected areas.
- We are pleased that the site North of Haversham has been dropped from the consultation draft.
- Oppose the inclusion of the South East Milton Keynes site.
- If there is to be development on greenfield sites outside the existing urban MK then we would suggest that the area East of M1 should be developed before the South East Milton Keynes area. This area is much closer to CMK than South East Milton Keynes and so residents are more likely to use sustainable transport modes such as walking, cycling and buses
- Para 5.15 Station Sq. Should state that bus interchange will remain as a main feature.
- Policy SD5/SD6/SD7/SD9/SD11 Need to add something about “Assessment of energy needs of the development and ways in which those needs can be met through local energy networks”
- The use and adoption of the place making principles will be critical to ensuring the planned growth are sustainable and bring along the local community along the council visionary journey for the future. The Open University could be a key strategic player

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in supporting and formulating the approach that needs to be adopted to support the Councils work in this area and the development of relevant policies.

- The knowledge based sector could be a vital source of expertise and advice on developing solutions for a sustainable city, for example the work from The Open University's MK:Smart project can contribute to transport challenges.

Policy SD1

8.11 Policy SD1 demonstrates the principles that all future development within MK should attempt to adhere towards and promote. A greater emphasis should be placed on green fields and this should be reflected within the policy. It is recognised that public transport is currently underutilised and future opportunities need to be investigated and explored through this plan. All future development that falls within the same boundary should provide the same level of inter-connectivity and priorities developments that enhance local environments for social and environmental benefit. As written, it is considered that this policy could be interpreted as a barrier to sustainable development.

8.12 In total, 29 representations were received. The majority of respondents provided supportive or general comments and suggestions, and 7 respondents objected to the proposal. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.13 What Statutory and National Consultees said:

- LLAOL continue to request that provisions to deal with appropriate noise insulation associated with proposals for residential and other forms of development, which are particularly sensitive to aircraft noise (e.g. schools, nurseries, hospitals), should be incorporated within Policy SD1 as follows: "Planning permission in areas affected by acceptable levels of aircraft noise, where the Council considers the proposed use to be particularly sensitive, will be subject to conditions or planning obligations to ensure an adequate level of protection against aircraft noise." This is of particular concern for the South East Growth Area and Eaton Leys.
- Propose that Policy SD1 is amended as follows: "Where appropriate, new development should take a strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation).
- Welcome the intention to ensure that transport solutions should give full consideration to the smart and sustainable mobility opportunities and encouraging new 'Park & Ride' or Parkway sites which provide an alternative to the car for journeys into Milton Keynes. Conversely the location of a site next to an M1 junction could attract an increased number of trips to that junction and increase congestion and queuing. Highways England recommend that assessment and careful consideration is given to the impact any Park & Ride sites could have on the SRN.
- Support Policy SD1 provided that the principles that are detailed are all applied in all instances.
- We welcome this policy, in principle, especially Principles 6, 10, 11 and 12.
- Like to see a reference to having regard to the historic environment in one of these principles, or in a separate principle, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.
- Suggest an additional bullet point that states: "All new development should create safe and secure communities where both opportunities for crime and the fear of crime

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are minimised, this is to be achieved through the adoption of Secure By design Principles and support for the appropriate level of infrastructure to be provided.”

- While this policy does incorporate some of the ideas of the environmental policies such as SUDS, it does not require that development provide strategic greenspace and green infrastructure or that development provide a biodiversity net gain. We suggest that words to this effect are added as its own numbered point in this policy.

8.14 What Neighbouring and other Local Authorities said:

- N/A

8.15 What Town and Parish Councils said:

- Agree with all the points noted
- Whilst the grid road system is a fundamental principle that has helped shape the city, it has never satisfactorily solved MK public transport issues and problems, which remain woefully unused and unpopular with many residents. Extending them should not be at the expense of having an unattractive and poorly used public bus service, and system in general. WPC believes that the ‘city street’ concept has yet to be fully tested and could be improved
- Keen to ensure that point 16 is adhered to and works in practise, and insist that any so called ‘technical work’ must include proper and full consultation with those communities that have to endure the consequences of poor transport planning or no planning at all which has been the experience around Whaddon
- Support point 2
- At paragraphs 3 and 19, the word ‘should’ to be replaced with ‘must’.
- The term ‘facilities’ should be more specific. Using such loose language may result in key aspects of the policy being lost. Could be expanded in a glossary.
- Para 8, what was meant by the ‘the shortest distance’? WCC agrees that rapid public transport solutions proposed as part of new urban extensions must connect to Central Milton Keynes but also to other main district centres such as Kingston and Westcroft. WCC believes the use of ‘Park and Ride’ will attract visitors to Milton Keynes but also considers it important to consider every day provision for ‘Park and Ride’ facilities where appropriate.
- Support Policy SD1 but raise slight concern about points 1 & 16.
- Never satisfactorily solved MK public transport issues and problems, which remain woefully unused and unpopular with many residents. Should continue to test and develop the ‘city street’ concept.
- WPC are particularly keen to ensure traffic impact are fully assessed and improvements to the road network (urban, extensions, rural) are identified. This should include proper and full consultation with those communities that have to endure the consequences of poor transport planning or no planning at all. There should be much better traffic and transport assessments for all those communities that may be affected by major residential growth, wherever they may be.

8.16 What Members of the Public said:

- Concerned about the pollution from traffic to the residential area of Bow Brickhill and its impact on health. Provide references to guidance regarding impacts of pollution on health
- Out of town park and ride facilities should not be provided at the cost of green landscapes.

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8.17 What Milton Keynes Council Ward Councillors said:

- If existing SPDs for residential neighbourhoods remain in place, then there is no need to duplicate them in this document.
- Reword point 9 to retain the intended separation between the public and private realm while avoiding the phrase “block structure” which, in the context of streets, is contrary to our agreed street hierarchy.
- Add a more explicit statement at the beginning or the end of the list, stating that ‘proposals that don’t meet these principles will be refused’.
- If we seriously want new residential developments to result in improved modal split we have to insist on the attributes that will make this happen. I would urge that we demand really sustainable systems, and that we put our expectations (requirements!) into SD1.
- In all the points of SD1, please can we have the word “must” instead of “should”.
- In point 4 we should widen our expectations to include “green walls” (unless this could be better included within SC1).
- Should include a point relating to heat risk/urban heat island.
- If primary school are not included in our general principles on placemaking, e.g. point 8, where else should they be mentioned (along with local shops, local community sports pavilions, play areas, etc)?
- All new development (not just in the areas designated by SD11-14) should be required to improve air quality, especially in and around the areas where children spend most time - new homes, schools, play areas.

8.18 Development industry (e.g. landowners, developers, agents):

- The word ‘must’ and phrase ‘must adhere to’ should be removed as it could place an unnecessary barrier to otherwise acceptable sustainable development being permitted. these place-making principles would be better pitched as guiding principles used to inform the design of proposals rather than them being identified as requirements which must be adhered to in every case.
- Concerned how this policy would be applied in a consistent manner through the development management process.
- Point 8 should contain a caveat that any additional retail should be of a scale as to serve a local need only and should not be open-ended as to hinder the retail hierarchy, especially the regional status of CMK. Must meet the requisite tests in the NPPF.
- The way that policies SD1 and SD11 interact is confusing and leads to duplication of policy requirements. Policy SD1 should be redrafted as follows
- Policy SD1 includes general placemaking principles that relate to any new development (not solely urban extensions) and should be re-worded (*example wording provided*) to allow specific design and placemaking requirements related to the specific urban extensions/strategic sites to be set out in policies SD11-16.
- Suggest points 1 and 18 are removed and in a re-worded form inserted into a redrafted SD11 (*example wording provided*).
- Also suggest that for clarity, reference is made in a new paragraph after paragraph 5.12 to state: “For the new urban extensions identified under policies 13, 14 and 15, the placemaking and design requirements are set out in Policy SD11”.
- Point 18 is unnecessary and undeliverable as the Council does not have a fixed solution or strategy for rapid public transport solution; CMK is not the only destination for public transport solutions (rail stations, employment, park and ride sites); grid road connections to and through urban extensions remain the most appropriate and

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'futureproof' way of delivering extension to the public transport infrastructure and network in MK. Other contributions to rapid public transport solutions/services can be secured through s106 agreements.

- The WEA Expansion Land would achieve the place-making principles set out within Policy SD1.

8.19 What Local organisations and interest groups said:

- Extended areas of MK should enjoy the same level of connectivity (eg underpasses/bridges/redways/footpaths) as that in the original New Town, not have a repeating what happened on the Western Flank where links are having to be retrofitted.
- Point 7 should be amended to "Development must be well connected into adjacent areas to ensure that areas beyond the original New Town boundary enjoy the same level of inter-connectivity as those area within the boundary. This should include the provision of subways and bridges and redways as appropriate".
- Point 12 should be amended to "The design of new neighbourhoods and character areas to be used to create a distinctive sense of place; their design to be guided by a lead architect to ensure that each development is consistent with the design principles agreed with the Council for the neighbourhood; consistency of approach to be demonstrated; development parcels to be less than 100 houses; up-to-date drawings of the complete neighbourhood to be publicly available at all times, demonstrating how each part contributes to the whole".
- Need to add something that says "Opportunities should be taken to include community energy networks in new development"
- We commitment that planned urban extensions should be based on principles that have shaped the city, especially the grid road system, redways, linear parks and strategic flood management.
- Policy should include new points as follows: "The design and layout of new development should include the strategic planning of inter-connected open spaces and green infrastructure".
- Delete "grid road system" from point 1 as it cannot be rolled out infinitely in all directions. Many parts of it have already reached capacity. Adding extensions will just increase traffic, and hence congestion, on the existing sections.
- Note that these principles have not been applied in the case of Eaton Leys - yet another reason for its deferral as a suitable site.
- Welcome references to the beautiful, "biodiverse" city, and the need to enhance city parks, local parks, lakes and canals.
- To bring in line with the NEP's GI Vision and Principles, we would encourage reference to the need to identify, protect enhance and connect existing green infrastructure of all types/scales to achieve a connected network of green space as a necessary component of sustainable place-making.

Policy SD2

8.20 Policy SD2 outlines the role and function of Central Milton Keynes. The overall response received was negative. The policy is currently considered unrealistic and conflicts to how CMK and the wider area have been developed. As written, the policy is considered flawed as local policies should be defined to clearly identify the types of development the Council would likely refuse and not favour planning permission. Further calcification is required throughout the plan and consideration to is suggested to align this policy with

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others documented in the plan (e.g. ER10 & ER11) to ensure the policy is robust and conforms to previous development within the Borough. The role of Campbell Park as the city centre park, the potential impact arising from surrounding development proposals, and improved access and linkages to the park need to be stated in the policy.

8.21 In total, there were 14 representations to this policy. The majority of respondents (8) provided support or general comments and suggestions and 6 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.22 What Members of Public said:

- CMK AP seeks more than just “shopping and cultural experiences” in the PSA.
- Current definition of CMK PSA is unworkable and contrary to how CMK and other parts of MK have developed. The existing tightly defined PSA borders give disproportionate weight to the company that owns the centre:mk and the food centre. This appears contrary to the NNPf which states policies should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres”.

8.23 What Town and Parish Councils said:

- CMK Town Council strongly objects to the indicated zoning approach. It is contrary to CMK AP which calls for mixed use through CMK and Campbell Park.
- Concerns over boundaries of PSA; await the Retail Capacity Study to inform and finalise representations on this matter.

8.24 What Milton Keynes Council Ward Councillors said:

- Centre:MK and old business district are losing popularity and there are a number of issues that should be addressed at a strategic level to resolve this (*full response provides more detail on each of the below*):
 - Design: move away from a strict rectilinear approach; seek high quality design standards to increase visual appeal; support raising height of buildings, but this brings about extra design requirements; protection of a few key viewpoints on top of tall buildings.
 - Car Parking: accept need to encourage modal shift in means of transport; parking needs to be integrated with buildings plus distributed around main demand areas; continued use of wide areas of surface parking is not appropriate; content to see frontages of buildings moved closer to internal roads and multi-storeys contained within. Open feel of CMK should be retained; consideration must be given to choice of frontages that must remain active to encourage flow between buildings and prevent overbearing feel of narrow streets and high buildings. Excellence should be sought in design of integrated buildings.
 - Open Spaces: Need for a large civic open space; Station square is not “in the thick of things” and so a new space should be designated and created and then Station square redeveloped. The Market is a vital part of CMK’s offer and is in a suitable location, any proposals to move the market must find a site with similar attributes. High quality network of green spaces through CMK should be continued. Assessment of play space requirements should be made, due to increase in conversions to residential. Essential that all parts are accessible by the less mobile.

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- Need to define a Primary Shopping & Leisure Area to align with national guidance imperative to treat retail and commercial leisure holistically. This cannot be PSA as current PSA excludes most of our major CMK commercial leisure facilities.
- Flaw in having policies expressed only in terms of “what we’d most like” within a national context presuming support for virtually all forms of development in virtually all locations. In this context, the main purpose of local policies is to define what sorts of development we would aim to refuse; this policy should therefore have wording along those lines.
- If we expect to attract families to CMK they will need schools.

8.25 What Development Industry said:

- Support principle of mixed uses, especially small scale retail or café uses at ground floor, but a cap on floorspace should be set to ensure no direct competition with Primary Shopping Area (PSA).
- Specific guidance on the definition of ‘edge-of-centre’ for retail purposes should be provided.
- Plan:MK should include a PSA which extends beyond that outlined in Policy SD2, so as to include Lloyds Court and related buildings. This will assist in delivering retail floorspace, will enhance CMK’s role as a regional centre and will allow SD2 to better fit the NPPF’s definition of a PSA. The submission includes details of the Lloyds Court site and the benefits to CMK of amending the PSA to include the site.
- Support the recognition that the city centre needs to promote the visitor experience by improving the overall mix of uses.
- Policy should be clarified; currently states that new leisure uses will be promoted within and on the edge of the retail core to support the diversification of Milton Keynes. Should state that new leisure uses will be promoted within the town centre in order to reflect the town centre first approach of the NPPF. Brings policy in line with ER10 & ER11.
- Support the proposed improvements to the public realm within CMK, especially Midsummer Boulevard.
- Whilst ambitions and aspirations for the city centre are supported, reserve the right to comment further once Retail Capacity and Leisure Study is published.
- Plan:MK must ensure that floorspace figures are reflective of the changing retail environment and that capacity does not leak to out of centre sites.
- Plan:MK will need to show that the city centre can accommodate the scale of assessed need for main town centre uses.

8.26 What Local Organisations and Interest Groups said:

- Parks Trust: support policy, but seek changes and new supporting text regarding the role of Campbell Park as the city centre park, the potential impact arising from surrounding development proposals, and improved access and linkages to the park (*suggested wording in comment*).
- Xplain: Plan:MK should align with the CMK Business Neighbourhood Plan (CMK AP).
- Xplain: Strongly object due to Plan:MK reverting to ‘zoning’. Principle of Central Business District, PSA and all housing in Campbell Park is in conflict with CMK AP, which seeks greater spread of uses and mixed use development throughout CMK.
- Xplain: Proposal to site housing on Station Square is contrary to CMK AP.

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- Xplain: No mention of the importance of 'Classic CMK Infrastructure', which is fundamental to the character of CMK, and the necessity of retaining in (re)development.
- Xplain: The difference in the architectural heritage and nature of CMK is different to the rest of the city and should be highlighted
- MK Forum: CMK AP is contradicted by Plan:MK, which describes an alternative prospectus for CMK e.g. return to 'zoning'.
- MK Forum: it is inappropriate to refer to the redevelopment of specific sites, focus should be on the development of over 50ha of undeveloped or underdeveloped land in CMK.
- MK Forum: edge of centre boundary of the PSA within CMK differs from that shown in CMKAP; no evidence to support this.
- MK Forum: Strategic Policy for CMK should be the adoption into Plan:MK of the whole CMK AP.
- MK Forum: suggestion of redevelopment in Station Square is a potential conflict with the CMK AP, as no mention is made of the CMK AP "Classic Infrastructure", which sets a high bar for any proposals. Therefore, no need to include reference to redevelopment in Plan:MK as CMK AP can adequately deal with this, or alternatively a clear statement that any redevelopment will take full recognition of the policies in the CMKAP should be included.

8.27 No comments received

Policy SD4

8.28 Policy SD4 supports measures to improve accessibility to and within Central Milton, including a high quality network of pedestrian/cycle routes, public open spaces and squares, the integration of public transport and improvements to and prioritisation of pedestrian and cycle accessibility.

8.29 There were 6 representations on this policy, one from a Parish /Town Council, one from an MKC Councillor, one from the Development Industry and three from local organisations and interest groups. Three representations were general comments /suggestions, two were in support of the policy and there was one objection. In the main, the general thrust of comments was supportive. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

- Although there were few representations to this policy and the general thrust of comments was supportive among the main points raised by these representations are:
- Greater clarity needed on what is the strategy for achieving this shift to sustainable mobility in the city centre, the time scale involved and how will this be funded?
- What does the Council mean by 'smart,shared sustainable mobility' (the first bullet point in Policy SD4).
- Should this policy be amended by possibly adding after the existing 4th bullet point Integration of public transport "to ensure provision of public transport services to the sites" and/or including a reference as one Councillor wanted to "permissions will be refused for schemes that detract from pedestrian, cycle, or public transport space or connectivity, within CMK's public or semi-public realm'. Although this last point may possibly duplicate criterion vi of design policy D2

8.30 What Town and Parish Councils said:

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- Clarification of what is meant by 'smart, shared sustainable mobility' (the first bullet point in Policy SD4).
- An enhanced and high-quality network of pedestrian/cycle routes should not be at the expense of maintaining existing routes. Redways will need to adapt to change.
- Provide express bus routes using solely grid roads to ensure quick connectivity between areas with buses through the estates transporting residents to express bus stops.

8.31 What Milton Keynes Council Ward Councillors said:

- Our preference for schemes that achieve the stated objectives is still meaningless without a statement in this policy to the effect that 'permissions will be refused for schemes that detract from pedestrian, cycle, or public transport space or connectivity, within CMK's public or semi-public realm'.

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

- Embrace the general vision, although clarity as to: a) how this will be funded; b) what the strategy is for achieving this shift to sustainable mobility, and c) the timescales for achieving this would be helpful.

8.33 What Local organisations and interest groups said:

- Two organisation support this policy.
- After 4th bullet point 'Integration of public transport' add "ensure provision of public transport services to the sites".

Policy SD5

8.34 Policy SD5 outlines when planning permission will be granted for development in an Expansion Area following approval by the Council of a comprehensive master plan for the whole expansion area. The general response was supportive towards this policy, in specific reference to points 6 and 7. The policy should contain a caveat that the principle intention of any additional retail should be to serve a local need only and not the wider area and must be in accordance to the policies set out in the NPPF. Biodiversity opportunities around the design of sustainable urban drainage systems should be further explored.

8.35 There were 7 representations on this policy. 5 supported the policy and or provided general comments, 2 respondents objected to the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.36 What Statutory and National Consultees said:

- Suggest an additional requirement for an archaeological investigation (with reference to the Historic Environment Record and further assessment if necessary) and consideration of the Historic Landscape Characterisation to inform the layout of development on these strategic sites, to accord with paragraph 170 of the National Planning Policy Framework.

8.37 What Neighbouring and other Local Authorities said:

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- N/A

8.38 What Town and Parish Councils said:

- N/A

8.39 What Members of the Public said:

- N/A

8.40 What Milton Keynes Council Ward Councillors said:

- N/A

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

- Consider that the policy should contain a caveat that any additional retail should be of a scale as to serve a local need only and should not be open-ended as to hinder the retail hierarchy. Must meet the requisite tests as set out in the NPPF.

8.42 What Local organisations and interest groups said:

- Welcome ref to points 6 and 7 in particular. We encourage reference also to the biodiversity opportunities around the design of sustainable urban drainage systems.
- Suggesting adding a new point as follows: "A management and maintenance strategy which will address for each type of open space and landscaping, who it will belong to, who will be responsible for maintaining it and how this will be funded over the long term. Such proposals should be formulated through discussion with the relevant responsible bodies including Milton Keynes Council, The Parks Trust, Parish and Town Councils".

Question 1

8.43 Question 1 acknowledges that policy SD5 has been largely replaced by the design and development framework that have been already been approved for the EEA and WEA. This therefore questions the usefulness of policy SD5.

8.44 A total of 10 representations were made in response to Question 1.

8.45 There were 2 representations that object to Question 1;

- Whilst Policy SD5 above has been included in the draft plan:MK, the policy has largely been replaced by the design and development frameworks that have already been approved for the EEA and WEA. Design and Development frameworks are not very robust. A policy is much more robust and should be used to defend against inappropriate proposals to amend or otherwise change the Design and Development Framework for a development. So the policy should be retained.
- I believe sufficient planning permissions are still required in the WEA (and to a lesser extent in the EEA) for this policy to be included. I would tighten up the sentence before the 9 numbered requirements to say something like 'must normally include'

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all these things, and I would explicitly include “a green street scene” into number 6, perhaps as follows: ‘A street scene, landscape and open space strategy...extend the “forest city” concept and achieve “garden street scenes”, and...’

8.46 There were **3 representations in support** of Question 1;

- Would like to see SD5 remain in Plan:MK.
- Yes. Development frameworks often ignored so retain policy.
- We believe that this policy should be retained to act as a benchmark in case changes are sought to the Frameworks.

8.47 There are **7 representations that made general comments/suggestions** to Question 1;

- Whilst Policy SD5 above has been included in the draft plan:MK, the policy has largely been replaced by the design and development frameworks that have already been approved for the EEA and WEA. Design and Development frameworks are not very robust. A policy is much more robust and should be used to defend against inappropriate proposals to amend or otherwise change the Design and Development Framework for a development. So the policy should be retained.
- As both the Eastern & Western Expansion areas are already underway and development briefs put forward and agreed this policy no longer seems relevant.
- The policy is still required as it sets out a useful streamlined set of strategic design principles and provides the parent policy which the EEA and WEA frameworks augment.
- Yes. Since specific plans, design codes, etc. can always be subject to change until they are finally built, we should retain the principles in our policy.
- Yes, proper, useable space standards should be included. Spatial standards in British homes are the lowest in Europe and MKC could at least revert to Parker Morris Standards
- The Policy should not be included for the sake of it. Where much of the Policy is superseded by permissions or Design and Development Frameworks, it should not be included or reworded to reflect this.

Policy SD6

8.48 Policy SD6 carries forward Policy EA3 of the Milton Keynes Local Plan (2005) in relation to proposals for the Eastern Expansion Area. A further provision for historic areas and cross boundary provisions are required throughout the policy, as part of the positive strategy for conserving and enhancing the historic environment. There was support for the proposed highways mitigation improvement schemes to M1 Junctions 13 and 14 as there were a number of concerns that these junctions would become congested if additional development is permitted. Furthermore the specific nature of these improvements should be fully discussed with Highways England.

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8.49 In total, 8 representations were received. Of that, 5 respondents provided general comments or supported the policy, and three respondents objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.50 What Town and Parish Councils said:

- Whaddon parish Council Support for Policy SD6
- Reference should be made to maintaining a grid road system.

8.51 What Neighbouring and other Local Authorities said:

- Central Bedfordshire Council (CBC): policy states a requirement to provide a new M1 junction 13a or equivalent improvements to junctions 13 and 14. CBC wish to see evidence to demonstrate that a new junction would not erode the strategic value of the M1 or have a significant detrimental impact on the Central Beds transport network. If a new junction is not taken forward, junction 13 will need improvements, as well as road connections through Central Beds.

8.52 What National and Statutory Organisations said:

- Historic England: no designated heritage assets on or adjacent to site, however, regard should be had to the Historic Landscape Characterisation and Historic Environment Record as part of the positive strategy for the conserving and enhancing, the historic environment.
- Highways England: Site is likely to have a significant impact on the M1 and potentially A421. If a Junction 13a were to be pursued, MKC would need to meet the strategic growth test to demonstrate that it would be required.
- Welcome the potential identification of improvements to M1 Junctions 13 and 14 where considered necessary to support development; specific nature of these improvements should be fully discussed with Highways England.
- Welcome the potential provision of a dedicated public transport route(s) between this site and the town centre and emphasise that these should be frequent, quick and reliable.

8.53 What Local Organisations and Interest Groups said:

- Parks Trust: Support policy but request amendment to point 8 to include wording relating to the linkages across the Broughton Brook between the two areas of linear park (*suggested wording provided in comment*).
- Bedfordshire Local Nature Partnership: Object on the basis that the approach towards the Bedford - MK Waterway is inadequate and the absence of a strong, cross boundary approach to this significant strategic environmental project is a failure under the Duty to Co-operate. Needs more than just safeguarding a route; policy wording on delivery must be strengthened so as there is a clear and unambiguous expectation that development will facilitate delivery.

Policy SD7

8.54 Policy SD7 outlines the Council's proposals and expectations for the Western Expansion Area. Reservation were received regarding the potential impact on a number of junctions along the A5, particularly those junctions connecting the development site

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with the town centre and other strategic routes. A greater regard to the Historic Landscape Characterisation and Historic Environment Record for enhancing the historic environment in accordance to the NPPF was considered desirable by some respondents. It would be worthwhile to consider how the grid system will be maintained with the proposed development. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.55 A total of 5 representations were made on policy SD7.

8.56 There were **no objections** received in response to policy SD7.

8.57 There was **1 representation in support** of policy SD7;

- Supported, but there should be the following amendment - Add the following words: "Protection and enhancement of the wildlife corridor along the North Bucks Way, including the establishment of a long term management and maintenance mechanism for the wildlife corridor and the creation of..." Reason : It is vitally important that well thought out proposals for the future management and maintenance of such areas of wildlife importance, are included as part of planning proposals for new areas of development if these are to maintain their wildlife value over time.

8.58 There were **4 general comments/suggestions** in response to policy SD7;

- The policy could result in impact on a number of A5 junctions, particularly those junctions connecting the development site with the town centre and other strategic routes
- Welcome requirement 7 for the retention of the listed buildings within the site, although prefer for a requirement as part of 7 for the retention of appropriate sympathetic setting.
- The policy should also have regard to the Historic Landscape Characterisation and Historic Environment Record for enhancing the historic environment as required by the NPPF
- The Western Expansion Area needs policy guidance - grid road connectivity, underpasses under the V4 and surrounding grid roads, wider mix of housing types and tenures, environmental enhancements for heritage assets of Calverton and the Three Wealds, which still have no gas, underground cabling or traffic calming measures.

8.59 Reference to maintaining a Grid Road system needed

Policy SD8

8.60 Policy SD8 continues on from the Core Strategy, it sets out the principles for the development of the Strategic Land Allocation (SLA), which is an urban extension to the south-east of the city currently under construction. There were eight representations to this policy three from the Development Industry, one from a Parish/Town Council, one local organisation and three national and statutory organisations. One representation supported the policy and there was one objection, six representations were categorised as general comments/suggestions.

8.61 The general thrust of the representations received was that the policy needed to be revised to reflect what had happened since production of Core Strategy policy CS5. This would assist in answering some of the questions raised by consultees e.g. Highways England on the status of the site. Given that outline consent now exists for the whole of the SLA

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and the principles for its development have been agreed; amending the policy to accord with representations received would not be possible in many instances at this late stage. The policy or supporting text could be reworded to reflect that outline consent now exists for SR1, SR2, SR3 and SR4. The development of the SLA area should integrate and connect with future development beyond its boundaries particularly with the proposal to develop a South East MK Strategic Urban Extension. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.62 What Members of the Public said:

- None

8.63 What Town and Parish Councils said:

- In bullet point 3 - replace 'should be' with 'must be'.

8.64 What Milton Keynes Council Ward Councillors said:

- None

8.65 What Neighbouring and other Local Authorities said:

- None

8.66 What Milton Keynes Council Departments said:

- None

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

- Support for the SLA and the housing this will deliver. However retail floorspace permitted in the SLA should serve a 'local need' only.
- Policy requires updating to reflect actions that have occurred since production of Core Strategy policy CS5. Refers to third and fourth paragraphs of SD8 to development "only be granted for development following the approval of the Development Framework". Points out the Strategic Land Allocation Development Framework Supplementary Planning Document was adopted by the Council in 2013. This should be reflected in the policy wording. The policy or supporting text could be reworded to reflect that outline consent now exists for SR1, SR2, SR3 and SR4.
- Encourage the Council to ensure that the development of this area integrates and connects with future development beyond the current boundaries of the SLA. Principle 2 of 5 included within Policy SD8 references the need for integration of proposals with the existing city and road networks. In our view, this principle reinforces our position that growth should be integrated with the rest of the City and that further growth at South East Milton Keynes has the potential to achieve this key principle, whereas land to the East of the M1 does not.

8.68 What National and Statutory Organisations said:

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- No objection to the principle of development of the sites identified in Policy SD8. However given the scale of the proposed developments it is important to consider how the development of these site(s) would be phased over the plan period to ensure that these are aligned with water and water recycling infrastructure. It is recommended that Policy SD8 should include reference to foul drainage as well as managing the risk of fluvial and surface water flooding. Amend Policy SD8 as follows: Bullet point 11. Take a strategic and integrated approach to flood management and provide a strategic and sustainable approach to water resource management, including Sustainable Drainage Systems (SuDS) and flood risk mitigation. New bullet point 12. Incorporate a foul drainage strategy for the site as a whole and for each phase;
- The four Strategic Reserve Areas (SRAs), identified in the Strategic Land Allocation were allocated in the previous Local Plan but are not included in the additional housing sites identified to make up the shortfall of housing in Table 4.3 of Plan:MK. Highways England seek clarification on the status of the rest of the 2,900 dwellings proposed in the SLA and how this relates to the commitments and shortfall identified within the Plan. The SRAs location suggests that these developments would have their greatest impact at M1 Junction 13.
- This allocation abuts the Wavendon Conservation Area and is within the setting of a number of listed buildings. Policy SD8 should therefore include a principle regarding the conservation and enhancement of the special interest, character, appearance and significance of these designated assets through careful consideration of development within their setting, as required by the National Planning Policy Framework. Regard should also be had to the Historic Landscape Characterisation and Historic Environment Record. To accord with paragraph 170 of the NPPF, which states "Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity".

8.69 What Local organisations and interest groups said:

- Seeks amendment of 4th paragraph of policy as follows: "... a single Development Framework for the area, which will be produced by Milton Keynes Council with the involvement of the landowner, developers, The Parks Trust , stakeholders and the community..." Reason : The Parks Trust is seeking involvement at the earliest stages of planning proposals in view of its experience and expertise in planning, managing and maintaining strategic open spaces, as well as its ability to take on responsibility for such new areas in the future.
- Additional criterion added after point 10 to state: " Include a management and maintenance strategy which addresses for each type of open space and landscaping, who it will belong to, who will be responsible for maintaining it and how this will be funded over the long term. Such proposals should be formulated through discussion with the relevant responsible bodies including Milton Keynes Council, The Parks Trust, Parish and Town Councils". Reason: It is vitally important that well thought out proposals for the future management and maintenance of open space and landscaping, as well as how this will be funded over the long term, are included as part of planning

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proposals for new areas of development if these are to be enduring, successful, attractive places.

- Policy SD8 Point 7 - says "Consider" community energy networks - needs to be strengthened to ensure that it says "Pro-actively investigate the establishment of a local energy network"

Policy SD9

8.70 Policy SD9 indicates the requirements for development in Newton Leys. Consideration should be given to historic landscape characterisation and the historic environment. Furthermore, new highway mitigation schemes need to be fully considered and investigated within the plan. Notable pinch point areas are likely to be at the A5/A4146/Watling St/Brickhill St roundabout, with improvement schemes associated with development at Eaton Leys. It was further stated that the proposed retail floorspace should be granted with the view and intention to serve the local community

8.71 In total, five representations were received and in the main, most were in support and or provided general suggestions. Only 1 respondents objected to the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.72 What Statutory and National Consultees said:

8.73 Highways England welcomes the intention to provide mixed use development as it could internalise trips, reducing the stress on the external highway network. The most notable impact of this development on the SRN would likely be at the A5/A4146/Watling St/Brickhill St roundabout. Highways England are aware of a proposed improvement scheme at the junction, associated with development at Eaton Leys, which could be coming forward soon. It is recommended that the implications of the Plan for this new junction layout are fully considered by MKC.

8.74 According to our records, there are no designated assets on or adjacent to this site. However, regard should be had to the Historic Landscape Characterisation and Historic Environment Record as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework, to accord with paragraph 170 of the National Planning Policy Framework.

8.75 What Neighbouring and other Local Authorities said:

8.76 N/A

8.77 What Town and Parish Councils said:

8.78 N/A

8.79 What Members of the Public said:

8.80 N/A

8.81 What Milton Keynes Council Ward Councillors said:

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- Development industry (e.g. landowners, developers, agents)
- We support the strategic land allocations and the level of housing this will deliver; however retail floorspace should be permissible to serve a 'local need' only.

8.82 What Local organisations and interest groups said:

- Add to point 2 the following: "...and the active landfill area with a strategy to establish the sustainable management of the buffer over the long term".
- Add in additional criterion which states: "A management and maintenance strategy which addresses for each type of open space and landscaping, who it will belong to, who will be responsible for maintaining it and how this will be funded over the long term. Such proposals should be formulated through discussion with the relevant responsible bodies including Milton Keynes Council, The Parks Trust, Parish and Town Councils".

8.83 What National Organisations said:

8.84 None

Policy SD10

8.85 Policy SD10 carries forward Policy KS3 of the Milton Keynes Local Plan (2005) in relation to proposals for the Linford Lakes Area. It was advocated that additional floorspace should only be made available to serve the local need, which concurs well to a some responses received to additional policies in this chapter (e.g. SD9). Consideration for private ownership should be taken into account throughout the policy. It is vital that this policy does not restrict public access from accessing areas of exceptional wildlife value, as this would be considered to have a detrimental impact. For example, the Ouse Valley and an 'ecological resource' is considered to be one of the most biodiverse areas in Milton Keynes. Any development adjacent to the reserve would have a detrimental effect on its biodiversity. Amendments to points 1 and 2 are suggested to retain, protect and buffer the Wildfowl reserve and to allow for increased public access where compatible with biodiversity conservation

8.86 A total of 7 representations were received. 3 supported, a further 1 supported with general comments and suggestions, 2 objected and 1 objected and provided general comment and suggestion. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.87 What Parish Council said:

- Whaddon Parish Council support Policy SD10.
- Gayhurst Parish Meeting: Support Policy SD10; Ouse Valley should be retained in as natural state as possible with facilities for leisure and recreation and not subject to grid road type crossings that would arise from any development to the north.

8.88 What Development Industry said:

- Support strategic land allocation and level of housing it will deliver however level of retail floorspace permissible should only be to serve a 'local need'.
- Not appropriate to carry forward this policy without review. Due to large private ownership of site it is limiting to not provide for housing development so as to enable

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the “linear park extension”. If policy is maintained it should fit alongside the allocation of the site at Linford Lakes for development.

8.89 What National Organisation said:

- Berks, Bucks & Oxon Wildlife Trust: Linford Lakes is possibly richest area for biodiversity in Milton Keynes and goes beyond the Stantonbury Lake nature reserve; the adjoining lakes within the Linford Lakes Biological Notification Site are also of exceptional wildlife value and Point 1 should be amended to incorporate. Point 2 needs amending to ensure this is not unrestricted public access; which could have a detrimental impact. *(Suggested wording in comment).*

8.90 What Local organisation said:

- Milton Keynes Natural History Society: supports the policy statement. Linford Lakes Area is a key component of the Ouse Valley and an ‘ecological resource’ as one of the most biodiverse areas in Milton Keynes. Any development adjacent to the reserve would have a detrimental effect on its biodiversity.
- Parks Trust: Supports Policy SD10 but seek amendments to points 1 and 2 to retain protect and buffer the Wildfowl reserve and to allow for increased public access where compatible with biodiversity conservation. *(suggested wording provided in comment)* Also add a glossary of MK specific and commonly used terms to Plan:MK.

Policy SD11

8.91 Policy SD11 states the general principles for new strategic urban extensions within the Borough. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.92 A total of 17 representations were made on policy SD11.

8.93 There were 7 objections received in response to policy SD11;

- We request that the plan acknowledge the importance of London Luton Airport and include suitable reference to the presence of the airport and ensure that its future operations are not prejudiced. Please include the proposed policy wording to deal with appropriate noise insulation associated with proposals for development sensitive to aircraft noise in accordance with the NPPF.
- Point 4 should be expanded to allow development which does not prejudice the New Strategic Urban Extension, to allow existing businesses to expand.
- We suggest that policy SD11 should be reworded as follows: SD11: General Principles for New Strategic Urban Extensions As well as the delivery of new homes, new strategic urban extensions will be expected to make provision for an appropriate level of employment, retail, and community uses in accordance with other policies within the Plan. The strategic urban extensions must be planned and delivered as high quality, integrated, sustainable and distinctive developments supported by necessary infrastructure, services and facilities. Sites must also provide the necessary infrastructure including new/extended grid roads and/or grid road reserves, highways and transport infrastructure, schools, health, open space, linear parks and green infrastructure provision and reserve sites. Sites must also design-in green buffers between new development and existing communities in order to preserve the setting and character of existing settlements (these green buffers can include open space,

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playing fields, landscape planting, and/or surface water attenuation but must establish a meaningful, effective and permanent green buffer. Planning permission will only be granted for development in a strategic urban extension following approval by the Council of a Submission and approval of a comprehensive master plan and development framework document for the whole strategic urban extension will be required prior to the submission of planning applications for development in a strategic urban extension. Development briefs will also be required for each phase or site, to be prepared by the council in conjunction with the developer(s). The Council will adopt the master plans and development framework documents briefs as supplementary planning documents. In addition to the normal requirements covered by other policies in this Plan, proposals for the strategic urban extensions should where necessary include: Environmental impact and transport assessments. Effective measures to balance the priority given to car and non-car modes of transport. Design, land use and transportation measures that integrate the strategic urban extensions with the existing built up area and ensure that further expansion opportunities are not precluded, by identifying and futureproofing land as necessary; other than where the proposals include a permanent long-term boundary for the City . Good transport links to adjoining areas, including grid roads, footpaths and redways /cycle ways, designed in conformity with the details set out in Policy CT7 Where identified on the Policies Map , reserve land reserved for potential transport links to future development areas including grid roads/ grid road reserves. Community facilities, local shops, other small scale employment development, schools and reserve sites in and around new in the form of local centres. A landscape and open space strategy to improve biodiversity, provide advance structural planting, green buffers extend the “forest city” concept, and incorporate public art and leisure and recreation facilities. A strategic and sustainable approach to urban drainage systems to control surface water flows. Design and layout measures that help to create sense of place.

Planning obligations relating to the phasing of development and the provision of on-site and off-site infrastructure and facilities, to include land, capital and initial running costs.

- We request that Policy CS6 of the MK Core Strategy is inserted in to Plan:MK, or Policy SD11 should be amended to clarify that it applies to urban extensions on the edge of MK in neighbouring authority areas.
- Review policies SD1 and SD11. Remove wording such as “where necessary” from the opening paragraph of item number 7.
- Reiterate need for generally green street-scene and give an example.
- In bullet 7 include “small areas of space to play” such as on routes to schools.
- Make more explicit in the policy that layouts must include routes to popular destinations within the development (eg shops and schools) that are shorter for pedestrians than for cars.
- We agree that there is a need to plan for SUEs comprehensively, by requiring approval by LPA of a masterplan and that a development brief is prepared by LPA in conjunction with the developer, may act to slow down delivery of much needed housing, especially when Policy SD12 Part 2 also requires design codes for each phase to be prepared by developer and then approved by the Council. The Core Strategy policy CS5 had no requirement for development briefs.

8.94 There were **4 representations in Support** of policy SD11;

- Welcome in particular general principle 2

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- Support criterion 4 requiring comprehensive masterplan to be approved for the totality an SUE before the grant of planning permission
- We support the strategic land allocations and the level of housing this will deliver. We do however rely on previous comments in relation to the level of retail floorspace that should be permissible in these areas, ie to serve a 'local need' only.
- Welcome the inclusion of a landscape and open space strategy
- Supports this policy, but add the following wording to the criterion (2); "...and green infrastructure provision in accordance with other policies within the plan". Also add bullet point under criterion 7; "A management and maintenance strategy which addresses for each type of open space and landscaping, who it will belong to, who will be responsible for maintaining it and how this will be funded over the long term. Such proposals should be formulated through discussion with the relevant responsible bodies including MKC, The Parks Trust, Parish and Town Councils." Add to 6th bullet point under criterion 7 "A landscape and open space strategy to improve biodiversity, provide advance structural planting, and a continuous network of publicly accessible open space connecting the existing city with new development, extend..."

8.95 There were **5 representations providing general comments/suggestions** concerning policy SD11;

- Policy SD11 General Principles for new strategic urban extensions should place a greater emphasis on cross border GI network improvements and their longer term management across administrative boundaries
- The policy also needs a requirement to extend the existing linear park system along the Ouse and Ouzel River systems and to provide a wildlife corridor of a width comparable to the current Ouzel Valley Park as required by Policy NE4.
- A caveat should be added to bullet point 4 to read "Planning permission will only be granted for development in a strategic urban extension following approval by the Council of a comprehensive master plan for the whole or a logical justified element of the strategic urban extension." No need for bullet point 4 and 5 as this is doubling up of work.
- Build infrastructure first, and proposals for strategic extensions should be specific, eg development must be within distance of doctors surgery. Relevant community organisations should be involved in development briefs.
- We agree that there is a need to plan for SUEs comprehensively, by requiring approval by LPA of a masterplan and that a development brief is prepared by LPA in conjunction with the developer, may act to slow down delivery of much needed housing, especially when Policy SD12 Part 2 also requires design codes for each phase to be prepared by developer and then approved by the Council. The Core Strategy policy CS5 had no requirement for development briefs.
- Not clear whether strategic sites not proposed to be allocated through PlanMK would be acceptable subject to meeting the principles within the policy and other relevant policies in the development plan.

8.96 Rationalise the number of policies relating to requirements for new developments

Policy SD12

8.97 Policy SD12 seeks to ensure that the infrastructure requirements of Strategic Urban extensions are delivered at a rate and scale to meet the needs that arise from the proposed development. The wording of the policy states planning permission for development will only be granted following the approval of a Development Framework produced by the

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Council in partnership with the landowner(s) and relevant stakeholders. Additionally, design codes will be required for each phase (of development) or site to be prepared by the developer and approved by the Council.

8.98 There were thirteen representations to this policy, a comment against the overall chapter has been added to this policy. The majority of representations, seven in all, were categorised as general comments/suggestions with four objections and two representations in support. Six representations were from the Development Industry, three from local organisations and one representation from a neighbouring local authority, a national organisation, a Parish and Town council and an MKC Councillor.

8.99 There were mixed opinions on the policy while some welcomed the certainty that Development Frameworks could provide; others particularly those within the development industry, criticised the approach advocated in the policy. They felt the approach of the Council was too bureaucratic and could limit housing delivery. There were some suggestions to make the policy more flexible such as the option for the developer(s) to prepare a Master Plan and Development Briefs for the scheme independently of a Development Framework. A number of representations referred to the inconsistency between the approaches in policy SD11 and SD12. One representation promoted the development of WEA Expansion Land before development east of the M1. Thames valley Police wanted "Emergency Services" included in bullet point 3 of the draft policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.100 What Statutory Consultees said:

- N/A

8.101 What Neighbouring and other Local Authorities said:

- Central Bedfordshire Council support the requirement for Development Framework to guide the delivery of strategic urban extensions in a comprehensive manner. Neighbouring authorities should have an integral role in the preparation of the Development Frameworks. SD12 should reference the need for neighbouring authorities to be included in the preparation of Development Framework for strategic urban extensions

8.102 What Town and Parish Councils said:

- Policy is missing paragraph 4. The last sentence in paragraph 2 should be deleted as developers must comply with existing design codes.

8.103 What Members of the Public said:

- N/A

8.104 What Milton Keynes Council Ward Councillors said:

- Developers should submit a programme for the completion and release of new homes, and for the completion (and adoption where applicable) of roads, footpaths, landscaping, play areas, etc - to protect the amenity of the new homes and to ensure the timely implementation of the permission. Facilities for residents should be linked

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to suitable residential milestones (e.g. works ABC to be completed prior to the occupation of dwellings XYZ).

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

- Two representations highlighted the inconsistencies between criterion 2 of policy SD12 which requires the approval of a development framework prior to the approval of a planning permission and policy SD11 which references comprehensive masterplans and development briefs. If there are separate items, they should be clearly defined.
- Objections to the principle that development will only be granted following the approval of the Development Framework. No objection to the principle of a Development Framework being brought forward for the Strategic Urban Extensions. However, to prevent unnecessary delays the option for the developer(s) to prepare a Master Plan and Development Briefs for the scheme independently of a Development Framework should also be included.
- Policy should allow for flexibility within a defined set of criteria for the creation of the Master Plans and Development Briefs. The requirement for such documents to be approved by the Council would enable the Council to take an active role in this process.
- Add after bullet point 2 - after 'approval of the Development Framework' add 'or Masterplan and/or Development Brief'. A mechanism for development of the Strategic Urban Extensions to be brought forward prior to the Council producing a Development Framework should be allowed for. The policy could set out what would be expected within a masterplan for a Strategic Urban Extension in terms of the scope but not being overly restricted
- Support for the general objectives of Policy SD12, including point 1. The first point of policy SD12 suggests that the infrastructure requirements must accord with the Council's Infrastructure Delivery Plan and Local Investment Plan. If this is to be set in policy without reference to specific infrastructure requirements, then the Council should be required to ensure both these documents have planning weight, i.e. they are subject of public consultation and scrutiny - and are kept up to date. Design and implementation of the urban extensions
- We advocate a number of changes to points 2, 3 and 4 (erroneously labelled as 5) of SD12. The following changes to SD12 are suggested: 1. Wherever practical, strategic green and grey infrastructure - grid roads and advance planting - should be designed and delivered as part of the first phase of development of the urban extension; 2. Other infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Development identified in this policy will be expected to make a contribution proportionate to its scale and impact for the delivery of strategic infrastructure requirements identified in the Local Investment Plan. 3. In order to ensure that the strategic urban extension is brought forward in a strategic and comprehensive manner, planning applications permission will only be submitted granted for development following the approval of the comprehensive master plan and development framework document . Design codes will also be required for each phase or site and secured through conditions following the grant of outline consents; these are to be prepared by the developer and approved by Milton Keynes Council. 4. The master plan and development framework document will be produced by the landowners/developers Council in partnership with the Council and relevant stakeholders (including adjacent land owners, relevant parish / town councils, infrastructure providers and statutory consultees). The development framework

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documents should be prepared in consultation with the local community, and be capable of being adopted by the Council in due course as Supplementary Planning Documents. 5. Development proposals for the strategic urban extensions must reflect and demonstrate that the place making principles set out in Policies SD1 and SD11 have been adhered to, as well as the specific policies in other chapters.

- Policy SD12 - at Bullet Point 2 Design Guide should be used instead of Design Code. Design Codes are rigid and restrictive and stifle innovation. As the development will be brought forward over a long period of time it is extremely important flexibility is included. Guidance will achieve the same aims for this policy but will include the implied flexibility. Support the use of design codes for strategic allocations such as South East MK. However, if this is combined with the requirement for a comprehensive masterplan (SD11(4)) and also a development brief prepared by the LPA (SD11(5)) and all of these require involvement and approval by the LPA it may result in unnecessary delays to the delivery of much needed housing.
- Policy SD12 requires the preparation of a Development Framework which will be required prior to the grant of planning permission. Design Codes are also required in support of each phase or site. Barton Willmore, on behalf of Gallagher Estates, has experience of the approach set out in SD12 through the planning and delivery of the Strategic Land Allocation. It reflects the requirements of Core Strategy Policy CS5 (and as it set out in Policy SD8 of Plan:MK). Having regard to the above, we recommend that the principles set out in 4. and 5. of Policy SD11 be revised to reflect MKC's existing approach as described in SD12.
- We note that MKC has not published the Local Infrastructure Plan referred to in the policy. This is a fundamental gap in the evidence base underpinning the proposed allocation of Land East of the M1. This supports our understanding that the site is not capable of being brought forward in the short or medium term. We strongly urge MKC to carefully consider the opportunity presented through the WEA Expansion Land as an allocation through Plan:MK. The site can be brought forward rapidly early in the plan period (post-adoption) and would deliver high quality development including significant new areas of public open space.

8.106 What Local organisations and interest groups said:

- To bring in line with the National Environmental Partnerships Green Infrastructure Vision and Principles, reference should refer to the need for: • Early and strategic planning of green infrastructure. This would show that the policy endorses the NEP's GI Principle 1 - that green infrastructure is as important and necessary as grey (man-made, constructed) infrastructure and social infrastructure for the health and wellbeing of Buckinghamshire's economy, environment and society.
- A community group supported infrastructure requirements to be delivered at a rate and scale to meet the needs arising from proposed strategic developments.
- The Parks Trust seeks the following amendment: amend point 3 to make reference to The Parks Trust as follows: "The Development Framework will be produced by the Council in partnership with the landowner(s), and relevant stakeholders (including adjacent landowners, The Parks Trust, relevant parish/ town councils etc.). Reason : The Parks Trust is seeking involvement at the earliest stages of planning proposals in view of its experience and expertise in planning, managing and maintaining strategic open spaces, as well as its ability to take on responsibility for such new areas in the future.

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8.107 What National Organisations said:

- Thames Valley Police (TVP) would request that “Emergency Services” be included in the (non-exhaustive) list of stakeholders and infrastructure providers set out in bullet point 3 of the draft policy.
- **Note** There is a typo of 'Strategic' in first line of the policy.

Policy SD13

8.108 Policy SD13 indicates the proposed south east MK strategic urban extension. A revisions of this policy will be required to inform how the proposed site will connect to surrounding neighbourhoods and not impact on the biodiversity of the local area as it likely to create congestion at M1 J13 in addition to the A5/A4146/Watling St/Brickhill St roundabout and the A5/A4146/Bletcham Way junction. Historic Landscape Characterisation and Historic Environment Record as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework, to accord with paragraph 170 of the National Planning Policy Framework need to be considered in the plan, which is currently omitted. It would be beneficial for a road strategy to be development, which aligns to the proposed development.

8.109 In total, there were 35 representatives received. Of that 15 objected, 6 provided support with general comments and 14 provided general comment and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.110 What Statutory and National Consultees said:

- Development trips from the site would likely affect the M1 J13 in addition to the A5/A4146/Watling St/Brickhill St roundabout and the A5/A4146/Bletcham Way junction in particular. The Draft Plan recognises the need to consider the potential East-West Rail Line and potential Oxford to Cambridge Expressway.
- Object to Policy SD13 as there is no certainty that the development proposed for this site will be deliverable even after 2026 as it relies on other schemes being identified and confirmed prior to delivery.
- The site individually and cumulatively will have a significant detrimental impact on the rural environment that provides part of the setting for Milton Keynes.
- According to our records, there are no designated assets on or adjacent to this site. Regard should be had to the Historic Landscape Characterisation and Historic Environment Record as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework, to accord with paragraph 170 of the National Planning Policy Framework.
- Policy should be strengthened with specific reference to the need for a new bridge over the railway to facilitate safe and sustainable access to the urban extension area, as the level crossing at Bow Brickhill is unlikely to have sufficient capacity to enable growth in road or pedestrian traffic. The impact of the urban extension on the level crossing at Bow Brickhill and any other in the vicinity of the development will need to be assessed, with routes diverted to enable closure of crossings where necessary.

8.111 What Neighbouring and other Local Authorities said:

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- Helpful if the plan set out the full delivery potential for this site beyond the plan period to assist in planning comprehensively for any future growth to the south east of MK and the wider Marston Vale.
- Support the recognition the time is needed for committed development to the south and east of MK to be completed and be established prior to more growth being supported.
- The phasing for future development within MK will need to be considered on a cross boundary basis in line with any future growth within the Marston Vale and wider strategic corridor. CBC will work closely with MKC in relation to development in this area, particularly with regard to impacts on the local road network/
- Whilst the Expressway would remove some vehicles from the local road network there will still need to be a comprehensive package of measures put forward to direct traffic from local roads or mitigate the impact of increased traffic. Junction 13 of the M1 will need further interventions or remodelling if significant growth puts further pressure on it. There will be a need to demonstrate sufficient capacity on the A421 and at key junctions.
- A collaborative approach to transport modelling and identifying mitigation measures will be required prior to the commencement of any development
- Support the need for EWR and the Expressway to be sufficiently progressed prior to commencement of development. Master planning of this site will need to ensure delivery of this key transport infrastructure is not compromised and as such their routes and appropriate buffers need to be safeguarded.

8.112 What Town and Parish Councils said:

- A road transport strategy for the south of MK needs to be developed jointly with Aylesbury Vale District Council ("AVDC") and CBC before further development to the south of Milton Keynes is considered. Local roads relied upon by the promoter of the site would not be able to cope with the additional traffic
- No suggestion as to how the site would be connected to the urban area. The extension of H10 gives access only to that portion of the site to the north of the rail line. Given the area south of the rail line is divided from the existing urban area by both the rail line and possibly an Expressway, the initial sustainability appraisal is meaningless.
- Allocation could not be in line with Policy SD1, as it is divided in its entirety from the existing urban area. Its integration and accessibility from the existing city could not be more problematic. The structure and layout cannot be based on the principles which have shaped the city. No suggestion is made as to how the area south of the rail line might connect to the grid road system, the redways, the linear park and how wildlife corridors, flood management drainage routes can be achieved. Therefore it is likely to be severed from the existing urban area by not only the rail line, but also by the expressway.
- Proposed development is in conflict with the recommendations of the MK Landscape Sensitivity Study which recommends at 6.12.4. development should be "small scale" and "reinforce the landscape framework". The site is drawn connected to the Area of Attractive Landscape and is therefore clearly in conflict with SD1.6.
- To designate the area without the most cursory examination of the traffic implications is a gross omission. It is also in conflict with policy SD1.16.
- H10 runs north of the rail line and can give no access whatsoever to the area of this site lying to the south of rail line. This policy (SD12) is therefore incompatible with a great number of the points in SD1 and SD11.

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- It appears that the Landscape Sensitivity Study has been completely disregarded in the scale of what is proposed, by joining the area designated south of the rail line to the Area of Attractive Landscape and coalescing it with both Woburn Sands, and Bow Brickhill at its eastern edge.
- Wording of Policy SD13 commits Plan:MK to delivering homes in this area regardless of other uncertain issues. Given the existing and ever-increasing road congestion associated with the restrictions caused by the rail crossings at Bow Brickhill and Woburn Sands, this is unsustainable.
- A large swathe of the land allocated to development south of the rail line would be required for the Expressway, potentially making the aspiration unlikely if not impossible.
- Suggest the policy is amended to ensure that it is not possible for any part of the area to be developed in a way unless it is properly connected in advance of development, to the existing urban area, (eg. roads, redways, wildlife corridors, flood mitigation channels) in order to protect the village of Bow Brickhill and town of Woburn Sands from unsustainable development incompatible with policies SD1, SD11 and SD12 as follows: "Development will not be brought forward until and unless it can be shown that it is in line with all the relevant policies in Plan:MK, particularly Policies SD1, SD11 and SD12.
- Map 1 uses an out-of-date version of a plan of Bow Brickhill which fails to show the development (now built and occupied) at Blind Pond Farm and also the approved site for 36 dwellings at Tilbrook Pastures. As a result of the omission of the Tilbrook development site, the South East Milton Keynes Strategic Urban Extension is shown at Station Road coalescing with the village of Bow Brickhill.
- Coalescence with the Area of Attractive Landscape occurs in the site's extension as far as the Bow Brickhill to Woburn Sands road. Bow Brickhill currently sits within the area of Open Countryside in a location acknowledged by all commentators as unique - at the foot and on the slopes of the Greensand Ridge. Any coalescence was unacceptable to the Core Strategy inspector who specifically rejected site OM 22 to the south of the rail line for strategic development in 2013. We believe there has been no material change which would lead the inspectorate to view this matter of coalescence any differently. Furthermore, we regard the lack of any comment on the issue of coalescence of the development with both Bow Brickhill, Woburn Sands and the Area of Attractive Landscape, a grave omission.
- Object on the basis that the Woburn Sands Neighbourhood Plan states that no extension to the current Woburn Sands Development Boundary will be permitted other than where PlanMK identifies a specific need for an amendment to the Development Boundary, and any proposed amendment is brought forward following full consultation with, and agreement by, the Woburn Sands Town Council, and the implications of any revised Development Boundary have been assessed in terms of the need to protect and maintain the character and countryside setting of Woburn Sands. Proposed site would be within the rural area of Milton Keynes and cannot be classified as an "urban extension". It would impact harmfully on a narrow section of rural land between urban Milton Keynes and the Greensand Ridge to the South. This would be directly contrary to the approved Woburn Sands Neighbourhood Plan.
- Recommend wording of Policy SD13 be replaced by the following: "1. Land to the South East of Milton Keynes, as shown on the Key Diagram and Policies Map, will be allocated for further mixed use residential development to meet the needs of Milton Keynes up to 2031 and beyond. However no permissions to develop in this area will be given until the following conditions are met: (a) The route of the proposed expressway has been agreed; (b) There is clarification on the future of East West

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Rail; (c) A robust assessment has been carried out on the impact of the already approved developments in the area. 2. If it is agreed that the expressway should run alongside the railway line between Woburn Sands and Bow Brickhill no development will be permitted to the South of this line unless agreed as part of the Neighbourhood Plans of Woburn Sands and Bow Brickhill.”

- Could possibly develop some housing South of the railway/expressway adjacent to Bow Brickhill provided it is considered in the light of the emerging Bow Brickhill Neighbourhood Plan. It is recognised that this will considerably reduce the scale of the development of South East Milton Keynes but believes that it is vital that the character and identity of Woburn Sands (and Bow Brickhill) must take precedence over the fulfilment of the housing target for Milton Keynes
- Note the proposed Expressway following a route running as close as is practicable to the East West Rail line. At this stage there has been no formal agreement and no substantive proposal for the Milton Keynes segment of the route
- No development should be allowed in South Milton Keynes until the impacts of the existing permissions on the Strategic Land Allocations (SLA's) are built out and assessed. No development in these areas has yet been started.
- Agree that no development should occur for the South East of Milton Keynes until 2031 at the earliest and suggests that, to avoid uncertainty that no development in this area be allowed during the lifetime of this plan
- Disagree strongly on the proposed scale of development for two reasons: a) The practicality of the route of the expressway b) The provisions of the Woburn Sands Neighbourhood Plan (due for revision) and the Wavendon Neighbourhood Plan (due for publication in 2018).
- The policy should clearly indicate that the plan period for the building of 1,000 dwellings to the south east of the existing urban area is from 2026 to 2031. WCC very much welcomes the last sentence in paragraph 5.25 that states that the principal vehicular access to the site should be sought via an extended H10 grid road that is delivered ahead of occupation of new housing within the site.

8.113 What Members of the Public said:

- Object to the allocation. Should be concentrating on larger sites to the North of Milton Keynes post 2031.
- I would compromise on 1000 homes from 2026 - 2031 around Wavendon/Woburn Sands as we do need to address the WS rail crossing, but there should no allocation post 2031.
- Gallaghers are promoting land which they do not own or control, and therefore Milton Keynes Council will look very foolish if the land allocations turn out to be undeliverable.
- Needs to be scaled back significantly if the Expressway route follows the A421, then the site in part needs to be dropped, or as mentioned scaled back to protect Bow Brickhill. Development should shift to East of the M1.
- If development does take place there should be significant green buffers, and farmland within the site should be retained similar to the planning of Woughton On The Green as this is a very rural area.
- MKC should await the detailed route which will be provided by the National Infrastructure Committee before making any allocations.
- No development should take place here the railway is the Southern boundary of Milton Keynes, and the farmland forms the setting for the green sand ridge.

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- If development was the last resort, need to address the level crossing and have no more than 750 homes.
- We are not happy our land is being promoted against our wishes. The site boundary needs to be investigated further and protection should be offered to the numerous smallholdings that are not part of this scheme being promoted by Gallagher. Should not be basing future growth for 'Milton Keynes' on a site where there is material uncertainty on the sites deliver..
- Should have a central green buffer so those landowners not in the consortium of gallaghers/gladman are given the assurance of being able to retain their smallholdings (*example diagram provided*)
- Loss of identity to Bow Brickhill and rural areas as MK urban expansion
- Traffic stress to Bow Brickhill, particularly lorries exceeding speed limits, and
- in older areas like Wavendon and Woburn Sands
- Hope to see extension on roads to the south of railway line and would like to see more extensive transport plans on buses and redways (from Kingston) to Woburn Sands
- Concerned about the delivery of facilities for neighbourhood in the development plan
- Object due to the uncertainty of the improvements to the Bletchley Bedford rail link the uncertainty of the expressway congested traffic at Eaton Leys

8.114 What Milton Keynes Council Ward Councillors said:

- We trust that more information will be forthcoming about the route for the Expressway so that the southern site can be properly assessed and transport connections considered.
- Policy should state that the H10 be extended into the South Urban Expansion Area and that it will be necessary to provide a bridge or underpass between Wavendon Gate and Old Farm Park.
- Policy SD13 (p48) I recall there was a mistake in the document pointed out by Mr John Baker, in connection with the South-East urban extension and we look forward to receiving the revised wording for further review.

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

- On Map 1, there are two areas of land (in white) that have been excluded. Question why they are not included within the overall allocation - no explanation is provided.
- A consistent approach to this site should be adopted - either the South-East Milton Keynes SUE as per Policy SD13 or the South-East Growth Area as per Policy DS2 and Table 4.3.
- No clarity on the overall scale of growth proposed other than a first phase of 1,000 homes to be delivered in the plan period and Sustainability Appraisal does not provide any further assistance on the issue of scale.
- Policy SD13 should follow the wording of the two smaller SUE's proposed under policies SD15 and SD16.
- Allocation does not include any land to connect the proposed allocation onto the existing highway network as it does not include land east of Phoebe Lane to enable an extension of the grid road reserve corridor to the H10/Old Farm Park/Wavendon Gate, or sufficient land to provide a connection to Newport Road. Question how the northern part of the proposed allocation is to be accessed.
- A Screening Opinion to extend the H10 grid road into the north-west corner of the proposed allocation does not reference the scale or nature of the development it is intended to serve. Suggests the northern part of the allocation is intended to be

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accessed via a single carriageway extension of the H10 with additional land to facilitate dualling if required in the future. The delivery of this is questionable given the identification of Community Foundation Reserved Sites identified in the Walton Neighbourhood Plan. More appropriate to consider an alternative access extending from the H10 roundabout along Tongwell Street to deliver access over the railway line.

- Should clearly set out an access strategy and whether the grid road reserve corridor should extend into the site or if this is not the intended access strategy, the type of connection from Newport Road. The proposed access route (extending the H10) is in multiple different ownerships which brings into question the deliverability of the proposed allocation in any event.
- It is believed that the area between Church Farm, Newport Road and the rail line comprises land within several ownerships. However, this has been promoted as separate land parcels through the SHLAA and earlier issues and options stages of the plan process. Only the O&H land appears to have been identified as an allocation. The allocation should comprise all land necessary to form a sustainable extension to Milton Keynes.
- Policy wording is ambiguous and there is a risk that isolated schemes may come forward for development without the necessary supporting infrastructure. Should ensure that any applications are informed by a comprehensive masterplan for the whole allocation.
- Policy should give the overarching context for the allocation and include its overall scale, the required level of infrastructure, phasing and delivery mechanism, requirements regarding access strategy, connections, education, provision of local/community facilities etc.
- Policy is not effective or justified given its reliance on progress of other strategic infrastructure projects which have yet to be progressed to a level of detail that can be relied upon to inform the draft plan policies. It is questionable as to whether the stated timescales can be achieved.
- We support the strategic land allocations and the level of housing this will deliver, provided any retail floorspace permitted serves a 'local need' only and meets NPPF tests..
- This Urban Extension has the capacity to provide approximately 2,000 homes within the area to the south of the railway line, a local centre with supporting services and facilities including retail uses, education and new public open space.
- Site is well located to take advantage of east-west rail and is located within the Cambridge-Milton Keynes-Oxford growth corridor.
- A masterplan for the area was submitted to the Council at the previous round of consultation and confirms that the site is deliverable, available now, and subject to receiving planning permission, is capable of making a significant contribution to the Council's housing need in the short to medium term.
- A part of the Urban Extension known as Malins Nursery is a 2.3 hectare site that is deliverable and available now for residential development, subject to planning permission.
- Policy currently states that the site will deliver up to 1,000 homes within the Plan period with the anticipation that further development will come forward after 2031. The Urban Extension to the south of the railway line is available now and could deliver approximately 2,000 homes. Number of dwellings referred to should not be seen as an upper limit on what can be delivered during the plan period and the Council should not seek to place a restriction on additional homes being delivered during the plan period. Restriction of no development to be completed until 2026 should be removed.

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- Details of the location of the proposed Expressway, in relation to the proposed South East Strategic Urban Extension, could be resolved at an early date within the plan period. There is no reason to prevent a sustainable new development coming forward at an earlier date should a proposal come forward that addresses all the other relevant policies in Plan:MK. In addition, the need to maintain a 5-year supply of deliverable sites should be taken into consideration and the fact that performance has been below the target requirement for the last 6 years.
- Support the principle of the allocation of land at South East Milton Keynes, however, we object restricting development until 2026 and limiting delivery to 1,000 homes by 2031. This will place an unnecessary and unreasonable constraint on the delivery and funding of well-planned infrastructure through sustainable growth; infrastructure which is needed at an early stage to meet the wider growth aspirations of the district as a whole. The land is suitable and available now, and can deliver supporting infrastructure. Object to the two reasons for delaying development.
- Restricting the delivery to 1,000 dwellings within the period 2026-2031, does not assist in the delivery of the Strategic Objectives of the Plan, as set out within objectives, 9, 11-17 (page 8-10 of the consultation document), as it will limit the delivery of services and amenities.
- The 1,000 dwelling figure proposed is an arbitrary figure within Policy SD13 and may result in a more piecemeal development coming forward which may not trigger the need for the delivery of certain infrastructure requirements.
- Support the second part of paragraph 5.24 in terms of requiring joint working between the developers and EWR, albeit that the requirement should be two way, in that EWR/Network Rail should equally be required to work with the developer to “ maximise the opportunities for sustainable travel ” arising from government investment in EWR.
- Do not consider it reasonable to assume the Expressway could be routed through land north of the railway line as it would need to navigate a number of obstacles and land uses which would not be conducive to a motorway style road. Detailed design for the Expressway will result in an alignment which either runs south of the railway from J13 westwards, or crosses the railway from J13 southwards at a point east of Woburn Sands, leaving the northern part of the urban extension free from constraint in this respect.
- Infrastructure improvements would be funded in advance of new homes to ensure that local communities and the local authority can be certain that the necessary infrastructure improvements are in place from day one, in particular the extension of H10 to provide access and access to future phases south of the railway
- The master planning of this part of the site does not prejudice the programmed EWR improvements, and in respect of the Expressway, it is expected that the Council will work closely with HE and DfT to secure early resolution of the routing options, not least to ensure that deliverability of wider growth aspirations for Plan:MK are not compromised or delayed.
- Should there be delays in the Council’s reliance on the supply of housing through “ brownfield development, infill, regeneration and redevelopment opportunities ”, the removal of the 2026 restriction would allow SE MK to deliver the growth needs identified.
- Development should not be held back to post 2026/31. OAN has not been truly calculated in the MK SHMA and further land needs to be allocated to meet the true housing need, these sites should be considered immediately available for development, to meet the shortfall identified. Mistake to delay their delivery given the amount of

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time major sites take to be delivered. Reserve Sites would not be in a position to meet this shortfall in need as desired without starting the process earlier.

- It is considered extremely likely that the position around the East-West Railway Line and A421 Expressway will be understood within 9 years (indeed delivery has already started on the Varsity Line), enabling development to come forward with certainty.
- Object to Policy SD13. Land to the south of the railway line would be developed entirely separately from land to the north, and land to the south of the railway line is separated from the urban area with only the bridge on Brickhill Street (V11) providing a connection back to the urban area and services therein.
- Site is likely to be compromised by the route of the Oxford Cambridge Expressway,
- Promotion of the 40Ha golf course to the southeast of Milton Keynes, which is available, suitable and viable for development and has no long term future in its current use, for housing development to meet the growth needs of Milton Keynes over the plan period within a new Southeast growth area.
- Support the identification of land to the South East of Milton Keynes for the delivery of a strategic housing allocation. This represents a sustainable location for significant growth and links well the existing built up area of MK.
- Oxford-Cambridge Expressway route will be agreed well in advance of 2026 (it is currently scheduled to be confirmed in 2019) and consequently once this is the case the Council should not unnecessarily restrict the delivery of development in this sustainable location. GDL/Gallaghers object to the use of the word 'concluded' regarding the expressway and instead suggest that the route needs to be sufficiently advanced/fixed.
- Concern that this limited amount of growth does not take advantage of the existing and new infrastructure that serves and will serve the area. We therefore object on the basis that the level of growth is too small.
- No certainty that existing commitments (75% of supply) will be delivered in the Plan period. The Plan should therefore be looking elsewhere for further allocations.
- Areas, particularly to the south east, already benefit from good transport connections, infrastructure and a large employment site at Magna Park, supported by further improvements where necessary. Should make the most of the opportunity of the East West Rail Lin
- In planning terms the land to the south east has pedigree having historically been proposed for development in the now withdrawn South East Plan. The growth would also follow the approach of the 2005 Milton Keynes Local Plan and the 2013 Core Strategy.
- There is the opportunity within this Plan to work proactively with Central Bedfordshire Council to take development further east.
- Commentary indicates that principal vehicular access should be taken via an extended H10 Grid Road, which should be delivered ahead of occupation of new housing. It does not explain how the two parts of the site either side of the railway line will be successfully linked and integrated with each other. Crossing will be expensive which should be factored into any viability assessment, which may present challenges for affordable housing provision, and a site selection process before they are chosen as preferred options.

8.116 What Local organisations and interest groups said:

- Proposed allocation is in conflict with many of the other policies in draft Plan:MK.
- Allocation could not be in line with Policy SD1, as it is divided in its entirety from the existing urban area. Its integration and accessibility from the existing city could not

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be more problematic. The structure and layout cannot be based on the principles which have shaped the city. No suggestion is made as to how the area south of the rail line might connect to the grid road system, the redways, the linear park and how wildlife corridors, flood management drainage routes can be achieved. Therefore it is likely to be severed from the existing urban area by not only the rail line, but also by the expressway.

- Proposed development is in conflict with the recommendations of the MK Landscape Sensitivity Study which recommends at 6.12.4. development should be “small scale” and “reinforce the landscape framework”. The site is drawn connected to the Area of Attractive Landscape and is therefore clearly in conflict with SD1.6.
- To designate the area without the most cursory examination of the traffic implications is a gross omission. It is also in conflict with policy SD1.16.
- H10 runs north of the rail line and can give no access whatsoever to the area of this site lying to the south of rail line. This policy (SD12) is therefore incompatible with a great number of the points in SD1 and SD11.
- It appears that the Landscape Sensitivity Study has been completely disregarded in the scale of what is proposed, by joining the area designated south of the rail line to the Area of Attractive Landscape and coalescing it with both Woburn Sands, and Bow Brickhill at its eastern edge.
- Wording of Policy SD13 commits Plan:MK to delivering homes in this area regardless of other uncertain issues. Given the existing and ever-increasing road congestion associated with the restrictions caused by the rail crossings at Bow Brickhill and Woburn Sands, this is unsustainable.
- A large swathe of the land allocated to development south of the rail line would be required for the Expressway, potentially making the aspiration unlikely if not impossible.
- Suggest the policy is amended to ensure that it is not possible for any part of the area to be developed in a way unless it is properly connected in advance of development, to the existing urban area, (eg. roads, redways, wildlife corridors, flood mitigation channels) in order to protect the village of Bow Brickhill and town of Woburn Sands from unsustainable development incompatible with policies SD1, SD11 and SD12 as follows: “Development will not be brought forward until and unless it can be shown that it is in line with all the relevant policies in Plan:MK, particularly Policies SD1, SD11 and SD12.
- Map 1 uses an out-of-date version of a plan of Bow Brickhill which fails to show the development (now built and occupied) at Blind Pond Farm and also the approved site for 36 dwellings at Tilbrook Pastures. As a result of the omission of the Tilbrook development site, the South East Milton Keynes Strategic Urban Extension is shown at Station Road coalescing with the village of Bow Brickhill.
- Coalescence with the Area of Attractive Landscape occurs in the site’s extension as far as the Bow Brickhill to Woburn Sands road. Bow Brickhill currently sits within the area of Open Countryside in a location acknowledged by all commentators as unique - at the foot and on the slopes of the Greensand Ridge. Any coalescence was unacceptable to the Core Strategy inspector who specifically rejected site OM 22 to the south of the rail line for strategic development in 2013. We believe there has been no material change which would lead the inspectorate to view this matter of coalescence any differently. Furthermore, we regard the lack of any comment on the issue of coalescence of the development with both Bow Brickhill, Woburn Sands and the Area of Attractive Landscape, a grave omission.
- Oppose this allocation, irrespective of it not being developed until after 2026. Development here would conflict with the Council’s intention to leave open countryside

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between the urban area of the Borough and the older, rural settlements. Perhaps this is more about protecting MKs rural north and east

- Woburn Sands to date it has taken most of the development across the three larger rural settlements and has almost doubled in size over the last decade
- Proposal mean the loss of Woburn Sands', Bow Brickhill's and Wavendon's distinctive character and identity, contrary to the Neighbourhood Plan (Woburn Sands). These old villages could be partly protected by green buffers but their setting will be destroyed, and once lost to development it can never be recovered, particularly the setting of the Greensand ridge
- Area south of the railway line was supposed to remain open countryside to frame the natural beauty of the rise of the greensand ridge, an Area of Attractive Landscape
- Historic Wavendon will also lose all its identity as it becomes part of that urban sprawl - to the north and east with the SLA and now to the west
- This allocation together with the large employment site on the other side will have a catastrophic effect on the local rural road network and surrounding historic rural communities, which were never designed to take this amount of development.
- Suggest limiting it to north of the railway line and restricting the spread eastwards, leaving Wavendon clear of this development.
- Should consider bringing forward the allocation east of the M1. This should have been investigated when the draft Plan:MK was being prepared, as the Secretary of State instructed following her acknowledgement that the SE Plan could not incorporate an area of Central Bedfordshire which lay within the East of England Region, which already had a RSS although this was under review but never completed. She required that MKC investigate extending east wards to incorporate the 5,600 dwellings that had previously been allocated in Central Bedfordshire We do wonder why and how these two allocations were ever made.

8.117 What National Organisations said:

Policy SD14

8.118 Policy SD14 relates to the allocation of a comprehensive new residential and employment development to the East of the M1 to meet the needs of Milton Keynes after 2031. It was recommended that development should be adjacent to the existing expressway, which is not currently proposed in this plan. Current concerns that the scale of proposed development will not be sufficient to meet housing demand, and a number of potential areas/sites and conflicts have been summarised below.

8.119 In total, 46 responses were received. The response received was mixed and were critical of the policy suggesting further clarity is required . 24 objected, 6 supported, and a further 15 respondents provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.120 What Members of Public said:

- Development should be adjacent to expressway; this area does not appear to be within the preferred route of the expressway (option B).
- Mass-transit system proposal should be supported and not necessarily restricted to a Cranfield to CMK connection.
- Site should come forward ASAP; more strategic and sustainable and would offer greater opportunities for connections and infrastructure provision.

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- 14 responses object to this policy for the following reasons:
 - Development east of M1 in conflict with NPPF, as Local Plan (2005) identified sustainable development East of M1 as a challenge and therefore not a long-term sustainable approach.
 - It is not an equitable situation to expose the eastern area to development due to failings to satisfy demands elsewhere. This provides no incentive to extract maximum potential from other, easier to develop sites in central MK area.
 - Approach to this important strategic plan for the area appears rushed and poorly managed. There are a number of possible caveats that are yet to be decided after consultation has concluded; these are key issues which should be part of a complete and more joined up approach to development in MK.
 - Development should be focused on the Expressway and various urban regeneration schemes.
- 14 responses outlined that If this policy is to remain they would like to see amendments to the boundaries of the site so as to protect Moulsoe to a greater degree, whilst reducing potential flood risk (*response provided details of exact boundary changes and outline map*).

8.121 What Town and Parish Councils said:

- Gayhurst Parish Meeting: Support Policy SD14; land is the best location for development once East West corridor is finalised and housing need post 2031 is calculated using current data. Essential facilities are delivered early in the new development to avoid overstressing Newport Pagnell.
- Newport Pagnell Town Council (NPTC). Plan:MK should clearly define urban and rural in the context of new extensions to the existing designated area. With potential growth of 20,000 residents within the next decade Newport Pagnell should be reclassified as urban, so as future infrastructure developments take this into account.
- NPTC: Key themes of Plan:MK should apply to all developments, not just some.
- NPTC: Whilst MK East site is allocated for development post 2031, the implications of oxford-cambridge expressway will likely be resolved before 2031, and given the house building rate in MK since 2009 and current government policy around 5 year land supply, it is likely MK East will be allowed to be developed pre the 2031 date.
- NPTC: Clarity is required on the site area, estimated capacity for housing and employment development and which areas are allocated for which use, at MK East.
- NPTC: Policy DS3 only allocated 56.7ha of employment land (Caldecotte South Site), which still leaves a shortfall of 46.3ha of warehousing land. It is assumed this will be at MK East, so why is no specific size of employment allocation made?
- NPTC: Site boundaries for MK East do not seem to follow particular boundaries. With no specified housing or employment targets, how were these boundaries arrived at?
- NPTC: Parts Trust land north of the M1 and Pineham, which would form part of a linear park extension should be included within MK East, as linear park.
- NPTC: Policy wording needs amending to make specific reference to the upgrading of the A422 & A509 which development of MK East will directly impact. Further amendment required to make reference to the need to investigate additional road crossings of the M1; policy does not currently require any new crossings.
- NPTC: MK East will require more than one district centre. Supporting community infrastructure must be built early to avoid impact on existing settlements.

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- NPTC: Amendment required to include: “ A network of footpaths and cycleways to connect to existing and proposed routes in Milton Keynes, Newport Pagnell and Moulsoe, including redways”
- NPTC: Amendment required to include: “A strategic landscape framework, **including an extended linear park around the River Ouzel**, and network of green spaces to meet strategic and local requirements”.
- NPTC: Policy SD14 requires development to be brought forward in line with SD1, SD11 & SD12; this is welcomed and endorsed.
- NPTC: MK East should be designed as part of the ‘forest city’ concept.
- NPTC: No explanation given for why a ‘mass transit’ corridor from CMK to Cranfield University is required.
- Moulsoe Parish Council: object to this policy for the following reasons:
 - Development east of M1 in conflict with NPPF, as Local Plan (2005) identified sustainable development East of M1 as a challenge and therefore not a long-term sustainable approach.
 - It is not an equitable situation to expose the eastern area to development due to failings to satisfy demands elsewhere. This provides no incentive to extract maximum potential from other, easier to develop sites in central MK area.
 - Approach to this important strategic plan for the area appears rushed and poorly managed. There are a number of possible caveats that are yet to be decided after consultation has concluded; these are key issues which should be part of a complete and more joined up approach to development in MK.
 - Development should be focussed on the Expressway and various urban regeneration schemes.
- Moulsoe Parish Council outlined that If this policy is to remain they would like to see amendments to the boundaries of the site so as to protect Moulsoe to a greater degree, whilst reducing potential flood risk (*response provided details of exact boundary changes and outline map*).
- Cranfield Parish Council: Object; There is no need for Land East of the M1 to be identified in Plan:MK, even as a reserve site. Once identified it will be brought forward prior to 2031, even without the flexibility Plan:MK gives for the site to come forward prior to 2031.
- Cranfield Parish Council: Policy also allows for site to come forward without the delivery of key infrastructure. It is not reasonable or good plan making for a site of this size to be delivered piecemeal without key infrastructure. Particularly given the M1 has traditionally been seen as a barrier and connectivity from the site to CMK will be key. Without necessary infrastructure, an intolerable burden would be placed on neighbouring infrastructure (M1, A509 and rural network).
- Cranfield Parish Council: Even with transport infrastructure, development on this scale will place unacceptable traffic increase on the rural road network. There is no reference made to how this will be considered or mitigated.
- Cranfield Parish Council: Further explanation required on the mass transit system between CMK and Cranfield University.
- Cranfield Parish Council: A reserve site for 5,000 homes is disproportionate for a plan that requires 6,775 homes. Smaller reserve sites which could be brought forward quicker, cause less landscape and visual harm and would not require major infrastructure should be identified instead.
- Cranfield Parish Council: MKC need to take account of Central Beds strategic growth locations and the cumulative impact of growth should be assessed.

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- Cranfield Parish Council: The allocation of a site to deliver growth in relation to the NIC Oxford to Cambridge Corridor is premature before the final NIC report is published. Any growth will need to be a coordinated response across a number of Councils.
- Cranfield Parish Council: Recommendation of the MK2050 commission, which identified east of the M1 as preferred direction for growth, was not underpinned by any technical evidence. Concern that principle of developing east will become established without necessary evidence.

8.122 What Milton Keynes Council Ward Councillors said:

- Concern that allocation of a small site across the motorway will not provide the scale required to build new infrastructure and will become isolated.
- Questions how this site can contribute to the Expressway corridor when it is surrounded by existing residential areas on 2 of its 3 sides.

8.123 What Neighbouring and Other Local Authorities said:

- Cranfield & Marston ward, Central Beds: Concerned about the delivery of infrastructure before 2031, particularly connection to CMK and improvement to road network.
- Cranfield & Marston ward, Central Beds: Concerned about impacts of urban extension on rural road network. Assessment of cumulative impact of proposal with Central Bedfordshire Council's proposal should be made.
- Cranfield & Marston ward, Central Beds: like to hear more about protection of corridor for mass transport system to Cranfield University.
- Cranfield & Marston ward, Central Beds: Smaller reserve sites which do not extend as damagingly into the open countryside should be identified (e.g. urban extension adjacent to Newport Pagnell).
- Central Bedfordshire Council: Plan should set out the proposed phasing and delivery potential of the site, and cumulative impact of future growth.
- Central Bedfordshire Council: Support requirement for further information from NIC to be available before site can be brought forward. Concerned that housing supply trigger may lead to site being brought forward before this resulting in piecemeal growth and prejudicing infrastructure delivery.
- Central Bedfordshire Council: Further discussion on mass transit system would be welcomed.

8.124 What Development Industry said:

- The infrastructure requirements for the Land East of the M1 would be sizeable and should be considered in more detail at this stage to ensure that this site option is deliverable. There is far too little information at present relating to what infrastructure improvements are likely to be required and how these can be funded.
- Support strategic land allocation and level of housing it will deliver however level of retail floorspace permissible should only be to serve a 'local need'.
- Boundaries for East of M1 are not based on an assessment of the extent of land considered suitable for a development of this strategic scale.
- It is unclear what extent of land is being considered for larger scale growth East of M1.
- Plan:MK overstates the support this development could provide to Milton Keynes as part of the growth corridor strategy.

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- Fundamental conflict in allocating land through Plan:MK which will not be developed until after 2031.
- Current triggers for early release relating to the growth corridor are ambiguous and subject to interpretation.
- Land East of the M1 is not capable of being brought forward quickly; it is perverse to identify it as a reserve/contingency to address a shortfall in housing supply as it will not assist with short-term supply deficits.
- Question the robustness of housing trajectories if already planning for a land supply shortfall.
- Should this not be a reserve site as opposed to an allocation; if an allocation more detail required. Policy is ineffective and premature.
- Clarification required over delivery timescales; Plan:MK suggests a number of different dates.
- Recommended amendment to reflect overarching objective of extending grid roads into new urban extensions (*Suggested wording in comment*).
- Support inclusion of Caldecotte Farm land, but land should be allocated for 20ha of B8 employment land to respond to the need of the logistics market in the early part of the plan period.
- Policy is premature and prejudices work of the NIC.
- Radical departure from earlier growth plans and runs counter to work which shows preference for expansion to south-west. Lack of SEA to assess impacts is a concern and nothing in evidence base supports expansion across M1; the SHLAA and SHMA only looking to 2031.
- Support the concept of a 2050 spatial vision and MK plan should reflect the NIC findings. The NIC needs to resolve the issue of the direction of future growth of the city and its ultimate extent, it is therefore premature to show long term growth to the east in Plan:MK.
- Post 2031 is too far into the future, an allocation of this size needs planning sooner. Policy should be amended to the same as SD13; no housing pre 2026 and NIC work to be completed first. This will ensure no hiatus in work.
- Land north of the A422 should also be included; could provide an extra 1000 dwellings.
- Allocation should be extended to the boundary of Central Beds. This will encourage a collaborative approach, allow comprehensive planning of the wider area, assist in meeting housing need (MK SHMA is not a true calculation) and assist in enhancing further connectivity and congestion issues.
- Site should be considered immediately, not held back to 2031. MK SHMA is not a true calculation and further land needs to be allocated to meet identified need. The site is recognised as sustainable as they are included within the draft Plan, given time taken to deliver major sites it would be a mistake to delay.
- This allocation does not have the ability to support national infrastructure; neither key projects have a proposed alignment near MK east.
- South East Plan examination raised a number of sustainability issues in relation to this site and direction of growth.
- The efficacy of links over the M1 need to be established before any allocation in this location can be considered. Crossings of the M1 are key to MK East attaining any integration with MK Urban area and a high priority should be placed on their guaranteed deliverability.
- Issues of accessibility, sustainability, viability and deliverability should be considered during the appraisal of sites prior to securing an allocation in the Local Plan, and the

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allocation rejected accordingly if it does not provide the most sustainable solution for development.

- Proposal would result in unplanned, piecemeal urban sprawl, creating an urban area disconnected from MK with no obvious long term boundary to prevent further encroachment into open countryside.
- Unclear how land to the East will connect to the existing city and achieve distinctive character of MK. Lack of existing infrastructure and time and cost to provide these would have significant deliverability issues, making the allocation unsound.
- Trigger relating to land supply would allow development without infrastructure; this is entirely contrary to the fundamental principles of sustainable development and in contradiction to the Policy's recognition that the site cannot be sustainably developed until after 2031.
- Para 49 of the NPPF would stop land supply falling as low as three years and would consequently make this policy ineffective.

8.125 What National and Statutory Organisations said:

- Natural England: Policy currently does not have a requirement to extend existing linear park system along the Ouzel River systems; it is important this is included.
- Thames Valley Police: Given scale of development, it is imperative that reference is made to the delivery of on-site infrastructure to support Emergency Services. Amendment to text suggested (*suggested wording within representation*).
- Historic England: Site includes Grade II Moulsoe Buildings Farmhouse, Policy SD14 should therefore include a requirement for retention of the farmhouse and an appropriate sympathetic setting. Regard should also be had to the Historic Landscape Characterisation and Historic Environment Record.
- Highways England: Land supply trigger point should be clarified as implementation of this site could have implications for the operation of the strategic road network.
- Highways England: unclear how the proposed development would be linked into the public transport, walking and cycling network. Important these sustainable options are integrated into the site to minimise impact on J14.
- Highways England: Alternative routes for localised trips crossing the M1 should be provided, to retain J14 to support strategic trips.
- CPRE Bucks: object to east of the M1 because it is premature, will deliver no housing prior to 2031 and has no bearing on the delivery of Plan:MK.
- CPRE Bucks: Object on the basis that allocations will individually and cumulatively have a detrimental impact on the rural environment that provides part of the setting for Milton Keynes.

8.126 What Local organisations said:

- North Bucks Parishes Planning Consortium (NBPPC) supports this policy and strongly supports the principle of a 'master-planned' approach to development. A properly planned 'MK2', East of the M1 motorway in the longer term would help realise the exciting strategic and infrastructure potential in this location, whilst supporting the recommendations of the MK Futures Commission.
- NBPPC agree that progress on East-West Rail and consideration of the final National Infrastructure Commission's report are essential, but despite this East of M1 is the best long term strategic location for growing MK and presents a number of potential benefits.

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- NBPPC agree that there is justification for recommending well planned, comprehensive development in this location must not prejudice infrastructure projects that could provide residential and employment growth up to and beyond 2031.
- MK Forum: Planning for crossing the M1 should be seen as a priority.
- Parks Trust: Support policy SD14 but require an amendment to include a linear park extension along the River Ouzel and tributaries (*suggested wording in representation*).

Policy SD15

8.127 Policy SD15 outlines the proposal for development land at Easton keys for the provision of up to 600 dwellings. It is considered that this policy is currently inaccurate and based on assumptions, and the proposed allocations will impact on the local rural environment within the borough. There is further concern that planned development will affect the existing highway capacity in particular along the A5 and that the proposed highways schemes will come after the planned development in turn, creating significant local road congestion and disruption. There are further concerns relating to the safety of road users which will need to be investigated if development is granted. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.128 A total of 11 representations were made in response to policy SD15.

8.129 Local organisation

- Mentions “utilities infrastructure” but no reference to local energy networks

8.130 There were 4 representations that object to policy SD15;

- If the allocation (4.17 and in policy DS2 of Land at Eaton Leys primarily for 600 dwellings) is to be retained MKC must set out how it expects the site to be developed in greater detail so that a proper assessment of its impacts can be undertaken in cooperation with AVDC in order to ensure that the plan can be produced in accord with legal requirements.
- We do not accept policy SD15 due to concerns with the delayed provision of infrastructure
- Object to SD15 as there is no certainty of delivery, it is premature, will deliver no dwellings in the period to 2031, proposed Eaton Leys allocation is inaccurate and based on assumptions, and the proposed allocations will impact on rural environment.
- Support this policy, but amend 6th bullet point to state: “Multi-functional and well-connected public open space...”

8.131 There was 1 representation in support of policy SD15;

- Support the policy, but the level of retail floorspace that would be permissible in these areas should serve a local need only.

8.132 There were 6 representations that submitted general comments/suggestions on policy SD15;

- The strategic residential site at Eaton Leys presents a challenge for BCC due to the impact that growth in this area will have on the existing highway network. Also have concerns with regard to the vehicular access proposals from the site on to the highway which will cause severe impacts on the road network and could jeopardise the safety

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of its users. **Alternative:** Under Policy SD15 for Eaton Leys, the following points should be considered to ensure that sustainable travel is encouraged, leading to a lower increase in car use: - Suitable walking/cycling links for shorter journeys to: Schools, shops, businesses, green space - ensure that there are appropriate crossing provisions in place where cycling/walking routes cross roads. Assess existing infrastructure (including Rights of Way network) to ensure that cycling/walking routes provide the shortest, most direct route to key destinations (creating a desirable alternative to driving).

- If the provision of land at Eaton Leys is 1800 rather than 600 then the impact on the wider highway network could be greater than predicted by the Plan. It is recommended that the appropriate number of dwellings associated with this site is included in the MKMMM when producing forecast flows.
- The north half of the land at Eaton Leys site forms the majority of the scheduled area of Roman scheduled ancient monuments, development on or near the monument would be unacceptable.
- We note that Policy SD15 requires "Mitigation of archaeological remains on the site either by recording or preservation in situ/avoidance of remains". However, we consider this to be inadequate to conserve or enhance the scheduled monument. We therefore object to Policy SD15 in its current form. Regard should also be had to the Historic landscape Characterisation and historic Environment Record.
- Please add: In conjunction with policy 16, "an area of linear park will be provided..., linking into Caldecott Lake to the north and providing future opportunity to link the park" south along the Ouzel River.... "The linear park should include balancing ponds as part of a Suitable Urban Drainage system across the site".

8.133 The whole area should be master planned in consultation with Aylesbury Vale and expressed some concern that the development would have an adverse impact on the A5 roundabout.

Policy SD16

8.134 This policy allocates around 57 hectares (ha) of land between the A5 and Brickhill Street, south of the Bletchley to Bedford railway line for employment purposes (B2/B8 uses with ancillary B1 uses). There were nineteen representations to this policy, the majority of them (ten) opposed this allocation, two representations were categorised as being in support and there seven representations which were general comments /suggestions. Responses were received from the following Parish /Town Council's (Five) Local Organisations (Five) Members of the public (Three) Development Industry (Two) and National Organisations (Two) (Neighbouring Local Authorities (One) and MK Councillors (One).

8.135 A number of representations felt more suitable sites for industrial/warehousing development should be developed elsewhere, east of the M1. Concerns raised included the process by which this site appeared in the plan. Specific impacts mentioned included the effect of the development on the open countryside and the landscape and views to and from the Greensand ridge, the impact of the development on the road network and the prospect of worsening traffic congestion particularly at the railway crossing at Bow Brickhill where a number of response wanted a bridge to be provided over the railway line. The Sustainability Appraisal was also criticised as being flawed containing inaccuracies and misunderstandings about the site itself. Buckinghamshire County Council requested collaborative and joint working process is undertaken too ensure the site is effectively

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integrated into the rural fabric of both Buckinghamshire and Milton Keynes. A number of representations criticised the allocation of this site for employment purposes when most of the site had been removed from Site Allocations Plan for housing.

8.136 In total, 19 representations were received. Only 2 representatives supported the policy, 9 objected and 8 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

8.137 What Members of the Public said:

- Concerns about the impact of the development on the local road network, and traffic congestion at the Bow Brickhill railway crossing.
- Concerns about cost and impact of infrastructure required for this proposal and impact on east -west rail
- Impact of development on the landscape, site is in open countryside and high grade arable farmland.
- Refers to site performing poorly in MKC Site Allocation Plan.
- Concerns about this site appeared in the plan without any notification and consultation with Bow Brickhill Parish

8.138 What Town and Parish Councils said:

- There are more suitable sites for this use such as development east of the M1 motorway.
- The suitability of this site for this use compared to other alternative sites needs to be objectively assessed.
- The rationale for including this site and the criteria used in its selection need to be clearly set out as part of the Plan.
- Concerns about intrusion into open countryside and coalescence issues between Bow Brickhill and the city.
- Concerns about this site appeared in the plan
- Concerns about proximity of site to residential properties in Bow Brickhill
- Development on this site would compromise views to and from the site to the detriment of the setting of the Greensand ridge and the nearby Area of Attractive Landscape (AAL)
- Reference made to the MK Landscape Sensitivity Study by Gillespies and the sensitivity of this site.
- Criticise the initial sustainability appraisal as containing inaccuracies and misunderstandings about the specific nature and features of the site itself e.g potential to provide new areas of accessible green space, opportunities to connect to the existing cycle network and emissions from site
- Noise from site
- Sceptical Brickhill Street can be upgraded to grid road standard because of the physical constraints of the rail line crossing.
- Concerned that the road network in the vicinity of Bow Brickhill and Woburn Sands is already severely congested during peak hours, and this proposal and the the rail upgrade will exacerbate these problems.

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- No access should be permitted on to the Bow Brickhill Road and thence through Woburn Sands. Physical deterrents to HGV access to this route should form part of any permission for developing South Caldecotte for employment purposes.
- Development must be sensitive to its neighbours and neighbourhood uses. It is imperative that the grid road would need to be dual carriaged or at least be of a design capacity so that it could be dual carriaged in the future.

8.139 What Milton Keynes Council Ward Councillors said:

- It will be critical to ensure that the transport interchange is right for the proposed warehousing site, to ensure minimal extra traffic within MK, and that any extra that does result is adequately provided for. Questions if HGVs visiting site will stop over.

8.140 What Neighbouring and other Local Authorities said:

- Buckinghamshire County Council are concerned at the effect of the development on the highway network e.g. the A4146 and the local roads within Buckinghamshire. They asks that as part of the implementation of Plan:MK, a collaborative and joint working process is undertaken to ensure the site is effectively integrated into the rural fabric of both Buckinghamshire and Milton Keynes.

8.141 What Milton Keynes Council Departments said:

- None

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

- Support for the strategic land allocations.
- Argue proposed site to the north east of Newport Pagnell is a more appropriate location to accommodate future employment land needs of the Borough and object to the allocation of land at South Caldecotte.

8.143 What National and Statutory Organisations said:

- Object to development of this site as it will have a significant detrimental impact on the rural environment that provides part of the setting for Milton Keynes, and because of the effect of tall buildings up to 25m high, which would be completely out of scale when compared to other developments in the vicinity of the site.
- Site is located across the A5 from the northern part of the Roman town of Magiovinium and Roman fort scheduled monument. Welcome the requirement in the policy for an archaeological assessment to understand the likely presence of archaeological remains within the site. However, it may also be necessary to undertake appropriate field evaluation to fully understand the archaeological potential and significance and inform the layout of development.

8.144 What Local organisations and interest groups said:

- Add to 2nd bullet "the level crossing at Bow Brickhill station will be replaced by a bridge over the railway line. Another organisation mentioned this point
- The Parks Trust seeks the following amendment add to 4 th bullet point to state: "The linear park should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds

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- Sustainability Appraisal is flawed and contains inaccuracies and a great number of misunderstandings about the site. Highlights many of the same issues mentioned above and includes concerns over flooding and effect on Greensand ridge
- The amount of floorspace should be expressed in sq.m to be consistent with areas quoted elsewhere in the Plan
- Could a local energy network/community energy supply be provided at this location.
- Criticise allocation of site for employment purposes when it was removed from the Site Allocations Plan for housing as it would be a 'harmful intrusion into open countryside'.
- No assessment of alternative and more suitable sites for more industrial/warehousing, e.g. the area to the east of the M1.
- Refers to Council's 2015 Employment Land Study, site does not appear in study and does not fit with the report's conclusion and recommendation, particularly in respect of large footprint employment sites including logistics. The demand is for access to the M1 corridor, not the A5; and the logistics in particular are "footloose" - i.e. they go wherever they can find on the motorway networks.
- Refers to Milton Keynes Council and Central Bedfordshire Council an HGV ban over all the wedge-shaped area of land between the A5 and the M1, from Junction 11A to Junction 13. Any HGV traffic from the proposed Strategic Employment Site could reach the M1 only by either travelling south on the A5 or by travelling north on the A5 and then traversing across the centre or the north of Milton Keynes.
- Because of its location and inrelation to the M1 this site would not be very attractive to logistic firms.
- Effect on the road network and on Bow Brickhill, Woburn Sands and Aspley Guise. Roads are already crowded and congested. Site is not well served by public transport, so workers there will have difficulties getting there unless they travel by car.
- Bow Brickhill is on the Bedford to Bletchley railway line but it will not be a stop for the fast service when the East West Rail line to Oxford is opened in 2024 This site appears to be a back of the envelope add-on with no serious thought given to the transport implications or indeed to what is required as set out in the Employment Land Review and Economic Growth Study Phase 2 Delivery Strategy Final Report.
- Ask the Council to reconsider the strategic employment allocation and allocating a more appropriate area close to the M1.

9 Economy and Retail

Chapter 6 - Summary of Comments

9.1 This Chapter identifies land and proposed sites to meet employment, retail and leisure needs up to 2031 and where they are intended to be located. There is concern that some employment sectors are too emphasised in the plan and this will need to be revised to reflect market demand and change, for example, the affect of technology and online shopping, which allows for 24hour access thus a potential reduction in retail floorspace required. Furthermore, there is a need to consider rural expansion as it is currently perceived there to be a predominant focus within the plan towards urban areas. For example, it was suggested that employment land should be investigated at Olney. Although this might affect/conflict other policies throughout this plan which intend to promote shorter journey times. Paragraphs need to be phrased to ensure they reflect local terminology, for example, paragraphs 6.13 and 6.14

9.2 In total, 80 responses were received. 19 respondents supported the proposals, 37 provided general comments and suggestions and 23 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.3 What Members of the Public said:

- 27,500 new jobs seems ambitious. The fear is that to achieve that many, it will mostly be warehouse jobs.
- Concerned as to the type of jobs available and points out there aren't enough jobs to keep children here once they leave school.
- Supportive of strategy to benefit from East-West Growth Corridor.
- Need to build a higher percentage of affordable housing - up to 40%+ to prevent a housing crisis developing for people in manual jobs who can't afford to live here.
- Happy to talk with the council about potential to develop a tech hub in MK.
- Support the 1.5 jobs per house policy.
- Support policies that facilitate a good level of broadband access and good mobile phone coverage.

9.4 What Town and parish Councils said:

- N/A

9.5 What Milton Keynes Council Ward Councillors said:

- Concern at the emphasis on warehousing in the Plan. The chapter should emphasise the amount of land being kept allocated for other types of employment, and perhaps the number of jobs expected under each use.
- Para 6.11 would like to see data on how much land allocated for employment in the Core Strategy has been used for employment purposes, how much has been used for other purposes, how much remains undeveloped. Would like to see whether the rate of development differs from the 2013 expectation.
- Consider amending either para 6.11 or 6.12 so that they are individually accurate as well as collectively accurate.

- Consider the use of local terminology in para 6.13 and 6.14, for instance our City Centre with NPPF terminology in brackets (the 'town centre')
- Would like to see estimates of the existing retail floorspace offered by each of the small town centres, as compared with the larger local centres to see if the policies are appropriate. Para 6.45 needs to make the point that these are mostly very small town centres, offering a limited number of outlets supplying a range of goods locally rather than at competition.

9.6 What Neighbouring and other Local Authorities said:

- N/A

9.7 What Milton Keynes Council Departments said:

- N/A

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

- The vision set out in the draft Plan MK is understandably urban focused considering the rapid growth of Milton Keynes town. However, the need for rural employment should not be overlooked and a greater onus should be placed on delivery of a mixture of employment sites across the Borough, including the rural area. The ability of the larger villages to support more strategic allocations of employment land has been overlooked in favour of the retention of long established allocated land in the urban area, a large supply of which has remained undelivered for over a decade.
- Rural settlements such as Olney, Newport Pagnell and Hanslope should be considered as growth points to accommodate both residential and commercial development. It will ensure such settlements can become more than commuter towns and villages. A site put forward being land adjacent to Yardley Road to the north of Olney which has potential for commercial/live-work or mixed use development.
- Policy ER9 seeks to accommodate rural economic growth to a very limited extent. It seeks to facilitate the location of business in bespoke instances, such as where a business model has a nexus with the rural area or where redundant rural premises such as barns become available for reuse. The policy is reactive rather than proactive and fails to recognise the importance of disseminating employment premises across more than simply the urban area. At the same time Policy DS2 of the draft Plan seeks to deliver at least 1,000 new homes in the rural area over the plan period. A balance needs to be struck. Indeed, the commuting distances of those already living in the rural area, predominantly travelling to Milton Keynes, need to be considered.
- With regards to Olney, the Plan seeks to allocate 10 ha of employment land to the north of the town although it is argued that a maximum 6.0 ha of this land will likely be developable taking into account the presence of existing uses on site and landscaping, habitat and access issues.
- Recommend consideration of further employment land in Olney, allowing Olney to provide a focal point for economic growth in the rural area. Land to the north of Site C of the Olney Neighbourhood Plan is put forward for development. It offers a further 6.5 ha of land that could be amalgamated with the allocation in the Olney Neighbourhood Plan, and would result in an overall allocation that is more easily delivered and offsets the numerous sites in the urban area of Milton Keynes that have not delivered since 2003.
- A number of historic allocations, first identified in the adopted Local Plan (2003), were retained in the Core Strategy in 2013 and are once again included as vacant

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employment land in the emerging Plan MK. The Employment Land Review (2015) recommends that the vacant land set out in Table 6.1 is sufficient to meet local demand. This is based on a comprehensive breakdown of current supply and demand within the Borough as well as an assessment of the quality of the existing employment land stock. This view appears to be simplistic, however, and avoids the fact that some allocations sought to be retained have barely delivered since 2003. The retention of a number of the allocations listed in table 6.1, when set against the advice of paragraph 22 of the NPPF, appears open to challenge.

9.9 What National and Statutory Organisations said:

- Request that the value of sport to the economy is reflected within the Plan.

9.10 What Local organisations and interest groups said:

- Para 6.15, Table 6.1 indicates that there is 160 ha of vacant employment land compared with a demand for 124 ha in Table 4.4. This indicates that there is a surplus of employment land and that no more is needed in the plan period.

Policy ER1

9.11 Policy ER1 demonstrates when planning permission will be granted for employment use. Further evidence is required to further support desired employment areas and there may be further opportunity to work with the knowledge base sectors to develop the research and development (B1) spaces that grow out of the University Innovation Centre. It is recommended that Towergate should be allocated as employment land within the plan and amendments are required to ensure they are accurate representations of areas.

9.12 In total, 8 representations were received. Of that, 4 provided general comments, 3 objected and 1 supported the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.13 What Members of the Public said:

- The focus of additional B1 uses within Central Milton Keynes is acceptable. However, the proposal to utilise thresholds as a requirement to provide evidence why development cannot occur within CMK is questionable as office uses (being a main town centre use) is subject to sequential test in any case.
- Consider the reference to providing evidence is too vague. It does not provide clarity on what evidence is appropriate and might not offer the necessary support for employment which appears to be the desired outcome.
- The knowledge based players in and around Milton Keynes could be important in meeting the Milton Keynes Skills Strategy. Recognises the need to work with these knowledge based providers to co-produce the desired higher degree and other apprenticeships to meet the Councils future skills needs.
- There may be an opportunity to work with the knowledge base sectors to develop the research and development B1 space as a spill over for companies that grow out of the University Innovation Centre.
- Question whether there is a need to have special consideration requirements for developing research and development sites which will have very different requirements from other businesses.

9.14 What Town and parish Councils said:

- With reference to Table 6.1, recommend that Towergate should be allocated as employment land.
- Request Para 6.40 be amended to correctly name the CMK Alliance Business Neighbourhood Plan (CMKAP).
- Feel there is little proposed to encourage businesses to move into CMK given the lack of parking provision/costs of parking.
- The proposal that special permission will be needed to set up an office outside of CMK requires greater information as to the sizes of the businesses this would impact.
- Would like to see opportunities for start-up or small businesses to have access to facilities that are able to provide suitable space, parking and services at a reasonable price to enable the businesses to build up.

9.15 What Milton Keynes Council Ward Councillors said:

- Consider re-wording the policy to require developments of additional office (over 1000 sq. m) and research and development (over 2000 sq. m) floorspace outside of CMK to demonstrate why the development cannot occur within CMK and why the development will benefit from being in the intended location rather than CMK.

9.16 What Neighbouring and other Local Authorities said:

- N/A

9.17 What Milton Keynes Council Departments said:

- N/A

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

- MSD welcome the allocation of employment sites which are set out in Policy ER1 and specifically support the inclusion of Walton as a continued employment allocation.
- O&H Properties control land at the former Bletchley Brickworks running along the southern edge of the Bedford-Bletchley rail line and propose the inclusion of this site (approx. 6.6 ha comprising the current allocation of 4.6 ha plus the proposed addition of 1.97 ha of land to the north) to table 6.1.
- Do not consider that the amount of vacant employment land identified in Table 6.1 and that proposed (Policy DS3) is sufficient to provide for the quantitative and qualitative needs of the large-scale logistics sector in the Borough.

9.19 What National and Statutory Organisations said:

- N/A

9.20 What Local organisations and interest groups said:

- Consider the addition of "and where energy use of the site has been assessed and efforts made to actively include renewable energy" to the last sentence.

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Policy ER2

9.21 Policy ER2 identifies when planning permission will be refused for the change of use or redevelopment of any land identified for employment use on the proposal map and for any building used for employment purposes. It would be beneficial for the policy to acknowledge the existence of MK One Retail Park in Denbigh North, which has drawn footfall away from CMK and this could impact on the proposals outlined in this plan.

9.22 In the main, the feedback received was supportive of the principles outlined. Revision will be required as there were concerns over the capacity of the PSA to accommodate the potential floorspace needs, and the plan would benefit from identifying how it intends to protect employment land within the Borough.

9.23 In total, 4 representations were received, 2 supported the policy, 1 provided general comments, 1 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.24 What Members of the Public said:

- Para 6.17 refers to a minimum of 6 months for the general marketing of a property in relation to the evidence required to show that it cannot be used for its existing or designated employment use. It is unclear as to why this requirement is not included in Policy ER2. Its inclusion will provide clarity for applicants.

9.25 What Town and parish Councils said:

- The policy seeks to protect employment land although none of the employment land in CMK is marked on the proposals map. How is employment land in CMK protected?
- Need to know the number of jobs required over the plan's lifetime and how many of these will be targeted to CMK. Likewise, there needs to be consideration of how many jobs CMK can accommodate when taking into the account available development land, re-development opportunities, and highway/public transport capacity to move workers in /out of CMK.
- It is unclear how this policy fits with recent government legislation allowing the conversion of office buildings to residential use.
- Para 6.40 should be amended to correctly name the CMK Alliance Business Neighbourhood Plan (CMKAP).
- The quoted capacity figure in para 6.40 is out of date, as some of these sites have already received permission for development. Data from the Retail Capacity Study is required.
- Concerns over the capacity of the PSA to accommodate the potential floorspace needs.
- The discussion of out of centre retail in this section discusses centres such as Kingston and Westcroft but does not acknowledge the existence of MK One Retail Park in Denbigh North which has drawn footfall away from CMK. Ask what is the policy to prevent further retail development on this site?

9.26 What Milton Keynes Council Ward Councillors said:

- N/A

9.27 What Neighbouring and other Local Authorities said:

- N/A

9.28 What Milton Keynes Council Departments said:

- N/A

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

- Welcome the scope that Policy ER2 provides in order to demonstrate the existing and future potential of a site for employment use in any future planning application.

9.30 What National and Statutory Organisations said:

- Support the policy as drafted.

9.31 What Local organisations and interest groups said:

- N/A

Policy ER3

9.32 Policy ERS indicates when planning permission will be refused for retail development on employment land. It was suggested by some respondents that the draft policy reflects well traditional manufacturing and distribution and conforms to the approach outlined in the NPPF. However, further clarification is required to reflect the influence of technology and changes in behavioural attitude (e.g. click and collect, phone applications etc) might have towards the demand for retail and employment land within the Borough. This therefore will require further refinement over the intended plan period. In the main, the responses received were negative towards the policy.

9.33 In total, 5 representatives were received. 3 objected, 1 supported and 1 general comments/ suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.34 What Members of the Public said:

- Request refreshment facilities to be provided on employment land to save car journeys.

9.35 What Town and parish Councils said:

- N/A

9.36 What Milton Keynes Council Ward Councillors said:

- The policy makes sense in terms of traditional manufacturing and distribution, but needs more clarify in terms of internet-based "click and collect". Hard to justify a policy that allows a courier to collect goods from a building on employment land and deliver to the customer, but precludes the customer visiting the same building to buy/collect the same goods.

9.37 What Neighbouring and other Local Authorities said:

- N/A

9.38 What Milton Keynes Council Departments said:

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- N/A

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

- Support the policy as drafted and acknowledge that it is in line with the sequential approach outlined in the NPPF.
- Consider amendment to reflect that there are circumstances other than those listed in the policy where retail development could be permitted on employment land, to accord with paragraph 22 of the NPPF. The policy should state that applications for alternative land uses will be assessed on their own merits.

9.40 What National and Statutory Organisations said:

- N/A

9.41 What Local organisations and interest groups said:

- N/A

Policy ER4

9.42 Policy ER4 details when planning permission is required for business use in a dwelling. It has been recommended to reword the policy to reflect home-based businesses. It is currently stated as 'working from home'. Some respondents expressed concern that the proposals intend to remove mixed use properties from estates. The policy might benefit from consulting the Chamber of Commerce or FSB to understand their needs and requirements to ensure the policy meets a holistic requirement for working from home.

9.43 A limited number of representatives were received. 2 respondents objected, 1 supported and 1 provided general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.44 What Members of the Public said:

- N/A

9.45 What Town and parish Councils said:

- Suggest making clear that the policy is concerning the operation of home-based businesses and not 'working from home'.

9.46 What Milton Keynes Council Ward Councillors said:

- Would like to see criteria related to visitor numbers and to the receipt/despatch of goods.
- Raise concern at proposal to remove the requirement for mixed use properties from estates. Agree that the traditional mixed use, aimed at local retail shops, is no longer appropriate, other types of mixed use, including personal services and professional consultancy, are rising. Suggest that the FSB or the Chamber of Commerce might advise on their needs.

9.47 What Neighbouring and other Local Authorities said:

- N/A

9.48 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.50 What National and Statutory Organisations said:

- Support the policy as drafted.

9.51 What Local organisations and interest groups said:

- N/A

Policy ER5

9.52 Policy ER5 indicates when planning permission will be refused for proposals that include the loss of small business. As written, it is considered that it currently contradicts paragraphs 19 and 22 of the NPPF. Furthermore, some responses suggested that the policy has the potential to work against and will be counter productive to small business, which contradicts the intentions of this policy. Recommendations and suggestions have been made below to guide how policy could be revised in order to be more supportive to small business.

9.53 A total of 4 representations were received. 2 provided supportive comments, 1 objected and 1 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.54 What Members of the Public said:

- Question whether the policy is effective or not, when considered against the changes to permitted development rights for offices and warehousing.

9.55 What Town and parish Councils said:

- N/A

9.56 What Milton Keynes Council Ward Councillors said:

- A policy which protects small business units is welcomed. However it highlights the absence of policies to encourage the creation of new small business units.

9.57 What Neighbouring and other Local Authorities said:

- N/A

9.58 What Milton Keynes Council Departments said:

- N/A

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9.59 What Development industry (e.g. landowners, developers, agents) said;

- As worded this policy conflicts with paragraphs 19 and 22 of the NPPF.
- The policy could work against the creation of new small business units by adding a burden to investment and developers may be less willing to include small units in speculative schemes. Given that one of the largest sectors of change in employment in the Borough is 'arts, entertainment, recreation & other services' the policy should also allow for employment generating non-B Use Class to occupy small business units where the proposed use would not have a prejudicial impact on the surrounding businesses. The inclusion of non-B Class activity provides a wider service offer which assists in the creation of attractive employment and business environments rather than 'mono-culture' business parks.
- The policy should therefore be reworded to: 1. Support the creation of small business units 2. Allow for change of use and expansion or redevelopment where: a) the proposed development would support the growth of an existing business; b) there is no longer a reasonable prospect of it being used for the existing or designated employment use; or c) The proposed development is for an employment generating non-B use which does not have a detrimental impact on the surrounding businesses and will either complement the facilities on offer in the local area or has been unable to secure a sequentially preferable site.

9.60 What National and Statutory Organisations said:

- Support the policy as drafted.

9.61 What Local organisations and interest groups said:

- N/A

Policy ER6

9.62 Policy ER6 states how the council will work with landowners and occupiers to secure the relocation of bad neighbour uses to more appropriate areas. It has been suggested to include further sites within the plan. For example, land at the former Bletchley Brickworks, which runs along the southern edge of the Bedford-Bletchley rail line. It was recognised there to be a minimal supply of vacant sites identified for bad neighbour uses and additional sites would be welcomed if made available.

9.63 In total, two representations were received. 1 objected and the other provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.64 What Members of the Public said:

- N/A

9.65 What Town and parish Councils said:

- N/A

9.66 What Milton Keynes Council Ward Councillors said:

- N/A

9.67 What Neighbouring and other Local Authorities said:

- N/A

9.68 What Milton Keynes Council Departments said:

- N/A

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

- Support the thrust of Policy ER6 and recognise the demand in MK for small scale bad neighbour uses and few sites on which to accommodate them.
- O&H Properties control land at the former Bletchley Brickworks running along the southern edge of the Bedford-Bletchley rail line and propose the inclusion of this site to the list provided. The land is currently unused and is partly allocated for industrial use in Table 6.1. It is separated from existing housing by the railway line and is visually self-contained and surrounded by mature landscape capable of screening any adverse visual impacts arising from an extension of the allocated site.

9.70 What National and Statutory Organisations said:

- N/A

9.71 What Local organisations and interest groups said:

- There are few vacant sites identified for bad neighbour uses and would like to see the addition of a further site identified for these uses.

Policy ER7

9.72 Policy ER7 indicates when planning permission will be granted when there is a risk of pollution. In the main, respondents supported the proposals and suggested a potential rewording of the first criteria.

9.73 A total of 3 representations were received, 1 objected, 1 supported and 1 provided general comment and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.74 What Members of the Public said:

- N/A

9.75 What Town and parish Councils said:

- N/A

9.76 What Milton Keynes Council Ward Councillors said:

9 . Economy and Retail

- Supportive of the policy but consider rewording the first sentence to read “Planning permission will be refused unless all of the following criteria are met”.

9.77 What Neighbouring and other Local Authorities said:

- N/A

9.78 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.80 What National and Statutory Organisations said:

- Support the policy as drafted.

9.81 What Local organisations and interest groups said:

- N/A

Policy ER8

9.82 Policy ER8 details the criteria that is required to be achieved in order to grant planning permission in terms of places of worship and associated community facilities on employment sites. It is recommended that the wording of this policy is revised to incorporate all faith groups to become more inclusive and reflective of all groups. A number of repeated requests for exceptions to current planning policy for places of worship on employment sites have been received by the Council and some respondents welcomed that attempts were being made to regularise this procedure.

9.83 The general thrust of responses provided general comments. A total of 4 representations were received. In total, 3 respondents provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.84 What Members of the Public said:

- Raise concern about the conflict between religions when more than one 'places for worship' are allocated in the same employment area.
- Welcome efforts to regularise the repeated requests for exceptions to current planning policy for places of worship on employment sites. Agree that the text (paras 6.29 - 6.32) is a good reflection of the issues and the trade-offs to consider.
- Request that clause 4 be rewritten to read “the site has adequate parking and access arrangements”.

9.85 What Town and parish Councils said:

- N/A

9.86 What Milton Keynes Council Ward Councillors said:

- The policy assumes that religious buildings are mainly used at weekends, when employment sites are in little use. Para 6.31 does not reflect the diversity of faiths within MK, where not all religions hold meetings for worship predominantly at weekends.
- Propose the application of separate, relevant criteria based on the weekday/weekend usage identified within each planning application.
- Information requirements listed in para 6.32 are welcomed, but would like to see the typical family/household mix of attendees (because “family” events will typically have more people per car than events for predominantly “adults only” or “one person per family” and this affects the likely parking requirements), and, the intended geographic catchment area (because this affects travel modes and therefore also affects likely parking requirements).

9.87 What Neighbouring and other Local Authorities said:

- N/A

9.88 What Milton Keynes Council Departments said:

- N/A

9.89 Development industry (e.g. landowners, developers, agents)

- N/A

9.90 National and Statutory Organisations

- N/A

9.91 Local organisations and interest groups

- N/A

Policy ER9

9.92 Policy ER9 indicates MK's position for supporting employment use/development of land within a rural area. It is recommended to suggest rewording the policy to incorporate that within Strategic Urban Extensions, planning permission will be granted for temporary uses that does not prejudice the long-term development proposals for the area and are acceptable in terms of the other policies within the Plan.

9.93 A limited number of responses were received. In total, 2 responses were received. 1 supported the development and 1 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.94 What Members of the Public said:

- N/A

9.95 What Town and parish Councils said:

- N/A

9 . Economy and Retail

9.96 What Milton Keynes Council Ward Councillors said:

- Supportive of paras 6.33 - 6.34.

9.97 What Neighbouring and other Local Authorities said:

- N/A

9.98 What Milton Keynes Council Departments said:

- N/A

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

- Within the Urban Extension areas, where investment into land based businesses is likely to be problematic due to redevelopment, the policy should support economic development which provides temporary uses for the land that do not prejudice the long-term development proposals. This will prevent blight and support economic development.
- Suggest rewording the policy to state that within Strategic Urban Extensions, planning permission will be granted for temporary uses that do not prejudice the long-term development proposals for the area and are acceptable in terms of the other policies within the Plan.

9.100 What National and Statutory Organisations said:

- Support the policy as drafted.

9.101 What Local organisations and interest groups said:

- N/A

Policy ER10

9.102 Policy ER10 sets out when planning permission will be granted for additional retail development within the primary shopping areas of existing 'town centres'. It is recommended to provide a similar definition to the 2013 core strategy to acknowledge districts and local centres are incorporated to the CMK phrase as well as noting it is a regional centre. The suitability of proposed areas and the expansion of the PSA should be reviewed. District centres should be considered as a critical community asset and a regional shopping destination is not a viable alternative.

9.103 In total, 6 representations were received and in the main, the responses received were mixed providing potential comments and suggestions. 2 supported, 4 provided objection and or general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.104 What Members of the Public said:

- As a resident for whom CMK is my district centre, request that CMK is acknowledged as not only a regional centre but also a district and local centre in the same way the 2013 Core Strategy used the phrase "CMK and other district and town centres".

- Need to recognise a district centre is very important to a community and a regional shopping destination is not an alternative. In the case of CMK the local community includes many poorer households for whom the expensive shopping and other facilities of a regional shopping centre are unsuitable.
- Suggest that developments that are appropriate to a district centre and not currently provided for within the PSA should not have to demonstrate why they cannot be located there. It should be accepted that, if they are not already there, it is likely that the PSA, is not a suitable place for them.
- Question whether the boundaries of the PSA could be considerably expanded.

9.105 What Town and parish Councils said:

- Fully supportive of the character and function of the shopping hierarchy, particularly point 3 which refers specifically to Woburn Sands.

9.106 What Milton Keynes Council Ward Councillors said:

- Supportive of paras 6.35 - 6.46 but should consider adding MK1, Oakgrove, Winterhill, Rooksley, Denbigh and Stacey Bushes to the bullet list in para 6.38.

9.107 What Neighbouring and other Local Authorities said:

- N/A

9.108 What Milton Keynes Council Departments said:

- N/A

9.109 What Development industry (e.g. landowners, developers, agents)

said:Comment: We do not consider that the amount of vacant employment land identified in Table 6.1 (Policy ER1) and proposed in DS3 is sufficient to provide for the quantitative and qualitative needs of the large-scale logistics sector in the Borough. Please see our covering letter and appendices for our full representations to the Draft Plan.

- Support this policy.

9.110 What National and Statutory Organisations said:

- N/A

9.111 What Local organisations and interest groups said:

- Suggest the inclusion of MK1 Retail Park/Stadium MK, Denbigh North and other retail parks within table 6.2 shopping hierarchy.

Policy ER11

9.112 Policy ER11 indicates the proposals for the main town centre uses outside of defined Town Centres Areas. Some of the criteria requires further clarification as it is currently unclear and widely open to interpretation. The criteria form permitting development is also considered to be against the NPPF guidance in terms of promoting diversification. It is recommended that further clarification is provided for key terms throughout the policy. Some responses indicated that there were some inconsistencies with the NPPF, which will need revising.

9 . Economy and Retail

9.113 In total, 4 representatives were received. Of which, 2 provided general comments and suggestions and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.114 What Members of the Public said:

- N/A

9.115 What Town and parish Councils said:

- Point 3 requires developments that "will not put at risk or harm public or private sector proposals". This would include restricting edge of centre retail in CMK. Restricting such development would be anti-competitive, goes beyond the sequential approach and against NPPF guidance to support diversification, not monopolisation.

9.116 What Milton Keynes Council Ward Councillors said:

- Request clarification as to whether Point 4 "any nearby town centre" relates to all the historic towns, or just the "city centre".

9.117 What Neighbouring and other Local Authorities said:

- N/A

9.118 What Milton Keynes Council Departments said:

- N/A

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

- Supportive of the principles of the policy as they are in line with the NPPF. Request the inclusion of a definition of edge-of centre in the policy, i.e. within 300 m of the primary shopping area, and any site outside of this threshold would then be considered out-of-centre.
- Points 1, 2 and 3 are inconsistent with the NPPF and should be removed from the Policy. Points 3 and 4 should be reworded to reflect paragraph 27 of the NPPF, by stating 'significant adverse impact' on the vitality or viability of the town centre, rather than 'harm'.

9.120 What National and Statutory Organisations said:

- N/A

9.121 What Local organisations and interest groups said:

- N/A

Policy ER12

9.122 The purpose of Policy ER12 is to inform when planning permission will not be granted as it would involve the loss of an existing shop, post office, bank and public house. The policy was welcomed as a way to ensure vitality and viability of rural settlements. It

was suggested that this policy should be extended to encompass commercial agricultural areas. The main thrust of responses received were general comments and suggestions and they have been summarised below.

9.123 A total of 6 representations were received. Of that, 3 provided general comments and suggestions, 2 supported and 1 objected to the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.124 What Members of the Public said:

- Question whether the first part of the policy is effective or not when considered against the changes to permitted development rights for A1 - A5.

9.125 What Town and parish Councils said:

- N/A

9.126 What Milton Keynes Council Ward Councillors said:

- Suggest the policy should not apply, or its application be limited, in CMK and the District Centres. These need to be able to react flexibly to the changing demands of the retail sector.

9.127 What Neighbouring and other Local Authorities said:

- N/A

9.128 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.130 What National and Statutory Organisations said:

- Support the protection of shops, post offices, banks and public houses and community facilities because the retention of these uses has the potential to maintain or enhance the vitality and viability of rural settlements and other areas.

9.131 What Local organisations and interest groups said:

- The conditions that apply should be extended to cover areas of commercial agricultural use.

Policy ER13

9.132 Policy ER13 provides information when planning permission will be granted for new village facilities. Further clarification is still required as it is currently unclear if this policy will also relate to historic villages within the MK urban area.

9 . Economy and Retail

9.133 In total, 2 representations were received. 1 supported and the other objected to the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.134 What Members of the Public said:

- N/A

9.135 What Town and parish Councils said:

- Supportive of the policy.

9.136 What Milton Keynes Council Ward Councillors said:

- Request clarification as to whether the policy will also apply to the historic villages within the MK urban area.

9.137 What Neighbouring and other Local Authorities said:

- N/A

9.138 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.140 What National and Statutory Organisations said:

- Support the policy as drafted.

9.141 What Local organisations and interest groups said:

- N/A

Policy ER14

9.142 Policy ER14 states when planning permission will be granted for non-retail uses in local centres. There were no responses received for this policy therefore no further revisions are required.

9.143 What Members of the Public said:

- N/A

9.144 What Town and parish Councils said:

- Wish to see the words 'should' and 'majority' changed to 'must' and 'all', respectively in Para 6.55.

9.145 What Milton Keynes Council Ward Councillors said:

- N/A

9.146 What Neighbouring and other Local Authorities said:

- N/A

9.147 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.149 What National and Statutory Organisations said:

- N/A

9.150 What Local organisations and interest groups said:

- N/A

Policy ER15

9.151 Policy ER15 indicates the proposed sites which are allocated for the provision of new local centres. In general, respondents welcomed the proposals for the policy. It was suggested that greater consideration is given to the provision and design of a Community Centre within each local centre. Further definition would be advantageous to define key terms such as "Local Centre", as it is currently unclear from this draft proposal.

9.152 A total of 3 representations were received all of which provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.153 What Members of the Public said:

- Welcome the proposal for community facilities 'for day to day needs' to be 'embedded' in local centres in an estate of 500 dwellings and be within 500 metres walking distance of these.
- Suggest that more thought is given to the provision and design of a Community Centre within each local centre recognising its potential for income generation and scope for information exchange, life-long education, childcare, voluntary activity and outreach groups, areas for socialising and cultural and artistic activities, space for voluntary and public sector organisations.

9.154 What Town and parish Councils said:

- N/A

9.155 What Milton Keynes Council Ward Councillors said:

- The policy should also mention that sites will be allocated in the new Strategic sites as appropriate, in the development briefs.

9.156 What Neighbouring and other Local Authorities said:

- N/A

9 . Economy and Retail

9.157 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.159 What National and Statutory Organisations said:

- N/A

9.160 What Local organisations and interest groups said:

- It would be helpful to define what is meant by "Local Centre" in para 6.54.

Policy ER16

9.161 Policy ER16 states the areas which will be granted planning permission for proposals for a car show room, servicing and other car-related retail uses. There was suggestion that the policy should reflect potential large showrooms as well as small car-related uses.

9.162 In total, 2 representations were received and they both provided general comment and suggestion. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.163 What Members of the Public said:

- N/A

9.164 What Town and parish Councils said:

- Supportive of Policy ER16 but feel it should relate to 'large' showroom dealers rather than smaller car-related uses.

9.165 What Milton Keynes Council Ward Councillors said:

- Consider also referencing the dirty uses policy.

9.166 What Neighbouring and other Local Authorities said:

- N/A

9.167 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.169 What National and Statutory Organisations said:

- N/A

9.170 What Local organisations and interest groups said:

- N/A

Policy ER17

9.171 Policy ER17 identifies where MK will support the development of Hotel and Visitor Accommodation. The responses received were mixed. Some respondents considered the proposed policy to be restrictive and requested that it is removed from the plan, where other stakeholders supported the policy. It was considered hotels amenities in district centres such as Kingston and Westcrof should be granted as this would provide competition for CMK, other respondents did not agree with development in district centres.

9.172 In total, three responses were received. 1 objected, 1 provided general comments and suggestions and 1 supported the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.173 What Members of the Public said:

- N/A

9.174 What Town and parish Councils said:

- Supportive of the policy.
- Allowing the building of hotels in district centres such as Kingston and Westcroft would compete with CMK and other town centres. Consider hotel development should be encouraged in town centres and discouraged in district centres.

9.175 What Milton Keynes Council Ward Councillors said:

- Propose revision or deletion of policy as it is damaging to the future growth of MK. The policy would have prevented the construction of many existing popular and successful hotels across the borough.

9.176 What Neighbouring and other Local Authorities said:

- N/A

9.177 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.179 What National and Statutory Organisations said:

- N/A

9.180 What Local organisations and interest groups said:

- N/A

9 . Economy and Retail

Policy ER18

9.181 Policy ER18 outlines when MK will support Tourism, Visitors and Cultural Industries. The responses received were mixed, ranging from objecting to supporting opinions. It was considered further clarification was required as it was unclear what the intentions of the policy were and a rewording of the policy by removing the word industries and replacing it with destinations from the title was suggested.

9.182 In total, 4 representations were received. 2 objected and 2 supported the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

9.183 What Members of the Public said:

- Request clarification as to whether all or any of the conditions need to apply before proposals are supported.
- Accept that point 1 should apply to all proposals, therefore an 'and' should follow it.
- Object to point 2 and 3 that cultural facilities need to strengthen tourism or business. Believe a benefit to local communities should stand alone as sufficient reason.
- Feel the policy in relation to location requires clarification. Does it mean that if the development is suitable for a town centre then it should be located there, if more suited to an edge of centre, then it should be located there, and if not suited to either then other accessible locations will be considered?

9.184 What Town and parish Councils said:

- Supportive of Policy ER18.

9.185 What Milton Keynes Council Ward Councillors said:

- Consider renaming the policy "Tourism, Visitor and Cultural Destinations".
- Disappointed that Para 6.62 gives no policy support for markets of all kinds.

9.186 What Neighbouring and other Local Authorities said:

- N/A

9.187 What Milton Keynes Council Departments said:

- N/A

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

- N/A

9.189 What National and Statutory Organisations said:

- Support the policy as drafted

9.190 What Local organisations and interest groups said:

- N/A

10 Sustainable Construction and Renewable Energy

Chapter 7- Summary of comments

10.1 This Chapter identifies MK's policies which intend to reduce carbon within the Borough in accordance to Section 19 of the Planning and Compulsory Purchase Act 2004. In the main, this policy was welcomed and considered to be in accordance with best practice and design. It is recommended that air quality and emission figures should be published regularly to establish pertinent polices. Although, some respondents suggested that the criteria stated for this policy appeared onerous and potentially might be restrictive to future development. There are currently no specific targets included for community energy/renewable energy installations, and it is recommended this is revised and engined into the policy.

10.2 Furthermore it was recognised, that this plan considers development that is resilient to meet future needs and demands. Therefore policy would need to be regularly reviewed to reflect the latest design guidance and advances in technology.

10.3 In total, 48 responses were received. 16 respondents supported the proposals, 19 provided general comments and suggestions and 12 objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

10.4 What members of the public said:

- The need for policy to drive energy efficiency in the housing development markets is essential. Good standards, clear tests and short feedback loops are key to motivating and improving the quality of our new build housing. Housing currently is too much focused on designed performance, therefore the as-built performance is barely monitored. Improving this, and shifting the focus to include design and built performance standards is key. The policy provides strong leadership in that direction, to ensure the MK that gets built today is fit for it's 2031 future.
- Shifting the focus to include design and built performance standards is key. The policy provides strong leadership in that direction, to ensure the MK that gets built today is fit for it's 2031 future.
- In the absence of strong environmental leadership from central government it is increasingly up to LAs, driven by the NPPF, to set such standards. In setting the policy, however, it is important that MKC is cognisant of the nuances of the Deregulation Act 2015. The legal position was further complicated by written ministerial statements in July 2015 by Oliver Letwin MP and Eric Pickles MP. Several LAs have effectively found a way around the complex regulatory position (including the Greater London Authority), but it needs great care to avoid the policy being challenged by developers. We are happy to discuss this further if the Council so wishes
- Disagree with the statement of Local policy context 7.5 (p.76) ' While it is possible to achieve carbon neutrality by just using on site measures such as biomass and solar panels, the policy recognised that, at least for the foreseeable future, it is very challenging and expensive and therefore introduced carbon offsetting as an alternative more cost effective option. ' This is short-sighted and the policy should have been withdrawn or reconsidered. Also air quality and emissions figures should be published regularly, as should waste management and construction systems performance figures in order to demonstrate their impact on health.

10 . Sustainable Construction and Renewable Energy

10.5 What Town and Parish Council said:

- N/A

10.6 What Ward Councillors said:

- N/A

10.7 What neighbouring and other local authorities said:

- The buildings that are being constructed at present are not going to be compliant with the type of buildings we need to reduce energy demand to the levels needed to meet our climate commitments in 2050. This is especially the case when the performance gap is taken into account. They are also risky buildings, as there are weaknesses in Building Regulations that mean overheating risk and ventilation/indoor air quality risk is insufficiently modelled and mitigated.

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

- The requirements of this policy are considered to be pretty onerous to a large housebuilder and there are some significant risks / costs contained within the SC1 Sustainable Construction section, particularly: 6. "Achieve whole life CO2 neutrality. The "Energy & Carbon" criteria reads as though one would need to achieve 19% betterment over regs (Code 4) but then also add on site renewables to reduce CO2 by a further 20%, giving a crude 39% betterment over Part L 2013. This would be impossible to achieve in some of our group standard current build specifications. CfSH previously required completion checks to provide a final certificate showing compliance with the design stage specification, as this has been withdrawn by the government there is no longer a standardised process. In addition BDW would be required to provide an indoor air quality calculation, overheating analysis and post completion monitoring of these various criteria (indoor sensors required in 10% of dwellings with future access to data). Again this is an onerous requirement on large developments.
- The wording in Policy SC1 is too vague to be effectively applied in decision-making. Statements such as "Use a good standard of building fabric, passive design, and landscaping measures to minimise energy demand" are not specific enough for applicants to be able to understand what standards are required. The requirements outlined under the Energy & Carbon section of the policy are not considered to align with the intentions of the government's Housing: Optional Technical Standards. There is no optional standard relating to energy efficiency, however the Written Ministerial Statement dated 25 March 2015 states that, "For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in the Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015. The government has stated that, from then, the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced, we would expect local planning authorities to take this statement of the government's intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent. The policy requirement relating to Water Efficiency mirrors the optional standard as set out in the National

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Technical Housing Standards, however where local planning authorities choose to apply this optional standard through their Local Plan they must provide clear evidence of the need for it, along with an assessment of its impact on viability. We are not aware of any such evidence having been published. Draft Policy SC3 outlines that developments of over 100 dwellings will be expected to consider the integration of community energy networks. Again, we would like to highlight that this proposal has implications for development viability which should be fully considered before taking this policy proposal any further.

10.9 What national/statutory organisations said:

- N/A

10.10 What local organisations interest groups said:

- Welcome encouraging improved energy efficiency, community energy networks and renewable energy schemes that may increase the amount of energy generated in Buckinghamshire, and generation that can benefit local communities. Much of this section aligns with the NEP's standard response on energy.
- The 2030 Climate Change targets set by the Government require a 57% reduction by 2030 (at 1990 levels) - we do not believe that Plan MK is in anyway ambitious enough, or putting enough emphasis on climate change for us to take action locally to support this target.
- Whilst we recognise that Plan MK is a spatial planning document, there is little mention of the role that the communities of Milton Keynes can play in helping to realise the vision for the future. Milton Keynes is fortunate to have a strong voluntary and community sector, and yet the role of this sector, and community/social businesses appears to have been completely ignored.
- Milton Keynes should set design/environmental standards for new housing which are ambitious and seek to achieve zero carbon emissions - all new housing should be connected to local energy network/community energy as a matter of course, not as an add only if a reason not to do so can't be identified.
- Milton Keynes should have targets for retro-fitting existing housing stock to make it more energy efficient - the carbon emissions from existing inefficient housing stock are significant and the fuel poverty experience of those living in this stock unacceptable.
- Milton Keynes Council needs to pro-actively respond to the Paris Climate Change targets, and Officer resources need to be devoted to writing a new Low Carbon Action Plan. This process should be involving of the local community, and community organisations, supported by Officers, not an Officer driven document which is then the subject of consultation.
- Plan MK lacks ambition in terms of addressing climate change issues and supporting community energy.
- There are no specific targets included for community energy/renewable energy installations - There needs to be strong grounds for NOT having community energy as standard within any new development - There is a failure to include energy as key infrastructure throughout the document - Chapter 7 on Sustainable Construction and Renewable Energy is particularly disappointing - with no excitement at the opportunity

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that Mk has to lead the way again. We would like to see a proper explanation of what community energy is and the opportunities it offers, in advance of any statement about the reasons it can't happen!

- We do not agree that it is too "challenging and expensive" to achieve carbon neutrality in developments and believe that carbon offsetting has failed as an approach to make any real impact on carbon emissions in Milton Keynes. We want to see less carbon off-setting, and more zero carbon/low carbon developments.

Policy SC1

10.11 Policy SC1 indicates how development will be designed to be sustainable and will be delivered and evidenced to show that the predicted sustainability performance has been delivered in practice and is capable of being maintained. In general, there was support for the principles of this policy. However, it was suggested that this policy would need revision in order to conform with the national policy on climate change and renewable energy as set out in the NPPF, the Planning Practice Guidance and the March 2015 Written Ministerial Statement.

10.12 Further consideration to the wording is required as it is currently considered too prescriptive and not location specific. It would be beneficial if the plan could provide a workable methodology in order to forecast CO₂ and include more flexibility to consider the feasibility for each development to achieve this policy.

10.13 In total, 18 representations were received. Of which, 6 supported and objected respectively, and 7 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

10.14 What members of the public said:

- Support the policy's direction to achieve sustainable construction in MK.

10.15 What Town and Parish Council said:

- Suggest applying this policy to all construction in MK.

10.16 What Ward Councillors said:

- Support the policy in large but suggest making the following changes:
 - Bullet point 6 and Point ii. should incorporate all heat losses from any heater exhaust and from all communal plumbing,
 - Bullet point 6b should use a 'real life' definition of renewable energy.
 - Point ii. Further energy efficiency should be treated as an acceptable alternative to improved energy generation methods.

10.17 What neighbouring and other local authorities said:

- N/A

10.18 What the development industry (e.g. Landowners, developers, agents...) said:

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- Support applying the optional higher water efficiency standard in MK.
- Think that the plan should provide a prescribed methodology to calculate the CO2 'neutrality' mentioned in Point 6.
- BDW Northampton thinks that the Part i. and ii. of 'Energy and Carbon' are impossible to achieve in some of their standard current build specifications.
- Regarding Part iv., more detail is required on what constitutes a recognised quality regime.
- Suggest the policy to make reference and guidance on:
 - What requirements or relaxations apply to listed buildings;
 - How the policy relates to developments that involve extensions to existing buildings, especially where the existing building performs poorly against the requisite assessments.
- Think the principle of the policy is laudable but the policy is not in accordance with the national policy on climate change and renewable energy as set out in the NPPF, the Planning Practice Guidance and the March 2015 Written Ministerial Statement. Suggest that the Building Regulation is the most appropriate way of dealing with requirements for on-site energy reduction and the use of renewable energy.
- MKC should review the policy and aware that the Outstanding level is the highest BREEAM level available.
- The wording in Policy SC1 is too vague to be effectively applied in decision-making. Statements such as *"Use a good standard of building fabric, passive design, and landscaping measures to minimise energy demand"* are not specific enough for applicants to be able to understand what standards are required or for officers and members to be able to determine whether it has been achieved.
- The requirements at point ii. and v. outlined under Energy and Carbon are not align with the Optional Technical Standards and should be deleted. While the other requirements should be tested as part of the evidence base.
- The policy requirement regarding Water Efficiency should provide clear evidence of the need for it as well as an assessment of its impact on viability.
- GDL/Gallaghers accept the goal of carbon reduction, but object to the requirement of a 19% improvement against Part L of Building Regulations as it could impact on the delivery of new homes across the borough. Suggest the requirement to be in line with current Building Regulations and national policy. Anything achieved above it should be seen as an added benefit.
- Wish to see the justification for the optional higher standard of Water Efficiency as it is stated by the PPG.

10.19 What national/statutory organisations said:

- Support the policy and think it can assist in meeting the targets of the Climate Change Act and UK Carbon Budgets.
- Suggest the plan to incorporate all appropriate Local, National, and European waste strategies including the Waste Framework Directive.
- Suggest including the Considerate Contractors Scheme, Building Research Establishment's Environmental Assessment Method (BREEAM), the Code of Sustainable Homes (CfSH) and the Civil Engineering Environmental Qualification (CEEQUAL) that could assist in reducing environmental harm associated with developments.
- Support the policies that reduce water demand, also suggest including low flush toilets, low flow showerheads, water butts for gardens and greywater recycling.

10 . Sustainable Construction and Renewable Energy

- Support the policy in large, but think the wording of the policy is inconsistent with national building regulations. Suggest making the following changes:
 - Remove “and will be delivered and evidenced to show that the predicted sustainability performance has been delivered in practice and is capable of being maintained”
 - Remove bullet point 6
 - Remove the ‘Energy and Carbon’ section
 - Remove “With the exception of carbon neutrality, and evidencing that achieved, ‘as-built’ performance matches or exceeds designed performance” from Water Efficiency.
- Support the policies that enable practical delivery of energy and comfort in use. But suggest including reference to reference CIBSE TM59 (overheating calculation); need for practical assessment of buildings in use (otherwise the industry will not learn); a requirement for there to be a focus on in-use energy, and a quality mechanism which achieves this.
- Object to SC1, and particularly Criteria i. and ii. under Energy and Carbon as there is no evidence of viability testing of the policy and it has not considered the viability of development or the practicalities of satisfying the policy obligation.

10.20 What local organisation/interest groups said:

- Suggest the policy to make reference to Passivhaus standards.
- Suggest the policy to include more flexibility by stating that the information required by the policy should be provided unless it is not feasible or viable.

Policy SC2

10.21 Policy SC2 informs how MK supports the retrofit improvements to existing buildings in the Borough. In the main the representatives supported the proposals. Despite this, it was recognised that retrofitting dwellings for energy saving warmer homes is necessary. However, this could be onerous and provide an additional cost for developers and thus has the potential to increase housing within the borough, which would contradict policies and ambitions of this plan to promote growth and development.

10.22 In total, 4 representations were received. 2 responses supported the policy and 1 general comment was received. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents

10.23 What members of the public said:

- Think retrofitting dwellings for energy saving warmer homes is necessary, but concern about the costs involved and its funding.

10.24 What Town and Parish Council said:

- WCC supports policy SC2.

10.25 What national/statutory organisations said:

10 . Sustainable Construction and Renewable Energy

- Welcome the policy as part of the strategy for the conservation and enjoyment of the historic environment.

Policy SC3

10.26 Policy SC3 demonstrates the council ambition to promote the use of low carbon and renewable energy schemes. The viability of the policy has been questioned, as the proposals will create a considerable cost for developers. Furthermore, consideration should be given as to if this policy presents expectations or proposals for encouragement which the Borough aspires towards and details should be provided as to the proposed percentages benefits for dwellings.

10.27 In total, 7 responses were received, of which 1 supported, 2 objected and 4 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

10.28 What members of the public said:

- N/A

10.29 What Town and Parish Council said:

- WCC supports the policy.

10.30 What Ward Councillors said:

- N/A

10.31 What neighbouring and other local authorities said:

- N/A

10.32 What the development industry (e.g. Landowners, developers, agents...) said:

- The BDW Northampton concerns that the network will face obstacles regarding:
 - The viability of a development based on the sterilised land required with the installation of a CHP unit
 - Installation and maintenance of the system would require precise management and expertise, at a sizable cost.
 - Potential forward costs of the system to residents
 - Additional infrastructure costs associated with delivering the heat and power across the development.
 - Complications associated with which property receives what percentages of the benefits from the system.
- The Hermes Property Unit Trust objects to policy SC3.

10 . Sustainable Construction and Renewable Energy

- Support the aspiration to promote the use of low carbon and renewable energy schemes. But suggest using 'proposals should be encouraged' rather than 'expected' to consider the integration of community energy networks in the development.
- Wish the MKC would be aware that the policy has implications for development viability and needs a full consideration before taking it forward.

10.33 What national/statutory organisations said:

- N/A

10.34 What local organisation/interest groups said:

- The Wolverton Community Energy and the MK Community Energy Alliance think that the wording of SC3 is not strong enough and that Community energy network should be supported in all new development and submitted a re-written version of policy SC3.
- Suggest including the definition of community energy and its opportunities in the introductory paragraphs.

Policy SC4

10.35 Policy SC4 indicates that the council will encourage proposals for low carbon and renewable energy generation developments that are led by, or meet the needs of local communities. The main comments received were supportive and welcomed the nature of this policy. Policy should be worded to ensure it safeguards against the heritage assets of MK.

10.36 In total, 4 responses were received, 3 supported and 1 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

10.37 What members of the public said:

- Support the principle of the policy to achieve low carbon and renewable energy generation.

10.38 What Town and Parish Council said:

- WCC is supportive of the policy.

10.39 What Ward Councillors said:

- N/a

10.40 What neighbouring and other local authorities said:

- N/a

10.41 What the development industry (e.g. Landowners, developers, agents...) said:

- N/a

10.42 What national/statutory organisations said:

10 . Sustainable Construction and Renewable Energy

- Welcome the reference to 'unacceptable impacts on the setting of heritage assets' but think it should be 'the significance of heritage assets' to cover proposed developments within or on heritage assets or within their setting.

10.43 What local organisation/interest groups said:

- Suggest deleting bullet point 1 and 2 or making them advisory rather than mandatory.

11 . Managing and Reducing Flood Risk

11 Managing and Reducing Flood Risk

Policy FR1

11.1 Policy FR1 seeks to promote all new development towards areas with the lowest probability of flooding. There were a number of concerns raised with this policy as it was suggested flooding along the Ouse Valley is becoming more prominent and further development might exacerbate this current problem. Further clarification of the policy is required and reference should be made to areas related to water supply, foul drainage and sewage treatment. Furthermore, consideration is therefore required in terms of policy guidance to ensure robust planning polices are delivered.

11.2 In total, 21 representations were received. Of which, 1 supported, 16 objected and 4 provided general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

11.3 What members of the public said:

- Flood Plains in the Ouse Valley. We are concerned about issues arising from flooding along the river which is becoming a more regular event. Increased density of housing/employment opportunities in this area would only exacerbate this issue where development would add to increased surface water run-off.

11.4 What Town and Parish council said:

- Council members reiterated what members of the public said with regard to concern about issues arising from flooding along the river which is becoming a more regular event.

11.5 What Ward Councillors said:

- Is there a need for a new balancing lake other than the one proposed in the southern employment site? The policy relies on the NPPF to ensure that no worsening of flood provision occurs. We would prefer that it is made explicit in the local policy as it was in the previous Local Plan.

11.6 What Milton Keynes Council departments said:

- Within the whole Borough of Milton Keynes it is essentially only the 'New City' designated area that enjoys the strategic surface water drainage system outlined in Plan:MK and as described above. Hence, if this policy is to be interpreted literally 'all new development' would be steered towards sites in the original 'New City' designated area. This is not what this draft of Plan:MK is proposing.

11.7 What neighbouring and other local authorities said:

- N/A

11 . Managing and Reducing Flood Risk

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

- N/A

11.9 What national/statutory organisations said:

- Asks that additional text be included in Policy FR1 to specifically refer to water supply, foul drainage and sewage treatment.
- Expected further detail on how fluvial flood risk is to be managed. There needs to be a clear position on acceptable safe access and egress from developments floodplain mitigation measures river crossings etc.
- All development, where possible, should seek to provide betterment, reducing flood risk locally and downstream.
- To avoid confusion and possible development proposals that would require a FRA, we consider it would be clearer for all proposals that fall in a CDC to be supported by a FRA.
- We recommend that reference is made to the Level 1 SFRA, which contains useful guidance and references for developers in relation to the preparation of flood risk assessments and surface water management.

11.10 What local organisations/interest groups said:

- Welcome that all new development is required to incorporate SuDS and to provide an undeveloped buffer zone between all new development and all watercourses.

Policy FR2

11.11 Policy FR2 indicates the criteria to which all new development is required to incorporate in terms of SuDS, in accordance with the national policy and guidance and, which meet the requirements set out in the national standards and the council's relevant local guidance.

11.12 In general, respondents appeared to be supportive of the intentions of the policy. However, it has been recommended that this policy is redrafted as it is suggested that SuDs are neither a feature nor an element of city centre public realm. The policy would benefit from considering the implications on business and further clarification is required in terms of policy throughout the policy.

11.13 In total, 7 representations were received. Of that, 3 supported, 3 provided general comments and suggestions and 1 objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

11.14 What members of the public said:

- N/A

11 . Managing and Reducing Flood Risk

11.15 What Town and Parish Council said:

- Detail of this policy is almost entirely focused on SuDS which are a local rather than a strategic solution. SuDs are neither a feature nor an element of city centre public realm. This policy needs to be redrafted, certainly to exclude CMK, and possibly to exclude the whole of the former 'designated area'.

11.16 What Ward Councillors said:

- N/A

11.17 What neighbouring and other local authorities said:

- N/A

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

- Policy should clarify that, in accordance with national policy, to protect the public while avoiding excessive burdens on business, this policy will only apply to all developments of 10 homes or more and to major commercial development.

11.19 What national/statutory organisations said:

- Supportive of the requirement to incorporate Sustainable Drainage Systems as part of the design of new developments which will help to address sewer flooding and surface water flooding.
- Support the use of SuDS where they do not present a risk to controlled waters. It should be noted that SUDs may not be applicable in areas where the groundwater level is close to the ground surface. Would also recommend that the geological and hydrogeological setting is explored for each site to assess sensitivity and vulnerability of the site to potential contamination and pollution. The use of deep infiltration systems should be avoided as they present an inherent risk to groundwater.

11.20 What local organisations/interest groups said:

- Welcome that all new development is required to incorporate SuDS.
- Seeks the following amendment: Amend point 4 to state: "...wherever possible. However land used to provide flood storage capacity must not conflict with amenity and recreation provision." Reason: The use of land for flood storage can conflict with its use for amenity and recreation, which should be reflected in this Policy.

Policy FR3

11.21 Policy FR3 identifies criteria for new development in order to protect and enhance existing watercourses within the Borough. The general thrust of comments were supportive towards the principles of this policy. There is a requirement to revise the criteria to reflect that the Environmental Permitting Regulations has replaced the Water Resources Act 1991.

11 . Managing and Reducing Flood Risk

11.22 In total, three representations were received. 2 supported and 1 provided general comments and suggestions for the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

11.23 What members of the public said:

- N/A

11.24 What Town and Parish Council said:

- N/A

11.25 What Ward Councillors said:

- N/A

11.26 What neighbouring and other local authorities said:

- N/A

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

- General support for policies

11.28 What national/statutory organisations said:

- It is stated that all new development must be set back at a distance of at least 9m from all watercourses. In terms of Main Rivers, this should be changed to 'within 8m of any main rivers' based on the Environmental Permitting Regulations that have replaced the Water Resources Act 1991.

11.29 What local organisations/interest groups said:

- N/A

12 . Biodiversity and Geodiversity

12 Biodiversity and Geodiversity

Chapter 9 - Summary of Comments

12.1 This Chapter sets out the council's policies on the natural environment. In particular, it sets out the policies key aim, which is to ensure that new development proposals are sustainable and result in moving from a net loss of biodiversity to achieving net gains for nature. Overall respondents supported the intentions and principles of this Chapter. Further revisions are required to reflect updated local wildlife surveys. It is recommended Ouse Valley should formally be stated within the Plan as a natural barrier to development north of MK. Furthermore, recommendations to enhance and extend existing wildlife corridors along the grid road were actively encouraged.

12.2 There is currently major concern that there is currently no reference in the policy to priorities habitats and species, and this should be reviewed. It would be usual to provide detailed maps which indicate high value wildlife corridors or areas which priorities green space.

12.3 In total, 62 responses were received. Of that, 34 provided general comments and suggestions, 19 supported and 8 objected with a further 1 providing objections with general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.4 What Statutory Consultees said:

- Strong support for green infrastructure to consolidate healthy ecosystems and to manage environmental risks (flooding and heat waves)
- Recognition for the importance of priority habitats and species, and the protection that will follow which is identified in the plan
- A positive reaction from achieving a net gain of biodiversity, from the use of the mitigation hierarchy, over avoidance first techniques and offsite-compensation as a last resort.
- The Local Plan does not recognise the existence of the Greensand Ridge Nature Improvement Area (NIA).

12.5 What Neighbouring and other Local Authorities said:

- The current approach is considered to be fragmented in the absence of an overview to deliver environmental enhancements on a cross boundary basis.
- LPAs should look for opportunities to enhance nature conservation through development, and any growth and development within the NIA should make a contribution to environmental enhancements, focusing on priory habitats.

12.6 What Town and Parish Councils said:

12 . Biodiversity and Geodiversity

- This study refers to a 2-year survey of smaller, local wildlife sites. If it has not been finished, the Town Council will need to comment on it after the current consultation closes.
- Wildlife corridors are not defined or located.

12.7 What Members of the Public said:

- The Ouse Valley is a natural barrier: The Ouse Valley should formally be stated within the Plan as a natural barrier to development north of the city.
- Extend the current site of Linford Lakes Nature Reserve into the adjacent land not currently in Stanton Low Country Park.
- It is concerning that the identification and preservation of ancient hedgerows and complex eco systems, are omitted from this section.
- Wild life corridors along grid roads and other areas should be enhanced and extended. No trees or hedgerows should ever be cut down unless replaced by similar planting elsewhere because of their efficacy in pollution absorption and traffic noise.

12.8 What The Milton Keynes Council Ward Councillors said:

- N/A

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

- Figure 2 Biodiversity Opportunity Areas requires a suitable map base layer to provide clarity over the extents of each area.

12.10 What Local organisations and interest groups said:

- A major concern is that there is not reference in Policy to priority habitats and priority species (a suggestion of new wording to the policy to comply with NPPF, NERC Act 2006) "9.19 A number of legally protected and priority species and their habitats occur throughout the Borough. Where there is a reasonable likelihood that protected or priority species, or the habitats upon which they depend, may be affected by a development proposal, planning applications will not be validated until survey information has been submitted that shows the presence (or otherwise) and extent of the species or habitat over the course of the year."
- We consider there needs to be more content on hedgerows in order to give adequate protection to these priority habitats (or habitats of principal importance under the NERC Act 2006) "Hedgerows within development sites should be retained and also protected by a 10m buffer of semi-natural habitat. We would suggest that wildflower meadow would be the appropriate habitat for the buffers. The hedgerows and buffers should also be specified as dark corridors with no lighting and measures to ensure lighting in other areas does not enter them.

12 . Biodiversity and Geodiversity

- There is clear evidence that wildlife habitat in urban areas have a highly significant beneficial effect for humans by: reducing the urban heat-island effect and reduce air pollution
- green roofs / green walls, species-rich wildflower, road / verges / street trees provision for wildlife within garden areas - both domestic and business bat and bird boxes within structure of buildings wildlife habitat within SuDS schemes
- Milton Keynes Council will regularly review its list of local wildlife sites and add new sites where they meet the criteria
- Add fungi to definition of biodiversity in paragraph 9.2
- Paragraph 9.9 indicates that all smaller wildlife sites should be re-assessed and either recognised as Local Wildlife Sites or deleted as recognised sites; this should go to consultation to reduce biodiversity loss.
- Poor translation of future green space which will capitalise on opportunities (e.g. no mapping of high value wildlife corridors or prioritising room for green space - Ouzel Valley and the Ouse Valley) In particular, the Ouzel Valley from Pineham towards the River Great
- Detailed plans needed to confirm linear parkland from Ouzel Valley from Pineham towards the River Great in the context of biodiversity change and climate change mitigation.

12.11 What National Organisations said:

- N/A

Policy NE1

12.12 Policy NE1 indicates when development proposals would likely to harm the nature conservation or geological interest of an internationally important wildlife site and when they would not be permitted. The general response received was supportive of the policy. Reference is required to the Greensands Ridge Nature Improvement Area (NIA) or the important ecological networks and opportunities for enhancement. Further consideration is required for policies for suitable methods of biodiversity measurement. It would be the intention this would strengthen the effectiveness of this policy.

12.13 In total, 9 representations were received. 5 provided general comments, 3 supported and 1 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.14 What Statutory Consultees said:

- The need for a biodiversity survey looking at both constraints and opportunities for enhancement of land within or adjacent to BOA.
- Clearer articulation of the mitigation hierarchy in a robust order: Avoid, mitigate, compensate; exhausted.

12 . Biodiversity and Geodiversity

- There is no reference to the Greensands Ridge Nature Improvement Area (NIA) or the important ecological networks and opportunities for enhancement. NIA Partnership will plan and deliver significant improvements for wildlife and people through the sustainable use of natural resources, restoring and creating wildlife habitats, connecting local sites and joining up local action.
- The local plan should include policies for suitable methods of biodiversity measurement - e.g. Defra biodiversity offsetting metric and the environment bank biodiversity impact calculator.

12.15 What Neighbouring and other Local Authorities said:

- N/A

12.16 What Town and Parish Councils said:

- Confusion over "there is no suitable alternative to the development". i.e. no alternative to development at all, or just sites for development?
- Members of the Public

12.17 What The Milton Keynes Council Ward Councillors said:

- N/A

12.18 What Development Industry said:

- GDL/Gallaghers supports the Framework policy based on a hierarchy distinction made between international, national and locally designated conservation sites and how protection varies accordingly.
- Gladman support this proposed Hierarchy policy as it aligns with the guidance set out within the Framework.

12.19 What Local organisations and interest groups said:

- Park Trusts seeks an amendment to Natural Conservation Sites:
 - 2nd paragraph, 3rd bullet point "conservation value of the site or its wider ecological network".
- This policy needs strengthening and should not be adopted as drafted. Linear Parks, Wildlife Corridors and Local Nature Reserves in Milton Keynes should have the same level of protection as designated SSSIs due to damage that can be done to biodiversity by developments too close to such sites from housing, noise, litter, light pollution and pets.

12.20 What National Organisations said

12 . Biodiversity and Geodiversity

- Supports policies that encourage the enhancement of biodiversity (e.g. SuDs/ cycleways), build on the heritage of existing sites (protecting community areas, designing quality areas), create employment in the local area and cater for all members of the community from families, to those who work at home, to travellers.

Policy NE2 Protected Species

12.21 Policy NE2 indicates when development will not be permitted if protected species are found on proposed development area. It is suggested that the current wording of the policy is too rigid and onerous for developers, which might discourage development. Further revisions are required to take a more holistic approach for protecting protected species. There is a concern that the current proposals do not follow the mitigation hierarchy and there should be promotion of long term management of buffer zones between developments.

12.22 A total of 7 representations were received. 2 supported, 3 provided general comments and suggestions, and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.23 What Statutory Consultees said:

- The need to protect priority habitats and species should be added into the text title of Policy NE2.
- Minimum buffer between development and irreplaceable habitats should be stated with long term management to form part of the planning permission.
- Hedgerows - loss to a minimum, use native species.

12.24 What Neighbouring and other Local Authorities said:

- N/A

12.25 What Town and Parish Councils said:

- N/A

12.26 What Members of the Public said:

- N/A

12.27 What The Milton Keynes Council Ward Councillors said:

- N/A

12.28 What Development Industry said:

12 . Biodiversity and Geodiversity

- GDL/Gallagher's believe the landscape policy needs to be revisited to ensure that it is consistent with the approach set out within the Framework as asking developers to enhance biodiversity and geological features is "too stringent".
- "Where possible" should be used instead.

12.29 What Local organisations and interest groups said:

- Priority habitats could be easily incorporated into Policy through amending Policy NE1 by adding "priority habitats" into the following paragraph
- Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats (ancient woodland, the loss of aged or veteran tree), unless the benefits of the development in that location clearly outweigh the loss.
- "All possibilities for mitigation have been put in place;" is the preferred word to "no suitable alternative to the development".
- Great concern that the current wording does not follow the mitigation hierarchy to show how mitigation and compensation should only be considered after all opportunities for avoidance has been considered.
- Park Trusts seeks amendments to NE2:
- 1st sentence from paragraph 9.21: "If biodiversity losses resulting from a development cannot be avoided (by locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused".
- Add to the end of policy NE2: "To avoid future doubt the words" and "their habitats".

12.30 What National Organisation said:

- Supports 5 key areas within the policy: employment opportunities through the protection of small employment units and the creation of new village shops; the sustainability vision achieved through biological and geological enhancement and the push for low emission vehicles; the drive for capturing the community feel by conserving heritage assets and enhancing the existing landscape; the capability of working with new technology through digital communication and the provision of services for all populations within the community.

Policy NE3

12.31 Policy NE3 states that development proposals will be required to ensure that damage to the biodiversity and geological resources of the Borough will be avoided where possible. Further revisions will be required to this policy. For example, it is recommended to increase the proposed 15m buffer around the ancient woodland as this is a critical

12 . Biodiversity and Geodiversity

importance from a local and national perspective. As written, it is considered that this policy requires further validation and should provided greater criteria for developers to safeguard and protect the existing wildlife/conservation areas.

12.32 In total, 10 representations were received. 3 supported, 6 provided general comments and 1 objected to the policy proposed. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.33 What Statutory Consultees said:

- Strengthen Policy NE3 by making reference to the implementation of the mitigation hierarchy and monitoring framework with long term noted time frames, and the future SPDs.

12.34 What Neighbouring and other Local Authorities said:

- N/A

12.35 What Town and Parish Councils said:

- Full support for the replacement of lost habitats.

12.36 What Members of the Public said:

- N/A

12.37 What The Milton Keynes Council Ward Councillors said:

- N/A

12.38 What Development Industry said:

- The vision includes enhancing the Bucks & Milton Keynes to Ouse Valley BOA, but wider contributions could be considered towards the economic and social objectives.
- Approval of Policy NE4 involving the creation of green infrastructure for Linford Lakes as part of the strategic Linear Park network to create new public open space and recreational opportunities, resulting in high quality development in the long-term growth of the city.
- Policy NE5: Gallagher Estates and its consultant team welcome the opportunity to refine the landscape proposals for North Milton Keynes through discussions with officers and other consultees.
- Policy NE3 includes a requirement for schemes to enhance biodiversity and geological features; Gladaman consider this to be too stringent.

12.39 What Local organisations and interest groups said:

12 . Biodiversity and Geodiversity

- The policy “Where enhancement is not possible on the site, appropriate enhancements will be sought on other land by provision of replacement habitat of higher quality to achieve a net gain in biodiversity.” Provides a clear steer towards net gain (in keeping with the NPPF).
- When off-site compensation is required, the sentence “Developments exceeding 5 dwellings...” is less clear and should be adapted to “Development proposals will be required to ensure that damage to the biodiversity and geological resource of the Borough will be avoided wherever possible, adequately mitigated, or, as a last resort, compensated for, and that a net gain in biodiversity is achieved.”
- The sentence “A Biodiversity Impact Assessment metric will be provided to help measure the habitat value gain or loss of due to a development.” should also be amended as follows: “A Biodiversity Impact Assessment metric will be provided to help measure the habitat value gain or loss of due to a development demonstrate a net gain in biodiversity.”
- As the ancient woodland is an irreplaceable habitat resource of Milton Keynes and is a resource of such critical importance in the UK context, a larger buffer than 15m is needed, made up of a semi-natural habitat.
- Policy NE3 should include a contextual map of BOAs with a separate policy for these areas.
- Addition to NE3: “Biodiversity Opportunity Areas: In order to conserve and enhance the environmental capacity of the District, all new development should maximise opportunities to achieve net gains in biodiversity in accordance with the ‘Buckinghamshire and Milton Keynes Biodiversity Action Plan - Forward to 2020’”.
- Amend policy NE3, 1st sentence, remove: “wherever possible”, to add more weight.
- Paragraph 9.21: Mitigation and translocation cannot compensate for the loss of protected species and their habitats or the loss of biodiversity; there are too many variables that make up the habitat. This view is too optimistic and those involved in the planning decision must be fully briefed on the implications for wildlife.
- This policy should begin with a more positive statement such as “Development proposals will be required to enhance biodiversity”. Landscape ecology could be strengthened by the provision of a map demonstrating a connected landscape. Off-site provision for biodiversity should be a last resort, avoided wherever possible, with the wording reflecting this.
- The Parks Trust should be brought into all discussions relating to Policy NE3’s implementation and mentioned in policy for long term management of green spaces.

12.40 What National Organisations said:

- As discussed in NE1 and NE2, there is support for policies generating employment, sustainability options, conservation for the local community, increased accessibility for the area, and housing opportunities for all members of the community.

12 . Biodiversity and Geodiversity

Policy NE4

12.41 Policy NE4 indicates the importance of green infrastructure throughout the Borough in order to protect and enhance biodiversity, recreational, accessibility, health and landscape value and to work towards achieving local and national climate change targets. It is recognised that Plan:MK provides a good opportunity to update policies and maps and opportunities for joint cross border projects/collaboration to improve GI networks. It would be worthwhile to include a map of the current/planned green spaces for further consultation. There is general support to the commitment to extend the grid road system in the planned new urban extensions for the Borough.

12.42 In total, 11 representations were received. Of that, 5 provided general comments, 5 supported and 1 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.43 What Statutory Consultees said:

- Support for the explicit reference to the NEP's "Vision for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes, including the outlined 9 principles required to achieve it.
- To strengthen the Policy, county wide goals should be set to show benefits of NEP's vision involving green infrastructure to cover Buckinghamshire and Milton Keynes.
- Would expect a map of green infrastructure 2017-2030 to demonstrate the maximum benefits of GI, as well as specific functions.
- It would be appropriate to see reference to cross border landscape deliverability to connect green infrastructure.

12.44 What Neighbouring and other Local Authorities said:

- The NEP sets out that there is a need for more, better quality and better connected green and blue infrastructure networks at the landscape scale to provide multiple benefits to all.
- The draft map which is being prepared between BCC, AVDC and MKC colleagues to support the Principles report, shows a Bucks-wide GI network which seeks to complement the equivalent MK network. The Plan:MK is a good opportunity to ensure that policies and maps are effectively coordinated and provides the potential for identifying joint cross border projects to improve GI networks.
- Policy NE4 Green Infrastructure and Policy SD11 General Principles for new strategic urban extensions should place a greater emphasis on cross border GI network improvements and their longer term management across administrative boundaries.

12.45 What Town and Parish Councils said:

- N/A

12.46 What Members of the Public said:

12 . Biodiversity and Geodiversity

- N/A

12.47 What The Milton Keynes Council Ward Councillors said:

- There is also no map of green spaces; any proposed version should come out for comment before inclusion.

12.48 What Development Industry said:

- N/A

12.49 What Local organisations and interest groups said:

- BBOWT welcome the inclusion of 'Vision for Green Infrastructure in Buckinghamshire', along with a set of 9 Principles which should be followed to achieve the Vision by 2030."
- COBRA wholeheartedly supports the extension of the existing network of linear parks and green spaces along the watercourses and flood plains.
- The Parks Trust seeks amendments:" The network of green infrastructure throughout the Borough will be protected, extended and enhanced for its biodiversity"
- 2nd paragraph, amend as follows: "...contribute to the enhancement and strengthening of existing green infrastructure".
- 3rd paragraph: Delete "seek to".
- 4th paragraph: Delete "prioritised" and substitute for "provided".
- 5th paragraph: Delete "along the watercourses and floodplains" and "multi-purpose". Amend as follows " The existing network of linear parks and linked parks and green spaces will be extended into the urban extensions and along the Ouse and Ouzel Valleys to the north to provide a well-connected network of green infrastructure"
- Add 1st new bullet to the list of bullets that says: "is strategically planned"
- Amend 7thbullet to say: "is managed by a sufficiently resourced local credible body that works in the public interest into the long term".
- 8th bullet Delete: " where possible "
- Final paragraph to be amended: "Where" instead of "if" at start of sentence.
- Add a new paragraph after the bullet points that states: "Proposals should include a management and maintenance strategy which addresses for each type of open space and landscaping, who it will belong to, who will be responsible for maintaining it and how this will be funded over the long term. Such proposals should be formulated through discussion with the relevant responsible bodies including Milton Keynes Council, The Parks Trust, Parish and Town Councils."

12 . Biodiversity and Geodiversity

- We support the commitment to extend the grid road system in planned new urban extensions to the city.
- Maps need to be included to demonstrate where landscape and open space will be provided. Developers are currently provided with unacceptable scope not to make adequate provision of new open space and landscaping. Proposals must not only “seek” to ensure, they must “ensure”, and proposals should not simply avoid habitat fragmentation “wherever possible”, they must “avoid” habitat fragmentation.
- All the green setting must be handed over to the Parks Trust with the required capital endowment to avoid burdening residents of these new areas.
- Open space has potentially a number of roles, such as flood prevention, playing fields, wildlife corridors, play areas, leisure paths and general recreation. Each use must remain viable without being compromised by overlapping uses.
- Landscaping should never be viewed just as ‘screening’ and for hiding things; landscaping should link to wildlife corridors or to farmland that has been converted to become wildlife friendly. Such an approach would mitigate rainwater run-off, accelerated by contemporary farming practices for drainage, ploughing and cultivation that encourages rather than impedes the flow.

12.50 What National Organisation said:

- As discussed in NE1, NE2, and NE3, there is support for policies generating employment, sustainability options, conservation for the local community, increased accessibility for the area, and housing opportunities for all members of the community.

Policy NE5

12.51 Policy NE5 states how new development must be delivered to conserve and enhance the surrounding landscape. The main responses received were supportive for the principles of this policy. It is recommended that further reference to historic landscape features are required as they enhance the existing fabric of the landscape. It has been suggested to revisit the proposed weightings and contributions towards protected wildlife or geodiversity sites or landscape areas to endeavour to achieve a consistent approach.

12.52 In total, 10 representations were received. 4 supported, 4 provided general comments, 2 objected to the proposed policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

12.53 What Statutory Consultees said:

- Reference to the historic setting and structure of villages and hamlets are supported, but further reference to historic landscape features as an aspect of landscape character to be conserved and where possible enhanced are also required.
- Although this policy is specifically for landscape character it does not cover the impacts of development on the landscape as seen from the Chilterns AONB.

12.54 What Neighbouring and other Local Authorities said:

12 . Biodiversity and Geodiversity

- N/A

12.55 What Town and Parish Councils said:

- "It is not clear what would constitute a site specific landscape and visual assessment.

12.56 What Members of the Public said:

- N/A

12.57 What The Milton Keynes Council Ward Councillors said:

- N/A

12.58 What Development Industry said:

- GDL/Gallaghers object to the specific reference made to tranquillity as no specific definition is offered to provide consistency in the development management process.
- As currently drafted GDL/Gallaghers do not believe protected wildlife or geodiversity sites or landscape areas have a consistent approach in terms of weightings and contributions, so ask that the landscape policy is revisited.

12.59 What Local organisations and interest groups said:

- BBOWT welcome the policy on air quality and contaminated land.
- Eaton Leys has not been included in the policy, despite the overall values of the policy being supported.
- The Park Trusts supports Conserving and Enhancing Landscape Character.

12.60 What National Organisations said:

- Supported by Daniel Carey-Dawes in aspects of benefits.

13 . Milton Keynes' Heritage

13 Milton Keynes' Heritage

Chapter 10 - Summary of comments

13.1 This chapter sets out the principles and policies on conserving heritage assets and the historic environment of Milton Keynes. It was recommended that the meaning of key terms such as urban and rural are clearly defined for the purpose of this chapter. A greater awareness of the historic environment and requirements stated in the NPPF were advocated to ensure that the policies are reflective and written to reflect national and local planning policy. Furthermore, characteristics of listed buildings, archaeological sites, conservation areas and registered historic parks and gardens should be referred to throughout the plan.

13.2 In total, 25 responses were received, of which 8 supported, 6 objected, and 11 of them were general comment.

13.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

13.4 What members of the public said:

- N/A

13.5 What Town and Parish Council said:

- N/A

13.6 What Ward Councillors said:

- Think it is wrong to describe Broughton Gate, Brooklands, Newport Pagnell, Redhouse Park, or Oakridge Park as part of our rural landscape.
- Para 10.2 needs to contain a realistic description of what is now urban and what is now rural, as part of describing the very important heritage.

13.7 What neighbouring and other local authorities said:

- N/A

13.8 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

13.9 What national/statutory organisations said:

- As required by the National Planning Guidance, the plan should be proactive in the conservation and enhancement of the historic environment. Also the NPPF required plans to recognise the importance of the historic environment and its role in delivering the plan's vision and wider economic, social and environmental objectives.

- Suggest the plan to refer to 'The Historic Environment in Local Plans', 'The Setting of Heritage Assets', and 'The Historic Environment and Site Allocation in Local Plans'.
- Welcome Para 10.1-10.24. But prefer the term 'conservation to 'preservation' in Para 10.20 to be consistent with the NPPF.
- Para 10.24. The NPPF also requires local plans to "include strategic policies to deliver the conservation and enhancement of the historic environment", "contain a clear strategy for enhancing the natural, built and historic environment" and "identify land where development would be inappropriate, e.g. for its environmental or historic significance".
- Welcome the MK New Town Heritage Register and the ongoing review of Conservation Areas.
- Think the the chapter cannot set out how the effects of a proposed development on the significance of designed and non-designated heritage assets will be assessed. Suggest the policy to include the important elements or characteristics of listed buildings archaeological sites, conservation areas and registered historic parks and gardens to which development proposals should have regard and seek to conserve or enhance.
- The policy should also reflect the requirement in Para 132 of the NPPF that any harm or loss of a heritage asset should require clear and convincing justification, most often in the form of public benefits

13.10 What local organisation/interest groups said:

- Para 10.12. Support the policy of structured, strategic archaeological investigation and wish it can apply to all green and brownfield development sites. MKC needs to continue managing and monitoring green and brownfield development sites with a long-term view of maintenance and development.
- Para 10.14. Strongly support the paragraph, wish the MKC can develop the resource to effectively identify and cataloguing new-town heritage.
- Para 10.16. Support the policy and the work of the MK New Town Heritage Register project. Wish the project can recognise younger new assets on an ongoing basis.
- Para 10.17. MKHA is willing to assist in the provision of SPD.

Policy HE1

13.11 Policy HE1 indicates criteria how the Borough intends to protect historic character, local distinctiveness and sense of place. In the main, there was support for this policy amongst the response received. However, there was concern with the viability of this policy and this policy may create additional resourcing, time and uncertainty to investment decisions due to heritage designations, CMK Alliance Business NP's policy to protect 'classic infrastructure', and land owners applying for Certificates of Immunity from Listing. Further consideration should be given to the MK New Town Heritage Register, the policy needs to better reflect the entire borough and the last 100 years of local heritage.

13 . Milton Keynes' Heritage

13.12 In total, 11 responses were received, of which 3 supported, 2 objected, and 6 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

13.13 What members of the public said:

- Support the principle of the policy of conservation and enjoyment of the historic environment.

13.14 What Town and Parish Council said:

- Welcome the policy to review the conservation areas and hope it can extend the Sherington conservation area.
- Bullet Point 3. Wish to see the timescale for the MK New Town Heritage Register. Or an amendment on its wording to stress the urgency.

13.15 What Ward Councillors said:

- Bullet Point 1. The plan should also reconsider other Conservation Areas in the borough other than the 27 areas.
- Bullet Point 3. Think the New Town Heritage Register needs a better title to cover the entire borough and the last 100 years of local heritage. Also, heritage should not be simply categorised as pre-1967 and post-1967.

13.16 What neighbouring and other local authorities said:

- N/A

13.17 What the development industry (e.g. Landowners, developers, agents...) said:

- Support the policy in large, but concern that Point 3 of the policy may add resourcing, time and uncertainty to investment decisions due to heritage designations, CMK Alliance Business NP's policy to protect 'classic infrastructure', and land owners applying for Certificates of Immunity from Listing.
- Think that MK New Town Heritage Register would add another layer of policy and guidance to deliver the vision of CMK.
- Think the policy is not relevant to Development Management Decision Making and such that should be removed.
- Suggest removing the policy and adding it to the supporting text of the heritage section.

13.18 What national/statutory organisations said:

- Welcome the policy for conservation and enjoyment of the historic environment.
- Welcome Para 10.25-10.32. But suggest adding "The significance of heritage assets may be affected..." to Para 10.31.
- Suggest the policy may need some amendments in order to comply with the requirement of Para 154 of the NPPF.
- Welcome the commitment to reviewing the 27 conservation areas, undertaking the MK New Town Heritage Register, and maintaining the Milton Keynes Historic Environment Record.
- Welcome the reference to heritage assets at risk or threat of decay, which is in accordance with the NPPF's requirement.

13.19 What local organisation/interest groups said:

- The Park Trust supports this policy to conserve the historic environment.
- The MKC should consider the establishment of the new Conservation Areas for the three 'Exhibition Village' of Homeworld, EnergyWorld and FutureWorld.
- There should be a standard clause within planning consents for the redevelopment of 'Phase 1' New Buildings that they should be properly recorded prior to demolition.
- There should be a requirement that the replacement of a building that is on the Local Heritage Register must be of a similar quality to the building that is being lost.

Policy HE2

13.20 Policy HE2 indicates when development will be supported where it sustains, where possible, enhance the significance of heritage assets which are recognised as being either historic, archaeological, architectural, artistic, landscape or townscape significance. In general, the main thrust of opinion was in support of this policy in terms of its intention to protect heritage assets. There are further recommendations for paragraph 4 as it currently lacks clarity, and it is inconsistent with the NPPF. Furthermore, the plan should address the long term care and funding of archaeological remains at the earliest opportunity in the development process. If archaeological remains are found within public open space they should be preserved.

13.21 In total, 10 responses were received, of which 4 supported, 3 objected, and 3 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

13.22 What members of the public said:

- Concerned about the preservation of stone walls in Bow Brickhill, which are important to its character. Wish they can be protected by HE2.
- Support the policy to protect heritage assets.

13.23 What Town and Parish Council said:

- Support the policy in general. Suggest including the following considerations concerning Heritage Assets from the NPPF (para 132 and 139):
 - great weight to be given to their conservation in all decisions;
 - clear and convincing justification for any harm to significance however slight and whether through direct physical impact or by change to the setting;
 - substantial harm (direct or by change in the setting) to or total loss of Grade II listed buildings and registered parks and gardens is expected to be 'exceptional';
 - substantial harm to or total loss of Grade I or II* listed buildings and registered parks and gardens, protected wreck sites, battlefields, World Heritage Sites, scheduled monuments and un-designated sites of equivalent importance to scheduled monuments is expected to be 'wholly exceptional'.
- Welcome the policy's protection for heritage assets. But concerned that in Para 4 development would be supported if the harm is 'less than substantial'. Suggest adding the following sentence: "...and these benefits cannot reasonably be realised by alternative development in other potential sites, which do not impact heritage assets".

13 . Milton Keynes' Heritage

13.24 What Ward Councillors said:

- N/A

13.25 What neighbouring and other local authorities said:

- N/A

13.26 What the development industry (e.g. Landowners, developers, agents...) said:

- Support the policy given that it is derived from the requisite Act and the NPPF.
- Object to the proposed wording of HE2, specifically Section 4. As it is inconsistent with Para 134 of the NPPF. Suggest the MKC to remove the reference to the harm being 'demonstrably' outweighed by public benefits.
- Object to the policy as it does not fully reflect the guidance set out in the NPPF as it requires distinction between designated and non-designated assets.. The policy should refer to Para 133-4 of the NPPF regarding assessing the significance of the designated heritage asset and where there is less than substantial harm, and Para 135 of the NPPF for non-designated heritage assets. Suggest redrafting the policy in order to conform with national policy.

13.27 What national/statutory organisations said:

- Welcome the policy but Clause 4 should refer to the significance of a designated heritage asset and the policy should also set out how the Council will react to proposals that would cause substantial harm to designated heritage assets and proposals that would cause harm to non-designated heritage assets

13.28 What local organisation/interest groups said:

- Point 7. Recording unavoidable lost assets should keep in step with current best practice and in particular the use of photogrammetry and fine grain LIDAR ground scans. They should be used in recording assets of local and greater than local importance.
- Think the plan should address the long term care and funding of archaeological remains at the earliest opportunity in the development process.
 - Suggest adding the following sentence to Point 7:
 - "Where archaeological remains are preserved within public open space, appropriate on site interpretation and a strategy for long term care (and funding thereof) should be produced as part of holistic approach to long term stewardship of the open space in question and agreed with the body responsible for the same".

14 Public Open Space, Leisure and Recreation

Chapter 11 - Summary of Comments

14.1 This chapter learns from previous feedback from consultations on Plan:MK, with available evidence to set out the Council's preferred policies regarding open space, sport and leisure. It is worth noting that these policies will continue to be refined to reflect consultation responses and additional evidence. Additional areas should be considered and appear to be missing from the draft proposal plan, which will need to be reflected in the final Plan:MK. Further clarification might therefore be required in order to ensure consistency throughout the Chapter.

14.2 In total 49 responses were received. Of that 25 provided general comments and suggestions, 9 support and 13 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.3 What members of the public said:

- The Open University's work on parks and spaces should be seen as providing useful source of advice and support for work under this area and the importance of this in the planning process should not be understated.
- We support retaining the current percentage level of green open space as the city expands. We need outdoor facilities for young people. We need an adequate level of leisure facilities.
- The land adjacent to Ashfield, which forms the wildlife corridor through Stantonbury from Linford lakes nature reserve through the stonepit lakes to Linford wood, is missing from the map Suggest to put Ashfield off the list permanently

14.4 What Town and Parish Council said

- Plan MK needs to indicate if the Open Space Assessment has completed, and if not will the consultation on Plan:MK will be reopened when it is.
- Fails to include any reference to civic space, requires similar protection to other types of Amenity Open Space.

14.5 What Ward Councillors said:

- N/A

14.6 What neighbouring and other local authorities said:

- N/A

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

- N/A

14.8 What national/statutory organisations said:

14 . Public Open Space, Leisure and Recreation

- New playing pitches should be constructed in line with Sport England guidance and should also be provided in line with specifically identified needs and only after a robust assessment.
- Terms like "parks system" and "open space network" are used interchangeably but what do they actually mean? If they are to continue to be used then they need to be defined in a glossary.
- Amendment requested; Add sentence to paragraph 11.10: "The Council recognises that there is a need for an up to date open space assessment and will work with The Parks Trust and other relevant stakeholders to progress this".

14.9 What local organisations/interest groups said:

- Welcome quotes from the NPPF and reference to the NEP's.
- The draft is confused, inconsistent, incomplete and unclear.
- Draft policy L2 fails to provide the level of protection needed for existing Amenity Open Space.
- Proposed policies do not provide enough protection for existing open space. Also, point 6 says amenity open space can be lost if its maintenance is "impractical or unduly onerous". This is a cynical catch-all to permit development against other criteria. It should be removed. There should be no possibility of development on existing identified/landscaped open space within Developed Areas.

Policy L1

14.10 Policy L1 informs developers when planning permission will be granted for outdoor leisure and recreation uses, or proposals that are ancillary to and directly support such uses, within the parks system unless the proposed developments achieves the set criteria. It is currently considered that the wording of the policy suggests that most development will be granted as long as it does not have a detrimental affect to the public realm. This therefore might require this policy to be revised to provided further clarification, for example, key terms such as greenspaces need to be clearly defined and they should not act as overspill carparks. In addition, further criterion was considered to be worthwhile to ensure that the proposals are robust. The general opinion received was negative and required further revision to this policy .

14.11 In total, 7 responses were received. 4 provided general comments, 2 objected and 1 supported the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.12 What members of the public said:

- N/A

14.13 What Town and Parish Council said:

- The model of transferring all parks and open spaces with a mortgage to support it to Parks Trust should be continued as it ensures that parks are protected for the future resident of MK
- Consideration should be given to the over saturation of parks with additional retail facilities which can put undue pressure on families when using the parkland

14.14 What Ward Councillors said:

14 . Public Open Space, Leisure and Recreation

- I fully support the aspirations set out in paras 11.11-11.13 and I ask for Policy L1 (p104) to be totally re-written to achieve those aspirations. Our starting point for this policy should NOT be that almost any form of development is acceptable provided it doesn't do too much damage

14.15 What neighbouring and other local authorities said:

- Consideration should be given to the over saturation of parks with additional retail facilities which can put undue pressure on families when using the parkland
- The model of transferring all parks and open spaces with a mortgage to support it to Parks Trust should be continued as it ensures that parks are protected for the future resident of MK

14.16 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

14.17 What national/statutory organisations said:

- Some of the wording in this paragraph requires clarification and amending
- It should be made absolutely clear that greenspace will not be lost for carparks, that an area outside of the greenspace will be needed for parking. This policy is somewhat confusing in that it appears to say that the loss of greenspace for an indoor sporting facility is acceptable. The loss of greenspace in an ecological corridor will have exactly the same impacts whether the development is a sports complex or an office block. It should stipulate outdoor facilities only
- An additional criterion could be added "Have an adverse impact on any historic significance of the Park", as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework

14.18 What local organisations/interest groups said:

- N/A

Policy L2

14.19 Policy L2 indicates when planning permission will be refused if the proposals involving the loss of open space or facilities used for leisure and recreation uses. It is currently considered that the policy is onerous to developers in comparison to the NPPF, which could have a detrimental affect to new development. The graphics and figures which support open space assessment need refining as they are unclear and standards would be worthwhile in terms of quality, variety, interest, and biodiversity of new green spaces.

14.20 A total of 11 representations were received. 6 Provided general comments, 3 objected and 2 supported the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.21 What members of the public said:

14 . Public Open Space, Leisure and Recreation

- There are many playing fields in Milton Keynes that serve multiple purposes, being accessible to walkers and providing space for formal and informal sporting activities, for children to play, for groups to picnic and for dogs to be given strenuous exercise (while their owners talk), as well as being visually important pieces of landscape. Such openness, in the commonly understood sense of that term, needs explicit protection.
- We have open access to all-weather surfaces for sporting activities, "whether publicly or privately owned", their accessibility should also be protected, for the "health and wellbeing" of the community.

14.22 What Town and Parish Council said:

- The refusal of planning permission on areas that would result in the loss of open space or leisure/recreation facilities would be supported by the Parish Council.
- The wording should be amended to include civic spaces.
- It should be made crystal clear that permission for change of use of Amenity Open Space will only be granted if all the ensuing points apply.

14.23 What Ward Councillors said:

- For transparency I urge that the entirety of Appendix L2 is merged into Policy L2.
- The photos in the Open Space assessment are unclear, but the standard of landscaping appears low so standards are perhaps needed about the quality, variety, interest, and biodiversity of new green spaces.

14.24 What neighbouring and other local authorities said:

- The refusal of planning permission on areas that would result in the loss of open space or leisure/recreation facilities would be supported by the Parish Council

14.25 What the development industry (e.g. Landowners, developers, agents...) said:

- The NPPF indicates that proposals will be approved where the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Clearly, this is a less onerous requirement than the Council's intention to require proposals to "significantly enhance" the Open Space Network, which would presumably result in the refusal of proposals which only sought to replace the loss with equivalent provision

14.26 What national/statutory organisations said:

- This policy provides a good opportunity to discuss accumulative impacts to the green corridor. The "Open Space Network as a whole" should be considered when determining development applications. The replacement of a grass field with an "all-weather surface" is the same as paving over that field, in ecological terms. Also, it's should be made clear that "Amenity Open Space", according to the Plan's definitions, should be preferentially protected from development as recreation is not its primary function

14 . Public Open Space, Leisure and Recreation

- Remove "Public " from title. To add clarity to Policy and to allow the possibility of off-site enhancements / improvements to the open space network
- When choosing where to allocate playing pitch space, an evidence based approach based on need would be favourable. Therefore, there are some concerns around this paragraph and you may wish to consider amending it to reflect the risks and limitations of standards. For example, in some cases improving the quality or accessibility of existing provision to increase its capacity may be a more appropriate way to meet the need generated by a development, rather than providing a single pitch site

14.27 What local organisations/interest groups said:

- Evidence suggests the target of 0.52ha of playing pitches per 1,000 population is not currently being met. Nor is there a protocol in place to prevent developments mixing uses of playing pitch land (e.g. doubling up playing fields or play areas as flood zones). This requires a policy in Plan:MK, reiterating the target, and setting out the requirement that playing pitches must be accessible year-round and not dual-use

Policy L3

14.28 Policy L3 indicates the requirements for new housing in terms of providing new or improved open space and recreational facilities in accordance with the council's adopted standards shown in Appendix B of the plan. In the main, the responses received were supportive of the policy. It is essential that this policy allows for the broadest sense of recreational use and therefore areas for a kick about and imaginative play, for example, should be considered within the plan. Revisions to the policy might be required in order to reflect multi-functional, resilient and sustainable green spaces.

14.29 A total of 7 representations were received. Of which, 3 supported, 2 provided general comments and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.30 What members of the public said:

- N/A

14.31 What Town and Parish Councils said:

- The Parish Council support the proposal for open space to be part of the design process for new developments. However it must be ensured that the open space includes areas for kick about and imaginative play and not solely play areas

14.32 What Ward Councillors said:

- N/A

14.33 What neighbouring and other local authorities said:

- N/A

14.34 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

14 . Public Open Space, Leisure and Recreation

14.35 What national/statutory organisations said:

- Amend first sentence to say: "New housing development will be required to provide new or contribute to improved open space and recreational facilities in accordance with the Council's adopted standards in Appendix B and policies in this Plan which support the delivery of a linked network of multi-functional, resilient and sustainable green spaces "

14.36 What local organisations/interest groups said:

- Welcome the need for proposals to include a long-term maintenance plan (Policy L3 Standards of Provision).

Policy L4

14.37 No comments received

Policy L5

14.38 Policy L5 provides guidance for when planning permission will be permitted/rejected for unpowered water sports on lakes and other water areas and for ancillary facilities. 1 response was received which objected to the policy and their response is summarised below.

14.39 What Ward Councillors said:

- It is hard to understand why a borough the size of MK (in area and intended population terms) should have a blanket policy objection to powered water sports (and apparently, for all forms of powered water leisure activities).

Policy L6

14.40 Policy L6 indicates the exception to when the Council will permit development for noisy sports. Currently, it appears that policies L3 and L6 contradict each other in terms of skateboarding parks, which will need to be reviewed. There is also a requirement to revise the title to reflect recreational facilities and to provide further clarity throughout the policy. For example, the definition of noisy sports is too vague and currently is unclear.

14.41 In total, 5 representations were received. 2 objected, 2 provided general comment and suggestions and 1 supported the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.42 What members of the public said:

- N/A

14.43 What Town and Parish council said:

- N/A

14.44 What Ward Councillors said:

14 . Public Open Space, Leisure and Recreation

- I think the authors of Policy L6, advocating that skateparks are noisy and should be located within large open spaces or in already noisy areas, and the authors of Appendix L3 advocating they only need to be slightly over 30m from housing, might perhaps get together and come up with a more consistent view of where skateparks should and should not go
- Noisy sports can generate significant noise some distance away. Modelling of the likely effects should be done, and appropriate screening pursued

14.45 What national/statutory organisations said:

- Amend title of Policy to: Criteria for the Location of Noisy Sports and Recreational Facilities. Reason: Some recreational facilities can also be noisy such as skate parks which the Policy mentions, so the amendment will improve the clarity of the Plan
- Suggest a distinction is drawn between sports that provide a relatively constant, high level of noise, such as motocross, for example, and those where high levels of noise may occur but would be intermittent (such as a netball court at a school). This will avoid any confusion if the policy is indeed aimed towards the former.

Policy 7

14.46 Policy L7 indicates the criteria for granting planning permission to intensify the use of the Milton Keynes Bowl for commercial leisure and recreational purposes. Greater emphasis should be placed on new development to enhance the ecological and public access connectivity through The National Bowl site, as it currently provides vital links to the local and surrounding areas. Revisions are required to ensure each criterion has relevance and justification, as it is considered some are redundant and irrelevant for the purpose of this policy (e.g bullet point 2 and 5).

14.47 In total, 5 representations were received. 3 provided general comments and suggestions, 1 supported with general comments and suggestions and 1 objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

14.48 What members of the public said:

- N/A

14.49 What Town and Parish council said:

- Agree that facilities used by local community and sports groups should be safeguarded. Increased use should not have a detrimental effect on nearby residents
- The policy should refer to 'routes' instead of 'sites'

14.50 What Ward Councillors said:

- I think Policy L7 (p109) on the Bowl needs considerably more thought. Bullet i is entirely redundant - the Bowl is where it is and there is nothing to prevent public transport operators from serving it (if they choose to). Bullet ii is hard to justify as the Bowl's current & historic category of use creates some of the biggest peak highways loads that MK has ever experienced. Bullet v is hardly appropriate as the Bowl is a commercial leisure site, not a piece of MK's Linear Park, public open space or "Park System". And Bullet vi is inappropriate for 2 reasons. Firstly, the site is already a commercial leisure site, so further development within that use class cannot be

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opposed in terms of “principle of development”. And secondly, it is unreasonable to give other operators a “viability” protection under our retail/leisure hierarchy that is any different from any other “out of centre” site

14.51 What local organisations/interest groups said:

- The National Bowl sits across a strategic connection between Tattenhoe Valley and the Teardrop Lakes, Policy L7 should place stronger emphasis on any new development enhancing the ecological and public access connectivity through The National Bowl site, as it provides the only practical connection between the Tattenhoe Valley Linear Park and the Loughton Valley Linear Park and is Route 51 of the National Cycle Network. It is not only an important movement corridor but should be an attractive and integral part of the citywide network of accessible open spaces
- This revised Policy draft does not make it explicitly clear that redevelopment and/or intensification of the use of the Bowl would not be approved without the incorporation by way of preamble or within subclause 1V of the Policy of the previous Dec2005 adopted plan clause 13.54 of the Leisure and Recreation Policy which provided as follows: “The Bowl currently incorporates a secure closed road Circuit, which serves as an important facility for Cycle Track Racing and Training. Development proposal will need to retain the existing Road Circuit for the use of Cyclists, or, make provision for an alternative, replacement facility, either on or off site.” Milton Keynes Cycling Association is appreciative of the continuing support for Cycling at the Bowl by Milton Keynes Council but believe that for the avoidance of any doubt that clear support needs to be continued in the Councils Plan:MK Policy!

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Chapter 12 - Summary of Comments

15.1 This chapter recognises that the Borough currently enjoys a general high quality environment both in its urban and open areas. It is therefore the intention of the Council to maintain this in order to build on the existing urban fabric whilst reflecting sustainable standards and aspirations. This chapter lacks clarity in terms of defining key terms. It is currently subjective and widely exposed to personal interpretation and debate. It would also be worthwhile to include relevant policies reflecting the importance of design in order to guide future development within the Borough.

15.2 In total, 78 responses were received. Of that, 45 provided general comments and suggestion, 19 objected, a further 3 objected with general comments and suggestions, 10 supported and 1 supported with additional comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.3 What Members of the Public said:

- The important role of co-creation and co-design through working closely with key stakeholders such as communities and the local neighbourhood working closely with the council, developers and builders will be critical and the importance of this needs to be emphasised.
- The Open University has developed expertise around the important role co-design plays and how it can be achieved and the OU must be recognised as an important strategic partner.
- Support policies that facilitate a variety of densities and size of housing.
- Support policies that facilitate higher levels of parking.
- Support policies that facilitate more space for larger families. Many ethnic minority families have more children than average, and as they will make up a higher percentage of the population in the future this needs to be recognised.
- Support policies that facilitate sustainable energy initiatives being built into new designs.

15.4 What Town and parish Councils said:

- Throughout the chapter, there are references to 'good quality' and 'high quality' and it would be helpful if the difference could be explained.
- The statements in this section are very broad and lack detail. CMK is unique and it needs different values for appraisal. The policies, which repeat the need to "add character" to new development, do not suit the heroic scale of CMK's spatial design and the understated Modernist values of CMK, as well as for prime locations elsewhere. There should be some wording specific and relevant to CMK, for example, making reference to Policy CMKAP G1, which describes and protects the classic CMK infrastructure "as an important public asset that establishes a principle design framework for further development and future prosperity in CMK".
- Since CMK has a particularly strong and established character there should be policies reflecting its importance and guiding development that adds to this character rather than dissipating it.

15.5 What Milton Keynes Council Ward Councillors said:

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- N/A

15.6 What Neighbouring and other Local Authorities said:

- N/A

15.7 What Milton Keynes Council Departments said:

- N/A

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

- Supportive of the aspirations to maintain a high standard of design in new developments. However, policies D1-D4 contain a large amount of repetition both between themselves and with other policies within the plan. It is therefore recommended that the four policies are consolidated into a single comprehensive yet concise design policy.
- The policy should also include an objective supporting innovation in building design and construction, so that exemplary design and development - maintaining MK's long tradition of innovation and creativity - is encouraged and supported. This approach would help both applicants and officers to ensure that schemes provide the highest quality developments possible; and would avoid potential conflict between policies.
- Concerned that a number of the design policies are vague, and this could ultimately stifle development. There is positivity in the sense that proposals will be approved if they accord with them but what happens if the specific proposal constraints mean it is not possible to accord with these policies?
- The policy intentions of this chapter in terms of encouraging good design are supported. In order to achieve the housing delivery rates proposed, volume housebuilders will play a key role. As such, bespoke housing designs for individual sites are not generally going to be possible.

15.9 What National and Statutory Organisations said:

- N/A

15.10 What Local organisations and interest groups said:

- New developments should reflect that MK is a new city and design of buildings should reflect this and be contemporary in nature.
- Welcome the holistic approach to design, termed "place-making" that can cover both the physical manifestation of a place and the social management.
- What is not clear in Plan:MK is how design quality and great places are to be achieved.
- There is no mention of design panels. To comply with the requirements of the NPPF, MKC must set up a design panel to work closely with the development team, the panel to have at least 50% lay representatives to avoid it being dominated by professionals in the construction industry.
- The recommendations of the design panel should be taken into account when assessing applications.
- Recommend consideration of CABE's 2006 paper 'Design Review: how CABE evaluates quality in architecture and urban design'. Planning policies should address the

connections between people and places and the integration of new development into the natural, built and historic environment.

- Must be clear about the definition of good design and have firm policies that promote it.

Policy D1

15.11 Policy D1 indicates the planning objective/principles to when the council should approve development in terms of the impact that a development might have towards the local area. There is requirement to revise this policy in accordance to the NPPF. It is suggested that the policy fails to take account of the need to conserve or enhance the natural environment, landscape and countryside when considering new development and should learn from CMK Business Neighbourhood Plan. As written, there are too many general terms used, for example, acceptable but to whom? When revised the policy should state clearly who future development is most likely to affect.

15.12 In total, 10 representations were received. Of which, 4 objected and 6 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.13 What Members of the Public said:

- N/A

15.14 What Town and parish Councils said:

- N/A

15.15 What Milton Keynes Council Ward Councillors said:

- For transparency would prefer to retain the 2005 Policy D1 wording.

15.16 What Neighbouring and other Local Authorities said:

- N/A

15.17 What Milton Keynes Council Departments said:

- N/A

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

- In relation to criteria v) where design may affect statutory protected sites or buildings, the policy should provide outweighing or mitigating criteria that may be considered, including public and economic benefits that may arise.
- The element of the policy in relation to traffic generation should be revised so that development is only resisted on transport grounds when the residual cumulative impacts of development are severe, in accordance with NPPF guidance.

15.19 What National and Statutory Organisations said:

- From a water quality perspective the policies and principles set out in the Plan provide appropriate safeguards to protect the local water environment. Policy D1 is essential

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to ensure that additional foul drainage arising from new development does not put local rivers (and existing properties) at unnecessary risk of pollution and/or flooding by sewage and/or wastewater.

- Expect evidence to be provided alongside planning applications to demonstrate that developers have consulted with the appropriate sewerage undertaker and to provide evidence that sewerage capacity is, or will be made, available ahead of occupancy of any new major development sites.
- Object because the policy fails to take account of the need to conserve or enhance the natural environment, landscape and countryside when considering development proposals.
- Para 12.5, English Nature is now Natural England. Historic England could be added to the list.
- Welcome the policy, particularly the reference in criterion v) to important built features, which would include listed buildings, although we would prefer the criterion to explicitly state “heritage assets”, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.

15.20 What Local organisations and interest groups said:

- Policy D1 relies too heavily on the words “acceptable” and “unacceptable”. “Acceptable” to whom? As it stands this policy is too loose to have any real meaning or value.
- An additional point which sets out the need to protect or enhance the natural environment, landscape and countryside when considering new development should be added.
- Policies need to recognise the distinctive urban design of CMK by acknowledging the adopted CMK Business Neighbourhood Plan, which contains more detailed design and development policies.
- High quality design of new developments will help reinforce the reputation of MK as a “designed place”. There should be a commitment to introduce a design panel along the lines suggested by CABI and propose the following new policy: “The Council, to comply with the requirements of the NPPF, will set up a design panel to work closely with its development team, the panel to have at least 50% lay representatives to avoid it being dominated by professionals in the construction industry.”
- Recommend amending the wording of ii) to read “An adequate surface water drainage system is proposed with acceptable flood control and foul sewer capacity that can cope with rainfall increasing due to global warming”.
- Amend wording of iii) to read: “Buildings are to be orientated to benefit fully from natural lighting and solar heating”. As draft the policy “mitigates” sunlight, which is clearly an error.
- Amend wording of iv) to read: “No pollution is to emanate from buildings that could damage human health as determined by the environmental health officers”.
- Amend wording of v) read: “Any damage to protected species, buildings, natural features and wildlife habitats will not be accepted: mitigation for this damage will only be accepted in exceptional circumstances”.

Policy D2

15.21 Policy D2 indicates when development proposals should be approved if they achieve the prescribed objectives/ principles in terms of designing a good quality place. In the main the policy was well received and respondents supported the principles. Revisions to the policy might be required to reflect the below recommendations and suggestions to the context as well as providing further criterion. This is to ensure the management and maintenance of landscape, boundary treatments, green spaces as well as the practical issue of ensuring adequate access for maintenance, are not overlooked in development proposals.

15.22 In total, 11 representations were received. 4 provided general comments and suggestion, 3 supported, 3 objected and 1 objected with general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.23 What Members of the Public said:

- N/A

15.24 What Town and parish Councils said:

- N/A

15.25 What Milton Keynes Council Ward Councillors said:

- Support the policy although, in bullet ii) ask for wording that establishes the principle of clear distinction between public and private realm without using the phrase “continuity of street frontage”, because that phrase appears to encourage street forms that we would prefer to discourage as much as possible.
- Bullet iv) should encourage generously green street scenes, rather than totally hard street scenes other than the occasional tree or shrub.
- There is a tension between permeability on foot (bullet vi) and design for the prevention of crime (bullet iii). Need to explain unambiguously what is supported.
- New developments require layouts that give well-surveilled, wide routes for pedestrians and cyclists (but not motor vehicles) that are the shortest route to key local destinations, avoiding narrow alleyways that contribute more towards “fear of crime” than well-used pedestrian routes.

15.26 What Neighbouring and other Local Authorities said:

- N/A

15.27 What Milton Keynes Council Departments said:

- N/A

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

- Consider that the policy should take account of the outcome of on-going work for the development of CMK and especially Midsummer Boulevard East. As currently worded, the policy reinforces the status quo in terms of surface level car parking fronting

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development blocks and does not contribute or tally with the vision of providing a more intimate pedestrian, cycle and public transport environment.

15.29 What National and Statutory Organisations said:

- Support Policy D2 as drafted.
- TVP welcome the requirement that the design of new development should minimise the risk of crime, however suggest that recognition be given to the concerns that vulnerable members of the community can have from the fear of crime also.
- Request that bullet point 3 be amended to read: iii. "Have shown regard to the need to design the layout to maximise surveillance of the public realm and prevention of crime and minimising the fear of crime".

15.30 What Local organisations and interest groups said:

- Welcome reference to street trees and shrub planting to soften the streetscape. To strengthen the design policy request reference to Appendix 2, in the NEP's Vision and Principles for the Improvement of GI document "Measures to enhance biodiversity in built environments" which outlines other examples of measures that can be taken to enhance biodiversity in development.
- Support the policy but request an additional criterion: "Have shown consideration of how the landscape, boundary treatments and greenspaces will be managed and maintained in the future, including ensuring the provision of adequate access for maintenance." This will ensure that management and maintenance of landscape, boundary treatments, green spaces as well as the practical issue of ensuring adequate access for maintenance, are not overlooked in development proposals.

Policy D3

15.31 Policy D3 indicates when development proposals should be approved if they meet the prescribed objectives/ principles in terms of creating character within the public realm. In general the policy was well received and supported. Although, further explanation of the term character might be required as well as additional criterion to enforce this policy for future development. It is worthwhile to note, there can be no silver bullet or umbrella affect and creating character within developments must be achieved on a development by development basis. Degrees of privacy and enclosure would also be worthwhile to include in the policy and revisions for the policy are discussed below.

15.32 In total, 7 representations were received. Of that, 3 provided general comments and suggestions, 2 supported, 1 objected and 1 objected with general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.33 What Members of the Public said:

- N/A

15.34 What Town and parish Councils said:

- There is no explanation on how a new development can create character.

15.35 What Milton Keynes Council Ward Councillors said:

- Suggest an additional criterion: In larger developments the development should be subdivided into a range of character areas aiding legibility, reflecting context and providing a greater variety of housing and neighbourhood types to suit a mixed community.

15.36 What Neighbouring and other Local Authorities said:

- N/A

15.37 What Milton Keynes Council Departments said:

- N/A

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

- We rely on our comments to Policy D2
- It is unclear what is meant by buildings exhibiting a “positive character or sense of place for development” and how this will be applied in a consistent manner through the development management process.
- Whilst recognising the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles/objectives.

15.39 What National and Statutory Organisations said:

- Support Policy D3 as drafted.

15.40 What Local organisations and interest groups said:

- In para 12.3 feel it is important to emphasise that high quality of design is being sought for all new developments and propose that the following wording (from the CABI 2006 paper Design Review: How CABI Evaluates Quality In Architecture And Urban Design) be incorporated within Plan:MK: “By good design we mean design that is fit for purpose, sustainable, efficient, coherent, flexible, responsive to context, good looking and a clear expression all of the requirements of the brief. High standards in architecture and urban design should be promoted everywhere. People who live in low quality environments should be entitled as anyone else to demand high standards in new projects that affect them. Poor designs are unacceptable wherever they may be proposed”.
- Amend wording of i) to read: “The development proposals, whether large or small, shall be based upon a comprehensive analysis of the brief and the surroundings; the design team will have to demonstrate its capacity to prepare proposals that will respond positively to this analysis”
- Amend wording of ii) to read “An analysis of the design will demonstrate that degrees of privacy and enclosure are appropriate for the approved brief; on larger developments where there is significant public realm, it will be closely integrated with the design of the buildings that surround it”.
- Recommend additional point: “high standards of design, as defined by CABI, are expected for both large and small developments. If not achieved the proposals will not be approved”.

Policy D4

15.41 Policy D4 outlines when development proposals should be approved if they meet the prescribed objectives/ principles in terms of Building design. It is currently suggested that the policy is too holistic and should be categorised to reflect building design in urban, suburban and rural areas. Clarification is required in terms of the height of building within CMK. The policy is considered to onerous for developers and it is recommended that it is reviewed to ensure flexibility to reflect specific development sites and a one size fits all approach is not adopted. Further consideration and guidance should be given to the production of a buildings.

15.42 In total, 6 representations were received. 2 supported, 2 objected, 1 provided objections with further comments and suggestions and 1 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.43 What Members of the Public said:

- N/A

15.44 What Town and parish Councils said:

- N/A

15.45 What Milton Keynes Council Ward Councillors said:

- Support most of Policy D4 but request recognition of the very different treatments required for CMK, the rural areas, the older towns, and the suburban areas.
- The policy should state whether taller buildings in CMK are encouraged.
- “Key frontages” should be barely applicable in most suburban neighbourhoods.
- In bullet vi. ask for materials to be durable and give the appearance of being durable

15.46 What Neighbouring and other Local Authorities said:

- N/A

15.47 What Milton Keynes Council Departments said:

- N/A

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

- Concerned that the design policies are too onerous and it is unclear how they will be applied in a consistent manner. Recommend the policy is reviewed to ensure that it is not too onerous and provides sufficient flexibility so that proposals can respond directly to site specifics.
- Do not support criteria iii, iv, v, vi and vii, considering that overall aims of these policies conflict with the aims and aspirations of the Plan to attract inward investment as a key growth area and a Regional destination for shopping and leisure. The criteria

highlighted are overly onerous and restrictive and will continue the lack of delivery of key sites in CMK, especially the Primary Shopping Area.

- The policy must provide a clear framework for Milton Keynes, CMK and key enhancement areas such as Midsummer Boulevard East, to provide the flexibility required to provide key, viable developments.

15.49 What National and Statutory Organisations said:

- Support the policy although it could be enhanced and supported by the production of a building design guide which could be adopted as a supplementary planning document.
- Welcome para 12.22 and Policy D4 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.

15.50 What Local organisations and interest groups said:

- N/A

Question 2

15.51 Question 2, should there be a policy requiring the Nationally Described Space Standards for new dwellings to be applied to all new dwellings in the Borough? A number of mixed responses were received. In the main, general comments were provided by members of the public, councils and councillors. Although, developers were less in favour of the policy, suggesting that the available and stock of affordable homes in Milton Keynes is already problematic and this policy will worsen the current situation. The current development within the Borough is suggested to be too small for families and if larger floorspaces were championed, this would have the potential to encourage a more diverse range of employment skills. It should be noted that if minimum standards are adopted, it is emphasised that they are minimum standards and there would be an expectation for developers to achieve above the standards provided.

15.52 In total, 13 representations were received. 9 provided general comments and 4 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.53 What Members of the Public said:

- The standards should be adopted to ensure that all new homes are developed to minimum standards. The reasons for adopting them are set out in the Government's literature, and the justification is in the many local plans that have adopted them.
- Very little internal space may be appropriate for temporary accommodation however it is undignified.

15.54 What Town and parish Councils said:

- Suggest that recent new builds are too small for families.
- Supportive of a minimum standard for floorspace for dwellings and that the nationally described space standard should be a minimum. Larger floorspace should be

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encouraged as this would support the policy of attracting a diverse range of employment skills into the area.

- Support standards for internal space in dwellings as there is evidence that this makes a substantial difference to quality of life for residents. The national guidelines on this matter are very weak and should only be used as a starting point.

15.55 What Milton Keynes Council Ward Councillors said:

- Wish to adopt the minimum space standards, but to emphasise that these are minimums, that we expect most housing to be larger, and that homes proposed close to the minimum standards will only be permitted if they show exceptional quality of layout and spatial design.
- We should adopt these minimum standards, because of the growing level of complaints about undersized dwellings backed by studies about the shrinking size of new dwellings.
- To offer choice to customers, at least 10% of dwellings in each bedroom-count category must be at least 10% bigger than the biggest "minimum size" for their person-count and number of storeys. In addition, for larger developments we should require developers to demonstrate that they are providing a mix of dwellings in terms of space, design, quality of fitments, etc. to improve choice.

15.56 What Neighbouring and other Local Authorities said:

- N/A

15.57 What Milton Keynes Council Departments said:

- N/A

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

- Para 12.26 notes the PPG guidance that such standards should only be applied where there is evidence of a need for them to be applied.
- The adoption of this standard should be justified by meeting the criteria set out in the PPG including need, viability and impact on affordability. Any views attained as part of this consultation will be purely anecdotal and insufficient to justify such a Policy, which must be based on empirical needs.
- It is considered that this policy is unnecessary. The MK New Residential Design Guide contains some of the most stringent design standards in the country and further restrictive policies could impact the viability of schemes and would affect densities, land take and efficient use of land. Most of these issues are already covered by either the New Residential Design Guide or Building Regulations.
- Application of these standards has the potential to have significant implications in terms of product range, build cost, affordability, consumer choice, cumulative policy burden, viability and ultimately housing delivery.
- BDW Northampton as a division of BDW Trading has not yet produced a range of core house types which satisfy the nationally described Space Standards. If the National Space Standards were to become policy, we would be required to design a whole new range of house types. This would require significant resources and is a potential obstacle to buying future land in Milton Keynes. BDW Northampton would not support such a new policy.
- Evidence presented in the SHMA indicates there is already an affordability problem in Milton Keynes, without introducing the space standards that would have the effect

of increasing house prices. Impacts on affordability will also have consequential impacts on delivery rates as developers only build as fast as they can sell. If popular units were to become more expensive they would take longer to sell and therefore sites would take longer to deliver.

- Developers are best placed to know what the market demands as we receive direct intelligence through our sales offices of what customers are looking for. We would not sell homes below the enhanced size standard if they did not appeal to the market. If customers were not happy with the market offer then they would have the option to purchase from the second hand market but demand remains high.

15.59 What National and Statutory Organisations said:

- N/A

15.60 What Local organisations and interest groups said:

- Internal space standards should be set for dwellings otherwise commercially-driven developers will continue producing sub-standard dwellings which do not support healthy communities and which are not sustainable.
- The policy should make it clear that these are the minimum required internal space standards and that a larger internal space standard than the minimum is required in most new dwellings.
- Developers are maximising the numbers of dwellings and minimising the space available within these dwellings. It is also recognised that internal dwelling space is shrinking.

Question 3

15.61 Question 3, is there a need for Plan:MK to include a policy or policies that address matters of amenity and living conditions in more detail? A broad range of opinions were received, which are summarised below. There were some concerns that such policies might lead to further restrictions and constraints from a developers perspective, and that planning officers should lead on the policy. It is worth noting that some of the responses might reflect a utopian vision of public realm and present a subjective opinion. There were concerns that some policies might be restrictive and that each development should be developed on a development by development basis. The broader environmental effects of promoting green spaces were also noted from a social and environmental perspective.

15.62 In total, 10 representations were received and they all provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.63 What Members of the Public said:

- Do not see the need to separate housing development from close proximity to busy roads in order to limit the effect of air pollution from traffic on residential areas.
- Support the consistency of gird road policy and red ways on urban extensions. Need to strengthen 'buffer local communities from the visual impact of vehicles and provide an attractive feature to motorists' and the protection from air pollution of traffic.
- Residents should be able to enjoy some non-overlooked indoor or outdoor space and not feel constantly observed and hemmed in. Most people wish to have a feeling of light and air in their homes and enjoy sunlight and an attractive view.

15.64 What Town and parish Councils said:

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- Plan MK should include guiding principles on amenity and living conditions as many recent developments have failed to provide basic amenities.
- The level of external private amenity space, ventilation and entrance space in multiple-unit blocks should be covered by a minimum requirement.
- Would like to see a policy that is supportive of general well-being and any policy that encourages social cohesion. Standard guidelines should be developed on floorspace and sunlight/daylight amenity.

15.65 What Milton Keynes Council Ward Councillors said:

- With regards to visual outlook, different people regard different outlooks as preferable. One policy will not fit all.
- As buildings get taller and infill fills up many spaces, levels of sunlight/daylight are becoming more of an issue.
- All homes need bin storage and drying space to the standard indicated, though this may be under cover.
- All blocks of flats need a small shared enclosed outside area where young children can play unless they are very close indeed to a play area.
- All houses need a garden.
- The current distances between windows should remain, and a new requirement added that side windows should not be directly opposite adjacent side windows into rooms unless at least one is obscurely glazed.
- There should be controls over odours, such as from take-away premises near homes. There should also be a requirement for ventilation to be capable of controlling heat in hot weather. This has implications for homes built very close to main roads where windows cannot be opened due to noise or pollution.
- Agree that policies to ensure the amenity of dwellings including avoiding unwanted impacts of one dwelling on another must be included. An example not covered by the officer list: all external walls should have maintenance access ensured, either by having a specified minimum distance to the plot boundary or by having a protected right to use an adjoining strip of land for this purpose.
- The drafting of such policies should be a matter for officers rather than Councillors.

15.66 What Neighbouring and other Local Authorities said:

- N/A

15.67 What Milton Keynes Council Departments said:

- N/A

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

- Such policies can be restrictive and lead to minimum standards being seen as all that is required. Is this matter best addressed by way of a detailed development plan policy, or should the plan itself simply require a high standard of design and amenity and refer the reader to a detailed (separate) design guide such as an SPD, where matters can be demonstrated, justified and drawn out in more detail?

- As a 5 star housebuilder we provide an excellent quality of housing and development and would welcome discussions on how we could share our best practice in achieving a better standard for amenity and living conditions.
- The proposal to introduce other amenity and living conditions standards is not considered to align with the intentions of the government in setting out national technical standards. Matters such as ventilation and circulation space are already adequately covered by Building Regulations and no additional standards should be applied.

15.69 What National and Statutory Organisations said:

- Plan:MK should address the requirement of integrating green infrastructure into building design, especially in multi-storey buildings. A roof garden should be a minimum consideration as it helps with SUDS, provide greenspace for the health and wellbeing of its residents, and provides homes for pollinators and birds. It may be appropriate to discuss this in Policies D1, D2 and D5.

15.70 What Local organisations and interest groups said:

- It is fundamental to human wellbeing to have access to green space including trees - whether a park, a private garden or a balcony - as well as developing a sense of place.
- Consider that green space within new developments is forgotten in favour of securing greater housing numbers.
- All new developments should be required to meet minimum standards. All houses should have a garden space that, as a minimum, equates to the floor space of the ground floor. All flats should have access to communal green space. All developments over say 50 dwellings should have easy walking access to a park. All dwellings should have at least one window that receives direct sunlight for at least 6 months of the year. Adjacent buildings should have a minimum separation distance of 2 metres to allow for air circulation.
- Recognise that green space and trees have other environmental benefits in respect of air pollution and in soaking up water.

Policy D5

15.71 Policy D5 indicates how development alongside canals should be development and what objectives they should follow throughout the planning process. There are concerns regarding the feasibility of the policy in terms of access to private land and suggestion that it contradicts current policy. Further clarification is required to the importance and significance of waterside buildings and key terms, which might require further clarification. Point 6, It is unclear how the the canal could contribute to localised flooding from the canal.

15.72 In total, 6 representations were received. 3 provided general comments and suggestions, 2 objected and 1 supported. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.73 What Members of the Public said:

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- The policy is generally supported, however, as drafted it is restrictive and requires greater flexibility.
- It is not possible or desirable to provide public access to all canalside land. It may not be feasible to provide access to land which is privately owned or where there is no existing connection to any wider highway or pedestrian network e.g. where the canal towpath is on the opposite side of the canal.
- Criterion 2 does not accord with proposed policy NE3 Biodiversity and Geological Enhancement which states that “where enhancement is not possible on the site, appropriate enhancements will be sought on other land by provision of replacement habitat of higher quality to achieve a net gain in biodiversity.” Policy D5 should reflect the greater flexibility afforded by the biodiversity policy.
- No explanation is given why significant waterside buildings should be retained and enhanced. A policy of conservation, although well intended may prove restrictive and undermine the aspirations and design quality for new canalside development. Unless the building is Listed or falls within a Conservation Area then there should be no blanket policy requiring retention. Rather the policy should allow for appropriate redevelopment as per any other built area.
- It is unreasonable to assume that all employment sites besides the canal will lend themselves to freight transfer. This should be considered on a site-by-site basis.
- Where there is public access or a canal towpath it is appropriate to require active frontage although the requirement is not relevant where no such route exists.

15.74 What Town and parish Councils said:

- N/A

15.75 What Milton Keynes Council Ward Councillors said:

- Having canal-borne freight facilities within employment areas is pointless unless there is a reasonable prospect of those facilities being used, and unless there are also facilities at some other point along the canal locally for the other end of the freight process.
- As rainwater doesn't normally drain into a canal, and canals have weirs for the water let in through use of the locks, it is hard to justify a “localised flooding from the canal” policy.

15.76 What Neighbouring and other Local Authorities said:

- N/A

15.77 What Milton Keynes Council Departments said:

- N/A

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

- N/A

15.79 What National and Statutory Organisations said:

- Support Policy D5 as drafted.
- Welcome an additional criterion: “The protection and enhancement of heritage assets”, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by the NPPF.

15.80 What Local organisations and interest groups said:

- The approach towards this significant strategic cross-border environmental initiative is inadequate. Limiting the approach to merely safeguarding the alignment of the Waterway route means that opportunities for facilitating the delivery of the Waterway will be missed. Development is a major opportunity for the delivery of the Waterway, and the opportunity to ensure delivery as a result of development is essential. Wording on delivery must be strengthened in order to ensure delivery opportunities are maximised. For example, Policy SD6 (Eastern Expansion Area) refers to safeguarding land ‘to enable construction of a section’ but this wording is weak and vague, and fails to include any wording that could facilitate any actual delivery.
- There should be a clear and unambiguous expectation that development will deliver the section of the Waterway route within their development site. It should be an absolute requirement for development, not just where it is “mutually beneficial” as stated in Policy D5. This wording is not strong enough, and would enable developers to merely safeguard the route as a sterile corridor, without the requirement to actually deliver the Waterway.
- The absence of a strong, cross boundary approach to policy on a strategic environmental project is a failure under the Duty to Co-operate. Planning policy needs to be strong and affective across the boundaries
- References in para 12.28 need to be updated. Specifically the Milton Keynes Canal Corridor Management Plan (2000) is out of date; however The Parks Trust would be keen to be involved in any work to update it. British Waterways is now the Canals and Rivers Trust.
- “Waterway Park” needs to be defined.

Policy D6

15.81 Policy D6 indicates how mains and telecommunications services should be provided throughout new development within the boundary of CMK. A limited number of responses were received. It is considered that the boundary of CMK should be defined and consideration should be given to rural areas as well as urban areas.

15.82 In total, 2 representations were received. 1 supported and 1 objected to the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.83 What Members of the Public said:

- N/A

15.84 What Town and parish Councils said:

- N/A

15.85 What Milton Keynes Council Ward Councillors said:

15 . Design

- The policy doesn't cover mobile telecoms services and doesn't mention the rural areas. The term "the boundary of Milton Keynes City" hasn't been defined, and for the purposes of this policy it needs a currently meaningful definition, as the edge of the conurbation.

15.86 What Neighbouring and other Local Authorities said:

- N/A

15.87 What Milton Keynes Council Departments said:

- N/A

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

- N/A

15.89 What National and Statutory Organisations said:

- Support Policy D6 as drafted.

15.90 What Local organisations and interest groups said:

- N/A

Policy D7

15.91 Policy D7 indicates when planning permission will only be granted for temporary buildings to meet essential short-term needs. A limited number of responses were received. The policy needs to reflect changes to modern temporary buildings and technologies, and there may also be a need to allow for buildings for a medium term rather than the proposed short-term period. It would be worthwhile to define these time periods within the plan to provide additional clarification and support.

15.92 In total, 3 representations were received. 1 supported, 1 objected and 1 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

15.93 What Members of the Public said:

- N/A

15.94 What Town and parish Councils said:

- N/A

15.95 What Milton Keynes Council Ward Councillors said:

- N/A

15.96 What Neighbouring and other Local Authorities said:

- N/A

15.97 What Milton Keynes Council Departments said:

- N/A

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

- The nature of temporary buildings has changed significantly over recent years with high quality, environmentally friendly products now available. There will be instances where a temporary rather than permanent structure would be more appropriate; for example, to provide visitor facilities within a sensitive landscape.
- Given that modern temporary building can have no more detrimental impact than permanent buildings, the policy should be reworded to allow for temporary buildings that do not have an unacceptable visual impact to be granted consent for longer periods of time (potentially 10+ years) depending on the lifespan. There should be no requirement to demonstrate essential short-term need.

15.99 What National and Statutory Organisations said:

- N/A

15.100 What Local organisations and interest groups said:

- N/A

16 . Homes and Neighbourhoods

16 Homes and Neighbourhoods

Policy HN1

16.1 Policy HN1 indicates the Council's expectations that 11 or more new dwellings will be expected to provide in terms of mix of tenure, type and size of dwellings. It is recommended that the policy provides examples of when exceptions might be allowed, for example, build to let dwellings as it was perceived this would be an expectation. Further connection between this Policy and aspirations for MK to do more than just "meet housing need" should be reflected throughout, for example, it is essential that new development creates communities and not just attempts to achieve the needs of the housing supply. Changes to the local demographic population will potentially create competition for smaller dwellings, which should be reflected in the policy to ensure that it is fit for purpose to meet future needs and demands.

16.2 In total, 11 representatives were received. Of which, 4 provided general comments and suggestions, 3 supported and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.3 Statutory and National Consultees

- Support this policy

16.4 Neighbouring and other Local Authorities

- N/A

16.5 Town and Parish Councils

- WCC believes that larger sites should provide smaller housing and affordable housing and that infills should provide for larger homes as high density infills will create added pressures on social well-being and surrounding infrastructure

16.6 Members of the Public

- Policy should allow exceptions of institutional "build to let" developments, to provide low cost housing, where they include the social support required for the expected tenants, thereby also allowing student accommodation, as covered in HN8
- Neighbourhoods should be a community, not just houses, and include community facilities, such as a local centre, shops, play areas, places of worship, and community centres.

16.7 Milton Keynes Council Ward Councillors

- Wholeheartedly support mixed communities and housing types/tenures, however, practical difficulties arise when homes designed to minimum space standards are immediately adjacent to/close to considerably larger homes. The expectations of what will and will not be carried out in the public realm (anything from children playing to equipment and furniture repairs, drying curtains, etc.) vary and cause conflict. We therefore acknowledge that there is a limit to the range of space sizes that can reasonably be accommodated immediately adjacent to each other, and recommend that layout devices such as landscaping barriers, turning corners, etc.

are used to provide a little separation, while continuing to have a wide range of housing in any one neighbourhood.

- Specify target average density ranges for doughnut ring, old town centres, and suburban areas, including a slight rise, (eg from 30-35 to 33-38 for suburban) and a minimum average density for CMK reflecting the trend. Stress that these are average and that a range across the development, not necessarily across each parcel, will be expected, giving an example to indicate what is possible on larger developments.
- Very small areas of infill should continue to be sensitive to the surrounding context. Larger areas should meet the current standard for average density for that type of location, but may need to be more sensitive to the surrounding density near boundaries.
- If there is justification that more flats (or houses) are needed locally, the buildings should blend into the area so that they are relatively tenure-blind.
- Remove the height (and therefore density) limit on CMK buildings (excepting those adjacent to listed buildings) but add standards for Higher density (12.1f) and Raising the Height (16.2) below.
- Significant rises in density, potentially above our targets, should be permitted during regeneration, where supported by a neighbourhood referendum.
- Standards for high density should be applied. 1) Applications to develop at higher density will be assessed at development brief or design code or pre-app stage and must satisfy factors including capacity of infrastructure, density and height of adjacent properties, daylight and direct sunlight to applicant and adjacent properties, access to open space, on-site or adjacent access to local shops, and public transport services to a range of basic desire points, as well as the usual considerations. 2) Applications for significant densification during regeneration must demonstrate public support at a neighbourhood referendum. 3) Applications seeking to raise the height of buildings must pass light, obstruction of views and “overbearing” criteria. 4) Applications seeking to reduce parking or road space below policy will have to demonstrate good public transport services to a wide range of desire points. 5) Applications seeking to reduce open space below policy standards will have to demonstrate exceptional quality and variety of open spaces provided or very close by and exceptional spatial layout and place-making.
- It is disappointing that there is no visible linkage between this Policy and our aspirations for Milton Keynes to do more than “meet housing need”, to attract people to Milton Keynes who would otherwise go to other cities based on culture and knowledge economy.
- The optimum mix of dwellings for MK’s future might not be the optimum mix for developers’ profit. Policy needs to create a basis for the Council to influence the mix of homes that get built over the period of this Plan. Please can we have some additional wording within this policy to achieve this?
- Consider this approach to be desirable but concerned there is no legal requirement to enforce proposals on Housing Mix and Density. Danger that developers would circumvent the proposals in Plan:MK to maximise profits, rather than interests of the Council and residents of Milton Keynes.

16.8 Development industry (e.g. landowners, developers, agents)

- We would suggest that the policy allows for viability considerations.
- We support the principles and flexibility provide which allow developers to respond to changes in housing need and market demand.

16 . Homes and Neighbourhoods

- The approach to density outlined in Policy HN1 is also flexible, and we support the objective of making efficient use of land. Minimum density requirements could be useful in guiding land acquisitions and ensuring the efficient use of land, but the Council should not be restrictive in terms of maximum densities as different design approaches can be used to produce high quality design at all levels of density.
- Support this flexible approach which allows proposals to respond to the latest evidence and reflect local needs. The Policy and supporting text at paragraph 13.3 needs to make it clear that these percentages are just a guide, not stringent requirements that will be applied.
- Considering housing mix on a site by site basis, with reference to the SHMA, will also allow viability issues to be considered on a similar basis as housing mix often has a considerable impact on a sites ability to be developed viably.
- Support the approach of higher density development being encouraged in locations with good accessibility to services and public transport. This will enable sites to be designed to a density which is appropriate and responds to any site specific features or reflects the densities within the locality.
- The policy will also be supported by suitable design policy to help ensure development proposals are appropriate to their surroundings. Well drafted design policy is considered to be a more effective means of control for the Council than prescribed density requirements in a local plan.

16.9 Local organisations and interest groups

- Single person households will grow from 27% to 36% with number of people aged 17 - 24 expected to grow by 17%. Older people downsizing will compete in the same market as younger people trying to get onto the housing ladder. This is recognised in 13.5 and compounded in the social rental sector where people of working age, unemployed and in receipt of Housing Benefit are subject to a 'Spare Room Subsidy'. This only affects people of working age but if it is extended to older people as a way of pressuring them to release family accommodation - it could again add to the competition for smaller properties.

Question 4

16.10 Question 4, in light of the changing demographic shift within MK, do you think Policy HN1 should adopt a more prescribed approach to facilitate the provision of general market and affordable housing.

16.11 In the main, it is recommended that planning policy should be reflected towards specific age ranges although as it is accepted that a population is not a homogeneous group and it is therefore logical to suggest that they might have different aspirations, but could share similar interests and opinions. Some respondents suggested that current policy was not flexible in order to meet demographic change indicating that developers and commercial bodies will deliver the dwellings the market requires in the most suitable locations, otherwise they would be unable to sell them or maximise returns. A negotiation on a case-by-case basis will provide the best solutions with the principles set by the overarching Policy HN1. In total, 9 responses were received, of which, 5 provided general comments and suggestions, 3 objected and 1 supported. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.12 Statutory and National Consultees

- N/a

16.13 Neighbouring and other Local Authorities

- N/a

16.14 Town and Parish Councils

- Should adopt a more prescribed approach to enable older people to live independently for as long as possible.
- Should facilitate the provision of affordable housing to meet the needs of all age groups and household types to find suitable accommodation. There has been an increase in the provision of flats as affordable housing which is not always appropriate for young families, those with mobility issues or older residents. The lack of single storey dwellings has an impact on older residents and with the reduced amount of green space in newer estates families would be better serviced with starter houses rather than being forced to purchase flats.

16.15 Members of the Public

- Many of us might welcome living in well-spaced and attractively designed flats with lifts, good views and large balconies. Whatever our age or ability we may or may not wish to live in segregated or sheltered housing

16.16 Milton Keynes Council Ward Councillors

- Our elderly population is rising much faster than in most areas, and we need to provide a lot of suitable homes in a hurry.
- Policies should relate to elderly, disabled and infirm people as the age range at which conditions occur is remaining wide, whereas the age range of "elderly" is rising!
- In general, the elderly who want specific accommodation are looking for a quiet, stable orderly environment rather than specifically one with solely elderly people, so these needs should be reasonably compatible.
- The market for elderly-only accommodation is for disabled-adapted or adaptable flats, but clearly these need lifts.
- Number of inter-generational households is also increasing and purpose built accommodation alone will not suffice. We need to ensure that every home (house or block of flats) has a ground floor that is disabled-accessible, to ensure sufficient provision.
- Policy should ensure that new dwellings meet the needs of everyone in MK plus those people/households we want to attract as part of our growth, culture, education, and knowledge-based economy (and all other) aspirations for the Borough.
- Do not believe it would be helpful to single out any one group (such as older people) for specific mention: doing so would simply invite lobbying on behalf of different household types with their own needs.
- Amend HN1 to include an additional numbered point (at the start of the list), to say "Helps meet the housing needs of everyone in MK plus those additional people/households we want to attract to the city as part of our growth, culture, education, knowledge-based economy (and other) aspirations."

16.17 Development industry (e.g. landowners, developers, agents)

16 . Homes and Neighbourhoods

- Specific policy wording relating to older persons housing is not required, as schemes will respond to the need and demand that is evident at the time. Policies requiring older persons housing on all sites are too restrictive and do not reflect the fact that this type of accommodation has specific locational requirements in terms of accessibility to key services and facilities.
- Do not support overly restrictive or overly detailed policy requirements as demographics can change over time, and as the plan ages, even with reviews, this may not be fully reflective of localised market demands or changes in patterns of occupation.
- Strongly oppose such a policy. Flexibility is crucial to delivering viable schemes. Prescriptive mixes would not allow a flexible approach to be taken and may lead to inappropriate development with dwelling types in the wrong location. Developers and commercial bodies will deliver the dwellings the market requires in the most suitable locations, otherwise they would be unable to sell them or maximise returns. A negotiation on a case-by-case basis will provide the best solutions with the principles set by the overarching Policy HN1.

16.18 Local organisations and interest groups

- Would not support a prescribed approach.
- Suggest the following types be included: Council/Social/HA/public rented housing providing decent, affordable housing especially for younger people; Rented housing should be well managed; Supported housing for the mentally ill/young people leaving LA care; Affordable housing for care workers who will be needed to look after people in residential/nursing care; A night shelter/hostel for rough sleepers /homeless; More shared ownership properties (a MK innovation in the past); A mix of social and private housing within a grid square; Residential care homes that provide for end of life care (the York 3 tier system) so that elderly people do not have to move home when they require nursing care; More assisted care homes.

Question 5

16.19 Question 5, considers should there be a more prescribed approach to densities be adopted in Plan:MK. A mixed response was achieved. It was noted, blanket density approach will not reflect local needs and demands and public realm. This therefore might require a more localised and prescribed approach. Before any policy is implemented it would be worthwhile to conduct a full review of the local public transport links and opportunities. A one size fits all solution should not be adopted as it is essential that communities are developed to meet the local community need and therefore, different densities in specific locations are required in order to preserve and enhance the attractiveness of MK, whilst achieving efficient use of land which is for the benefit of the whole community.

16.20 In total, 10 representations were received. Of which, 7 provided general support and comments, 2 objected and 1 supported. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.21 Statutory and National Consultees

- N/A

16.22 Neighbouring and other Local Authorities

- A more prescribed approach to densities should be adopted for certain areas of growth and change because they would provide certainty and clarity to prospective developers whilst allowing the Council to manage growth and capitalise on the opportunities offered by these sites.

16.23 Town and Parish Councils

- A prescribed approach to density should not be adopted. Encouraging higher densities in certain areas is not appropriate without a full review of the services and transport links. The location alone should not dictate the density.
- Appropriate to state maximum densities. There should be a distinction of densities dependent on area and whether a development was located within CMK or out of centre.
- Densities of 15 to 25 dph are extremely low.

16.24 Members of the Public

- N/A

16.25 Milton Keynes Council Ward Councillors

- Proposed policy leaves it completely wide open with no “usual” density specified and a vague statement about higher density in areas well-served by public transport. Infrastructure planning will become impossible. We need to be more specific and specify ranges.
- We should be more prescriptive about housing densities. For developments of 50 dwellings or more, we should encourage developers to have significant density variations both sides of their overall/average density to create greater visual interest and a greater range of dwellings available to residents.
- We should encourage very different densities in specific locations, to preserve and enhance the attractiveness of MK overall while achieving efficient use of land. For CMK, I believe we should have no upper limit on density (but only a limit on height and appearance), and for rural areas and developments in close proximity to villages (both within the MK conurbation and outside), much lower densities will be expected than for more typical new developments.

16.26 Development industry (e.g. landowners, developers, agents)

- Object to a more prescribed approach.
- Needs to be flexible and responsive enough to allow the wider context to be taken on board by the decision maker.
- Prescriptive requirements tend to throttle creativity and fail to take on board very localised circumstances based on experience.
- The densities achievable within the area are already highly constrained by the New Residential Design Guide and various other standards. The proposed Design Policies will automatically steer you towards appropriate densities
- Adding additional policy constraints could make sites undeliverable and unviable and prevent schemes being able to appropriately respond to their contexts.

16.27 Local organisations and interest groups

- Consider a flexible approach is appropriate provided densities respect and reflect the local area

16 . Homes and Neighbourhoods

Policy HN2

16.28 Policy HN2 indicates that on development sites which provide for 11 or more homes, the council will seek a minimum of 33% of those homes for affordable housing. Consideration needs to be given to the impact of social rent / shared cost split housing and how this could affect the requirements regarding delivering affordable homes. Further clarification throughout the plan will therefore be required. In the main, the policy was welcomed by respondents, although it was considered that the current target is too low when considering the current housing shortage for affordable homes within the Borough. It is essential that the development proposals take account of the current and forecasted demographic change in order to meet the local need and attempt reduce the gap between shared ownership and market value housing.

16.29 In total, 19 representations were received. Of that, 13 provided general comments, 4 objected, 1 objected and 1 objected with further comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.30 Statutory and National Consultees

- Support policy

16.31 Neighbouring and other Local Authorities

- N/A

16.32 Town and Parish Councils

- Welcome the increase in affordable housing to 33%, but would like consideration be given to some flexibility on the social rent / shared cost split, particularly in neighbourhood plan areas, where it is backed up by a robust evidence base.
- Support proposal to provide more affordable housing. The level of affordable housing available for purchase should also be considered as the figures propose a strong leaning towards rent rather than ownership. Consideration should also be given to the type of property included within the provision to provide properties suitable for all.

16.33 Members of the Public

- 33% is too low, should be 40%+. Developers will object, but we have a housing crisis for people in manual jobs who can't afford to live here, and instead move to Bedford.
- Starter homes should be mentioned in either this, or a new policy, while recognising the point made in section 13.9
- No justification for 7% Shared Ownership and 26% Affordable Rent split, flexibility should be introduced into that split.
- The Plan should minimise the use viability arguments to reduce social housing occurring, stating that Milton Keynes will only allow such arguments when national government policy forces them to be considered.
- Support a mix of house tenure and pepper potting social housing.
- Support the provision of a higher percentage of affordable housing

16.34 Milton Keynes Council Ward Councillors

- Nearly $\frac{3}{4}$ of the housing expected already has either outline or full planning permission, with affordable housing at lower than 33%. To meet the Borough's affordable housing requirement 37% would be required on all developments remaining to be permitted. Accounting for exempted sites, the percentage will be closer to 39%. We recommend that the Council explores the viability of options up to 39%, with proportions of tenures pro rata. If it cannot require 39%, then seeks other options on its own land or through partnerships with private funders, to make up the difference.
- Second sentence of HN2 ii (mixed neighbourhoods) should apply to the homes under both parts i and ii, and therefore should be made into a separate paragraph.
- Lifetime Homes Standard should apply to all homes, and not just Affordable homes, and thus should be moved to HN6.
- Increasing the supply of affordable housing is currently MK's highest strategic priority, and that reductions in provision will only be considered in cases where overwhelming support from the NPPF applies.
- In paragraph 3.8, suggest adding "Under current legislation, homes at a range of rents from social rent to 80% of market rent, and shared ownership homes are the only permitted tenures that are affordable to the client group in MK. Should other tenures become available they should be permitted providing that the current SHMA indicates that they are affordable to at least xx% out of MK's bottom 40% of residents." And add "MK's SHMA currently indicates that 75% of those requiring affordable housing cannot afford more than social rent levels without housing benefit. In line with the Government's aspiration to end benefit dependency, the borough therefore sets an aspiration to build 75% of its affordable housing at social rent levels. However, it notes the current restriction on the proportion of social rent that can be required."
- The affordability gap continues to widen, and extends to some residents who do not qualify for affordable housing or housing benefit. The Council should support innovative solutions in terms of design, construction and funding and bring forward policies accordingly. Starter homes should be encouraged as part of the market housing offering, but not at the expense of "affordable" housing.
- Justification for 30% seems sound but the justification for 33% AH seems entirely spurious, unless some 10% of all new homes every year are built on sites of under 11 dwellings. Can we please see an informed projection of the number of homes per year likely to be built on these small sites, giving us a confirmation or a correction of the percentage AH requirement for the remaining "big sites", to achieve the target of 30% overall.
- Council should enforce 33% as a minimum on all developments where it considered this to be applicable.
- Second part of HN2 is a "get out" clause for developers. Should include measures to ensure the 33% is as tight as possible and there are no loopholes
- Gap between shared ownership and market value housing is too great. A step in the middle is desirable.
- Provision of starter homes could make a valuable contribution to the local housing mix and increase the choice available to some buyers. Recommend developing a separate policy on the provision of some starter homes on new developments

16.35 Development industry (e.g. landowners, developers, agents)

- We would suggest that the policy allows for viability considerations.
- The provision of affordable housing is supported to assist in the aims of the NPPF to create mixed and balanced communities, however, the increase from 30% to 33% is not appropriately evidenced or appraised and could negatively impact on the viability

16 . Homes and Neighbourhoods

and the delivery of housing which would be contrary to the core aims and objectives of the NPPF.

- The Planning Practice Guidance states that local planning authorities should be flexible in their requirements taking into account specific site circumstances.”
- Viability should be in accordance with paragraph 173 of the NPPF and the guidance within the PPG.
- In light of the miscalculation within the MK SHMA it is considered that the Affordable Housing rate should be provided at between 25% and 30%. Allocations are to be a minimum, so additional land should be allocated to meet the Affordable Housing need if this need cannot be met through the existing allocations with 25-30% provision. This approach reflects recent High Court Decisions including Kings Lynn v. Elm Park Holdings [2015] EWHC 2464 (Admin) and the Housing and Economic Development Needs Assessment Planning Practice Guidance. In particular at Paragraph 29.
- Should include an element of flexibility to allow for Government changes to Affordable Housing such as the introduction of Starter Homes.
- Support the statement that affordable housing will be subject to viability
- Concerning that the Council has not yet published a plan-wide viability assessment. The requirement for a minimum of 33% is purely based on an assessment of need. Difficult to comment on the policy proposals without having the viability evidence to consider it against.
- The policy make reference to Social Rent which we find Registered Providers are increasingly unable to take on due to the funding arrangements from the HCA. As the rents are lower than Affordable Rent, requiring this tenure also has viability implications.
- The weighting in favour of rental tenures is very high compared with most areas and will have further impact on viability.
- Reference to just ‘shared ownership’ instead of ‘intermediate’ tenures is too restrictive and should be widened in line with both the current definition of affordable housing in the NPPF and the proposed new definition that was outlined in the Housing White Paper.
- Reference in Policy HN2 to new homes being required to meet ‘accessible and adaptable homes standards as defined by the Building Regulations applicable at the time of the application’ is unnecessary and should be deleted.
- Need to clarify that the reference to “11 or more homes” applies to proposals which comprise 11 or more net additional dwellings in order to ensure consistency with national policy.
- Need to to clarify within the policy that the identified tenure mix for affordable housing will represent the Council’s overall aim or starting point, having regard to the identified need across the District, but that the precise tenure provided within specific development proposals may vary depending upon the nature of the development proposals and the need across the different tenures at the time of the application.
- The Council will need to test this scale of affordable housing provision through the Whole Plan Viability Assessment to ensure that this scale of affordable housing is likely to be deliverable in the majority of cases.
- Support the approach referring to the latest Building Regulations as this means that this element of the policy will remain up to date as and when changes are made to the Building Regulations
- Support the statement around exceptional circumstances and off-site/financial provision as there may be instances where off-site provision or financial contributions

are more appropriate for addressing a specific affordable housing need than delivering the 33% affordable housing on site.

16.36 Local organisations and interest groups

- Past experience has taught us that it is sometimes difficult to make a site work at 30%. Registered Providers will always prefer Affordable Rent while they still have capacity in the HCA affordable housing programme. Social Rent is likely to have the biggest financial impact on viability of site.
- Most RPs would prefer to see an increased percentage in Shared Ownership as this is a popular tenure in Milton Keynes. It also allows the RP to use financial investment to cross subsidise future developments.
- MKC should look at a more pragmatic approach by agreeing to a tenure split 50/50 Affordable Rent/Shared Ownership. This would potentially guarantee that MKC would not need to enter into a viability challenge to reduce the overall percentage, which would be the case if 33% was implemented. Consideration should be given to the use of Non-Grant Funded sized affordable units which would free up more land for additional dwellings. This would in turn increase the number of overall affordable in the area.
- Broadly agree, but that there needs to be a more holistic approach when considering sites with viability issues to ensure that the desired balance overall is achieved.
- Support development of policies to support and encourage the building of starter homes, the dearth of which is a particular problem for young people in Milton Keynes.
- The social rent proportion should be more than 5%, say 10%. There is huge unmet demand for social rent housing already.
- Should be a section about encouraging housing cooperatives and Community Land Trusts. These are ways of building sustainable communities.
- A growing number of examples of developers using the viability argument to water down this requirement.
- Affordable Rent at 80% market rent is not truly affordable for many - so the suggestion that of the affordable homes only 5% [approx. 29 per annum] would be "at a level broadly equivalent to Social Rent" is too small a number.
- Paragraph three of the policy states that in seeking the affordable housing provision the Council will have regard to "the current viability of developments including land value and other development costs". Where MKC owns the land could it consider offering sites with a deferred land value? It would obtain the full value of the land at any time the properties were sold or were no longer offered at Social Rent levels.
- Homes for rent at up to 80% of market rent and a variety of low cost home ownership options are not 'affordable' for a significant number of people: particularly if they are in low-wage, insecure, employment.
- No numbers are given for the number of homes to be provided at a level equivalent to social rent
- 15% of units to be 1-2 bed far too few to meet the needs of young people looking for truly affordable rental accommodation especially if they are also going to be competing with older working age people looking to downsize, to avoid the Bedroom Tax
- Don't think that development proposals take into account the changing demographic profile of Milton Keynes.

16 . Homes and Neighbourhoods

Policy HN3

16.37 Policy HN3 indicates that the strategic allocations set out within Plan:MK will be required to make provision for serviced plots of land to contribute towards meeting the evidenced demand for self-build and custom housebuilding in the Borough. Response were mixed. There is a need to clarify key terms/phrases such as "evidenced supply and demand" and define the problem with market demand. It is recommended that flexibility to mitigate against non-delivery of plots and therefore non-delivery of otherwise sustainable land for housing is included into the plan. It might be advantageous to set a clear target for self-builds, as MK used to be a leading Borough in the UK.

16.38 In total, 9 responses were received. 7 provided general comments, 1 objected and 1 supported the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.39 Statutory and National Consultees

- N/A

16.40 Neighbouring and other Local Authorities

- N/A

16.41 Town and Parish Councils

- Should ensure that where a plot is sold as a 'self-build' that it is to be undertaken as such and not as part of a small development.

16.42 Members of the Public

- Para 13.12 does not adequately address this subject. Plan:MK must deal with it positively and transparently.
- Not clear what 'evidenced supply and demand' means in practice.

16.43 Milton Keynes Council Ward Councillors

- Add that we will encourage housing co-ops and associations to assist those on low incomes to build their own homes.
- Illustrates the problem with "market demand". All dwellings built in MK have been speedily sold, irrespective of their type (including self-build). We therefore have no evidence for what the total market demand is for ANY type of dwelling (including self-build): we just know that the demand is more than the supply. Unless data indicates a shortage of potential buyers, we should allocate at least 3% of new homes each year as self-build plots - that would be just 50 a year.
- Self-build attracts many different sub-categories - niche developers, client-designed and client-managed projects, cooperatives, multi-generational households, and genuine owner-constructed properties, all of which we should want to support because they add something important to our communities and to our mix of dwellings.

16.44 Development industry (e.g. landowners, developers, agents)

- Requirement will have to form part of the Affordable Housing requirement rather than being additional otherwise risk strategic allocations becoming unviable due to the need to fund major infrastructure .
- Welcome policy in relation to self-build and custom build housing which is in line with government thinking and objectives and support the policy as it does not set out a specific scale of provision, and takes a flexible approach instead. This will allow negotiations over self-build plots on the basis of viability and demand to ensure that the site delivery is not delayed or prevented from coming forward.
- Any requirement should be tested through the Council's Viability Assessment of the Local Plan.
- Urge the Council to ensure that the policy has added flexibility to mitigate against non-delivery of plots and therefore non-delivery of otherwise sustainable land for housing. Should include a mechanism whereby if the self-build plots are not taken up within a given time-period then these revert back to market housing to be provided as part of the wider scheme.

16.45 Local organisations and interest groups

- Milton Keynes used to be one of the country's leaders in the provision of selfbuild housing. Evidence from elsewhere indicates that there could be a big demand and believe that a specific target should be introduced as at eg Teignbridge (where an SPD requires that sites of 20+ dwellings should include a minimum of 5% of plots for such use).

Policy HN4

16.46 Policy HN4 outlines the need for supported housing within the Borough and suggests the number of dwellings that will be required. It might be worthwhile to include a breakdown/ supportive evidence in terms of different types of supported housing which could be available as a result of this policy. It is suggested that this policy should not be promoted through the most relevant neighbourhood plans, as it is important support housing is delivered across the borough. The policy would benefit from considering the local demographic population in order to determine their needs for housing provision, as MK is considered to have a growth amongst ages 17-24 year olds.

16.47 In total, 5 representative were received. 4 provided general comments and suggestions and 1 supported the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.48 Statutory and National Consultees

- N/A

16.49 Neighbouring and other Local Authorities

- N/A

16.50 Town and Parish Councils

- N/A

16.51 Members of the Public

16 . Homes and Neighbourhoods

- N/A

16.52 Milton Keynes Council Ward Councillors

- Is there any breakdown of this figure into different types of supported housing? Is the need for other types (eg for learning disabilities or severely disabled) in total sufficient to warrant including it in strategic sites, with the specific type to be negotiated at the time? Can we protect bungalows from Right to Buy to retain what we have?
- Should consider a policy to protect council bungalows and other adapted properties from the Right to Buy option.

16.53 Development industry (e.g. landowners, developers, agents)

- Requirement for supported housing will have to form part of the Affordable Housing requirement rather than being additional otherwise risk strategic allocations becoming unviable due to the need to fund major infrastructure .
- Welcome inclusion of policies relating to the provision of specialist and supported housing with Plan: MK.
- Recommend that the Council do not place too much reliance on the delivery of this type of accommodation through neighbourhood plans, which may or may not come forward and provide a policy approach within Plan: MK which encourages delivery of this type of accommodation in general across the Borough.
- It is important that the Council has an up-to-date and robust understanding of the scale of this type of need across the Borough and provides a positive approach for delivering the accommodation to meet this need. Specialist housing schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents lounge, library, dining room, guest suite, quiet lounge, IT suit, assisted bathroom, internal buggy store, reception and care managers office and staff facilities.

16.54 Local organisations and interest groups

- HN4 and HN5 focus on the needs of the elderly and disabled and other vulnerable groups in the community. However, there are young, single, people who approach the YMCA for support who need a home but are not ready to live independently. For this reason, YMCA Milton Keynes has been pursuing its plan to develop a new YMCA in CMK with capacity to provide a range of supported accommodation for 196 residents: some 50 more than it can accommodate currently.
- Where possible consideration should be given to the needs of the growing population of younger people [17-24 year olds 17% increase between 2010 and 2026] for independent or supported living.

Policy HN5

16.55 Policy HN5 indicates an additional net increase of around 1,200 bed-spaces to help meet the accommodation needs of those who need specialist (C2) residential or nursing care will be supported in the Borough. A broad range of comments were received. Repetition of the previous policies (HN3 and HN4) occurs and revisions and amendments might be required. A review of the policy is recommended with relevant organisations and bodies (e.g. Adult Social Services) to ensure the policy fulfils and achieves the appropriate provisions to meet future need and demand amongst MK's demographic population.

16.56 In total, 3 representations were received who all provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.57 Statutory and National Consultees

- N/A

16.58 Neighbouring and other Local Authorities

- N/A

16.59 Town and Parish Councils

- N/A

16.60 Members of the Public

- N/A

16.61 Milton Keynes Council Ward Councillors

- Should consider a policy to protect council bungalows and other adapted properties from the Right to Buy option.
- HN5 is an expression of need / aspirational statement, rather than a policy as it did not explain how this would be achieved, and it contradicts the information received by the Budget Scrutiny Committee in January 2017 from the Adult Social Care Team on what it considered to be the number of residential care bed-spaces required.
- Essential that the team working on developing Plan:MK discussed proposals with colleagues in other departments to ensure that they matched individual departmental policies and were achievable.
- There will be a need for some more nursing beds. Please review with Adult Social Services and ensure that an appropriate % is used.
- Support the need for a quick injection of temporary accommodation at present, to make it possible to accommodate the statutory homeless in Milton Keynes until levels of affordable housing provision rise. Support allowing some departure on typical density and possibly on minimum space to enable this, providing the high density requirements were met, and the space was liveable-in.
- Support the provision of night shelter accommodation for rough sleepers, until support can be given to enable them to move on to other forms of accommodation.

16.62 Development industry (e.g. landowners, developers, agents)

- Overlap between HN4 and HN5. Recommend amalgamating them, or revisit the policies to ensure it is clear exactly what each of these relates to.

16.63 Local organisations and interest groups

- N/A

16 . Homes and Neighbourhoods

Policy HN6

16.64 Policy HN6 indicates the viability that proposals for 11 or more dwellings will be required to meet. Further justification and evidence of this policy is required, as the policy as written, is perceived by some stakeholders as subjective, unrealistic and unjustifiable. It should be considered of the topography and geography of certain sites as this may make them less suitable to complying with optional accessibility standards and therefore, it is recommended that a level of flexibility is built into the policy.

16.65 In total, 7 responses were received. 3 provided general comments and suggestions, 1 supported, 1 objected and 2 objected with further general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.66 Members of Public

- Phrase “subject to viability” should be changed to “subject to viability tests imposed by government”

16.67 Town and Parish Councils

- Walton Community Council fully support the policy.

16.68 Milton Keynes Council Ward Councillors and Committees:

- Paragraph regarding accessible and adaptable homes should be moved from HN2 to HN6 (*Exact paragraph outlined in comment*)

16.69 Development Industry

- Three responses felt the policy is currently not ‘justified’; the justification and rationale for the percentage requirements need to be demonstrated through robust evidence.
- The evidence likely to be required is set out in the PPG; none of these points have been appropriately assessed.
- Needs to be amended to include the PPG requirement for policies to take account of site specific factors which make them less suitable for complying with optional accessibility standards.
- It is inappropriate that at least 60% of all dwellings should meet the M4(2) requirements of building regulations given the amount of need from older households will already be in existing homes and that most of those new households seeking housing will be in their twenties and thirties.
- The figures of new build housing needing to meet M4(3) are too high and not supported by the evidence.
- House builder has not yet produced a range of core house types which comply fully with the requirements of Building regulations Part M4(2). To fully comply for 60% of a development would require a substantial re design of a large proportion of house types and thus such an onerous policy is not supported.
- Need to justify the stated minimum percentages through an appropriate evidence base. The viability element of the policy will also need to be retained to ensure a necessary degree of flexibility

Question 6

16.70 Question 6, reviews the viability of the proposed policy HN6. A broad range of comments were received. For example, some respondents suggested that a higher target should be adopted for wheelchair accessibility, however, other responses disagreed by indicated that there was no way of ensuring 5% goes to those in need; would support raising levels further to compensate. Further consideration should also be given to construction cost as this could affect the viability of developments. A robust evidence based is required to support these additional proposals.

16.71 In total, 6 representatives were received. 4 provided general comments and suggestions and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.72 Town and Parish Councils

- Shenley Church End Parish Council: No available data to support the setting of higher targets.

16.73 Milton Keynes Council Ward Councillor and Committees

- Numeric targets should meet the projected demand for such properties, bearing in mind the total demand and the existing number of applicable properties.
- Support requirement for disabled and wheelchair adaptability and for built in wheelchair/scooter/walking frame accessibility for affordable housing.
- Welcome requirement for “built in” accessibility in affordable housing. Less convinced for need in market housing, as there is no way of ensuring 5% goes to those in need; would support raising levels further to compensate.
- Higher targets are not necessary.

16.74 Development Industry

- Given the above proposed standards are already subject to viability, it would seem challenging to seek to make these requirements even more onerous.
- Strong objection to setting higher standards, due to high construction costs of these dwellings already affecting viability. No clear evidence that this is required.
- Any increase in proposed targets would be need to be based on robust evidence.

16.75 Local Organisation

- Should be 10%; the same as for affordable homes; this would not threaten viability.

Question 7

16.76 Question 7, investigates if a policy is required to guide and support the provision of temporary accommodation. A broad range of opinions were achieved and it was suggested if the right balance of affordable housing was delivered temporary accommodation would be obsolete. Further consideration is required to the criteria, which will be used to understand reasons behind each case of homelessness.

16.77 A total of 7 representations were received, all 7 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16 . Homes and Neighbourhoods

16.78 Members of Public:

- Temporary and other housing supply through the Council and/or other agencies should be increased so as a young couple without capital can obtain an affordable home within 6 months of request.

16.79 Town and Parish Councils:

- Shenley Church End Parish Council: support the provision of temporary accommodation for those in need.
- Walton Community Council: would this be temporary accommodation for the homeless or for those who are temporarily homeless? Would .rather see a policy that tackles both scenarios and provides a permanent solution.

16.80 Milton Keynes Council Ward Councillors and Committees:

- Support inclusion of policy on temporary housing, likely to be an issue for some years; should be reviewed at every review point for the plan.
- Temporary housing should still meet practical space standards sufficient for it to be liveable-in for the target group.
- We should ensure we meet the housing needs of everyone living in MK and those we want to attract here, including rough sleepers and homeless people.
- Also under the category "temporary" accommodation, we should be thinking about "temporary" residents/households (e.g. students, those on contract work (*more examples provided in representation*)), whose requirements might be different from "permanent" residents.
- Policy should be written that sets out the totality of need for "temporary" dwellings and supports in principle development proposals addressing any aspect of this need.
- Strong recommendation that a defined policy on this is included and is developed in consultation with Milton Keynes Homelessness Partnership.
- Your:MK should also be involved given the identification of 300 quick-build sites for temporary accommodation units.
- If the Council achieves the right balance of affordable housing, then need for temporary units would be reduced to those only needed in emergency.

16.81 Local Organisations and Interest Groups

- Parks Trust: Support such a policy; criteria should ensure temporary accommodation will not be permitted in Milton Keynes' parks. Temporary accommodation is not compatible with their key use of providing space for recreation, leisure, biodiversity and flood capacity.
- Woburn Sands and District Society: Support inclusion of a policy, but are unclear what criteria should be used as an understanding of the reasons behind each case of homelessness is needed and then should plan to meet that need, whether through hostels, private-rented etc.

Policy HN7

16.82 Policy HN7 indicates the Councils ambition to maintain mixed, balanced, sustainable and inclusive communities. It is essential that a balance of HiMOs is delivered into a community but recognition that they can also be detrimental to the fabric local communities. Recommended that when and where possible, management of HiMOs should

be provided by a single landlord. It would be worthwhile to learn from other sectors as it was suggested that the Knowledge based sector can play a role in identifying innovative new build solutions, which might allow for some of the intentions of the policy to be met. The affect of the Open University's 800 - 1000 postgraduate students who live locally within Mk would also be beneficial to consider.

16.83 In total, 7 representations were received. 5 provided general comments, 1 supported and 1 objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.84 Member of Public

- Would welcome some means of making residents more responsible for the public impact caused by the use of their home.
- Overlooks the need to factor in the The Open University's 800 - 1000 postgraduate students who live locally within the town. The needs of these student for HiMO should not be ignored. Knowledge based sector can play a role in identifying innovative new build solutions.

16.85 Town and Parish Council

- Walton Community Council supports the policy.
- CMK Town Council: Policy is weakly worded and not workable as a policy to manage HiMO applications. Needs to be more strongly worded and clearly defined.
- Shenley Church End Parish Council: Object to the policy as HiMOs can be detrimental to local communities (increased traffic, noise, parking and issues with disposal of waste)

16.86 Milton Keynes Ward Councillors and Committees

- HiMOS are an essential part of the mix of accommodation required by a community; encourage MKC to build them as part of its own commercial housing plans. Wherever HiMOS are proposed, the communities should be given the opportunity to give their views.
- Concern too many HiMOs in an area having a negative effect on social cohesion. Poorly managed and unregulated HiMOs proving detrimental to reputation of an area.

16.87 Local Organisations

- HiMOS and student accommodation are required in significant numbers; young people will only be able to afford shared housing due to changes in in local housing allowance.
- Where a whole block of row of houses could be used as a HiMO, it should be under the management of a single landlord.

Policy HN8

16.88 Policy HN8 outlines the Council's position to support student accommodation within the Borough. In the main, there was support for the policy in terms of its principles and intentions. It is currently perceived there to be limited evidence in order to support this policy and too restrictive in terms of location. Consideration to how the existing student accommodation is used needs review in order to maximise its potential.

16 . Homes and Neighbourhoods

16.89 In total, 4 representations were received. Of that 2 provided general comments and suggestions and 2 supported the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.90 Town and Parish Council

- Shenley Church End Parish Council; not enough information to support this policy.
- Walton Community Council supports the policy.

16.91 Milton Keynes Ward Councillors and Committees

- Support inclusion of a student accommodation policy; this should be differentiated from other HiMO accommodation and need for numbers to be included in SHMA and an understanding of whether there is urgent need for any sites.
- Support allocating a student accommodation site for University MK. It may be two sites are required for the University and its accommodation; this could assist in generating footfall within CMK and assist invigoration of CMK.
- Create student accommodation earlier and consider leasing for short term use by young single people.
- Prefer student-style shared apartments to separate rooms with minimal facilities.
- This should be demand-led, as and when a university has been established.

16.92 Developer

- Policy is too restrictive regarding the location; CMK by virtue of location should be suitable for student accommodation.
- Accessibility point is contradictory; seeks to encourage sustainable modes of transport whilst encouraging on-site parking.

Question 8

16.93 Question 8, considers if policy HN7 should allow for exemptions to HiMO proposals where it involves a change of use of entire blocks or a complete row of houses within a street. There is concern that it should not allow for exemption as it could have a detrimental impact. It would be beneficial if the plan provided further clarity in terms of converting a large property into a HiMO and specific student accommodation.

16.94 In total, 5 responses were received. 4 provided general comments and suggestions and 1 objected to the proposals. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.95 Town and Parish Council

- Walton Community Council: not supportive of changing exemption due to detrimental impact to an area.
- Shenley Church End Parish Council: Policy should not allow for exemption as it would not support a mixed and balanced community.

16.96 Milton Keynes Council Ward Councillors and Committees

- Support proposal for special-purpose neighbourhoods for students due to homogenous needs, but not for mixed client group accommodation due to varying needs. Prefer students to be accommodated in shared apartments.
- Need policy encouragement for purpose-built HiMOs if there is objective need for either category (low-cost HiMOs & Executive HiMOs), and we should not reduce the existing level of protection for immediate neighbours or the wider community against excessive levels of HiMO conversions.
- Plan should make it clear that there is a difference between converting a large property into a HiMO and specific student accommodation.

16.97 Local Organisations and Local Interest Groups

- No exemption should be allowed as it would change the nature of the wider mixed community area that the Council is looking to achieve.

Policy HN9

16.98 Policy HN9 details the criteria which development must achieve in terms of loss of conversion of residential dwellings. It is recommended to remove Gypsy and Travellers sites from the policy and the council should seek evidence in writing (e.g. independent examiners report) to determine if individual properties are beyond economic repair. It would be beneficial if the policy could indicate the intended scale/size of development. Some responses suggested the deep concern to include Gypsy and Travellers sites in the same policy. The policy would also benefit from suggesting the scale of demolition it intends, as HN9 could be interpreted as applying to large scale developments.

16.99 In total, 5 responses were received. 2 supported, 2 objected and 1 provided general comment and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.100 Members of Public:

- Policy not acceptable. Section A would only be acceptable to the loss of a very small number of dwellings. Policy should have no application to the regeneration of an estate or section of an estate.
- Section B should be moved to Policy HN11.
- For estate, or partial estate regeneration, a new policy should be created, reflecting the policy statement of Woughton Community Council

16.101 Milton Keynes Council Ward Councillors and Committees:

- Support policy to prevent loss of residential accommodation and note separate permission to compulsory purchase would be required if meaning existing residents were not backing the scheme.
- Clause A should have additional protection, adding; "and existing residents overwhelmingly support the scheme."
- ii) Should refer to site not dwelling; this would encourage redevelopment proposals rather than demolition.
- Policy seems like an open license to build 2 homes or any plot occupied by 1 home. In the absence of any other criteria object profoundly to this policy.

16 . Homes and Neighbourhoods

- Deeply undesirable and unnecessary to include Gypsy and Travellers sites in the same policy.
- Section B should be moved to Policy HN11 and the wording of HN9 should be tightened to provide clarity of purpose.
- Policy needs to be clear that this is nothing to do with regeneration programme; which should be subject to a separate policy.
- (i) Needs to be clear this does not apply to large scale demolition of existing estates.
- (ii) Reasonable if demonstrated that individual properties were beyond economic repair.

16.102 National and Statutory Organisations

- Bucks CPRE: Support policy as drafted.

16.103 Local Organisations and Interest Groups:

- YMCA: There is no policy in Plan:mk regarding the conversion of commercial units to residential.

Policy HN10

16.104 Policy HN10 indicates the proposal for small-scale "affordable" housing schemes in order to meet local rural needs. The policy should make recognition to the relevant neighbourhood plan in order to reflect the views of the local population, and rural sites should be removed from the proposals unless stated in the local neighbourhood plan. In general, the feedback received was in support of this policy.

16.105 In total, 4 representations were received. 2 supported and 2 provided general comments and suggestions. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.106 Town and Parish Councils

- Gayhurst Parish Meeting: number of small parishes which are unlikely to prepare a neighbourhood plan; the absence of a plan should not give carte blanche to development within or adjacent to development boundaries. In the absence of a plan any new developments should be subject to local referendum or similar consultation.

16.107 Milton Keynes Council Ward Councillors and Committees

- Unlikely to happen, but safeguards are appropriate if it did.
- Use of rural exception sites should be ruled out unless taken into account in an approved Neighbourhood Plan

16.108 National and Statutory Organisations

- Bucks CPRE: Support Policy as drafted

Policy HN11

16.109 Policy HN11 details the sites that will be allocated for Gypsies and travellers within the Borough. There is potential to revise the proposed allocation of pitches at specific sites in order to reflect local knowledge, for example, Calverton and Willen. Section B, should be amended to ensure that no site should have an adverse affect towards any heritage asset.

16.110 In total, 3 representatives were received. Of which 2 provided general comments and 1 supported the proposal. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

16.111 Milton Keynes Ward Councillors and Committees

- Limit of 8 seems very low since Calverton is already operating at 12 and Willen has plans to extend to 10.
- Part B of Policy HN9 to be added to HN11.

16.112 National and Statutory Organisations

- CPRE Bucks: Support the policy as drafted.
- Historic England: proposed addition to Section B of Policy to include *"The site should not adversely affect a heritage asset."*

Policy HN12

16.113 Policy HN12 indicates the criteria that sites for travelling showpeople should adhere to. In total, 2 responses were received. 1 supported and 1 provided general comments and suggestions. A summary of their comments is shown below:

16.114 National and Statutory Organisations:

- Bucks CPRE: Support Policy as drafted.
- Historic England: proposed addition to Section B of Policy to include *"The site should not adversely affect a heritage asset."*

17 . Culture and Community

17 Culture and Community

Chapter 14 - Culture and Community

17.1 The Chapter indicates the plan's commitment to building healthy and inclusive communities. It also outlines the plan for provision of community, leisure and cultural facilities in Milton Keynes. It was suggested that lessons should be learnt from surrounding boroughs and neighbourhoods, for example, the London Borough of Ealing's 'Planning for School Development Plan Document' which provides policy direction and establishes the Council's approach to providing primary and secondary school places and their sites' identification. Recognition of national policy should be included within the plan where and when appropriate.

17.2 In total, 69 responses were received, of which 10 supported, 13 objected, and 46 of them were general comments.

17.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.4 What members of the public said:

- Think Plan:MK should put more attention on the issue of cultural diversity and social cohesion in the city.
- Suggest removing Para 14.10 as it is nonsensical. And suggest the MKC to refer to authoritative sources such as the Planning Portal Glossary and UNESCO.
- Hope MKC can make reference to Leicester Core Strategy regarding social and cultural diversity policies.
- Suggest that town centres and major sports and leisure venues such as CMK Market, Willen Lake, Campbell Park, and Station Square should be prioritised and protected for cultural interaction events.

17.5 What Town and Parish Council said:

- N/A

17.6 What Ward Councillors said:

- The chapter should cover CMK, the Bowl, the concert hall and other performing spaces. Also, there is a need for the school theatres to be upgraded.

17.7 What neighbouring and other local authorities said:

- N/A

17.8 What the development industry (e.g. Landowners, developers, agents...) said:

- Largely supportive of the policies in Chapter 14 that ensure existing community facilities are protected and new facilities are provided within new development.

17.9 What national/statutory organisations said:

- Suggest changing the sub-heading above Para 14.37 to 'Education, Safety and Health'. The text should also recognise the important role of the Emergency Services. Also, suggest including the following text:
 - "The delivery of new development can place a significant strain upon existing Emergency Services through additional demand. It is important that new development has regard to the potential impact on Emergency Service providers and seeks to mitigate this impact through the provision of new infrastructure where appropriate or the delivery of developer contributions towards the provision of new infrastructure. The ability of Emergency Services to maintain the safety and health of both new and existing populations is fundamental to delivery of sustainable communities."
- Suggest the plan to explicitly refer or signpost to national policy. And in particular, the NPPF Para 72, and the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011).
- Suggest Plan:MK to make reference to London Borough of Ealing's 'Planning for School Development Plan Document' which provides policy direction and establishes the Council's approach to providing primary and secondary school places and their sites' identification.

17.10 What local organisation/interest groups said:

- In line with the NEP's GI Vision and Principles, wish to see reference to green infrastructure and open spaces as a 'requirement' of any community.
- Statement CC1. Support the development of new cultural policy. Wish it could include a consultation with various stakeholders, as well as a research to assess the cultural strategy of UK and European cities.
- Statement CC1. The new Cultural Policy should incorporate the planning and feasibility work undertaken in 2014 regarding development of a cultural zone focused around Midsummer Boulevard East.

Policy CC1

17.11 Policy CC1 indicates how the provision of public art can enhance the environment and provide broader social benefits. It would be beneficial if the capital cost was justified and further clarification is required in terms of community facilities. As written, the policy is considered too vague. Removal of Section 106 agreements from the policy is advised as it should conform to the CIL 123 Reg List. Some responses suggested that there was funding issues and additional finances should be made available to support the principles of this policy.

17.12 In total, 9 representations were received. 7 provided general comments and one objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.13 What members of the public said:

- Wish to see clarification as to why a figure of 0.5% of the capital cost of new development should be allocated towards cultural wellbeing.

17.14 What Town and Parish Council said:

17 . Culture and Community

- N/A

17.15 What Ward Councillors said:

- Support the aspiration of the policy. But think the clarification is needed on how the 0.5% of the cost will be used without revealing the cost of the development. Suggest the calculation to be based on the market value of the finished development.
- There is a need to clarify whether community facilities, such as community centre or schools, are count as contributions towards 'cultural wellbeing'.

17.16 What neighbouring and other local authorities said:

- N/A

17.17 What the development industry (e.g. Landowners, developers, agents...) said:

- Support the provision of Public Art across the area. However, would like to see clarification on 'capital cost'.
- Suggest the policy to state that funds can be used to commission public arts at or in the vicinity of the development proposed.
- Suggest deleting the policy and replacing it with a policy regarding public art and cultural wellbeing through S106/CIL in the Arts and Public Art Strategy. The current policy is too vague in describing where and for what the contributions would be spent.
- Think the policy should be removed as it is not compatible with S106 Pooling Requirements and should form part of the CIL 123 Reg List.

17.18 What national/statutory organisations said:

- N/A

17.19 What local organisation/interest groups said:

- Wish to see more ambitious approach to the contribution of public art and cultural activity, which stipulates a minimum 0.75% of the capital cost of a new development allocated towards public art and cultural activity.
- Suggest increasing the 'Percent for Art' to 1% as it is most vulnerable in financial viability statement considerations.
- Suggest that all planning application should be assessed individually on its appropriacy to adopt this policy.

Policy CC2

17.20 Policy CC2 specifics when planning permission will be granted for the location of community facilities. Revision should be made to the definition of community centres, however, conflicts between different community groups might exist. Therefore a holistic view in terms of community facilities is required in the revised draft.

17.21 In total, 9 responses on the policy were received, of which 2 supported, 1 objected, and 6 of them were general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.22 What members of the public said:

- It is wrong to assume 'places of worship' are separable from 'community centres' as many of them are multi-purpose premises.
- Suggest Plan:MK to link related sections: ER8 and CC2.
- Hope the MKC is aware of the possibility of conflicts between religious communities, mainly due to the use of parking spaces, when more than one place of worship is permitted in the same employment area. Suggest conducting a more culturally sensitive examination.
- Suggest building and running community buildings for not-for-profit groups in MK.
- Support the introduction of such policy addressing new community facilities and hope the MKC could take into account all the impacts of such provision.

17.23 What Town and Parish Council said:

- Support the policy but hope the MKC could ensure the provision of sufficient parking and proficient management at the buildings.

17.24 What Ward Councillors said:

- Think there is a need to amend the policy which precludes new community facilities to be built in new residential neighbourhood unless they are in a Local Centre.

17.25 What neighbouring and other local authorities said:

- N/A

17.26 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

17.27 What national/statutory organisations said:

- N/A

17.28 What local organisation/interest groups said:

- Suggest changing the title of CC2 into 'Location of Community and Cultural Facilities'.
- Plan:MK lacks provision for substantial places of worship considering the serious lack of supply in larger plots at present. It should also consider change of use or new allocation of land away from town, district and local centres.
- Suggest including the following in the policy text:
 - Non-residential community facilities at other locations if all of the following criteria are met:
 - The proposal is accompanied by evidence that demonstrates why it cannot be satisfactorily accommodated at other locations;
 - There would be no conflict with existing or potential neighbouring uses
 - The site has adequate parking and access arrangements
 - The number of places of worship permitted in an area does not undermine its main planning use.

17 . Culture and Community

Policy CC3

17.29 Policy CC3 outlines the council's position if proposals involve the loss of an existing community facility or the loss of a site allocated for such a purpose. In the main there was support for this policy, although consideration should be given to educational land that does not belong to a Council-owned school.

17.30 In total, 4 responses were received. 2 responses supported the policy, 1 objected and 1 provided general comment and suggestion. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.31 What members of the public said:

- Support the policy to protect community facilities to ensure the local community could have access to the facilities.

17.32 What Town and Parish Council said:

- N/A

17.33 What Ward Councillors said:

- The policy need to be amended to cater for educational land that does not belong to a Council-owned school.

17.34 What neighbouring and other local authorities said:

- N/A

17.35 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

17.36 What national/statutory organisations said:

- N/A

17.37 What local organisation/interest groups said:

- Welcome the policy as they reflect Para 70 and 156 of the NPPF regarding the promotion and protection of community facilities.
- Suggest changing the title of CC3 into 'Protection of Community and Cultural Facilities'. The text should also include an explanation for the term 'Community and Cultural Facilities': cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

17.38 1 response was received from local organisation/interest group:

- Welcome Statement CC2. But concerned about Para 14.29 and think that some community facilities should not be located at a central location.

17.39 No response was received on this policy.

Policy CC5

17.40 Policy CC5 indicates the Council's position in terms of granting planning permission for the use of land as burial/memorial ground or green burial/memorial ground. There is a preference for the existing burial sites to be expanded. Two responses were received and they both conflicted one another.

17.41 In total, 2 responses were received, 1 supported and 1 objected the policy. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.42 What members of the public said:

- N/A

17.43 What Town and Parish Council said:

- N/A

17.44 What Ward Councillors said:

- There is a need to cover parking and traffic at burial services.

17.45 What neighbouring and other local authorities said:

- N/A

17.46 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

17.47 What national/statutory organisations said:

- N/A

17.48 What local organisation/interest groups said:.

- Suggest that traditional burial sites should expand in line with population growth to cater for different faith and religions.

Question 1 Reserve Sites

17.49 Question 1 indicates the council's intentions to review its approach for the provision of reserve sites in new developments. A wide range of responses were received. It is suggested that the current MKSHLAA is out of date and is not applicable/ appropriate as part of an up to date evidence base needed for Plan:MK. It is recommended that

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consideration is given to what type of alternative use would be allowed and the impacts on the surrounding community. Furthermore, it is recommended that the whole community is planned at the same time rather than the suggested community reserve site, for example, advocacy of a master plan.

17.50 In total, 7 responses were received, 2 objected and 5 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.51 What members of the public said:

- N/A

17.52 What Town and Parish Council said:

- Think that the selection of new strategic sites for development, including the Strategic Reserve Site in Bow Brickhill, Woburn Sands and Wavendon, is premature as the evaluation of sites submitted to the recent Call for Sites has not been completed.
- MKSHLAA is out of date and cannot be relied on as part of the up to date evidence base needed for Plan:MK. Believe that the Call of Sites is more suitable for identifying sites that are more suitable for development. Plan:MK should make the appropriate amendments.
- MKC should publish the criteria and assessment that the choice to exclude the large development site to the north of MK and to include the Strategic Reserve Site was based.
- Whether the mechanism to allow sites to be used for alternative uses should consult residents and parishes.
- MKC should consider what type of alternative use would be allow and their impacts on the surrounding community.
- This should make reference to neighbourhood plans.

17.53 What Ward Councillors said:

- Support the need for general reserve sites to be allocated on Strategic Sites. Also, support giving full flexibility of eventual use, but the proposed use should consult the public.
- Suggest planning the entire community in advance rather than having 'community reserve site'. But schools should be built with excess capacity, or have reserved and suitable space for future expansion.

17.54 What neighbouring and other local authorities said:

- N/A

17.55 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

17.56 What national/statutory organisations said:

- N/a

17.57 What local organisation/interest groups said:

- Think the questions do not address the key issue which is the sites allocated are too small for community users and the terms are too unattractive. New approaches are required for their allocation and the terms on which they are used.

Policy CC6

17.58 Policy CC6 defines the criteria for the proposal for upgrading and expansion of existing schools and developments of new schools in locations where additional provision might be required. There is current concern regarding the feasibility of the policy in terms of land availability. Further consideration should be given to ensure that all students are catered for within a defined catchment area. Potential areas have been outlined below that might benefit from the provision of new educational facilities.

17.59 In total, 7 responses were received on the policy, 1 supported, 2 objected, and 4 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.60 What members of the public said:

- N/A

17.61 What Town and Parish Council said:

- Support the proposal for new schools and it should include access to public transport and outdoor facilities for sport and recreation.

17.62 What Ward Councillors said:

- Concerned about the availability of sites proposed to be allocated for new or expanded schools within the existing city, considering the number of additional homes proposed. Suggest the MKC to assess the need for new schools as well as their suitable sites.
- There is a need to clarify the child yield in CMK blocks.
- Suggest removing the Government's Wave program for all future school allocations as it is more an Education Policy .
- Think there is a need to re-draft the policy to cater for all types of schools which might not fit into the defined pupil age bands or aimed at the surrounding catchment area.

17.63 What neighbouring and other local authorities said:

- Aware that South East MK expansion and the Eaton Leys development could have impact on Buckinghamshire's school. Suggest that the provision of a new secondary school and/or expansion of the existing local school to meet the scale of housing growth.
- Suggest developing a cross-authority solution by both authorities to ensure sufficient provision of schools and other facilities for new developments near the MK/Bucks boundary.

17.64 What the development industry (e.g. Landowners, developers, agents...) said:

- The proposed South West MK Site requires additional school place and their delivery has to be supported by statutory consultees.

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17.65 What national/statutory organisations said:

- N/A

17.66 What local organisation/interest groups said:

- Welcome the requirement for safe drop-off and pick-up provision for new schools. However, the amount of space allocated should reflect the size of the school and the nature of its urban location. The proportionate space requirement should be specified.

Policy CC7

17.67 Policy CC7 indicates the requirements for new school sites within the Borough. Further clarification is required in terms of the approach and evidence used to inform the minimum site sizes. Additional guidance therefore might be needed to enforce this policy.

17.68 In total, 3 responses were received on this policy, 1 objected and 2 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.69 What members of the public said:

- N/A

17.70 What Town and Parish Council said:

- N/A

17.71 What Ward Councillors said:

- Think there is a need to re-draft the policy to cater for all types of schools which might not fit into the defined pupil age bands or aimed at the surrounding catchment area.

17.72 What neighbouring and other local authorities said:

- N/A

17.73 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

17.74 What national/statutory organisations said:

- Welcome the policy to provide new schools and especially the consideration to enable schools' expansion in the future.
- There is a need to clarify the approach and evidence used to inform the minimum site sizes stated for new schools in CC7. It should reference the area guidelines and formulae in the DfE's Building Bulletins 98 and 99.

17.75 What local organisation/interest groups said:

- N/A

Question CC2

17.76 Question CC2, asks for informative opinion in terms of enabling school expansion adjacent to school sites in new developments areas, or in areas subject to significant redevelopment in order to ensure that there is sufficient land available to allow for the future expansion of new and existing schools. The general thrust was supportive, however, it was recommended that sites should be reserved for up to 20 years or the period of the core strategy (i.e. 2031). Furthermore, it was advocated that reserve sites should not be solely inclusive for schooling and the policy should be extended and expanded, for example, for commercial, sporting and religious facilities

17.77 In total, 4 responses were received, 1 supported and 3 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.78 What members of the public said:

- N/A

17.79 What Town and Parish Council said:

- Reserve sites for schools should be retained for a longer period than 10 years.

17.80 What Ward Councillors said:

- Support the proposed policy. But require the sites to be reserved for up to 20 years. And the size of the site should consult the school.
- Support spaces to be reserved for its expansion in the future.

17.81 What neighbouring and other local authorities said:

- N/A

17.82 What the development industry (e.g. Landowners, developers, agents...) said:

- There are other community and commercial uses for which land could be reserved adjacent to schools and/or local centres as part of the inclusive and sustainable growth of new development areas.
- The period of time for protection of new reserve sites should not be an arbitrary period of 10 years (or another fixed figure) but should be bespoke reflecting the delivery trajectory for new development and as a minimum should be until the completed occupation of the grid square/urban extension in question;
- Should not be limited to education uses but should also include local community, religious, leisure, sports or health uses; services which are equally important to the successful operation of a new neighbourhood, grid square or urban extension and which may not be able to be identified at the outset
- Suggest to include the following:
 - A reserve site policy should be put in place which:

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- protects existing reserve sites in MK for a substantial period following completion of the grid squares (as there is no ability to allocate significant additional sites within established grid squares; and
- seeks provision of new reserve sites at a standard rate in line with the MK Planning Manual calculation in new developments/grid squares/urban extensions;

17.83 What national/statutory organisations said:

- Welcome the 10 years reserve period for schools' expansion. However, the uses of these sites during the period require careful consideration. Also, the size requirements for each site should be site specific based on an assessment on the potential future demand.

17.84 What local organisation/interest groups said:

- Support this approach to allow for school expansion, but not for 10 years and instead for the period of the adopted Core Strategy. Review of the Core Strategy should also assess the need of these reserve areas.

Policy CC8

17.85 Policy CC8 outlines the Council's position in terms of further and higher education provision. In the main, the policy was supported and it was suggested that a greater flexibility should be allowed for potential site allocations. Faith schools appeared to be divisive amongst some representatives as it was suggested they perhaps might encourage segregation amongst communities.

17.86 In total, 3 responses were received, 1 supported and 2 were general comments. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.87 What members of the public said:

- N/A

17.88 What Town and Parish Council said:.

- N/A

17.89 What Ward Councillors said:

- The plan should cover new premises seek by MK College.

17.90 What neighbouring and other local authorities said:

- N/A

17.91 What the development industry (e.g. Landowners, developers, agents...) said:

- Suggest that the policy should allow flexibility for the location of student accommodation.

17.92 What national/statutory organisations said:

- N/A

17.93 What local organisation/interest groups said:

- The majority of members of the Council of Faiths are against faith schools as they recognise the importance of integration, but one or two representatives indicated that their faith group may wish to have the potential for the provision of a faith school.

Policy CC9

17.94 Policy CC9 outlines the Council's position in terms of development plans regarding health facilities. In the main, the responses received were supportive of the policy. The importance of delivering health facilities is widely recognised both locally and nationally, and it is suggested that the plan emphasises, promotes and enforces this in a stronger manner and enforces this policy as a requirement for all future development.

17.95 In total, 5 responses were received on this policy, 1 objected and 4 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.96 What members of the public said:

- N/A

17.97 What Town and Parish Council said:

- The plan should cover the provision of healthcare facilities due to increased population.
- Suggest using more positive wording in the policy text regarding health facilities.

17.98 What Ward Councillors said:

- MKC should seek co-operation and understanding with CCG that new sites are needed in the strategic growth areas.
- Better signposting is required for minor injuries walk-in clinic.

17.99 What neighbouring and other local authorities said:

- N/A

17.100 What the development industry (e.g. Landowners, developers, agents...) said:

- The proposed South West MK Site requires additional health facilities and their delivery has to be supported by statutory consultees.

17.101 What national/statutory organisations said:

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- N/A

17.102 What local organisation/interest groups said:

- N/A

17.103 No response on Statement CC3 was received.

Policy CC10 and Statement 1

17.104 Policy CC10 outlines the councils commitment to reducing health inequalities, increasing life expectancy and improving quality of life amongst the Boroughs population. There is a requirement for the policy to address a holistic range of health issues and provide a greater awareness of relevant policy. Although greater consideration to how development might be controlled needs to be addressed.

17.105 Statement 1, outlines the Council's intention to restrict the proliferation of hot food takeaways and fast food establishments around primary and secondary schools. This is part of and in support of the wider initiative by Public Health Milton Keynes to improve the health and well-being of the population. However, it was recommended that it would be advantageous to provide additional evidence in the plan to demonstrate the link between fast food, school proximity, and obesity.

17.106 In total, 9 responses on CC10 and Statement 1 were received, of which 2 supported, 3 objected and 4 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

17.107 What members of the public said:

- Support the policy's commitment to promote healthy communities.
- The policy needs to address issues such as mental health, loneliness and isolation, timely access to services and information, sexual health, food and healthy eating, and not least the impacts of poverty and pollution.
- Concern that the policy would preclude any takeaways in local centres unless they do not have schools. Suggest restricting the opening hours instead. Also, suggest deleting 'widely' from the reference to 'buffer zone being widely used across the country'.

17.108 What Town and Parish Council said:

- N/a

17.109 What Ward Councillors said:

- Support the aspiration of the policy. However concern that the policy may have no Development Control purpose. Suggest including the following text: "Permission should be refused for proposals that are contrary to any of these aspirations."

17.110 What neighbouring and other local authorities said:

- N/a

17.111 What the development industry (e.g. Landowners, developers, agents...) said:

- N/a

17.112 What national/statutory organisations said:

- Welcome the policy and believes it would be strengthened with reference to Sport England Active Design guidance, which made clear reference to the NPPF to maximise the opportunities for design in physical activity. Suggest the plan to incorporate the 'Active Design' concept regarding making places for the wellbeing of people and communities.

17.113 What local organisation/interest groups said:

- N/a

17.114 What members of the public said:

- N/A

17.115 What Town and Parish Council said:

- Support restricting the hot food takeaways and fast food establishments around primary and secondary schools. Wish the policy can apply to mobile sites and fixed sites.

17.116 What Ward Councillors said:

- N/A

17.117 What neighbouring and other local authorities said:

- N/A

17.118 What the development industry (e.g. Landowners, developers, agents...) said:

- Locating schools close to local centres allows for shared parking and greater use of footfall.
- Suggest controlling opening hours to allow potential use and viabilities of local centres.

17.119 What national/statutory organisations said:

- N/A

17.120 What local organisation/interest groups said:

- Statement 1 is not justified, effective and consistent with the NPPF. Think the statement is an over-generic approach to resist development.
- Suggest to adopt Para 69 of the NPPF instead.
- There is a lack of evidence to demonstrate the link between fast food, school proximity, and obesity.

18 Connectivity

Chapter 15 - Connectivity

18.1 The chapter sets out policies on sustainable transport network, walking and cycling, public transport, low emission vehicles, freight, the grid network and digital communications. The broad principles of this chapter were supported by the respondents. A number of general comments were received which suggested amendments to key phrases and they have been detailed below. There is a need to distinguish between the concepts of car ownership and car usage within MK. The importance to allow users to access a range of modal choices which link to neighbouring authorities was highly recommended as an essential component to deliver the ambitions stated throughout this chapter.

18.2 In total, 79 responses were received, 16 supported, 17 objected, and 46 of them were general comment.

18.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.4 What members of the public said:

- The plan should also address traffic congestion in neighbouring villages such as Aspley Guise and Husborne Crawley due to the strategic growth in MK.
- Concern about the abandonment of the transport strategy SITS.
- Support the plan to downscale the number of and dependency on cars in MK.
- Suggest including traffic modal splits in the plan as well as the concept of 'peak car use'.

18.5 What Town and Parish Council said:

- The plan needs to have greater emphasis on public transport transformation . For example the key objectives in the Council's Core Strategy need to be stated more forcibly.

18.6 What Ward Councillors said:

- Suggest adding the following text in the introduction of the chapter: we aspire to a higher proportion of total journeys within and into the borough to use more sustainable model of travel, while recognising that as the city grows in population and physical size, the average journey distance between residential areas and typical destinations (work, retail, leisure, education, and transport hubs) is increasing, and while recognising that as the city grows in regional importance its typical visitor journey distance is intended to increase.

18.7 What neighbouring and other local authorities said:

- N/A

18.8 What the development industry (e.g. Landowners, developers, agents...) said:3

- Think there is a need to distinguish the concepts of car ownership and car usage within MK.

- Additional residential development on the edge of MK is able to deliver a sustainable transport network to encourage walking, cycling and use of public transport.
- Support the plan in large but concern that the chapter relies on an out dated Transport Vision and Strategy LTP3.

18.9 What national/statutory organisations said:

- Welcome the full considerations given to the smart and sustainable mobility opportunities in Strategic Site Allocations.
- Suggest the MKC to carefully consider the implications of Park and Ride site on both sections of the SRN in the vicinity of MK (M1 and A5).
- Welcome the MKC's approach to minimise the dependency of private car through improvements to public transport services, cycling and walking networks, and engaging with stakeholders along the East-West Rail line and Expressway.
- Suggest the chapter to include specific reference to station capacity, accessibility and facilities, as well as increased car parking at railway stations to promote modal shift.

18.10 What local organisation/interest groups said:

- The Open University proposes that MK:Smart can collaborate with the MKC to achieve a sustainable transport strategy. There is also an opportunity to create a centre for transport in collaboration with the Transport Catapult to deliver solutions.
- Para 15.4. The HS1 has no direct service to Gatwick and has only 2 direct services to Liverpool per day each way.
- Para 15.9. Suggest adding a bullet point: "The low occupancy rate of cars. Average vehicle occupancy to CMK is just 1.15, i.e. at least 85% of cars carry just the driver".
- The plan does not have sufficient commitment to reduce CO2 emissions in the city.
- There is a need to provide facilities in close vicinity to houses, which can enhance travelling on foot or by cycling.
- There is a need to provide more incentives for travel modal shift such as car sharing in order to reduce the number of cars on roads.
- Buses should be given priority at junctions which could attract more passengers to use public transport. And their operate hours should be extended to suit the varied work and leisure times of residents.
- Bus interchanges should be upgraded at key locations, particularly CMK shops, Hospital, Westcroft, Kingston, Wolverton, Stadium:MK/MK1, Newport Pagnell
- The speed limit on grid roads should be reduced to 50 mph.
- Flexibility is needed for Movement as a Service (MaaS) to incorporate new transport modes such as light rail and flexible transport systems over the plan period.
- Fully support the Cambridge and Oxford Rail, but think the rail line should also serve MK and Luton as the two intermediate towns in-between. However, disagree with the route selection by the Network Rail.
- Suggest connecting direct trains from Cambridge to MK Central Station.
- Think the level crossings at Woburn Sands and Bow Brickhill should be replaced by bridges.
- Object to the Expressway between Cambridge and Oxford. It could lead to more congestion in towns and villages in the corridor as well as more pollution.
- The plan should assess the impact of developing technologies such as autonomous and driverless vehicles.

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- Dispersed urban extensions around the fringe of the existing urban area will create high demand for journeys to work.
- There is a need to plan for Zero Carbon transport system in MK to achieve Zero Carbon 2030.
- There is an urgent need for:
 - more efficient use of the current infrastructure by shared vehicle use whether public, private or freight;
 - an intelligent use of improved public transport vehicles with a view to increasing their market share and reducing the number of empty buses running around the infrastructure;
 - a substantial increase in vehicle sharing generally; and
 - greatly increased support for low pollution vehicles which does of course assume electricity generated from renewable sources.
- There is a need for assessment on the limitations on growth of building across the external ends of grid roads and at other key locations (such as the eastern end of H10 Bletcham Way and around junction 13 and Eagle Farm North) or land reserved to ensure that other future options are not blocked by development;
- Assessment is required to understand the potential for East-West Rail to achieve commuting modal shift from private cars to rail. And how this is assisted by the Parkway Rail Station car-parking along the rail.
- Land should be reserved for acquisition to enable a chord to be inserted at Bletchley to link the rail route from Bedford northwards to the West Coast Mainline.
- Facilities for proposed development should be identified and reserved, in particular:
 - potential crossings of the M1
 - route(s) of the Oxford to Cambridge Expressway
 - expanded facilities at stations
 - park and ride facilities
 - strategic pedestrian and cycle routes
- Land allocations should consider to minimise the demand for public and private transport.
- Para 15.4. There are no direct services to Gatwick.
- Para 15.9. Suggest adding a bullet point: "The low occupancy rate of cars" (the average vehicle occupancy to CMK is just 1.15, ie at least 85% of cars carry just the driver (Transport Strategy Review, MKC, 2008)").

Policy CT1

18.11 Policy CT1 outlines the council's ambition to promote a sustainable pattern of development in Milton Keynes. The plan would benefit from being more specific in terms of how it intends to promote low carbon forms of transport. It would be worthwhile to engage with neighbouring boroughs in order to promote a concise plan for low carbon travel. In turn, the plan should indicate the wider benefits of sustainable transport from a local and national perspective. A number of revisions and suggestions to the policy have been suggested below.

18.12 In total, 12 responses were received, 4 supported, 2 objected and 6 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.13 What members of the public said:

- Support the principle of the policy but disagree with criterion VI.
- CT1 needs to be more specific and words such as 'low' has to be quantified.

18.14 What Town and Parish Council said:

- Better connections are needed for Bletchley and Woburn.
- Transport hubs of the Expressway and East-West Rail can enable linked journeys and higher density housing development

18.15 What Ward Councillors said:

- The plan has to be more specific on how to increase the use of shared and public transport. Cheap public transport should be provided between the MKC rail station and Campbell Park. The plan should allocate sites for park and ride.
- Welcome the principle of the policy but question if it should be placed in the Forward Plan or the Corporate Plan. Suggest using stronger wording in the policy.

18.16 What neighbouring and other local authorities said:

- Objectively assessed evidence is required for the choice of potential route for the Oxford-Cambridge Expressway. The final allocation should be jointly assessed by MKC and its neighbouring authorities.
- Welcome the MKC's engagement with stakeholder along the East-West Rail line and expressway to identify operational benefits.
- Suggest further engagement between Buckinghamshire County Council and MKC to investigate the potentials for public transport improvement between the border of the two authorities.
- Support the Plan's approach to widen sustainable transport choices and reduce car use.
- There is a need to increase the capacity of highway network within, from and to MK.
- Suggest providing sustainable transport opportunities to improve the connections to key locations in Central Beds.
- Developments across boundaries should contribute to improve bus infrastructure in Central Beds, particularly routes to and from Cranfield, Ridgmont Station and Woburn.

18.17 What the development industry (e.g. Landowners, developers, agents...) said:

- The policy needs to clarify how the measures are to be achieved and financed.
- Support the approach outlined in criteria vi and vii. But the policy needs a better linkage with the Milton Keynes Parking Standards SPD (Jan 2016) or the CMK Alliance Business Neighbourhood Plan standards.
- CT1 should make recognise the need to assess whether developments would prejudice the effective delivery of the strategic infrastructure.
- Suggest to make the following amendment at point vi.: "iv. Continue to engage with relevant stakeholders along the East-West Rail line and Expressway to

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identify operational benefits, which provide additional support for a more sustainable transport strategy and/or economic growth of the city. Land that is identified as required to facilitate either project will be reserved and shown on amended or future versions of the plan. Applications for land in or around these identified land/corridors will be expected to demonstrate that the development proposed will not prejudice the construction of this strategic infrastructure”.

- Think the policy is not relevant to Development Management Decision Making and therefore should be removed.

18.18 What national/statutory organisations said:

- N/A

18.19 What local organisation/interest groups said:

- Think the plan should cover how the MKC would address issues like climate change and air pollution. Wish to see less reliance on private car use.
- Support the extension of Redways and suggest cooperation with neighbouring authorities.
- Support the cycling speed limit at 20mph in all residential areas.
- Wish to see more indoor cycle storage in houses and flats.
- Suggest adding the following text to the 2nd bullet point:
 - "this could include priority measures on roads and at junctions for buses. These could take the form of bus lanes and bus activated traffic lights"
- Suggest adding a new bullet point v.:
 - "encourage car sharing, to reduce congestion, emissions and the amount of parking spaces required, by giving priority to multiple occupant cars over single occupant cars in the allocation of road space and parking spaces."
- Suggest adding the following text to ii.: "This could include priority measures on roads and at junctions for buses"
- Suggest adding a new bullet point v.: "Encourage care sharing, to reduce congestion, emissions and the amount of parking spaces required, by giving priority to multiple occupant cars over single occupant cars in the allocation of road space and parking spaces"

Policy CT2

18.20 Policy CT2 indicates the council's preference for development proposals to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support transition to a low carbon future. In the main, there was a general census of support for the principles of this policy. It would be worthwhile to clarify the legality of this policy to ensure it can be legally binding and thus delivered. It should be careful considered how the spatial development strategy will be developed, as this may encourage travel to the periphery of the city and in turn, increase the need to travel by car.

18.21 In total, 8 responses were received. Of which, 3 supported, 1 objected, and 4 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.22 What members of the public said:

- Support the policy's approach to promote sustainable transport mode.

18.23 What Town and Parish Council said:

- Support the multi-centric nature of MK.
- The principle element of the spatial development strategy to disperse urban extensions around the fringe of the existing urban area may contradict with the policy to minimise the need to travel.

18.24 What Ward Councillors said:

- Public transport should be provided for better connectivity to main points of service provision. Clause C of the policy should also state that uses that generate high levels of HGV road traffic will be refused unless the site has good short links to the national strategic road network.
- Think it is unlawful to expect developers to improve road safety.

18.25 What neighbouring and other local authorities said:

- N/A

18.26 What the development industry (e.g. Landowners, developers, agents...) said:

- Criteria iii. 'Prejudice the future development or design of suitable adjoining sites' needs to be defined.
- Criteria vi. The word 'Inappropriate' need to be quantified.
- Part C. A threshold is needed regarding when floorspace or housing numbers will trigger a transport assessment or statement.

18.27 What national/statutory organisations said:

- Part C should include a requirement for the impact of development on level crossings to be assessed as part of a TS/TA, with mitigation implemented as required.

18.28 What local organisation/interest groups said:

- N/A

Policy CT3

18.29 Policy CT3 outlines the councils expectation that development proposals must be designed in order to meet the needs of pedestrians and cyclists. In the main, the context and visions of the policy were supported and it was suggested to continue and expand MK redways and greenways, with segregated cycle lanes. It would be worthwhile to consider how grade separated junctions can be incorporated into the policy. To promote greater levels of cycling and low carbon transport, it was advocated further

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investment/improvement is required to the existing cycle and walking infrastructure and safety of existing and proposed designated cycle lanes, for example, promote a 20mph speed limit within residential areas.

18.30 In total, 11 responses were received. 2 supported, 3 objected, and 6 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.31 What members of the public said:

- MK redways and greenways should be continued. Cycles and pedestrian should not be mixed.
- Support the policy to promote accessibility in the city by providing more walking and cycling facilities.
- Support the policy to encourage bicycles connectivity of Aspley and Woburn to the redway network.
- Suggest expanding the redway network to CBC. Also, propose a redway route adjacent to the railway, from Old Farm Park to Husborne Crawley.
- Suggest promoting cycling through redways by public campaigns.

18.32 What Town and Parish Council said:

- The policy should include grade separated crossings.
- Point D. Suggest changing 'should' to 'must' in the policy text.

18.33 What Ward Councillors said:

- Support separating pedestrians/redways with grid roads. Suggest Plan:MK to encourage children to walk or cycle to school.
- Think the policy is more a aspiration statement than a Development Management Policy.

18.34 What neighbouring and other local authorities said:

- Suggest investing cycling and walking infrastructure in key access routes in MK, in particular NCN Route 51.
- Suggest an expansion of redways to Cranfield, Aspley Guise and Ridgmont Station.

18.35 What the development industry (e.g. Landowners, developers, agents...) said:

- Part E. Think clarification needed for the requirement for showers and changing facilities with cycle parking. Suggest providing such facilities is inappropriate in Local Centre.

18.36 What national/statutory organisations said:

- Suggest the plan to include specific policy wording to ensure the impact of the proposed new development on the risk at existing level crossings is assessed by the developer. Also, suitable mitigation is incorporated and funded in the proposals. TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.

18.37 What local organisation/interest groups said:

- Para 15.20. Speed limit within estates should be reduced to 20mph.
- Support the policy but suggest making the following amendment to point A: "The layout of the external environment, including links to adjoining areas should provide convenient, direct, safe, secure and understandable pedestrian cycle routes that are not isolated from other transport routes and are well connected to the existing network"

Policy CT4

18.38 Policy CT4 indicates how the council will attempt to develop the quality and capacity in public transport within the Borough. A wide range of opinions were achieved with a number of representatives providing general comment and suggestion. There appeared to be general support for the principles of the policy or comment/suggestion for particular criterion. Further consideration regarding guidance on bus services going through estates or along grid roads is recommended by the council, and how specific local travel needs can be achieved needs additional investigation. A number of recommendations to individual policy is suggested below.

18.39 In total, 8 representations were received, of which 1 supported and 1 objected, and 6 of them were general comment. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.40 What members of the public said:

- Support a mass-transit system in MK, along with improvements in park and ride facilities.
- Improvements required for the M1 and the access to it.
- Support the principle of the policy but object to criterion i.

18.41 What Town and Parish Council said:

- Public transport in some areas, such as West Bletchley, of MK cannot provide sufficient access to locations. Suggest conducting a research to understand residents' travel needs and to the public transport routes required.

18.42 What Ward Councillors said:

- Support the CMK-Bletchley rail link. But think there is a need for spatial requirement and crossings of the railway near Caldecotte and Woburn Sands.
- Bus services is required around the expanded hospital site. Also, supportive of low-carbon transport.
- Support the policy in large but suggest changing the requirement for developments to be within 400m to 250m, with at least 30 minute service to CMK or other major employment destinations.
- The policy should cover demand-responsive 'small vehicle service' which has the potential to resolve obstacles identified in Para 15.25.
- The plan should have guidance on whether bus services going through estates or along grid roads.
- Think the plan should not reference a particular version of SPDs etc.

18.43 What neighbouring and other local authorities said:

18 . Connectivity

- N/A

18.44 What the development industry (e.g. Landowners, developers, agents...) said:

- Criteria iii. Should be aware of alternative or enhanced public transport route arises following work for Midsummer Boulevard East.
- Criteria iv. Doubt the effectiveness of concentrating developments along public transport routes considering the level of private car ownership in MK.
- Criteria V. Clarification required for the level of contribution to public transport facilities in development proposals.
- Part B. Think it is inappropriate for tertiary streets to be convenient and safe bus routes. The policy should recognise the hierarchy of streets.
 - Suggest amending the wording to: "Development proposals must be designed to meet the needs of public transport operators and users. In particular where appropriate :..." and remove all references to where appropriate from i to v. OR "i. Road layouts must include direct, convenient and safe bus routes and free of obstructive parking where appropriate ... "

18.45 What national/statutory organisations said:

- N/A

18.46 What local organisation/interest groups said:

- Para 15.24. Should include 2, 6, 14, 300 as part of core network, but not 4A.
- Para 15.27. The infrastructure requires committed funding if they are not commercial.
- Para 15.33. Add "and will give public transport priority on congested parts of the grid road network." to the text
- Policy Text B ii. Add "Note: some of these priority measures may be outside the development"
- Policy Text B iii. Delete the qualification at the beginning Replace with "all houses and most other developments should be no more than 400m walking distance from a bus stop"

Policy CT5

18.47 Policy CT5 indicates how the the council will actively support the usage of low emission vehicles within the Borough. The general thrust of opinion was supportive towards the principles of the policy. There was support for promoting low carbon emission vehicles in both urban and rural areas, and recommended that all new dwellings provide a higher provision of vehicle charging points for electric cars.

18.48 In total, three representations were received. One response was received for each support, object and general comment respectively. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.49 What members of the public said:

- Support the policy to promote low emission vehicles in the city.

18.50 What Town and Parish Council said:

- N/a

18.51 What Ward Councillors said:

- Support the policy principles to reduce cars' emissions. Suggest including a requirement for new dwellings to have higher provision of vehicle chargers for electric cars.

18.52 What neighbouring and other local authorities said:

- N/A

18.53 What the development industry (e.g. Landowners, developers, agents...) said:

- Support the vision of the policy. The provision of electric charging points should allow for viability and other on-site constraints or provision considerations.

18.54 What national/statutory organisations said:

- N/A

18.55 What local organisation/interest groups said:

- N/A

Policy CT6 Freight

18.56 Policy CT6 outlines how the council will continue to engage with its partners in order to ensure fast and efficient movement of freight. Only one response was received, which provided general comment and support from local organisation/interest group. A summary of the response is shown below.

- Policy Text. Add "there should be some Rail connected warehouses in MK. Possible sites are Magna Park or Caldecotte South."
- Para 15.40. Suggest adding the following text:" Work should be undertaken to establish the feasibility for rail connected warehouse sites within Milton Keynes e.g. at Caldecotte South".

Policy CT7

18.57 Policy CT7 outlines the Council's anticipation to conserve the existing grid road network within MK. It is considered as an essential characteristic of MK and allows for quick vehicle movement with convenient parking in CMK. Therefore, where possible opportunities to expand and enhance the existing grid system will be encouraged with road networks within neighbouring authorities dependent on negotiations between MK and neighbouring authorities.

18.58 In the main, there appeared to be support for enhancing and expanding the existing the grid network within MK. However, a number of recommendations to how this could be achieved were received. Further consideration is required to understand how the grid network can best meet the demands of different residential neighbourhoods and travel needs/requirements.

18 . Connectivity

18.59 In total, 13 responses were received, of which 6 objected and 7 of them were general. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.60 What members of the public said:

- Suggest making the policy a mandatory requirement. The standards and design guidelines in the Milton Keynes Planning Manual should be applied.

18.61 What Town and Parish Council said:

- Support maintaining and expanding the grid road system where appropriate. Suggest changing the second paragraph to: "It must be a requirement to extend the grid road system design into any major new development".
- Reference to CMK car parking should be removed from the policy. While definition is needed for the concept of 'the Grid Road Network'.
 - Suggest replacing the first paragraph by the following text: "The Council will conserve and seek to enhance its iconic grid road corridor network, including landscape buffers and reserve transport corridors, as this network is a unique characteristic of Milton Keynes, reducing journey times across the 'city', particularly for journeys to work to the major areas of employment dispersed throughout the borough."

18.62 What Ward Councillors said:

- Support expanding the grid roads to developments within the borough and also to new cross-boundary developments.
- Suggest including the following text to the policy: "In any new residential or other development in a location where a grid-road could be extended, the grid road must be extended, in a way that allows further grid road connectivity to further developments at some future time, except where there is no possibility of any further expansion of the conurbation (within the borough boundaries or otherwise) in that direction."

18.63 What neighbouring and other local authorities said:

- N/A

18.64 What the development industry (e.g. Landowners, developers, agents...) said:

- Bletchley Southern Relief Road should be considered as a separate policy from grid roads. The policy should take into account as part of the formulation proposals for land to the south west of MK and in conjunction with Aylesbury Vale District Council and Buckingham County Council.
- Support the principle of the policy to extend grid roads to major development areas. However, more detailed wordings could avoid misinterpretation and ensure a consistent design approach. Suggest the policy to be explicit in design criteria for a grid road by including the extracts from the Milton Keynes Planning Manual (1992) (Appendix C: Policy for City Road Reservations)
- The policy should reserve land for future extension of Grid Roads and these reserves should be identified and shown on the key Diagram/Policies Map.

- On the basis of our comments, we seek the following changes to Policy CT7. *[NB. The principles below are largely reproduced from the MK Planning Manual 1992 but must be reproduced in Plan:MK so that they can be tested and approved through Examination and have the appropriate weight as part of the plan]*
- “ The Council will seek to conserve the existing iconic road system which is a unique characteristic of Milton Keynes, and allows ~~quick vehicle movement~~ the efficient movement of through traffic - cars and public transport - across and through MK and enabling the separation of local traffic movements in residential neighbourhoods and employment areas within grid squares. The complementary ‘redway’ network alongside the grid roads allows for the safe and efficient movement of pedestrians and cyclists through MK, with grade separated crossings of the grid roads via bridges or underpasses. Substantial landscape buffers alongside the grid roads together with space for utilities services and/or future dualling/dedicated public transport routes combine to create a movement network for MK which is highly adaptable to known and future changes in technology, travel demand and wider infrastructure provision. ~~convenient parking in Central Milton Keynes.~~

Opportunities for extending the grid road system design into any major new development areas will therefore be required ~~encouraged~~ to ensure that the grid continues to function effectively and sufficient land/corridors are safeguarded for future highway/transit links around the district to accommodate and manage increased travel demands changing and future travel demands. The Council will consider the use of its Compulsory Purchase Powers to secure the effective delivery of new grid roads and grid road connections if required.

Road networks in new development areas in neighbouring authorities will be dependent on negotiation between Milton Keynes and neighbouring authorities.

The MK grid road network is designed for through traffic, and is designed to keep this through traffic out of the grid squares.

New grid roads will be designed with the following characteristics:

- (i) There will be no direct frontage development within residential areas and limited access to adjacent grid squares;
- (ii) Grid roads will run in generous landscaped reservations (which are designed to allow for future upgrading to dual carriage ways if and when required);
- (iii) Grid roads will also accommodate main services and landscaping to protect adjacent development from the noise and visual intrusion of traffic and give a parkway character to the road;
- (iv) Grid roads will also be designed for use by public transport and for alternative forms of transport if required [eg electric cars/driverless cars], with bus laybys at intersections with pedestrian bridges and underpasses;

18 . Connectivity

(v) Grid Road Reserves will be identified in order to safeguard further potential extension of the grid and enable future development to access the grid.

The grid road reserve dimensions and junction spacings will be as set out in Figure 1 and 2 below[Reproduced from MK Planning Manual pp45-7]

Two plans accompany this representation.

Under Fig 2 Typical Junction Spacings

There are cross-border locations where MK Council considers that the extension of the grid road network as part of new or future development allocations will provide benefits to both local communities in MK and those in the adjacent district as well as provide much needed connections to the strategic road network.

These locations are identified on the Policies Map and Milton Keynes Council will seek the safeguarding of grid road connections or reserves through joint working and consultation responses to neighbouring authorities' local plan policy or its response to planning applications in adjacent districts".

- The grid road through the SWMK Consortium's site will be supported if the requirement for a link road between the A4146 and the A421 is removed.
- Grid road system should not be expanded to developments which are adjacent to MK but within other authority areas.

18.65 What national/statutory organisations said:

- N/A

18.66 What local organisation/interest groups said:

- Policy Text. Suggest deleting the first paragraph as this is the cause of congestion, high CO2 emissions and high demand for parking spaces in MK. Instead, add the following text: "there should be more priority for buses and multiple occupant cars on the grid road network by creating more bus/MOV lanes" Add "The speed limit on grid roads should be reduced to 50 mph."
- There is a need to include future management and maintenance of the grid road reserves and how they are to be funded in the plan
 - Suggest adding the following text to Para 15.45: "Where the grid road system is to be extended, proposals should include management and maintenance plans for the grid road reserves and / or landscaped corridors which include proposals for this to be funded over the long term. Such Plans should be drawn up with the involvement of The Parks Trust"
- This policy should cover road safety and parking of the grid road system.
- The grid road network should be retained and expanded, wherever possible, to new developments. Plan:MK should also retain 'stub ends' to allow further expansion of the grid road system.
- Suggest the following wording for CT7:

- The Council will conserve the existing, landscaped grid road system with reserved transport corridors which is a unique characteristic of Milton Keynes offering widespread advantages. Grid roads should be extended into new development to retain and improve connectivity and manage increased travel demands. New grid roads should also include landscape buffers to improve air quality, reduce noise and vibration and enhance the landscape. Where existing grid roads remain open-ended development will not be permitted which would block off or otherwise prevent their extension.
- Think CT7 may nullify SD10. The policy needs to be more proactive than 'encouraging' developers to expand the grid road system.
- Para 15.45. Suggest adding a new paragraph: "The grid roads should be managed to provide more priority for buses and multi-occupant vehicles in areas and at times of peak demand".
- The policy needs to be strengthened to safeguard existing grid road ends for future extension and require. Suggest including the following wording: "Outer ends of grid roads must not be blocked by developments. Where development is proposed these grid roads should be extended into and through developments to provide for increased travel demand, and to enable future urban expansion".

Policy CT8

18.67 Policy CT8 outlines how the council will support the expansion of high quality digital communication to promote economic growth, connect communities and minimise the need for car journeys. In the main, there was support for the principles of the policy and recognised that it was in accordance to the NPPF. Although, further clarification is required to the policy, for example, distinguish between developments for the purpose of delivering datacoms and developments for which datacoms cabling/ducting is merely a point of detail.

18.68 In total, 5 responses were received, of which 3 supported and 2 objected. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

18.69 What members of the public said:

- N/

18.70 What Town and Parish Council said:

- Strongly support Para 10.51. But think CT8 should also include actions to improve the speed in rural areas.
- Support CT7 to improve the digital connectivity.

18.71 What Ward Councillors said:

- Support the policy in large but think there is a need to distinguish between developments for the purpose of delivering datacoms and developments for which datacoms cabling/ducting is merely a point of detail.

18.72 What neighbouring and other local authorities said:

- N/A

18 . Connectivity

18.73 What the development industry (e.g. Landowners, developers, agents...) said:

- N/A

18.74 What national/statutory organisations said:

- Welcome Criterion 2 as part of the strategy for conserving historic environment as required by the NPPF.

18.75 What local organisation/interest groups said:

- Support the digital communication policy. But suggest the following amendment: "Installations and cable infrastructure have been designed, sited and appropriately landscaped to minimise their impact on amenity as well as on the surrounding landscaping and will not adversely impact on the management and maintenance of the same;"

19 Infrastructure Delivery

Chapter 16 - Infrastructure Delivery

19.1 The purpose of this chapter is to ensure the demand for infrastructure, facilities and resources are being met for new developments. Also, it identifies the circumstances where planning obligations will be sought for their provision. There was particular concern regarding the appropriate infrastructure delivery in Olney therefore, it was suggested adequate infrastructure should be in place prior to any occupation of a new development. Further consideration should be given to healthcare facilities and provision in light of the increasing population, which undoubtedly will create an additional burden. Clarification is required regarding funding of some infrastructure projects and proposed timescales to inform reasonable planning obligations. All policies must ensure they can cover the whole life of the infrastructure and it continues to operate in the future.

19.2 A number of comments and suggestions were received regarding delivery of different infrastructure and facilities as well as the inclusiveness of the chapter. 20 responses were received, of which 2 supported, 4 objected, and 14 of them are general comments.

19.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

19.4 What members of the public said:

- Support the infrastructure proposal of Plan:MK, but at the same time, concerned about its impact on the environment and rural areas, as well as the cost involved.

19.5 What Town and Parish Councils said:

- Concerned about the availability of appropriate infrastructure in the development in Olney, in particular the A509 and local facilities such as medical centres, schools and shops.
- Plan:MK should cover the provision of healthcare facilities for the increasing population, as well as other infrastructure delivery such as road maintenance.
- INF1 should cover S106 or Tariff or other arrangements, which is critical to development.
- Adequate infrastructure should be in place prior to any occupancy in new development.
- Support the Milton Keynes Council (MKC) to produce a new and up to date Planning Obligations Supplementary Planning Document, as it is recognised in the chapter that the Council's Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents are out of date and do not properly address the needs of the Council's Core Strategy or many other neighbourhood plans, and especially the CMK Alliance 2026.
- New development of university and employment areas should be in line with transport plans and infrastructure.

19.6 What Milton Keynes Council Ward Councillors said:

- INF1 should include a list to indicate what facilities it is referring to and a reliable mechanism to fulfil extra demand.

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19.7 What Neighbouring and other Local Authorities said:

- Infrastructure improvements are required for development in MK, and particularly sustainable links and transport interchanges.
- Investment in rail infrastructure is required to support the growth in MK and along the EWR corridor, in particular Ridgmont Station and stations along the Bedford and Bletchley line.

19.8 What Development Industry (e.g. landowners, developers, agents) said:

- Support INF1, but it should also include reference to the phasing of development to ensure it is aligned with the provision of infrastructure. Suggest the text to include: 'Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement'.
- Support INF1 to ensure infrastructure, facilities and resources are provided on and off-site or a contribution is provided.
- Support INF1, but also aware that 'abnormal costs' associated with the early or advance provision of strategic infrastructure should be credited against future planning obligation for the site.
- Suggest adding the following to INF1: 'Where a developer delivers early infrastructure in advance of, or prior to, development then the 'abnormal' costs of this infrastructure provision will be credited against future planning obligations for the site'.

19.9 What National and Statutory Organisations said:

- INF1. Aware that the funding requirements for SRN improvements have not been considered and identified. Recommend INF1 to clarify the potential need for improvements to SRN and how it is funded.
- MKC should discuss with the Anglian Water Services regarding water supply in the new development area, and to determine whether a new source needs to be developed or a new abstraction licence is sought.
- The chapter should specifically refer to rail transport infrastructure such as passenger car parking at stations to promote modal shift, and their funding should also be included in the new 'Planning Obligations SPD'.
- Suggest MKC to acknowledge Emergency Services as an Infrastructure Provider. Police equipment and other items of capital expenditure necessitated by additional development should also be funded alongside other facilities and infrastructure.

19.10 What Local organisations and interest groups said:

- Suggest the chapter to make reference to green infrastructure and open spaces as a 'requirement' of any community.
- Planning Obligations Supplementary Planning Document should include the 'Infrastructure before Expansion' policy.
- INF1 should recognise management and maintenance of open space and landscaping and how they are funded should be included as part of planning proposals.
- Suggest INF1 to make the following amendment: 'Where appropriate, the Council will permit developers to provide the necessary infrastructure and facilities themselves as part of development proposals, rather than by making financial contributions,

19 . Infrastructure Delivery

provided that these include funded proposals for the long term management and maintenance of any green infrastructure proposed’.

- Suggest MKC to ensure policies can cover the whole life of the infrastructure and it continues to operate in the future.
- Support a model that is similar to the MK Tariff, that the change in legislation permits.

20 . Main Revisions

20 Main Revisions

20.1 A brief summary of the main revisions for the proposed submission of Plan:MK are detailed below:

Chapters 1 and 2 Introduction, Vision and Objectives

- The bulk of the structure has remained unchanged, although, the introductory text has been revised to reflect that this is now the proposed submission of Plan:MK.
- Objective 11, in the Vision and Objectives chapter, has also been revised to reflect the need for housing that supports the growth of the knowledge economy and to offer a vibrant cultural environment.

Chapter 3 Sustainable Development Strategy

- The general thrust of this chapter has remained the same. Albeit, greater emphasis has been placed on the National Planning Policy Framework (NPPF), for example, by incorporating the definition of the NPPF's definition on sustainable development.

Chapter 4 Development Strategy for Homes, Employment, Retail and Leisure

- Inclusion of open countryside (DS5) and linear parks (DS6) policies which were omitted from the draft Plan:MK
- Updated land supply figures to reflect current situation regarding existing commitments. Reflected in Table 4.3.
- Policy DS2 and supporting text: greater consideration for agreed development strategy and housing numbers to be supplied within the urban area and on strategic growth sites.
- Policy DS2: The initial requirement for 1000 dwellings in the rural area has been removed.
- Policy DS2: Change to the trigger points for bringing 'east of the M1' forward prior to 2031, relating to the Council obtaining Government funding for infrastructure provision.
- Table 4.4 amended the supporting text to reflect the latest updates for employment floorspace requirements.
- Policy DS3 amended and removed reference to Caldecotte South. Addition of text promoting provision of superfast Broadband to all employment and residential sites. New criteria added at D and I on further and higher education and public transport provision

Chapter 5 Spatial Delivery of Growth: Strategic Site Allocations

- Policy SD1: Improvements towards consistency, removed duplication within the policy and with Policies SD11/12, improved clarity and responded to specific comments from consultation, for example, including neighbouring LPAs in the list of bodies involved in drafting Development Frameworks.
- Policy SD2: Amended to refer to expanded primary shopping area incorporating area around Xscape and, development of community facilities in CMK.
- Policy SD9: included greater regard to historic landscape characterisation and Historic Environment Record (HER) as this was felt to be missing from the policy.

- Policy SD10: Removed and now included within Linear Parks Policy (DS6) within Development Strategy Chapter. Also, inclusion of the Wildlife Trusts amendments to policy to reflect protecting the wildlife fowl reserve on Stantonbury Lake and surrounding lakes.
- Policies SD11 and SD12 restructured to avoid duplication and incoherence/inconsistencies between these two policies. Also removed placemaking elements from SD11, as it was perceived this was covered in SD1.
- Policy SD13: Changes made to reference the full potential size of the site and to specify the timing around when the site can come forward.
- Policy SD13: Inclusion of 7 Gypsy and Traveller pitches.
- Policies SD15 and SD16: Minor changes to principles to respond to specific comments, predominantly from the Parks Trust and English Heritage.
- Policy SD16: The principles of development revised, and preference for the location of 'green open space link' on site has been removed.

Chapter 6 Economy and Retail

- Table 6.1 (vacant employment land within the Borough) has been revised. It now also includes the proposed Caldecotte South allocation.
- Policy ER4 has been renamed Home based business and revised with additional criteria added to the policy.
- Table 6.2 (Retail Hierarchy of Town centres) revised to reflect NPPF, second tier centres renamed town centres and third tier centres district centres.
- Policy ER11 revised to include amended criteria on thresholds for where an impact assessment is required.
- Policy ER12 (protection of local shops, post offices etc) amended so as to no longer refer to community facilities
- Policy ER13 revised to clarify it refers to shops in the rural area.
- Policy ER19: New policy on non-retail uses on Ground floors in town centres.

Chapter 7 Sustainable Construction and Renewable Energy

- Significant changes to this chapter include: restructured into distinct sections to aid reading. Introduced Materials and Waste section. Removed reference to whole life zero carbon, as it suggested all housing must be zero carbon and incorporated retrofit policy.
- Deleted Policy SC2 and incorporated the principle of the Policy into SC1. It was considered there was no requirement to have two separate policies and in turn beneficial for stakeholders to have one concise policy.

Chapter 8 Managing and Reducing Flood Risk

- The three Policies in this Chapter remain relatively unchanged. Although, greater significance has been given to locally specific strategic flood risk management policies to maintain and continue the exemplar sustainable drainage model of Milton Keynes in the supporting text. The supporting text also associates between Plan:MK and strategic site allocation policies as outlined in Chapter 5: *Spatial Delivery of Growth: Strategic Site Allocations*, which was considered as a fundamental aspect to manage and reduce flood risk in Milton Keynes.

20 . Main Revisions

Chapter 9 Biodiversity and Geodiversity

- This Chapter has been renamed and includes the word 'environment'.
- Revisions to Policies NE1 - NE5, to ensure clarity in policy.
- New policy has been included to consider Environmental Pollution in Milton Keynes. The intention is to ensure new development plays a key role in creating and sustaining healthy places and communities and avoiding or mitigating unacceptable risks to health and the wider environment from pollution.

Chapter 10 Milton Keynes' Heritage

- Policies included to address particular types of heritage assets (conservation areas, registered historic parks and gardens, listed buildings, etc.) in turn, providing more detailed guidance on what matters to consider when determining the significance of a heritage asset and what might impact heritage.

Chapter 11 Public Open Space, Leisure and Recreation

- Moved policy "Change of use amenity open space" from the Appendices, to Chapter 14 (Public Open Space, Leisure and Recreation) under the new Policy L3.
- Policy L3 Change of Amenity Open Space was amended to ensure flexibility of open space that is surplus to requirements.
- Chapter title renamed from "Open Space, Leisure and Recreation" to "Public Open Space, Leisure and Recreation".
- Added references to Open Space management, Play Area Action Plan and Tree Management strategies.

Chapter 12 Design

- Removed Policy D1 as the issues was considered to be better addressed in other policies in design chapter and SD1.
- Amended Policy D4 (now D3) to improve clarity and provide new criteria for assessing tall buildings.
- New policies on Amenity and Street Scene (now D4) and Granny Annexes (now D5).

Chapter 13 Homes and Neighbourhoods

- Policy HN1: amended policy to strengthen the requirement for mixed and inclusive communities, to provide density ranges for CMK and Bletchley alongside criteria for considering higher density development, and to provide greater clarity overall.
- Policy HN2: reduced target to 31% due to viability evidence, and incorporated new criteria for assessing Build to Rent/PRS proposals.
- Policies HN4 and HN5: amalgamated into Policy HN3 and redrafted following discussions with Housing and Adult Social Care. Removed fixed target for provision and replaced with a criteria based policy as it is considered this approach would be better able to grapple with the complexity of both the range of needs and how those needs are met.
- Policy HN6 (now HN4): Added requirement for all new C3 dwellings to meet Nationally Described Space Standards based upon emerging evidence around viability and need.
- New Policy HN6 Housing for Temporary Accommodation: a new criteria-based policy that supports and guides proposals for housing to accommodate households who are in emergency or urgent need for accommodation.

- Policy HN9: supporting text amended to clarify that this policy does not relate to wider estate regeneration programmes or for use in wholesale demolition of existing estates. New provision added with a presumption against the loss of bungalows. Provision B regarding Gypsy and Traveller pitches and Travelling Showpeople removed and moved to Policies HN11 and HN12.
- Revised policy on Supported/Sheltered Housing - constructed following discussions with housing and adult social care. Fixed target not helpful, prefer a criteria based policy as this is better for grappling with the complexity of both the range of needs and how need is met.
- New NDSS requirement - viability not an issue. Early evidence indicates recent 3 bed houses are below the standard, but 2/4/5 beds are not. Sample size expanded as there was a lot of noise.
- HN11 and HN12 - addition of text relating to loss of sites/pitches, taken from HN9.
- New Temporary Housing policy - criteria based policy responding to issue identified with current applications (opportunity to be more flexible when considering these schemes, but some firm criteria that needs to be met).
- New Private Rented Scheme (PRS) policy element and supporting text added to Policy HN2.
- Proposal for a new Gypsies and Traveller site to accommodate 7 additional pitches in SEMK strategic extension via Policy SD13.

Chapter 14 Culture and Community

- Greater overview of culture and community added in introduction.
- More detail included on MK Cultural Strategy and MK Futures 2050.
- Removal of Education and Health in this chapter and incorporated it into a new chapter - Chapter 9 (Education and Health). This allows greater focus to be placed on the these two areas in the plan and responded well to the comments received.
- Three new policies have evolved, they are: EH3 (Reserve Sites to Enable Future School Expansion), EH6 (Delivery of Health Facilities in New Development) and Policy EH8 (Hot Food Takeaways). All were previously statements or questions.
- EH1 (formally CC6) - has included a reference to the School Place Planning Forward View 2017 - 2018.
- EH2 (formally CC7) - emphasises the importance that new school development should be delivered to serve the needs of the catchment area, and to allow for possible expansion thus future proofing of school development.
- Policy EH4 (formally CC8) - now reflects the inclusion of MK College in site B4, as this was previously omitted. Furthermore, it has been revised/restructured to improve consistency/conciseness.
- Policy EH6 (formally statement CC3) - removal of first paragraph and minor restructure to second paragraph and it was considered it was too wordy and unclear.

Chapter 15 Connectivity

- Overall, policies have been reworded to strengthen their purpose and meaning, for example removal of words such as 'expected' and replaced with 'should'.
- Greater overview of national policy, relevant strategies and studies (including the Mobility Strategy, LTP3).
- CT1 - provided a list of interventions and ways to increase and encourage the use of shared and public transport.
- New Policies on Parking Provision (CT10) and, Crossover of Redways (CT4), included.

20 . Main Revisions

- Restructured the chapter introduction, and added more detail on Futures 2050 and Mobility Strategy.
- Added more detail to Policy CT8 (Grid Road Networks).
- Rewritten Policy CT9 (Digital Communications).

Chapter 16 Infrastructure Delivery

- There was a requirement to consider how to future proof infrastructure provision for future growth beyond the site that is being assessed, and as such amendments to the wording of Policy INF1 to reflect this.
- Additional paragraph included into the policy to reflect the potential for development to pool funding together to improve infrastructure provision.

21 Appendix A

Appendix A - Comments relating to Plan:MK - Change of use Amenity Open Space

21.1 Appendix A indicates the policy guidance that planning permission will be granted for the change of use of amenity open space.

21.2 Overall, respondents suggested that Appendix A might need to amend its wording in order to protect the amenity open spaces. 4 responses were received, of which 1 objected and 3 of them are general comments.

21.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

21.4 What members of the public said:

- Needs to make clear that all listed circumstances should apply if amenity space is to be developed. Point 6 seems to be a 'get-out clause' and should be removed.

21.5 What Town and Parish Council said:

- Object to land grab for any reason, which caused problems such as change of line of sight at junctions.

21.6 What Ward Councillors said:

- Rather than point 1 or 2, etc. The 6 points in Appendix A should be 1 and 2 and 3, etc in order to ensure all conditions are fulfilled.
- May consider to separate point 6 as 'OR'.

21.7 What neighbouring and other local authorities said:

- N/a

21.8 What the development industry (e.g. Landowners, developers, agents) said:

- N/a

21.9 What national/statutory organisations said:

- N/a

21.10 What local organisation/interest groups said:

- Appendix A should clarify that planning permission will only be granted if all of these conditions are met.
- Suggest to amend: ".....into private land, if all of the following conditions are met:"
- Point 6 should be deleted as it addresses completely different concern compared with point 1-5.

22 . Appendix B

22 Appendix B

Appendix B - Comments relating to Plan:MK - Open Space and Recreation Facility Provision

22.1 Appendix B indicates the Council's adopted standards for open space and recreational facilities provision in new housing development.

22.2 Respondents have provided some constructive comments and suggestions for Appendix B. 4 responses were received, of which 1 supported, 1 objected and 2 of them are general comments.

22.3 As far as possible, the summaries below start with the issue on which there was most consensus. The summary below is best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents.

22.4 What members of the public said:

- N/a

22.5 What Town and Parish Council said:

- Agree with the principles of this policy.
- Green Access Links (p169). This section needs clarification. The Council should expand 'hedgerows' to include 'lines of trees'.
- Transport Corridors (p171). This section should acknowledge landscaping as a buffer to noise and air pollution. Suggest the following to be included: : "Define the urban form of Milton Keynes, flanking the main grid roads they buffer local communities from the visual, noise and air pollution impact of vehicles and providing an attractive and calming landscape feature to the motorist."
- Do not think it is practical or desirable to encourage the provision of allotments 'adjacent to grid roads' as it could hamper the delivery of transport solutions.

22.6 What Ward Councillors said:

- N/a

22.7 What neighbouring and other local authorities said:

- N/a

22.8 What the development industry (e.g. Landowners, developers, agents...) said:

- N/a

22.9 What national/statutory organisations said:

- N/a

22.10 What local organisation/interest groups said:

- Suggest to include Accessible Natural Green Space (ANGSt) criteria, or equivalent, such that all residents could have access to green space.

- Support the extended typology of open space in Appendix B, but think the categories of open space can be clarified to ensure open space and play provision meets the vision and objectives of Plan:MK.
- The Parks Trust made a detailed representation on Appendix B and their suggestions are summarised as follows:
 - Linear Park
 - Minimum Size and Catchment Area or Standard:
 - Suggest that there should be no minimum size or catchment area/standard set as it could rule out the possibility to create smaller areas of linear park. Also, it may overlap/double count where other categories of open space are incorporated within a linear park.#
 - Suggest to include the following in 'Minimum Size': 'To be required on a case by case basis to ensure that the provision and/or extension of linear parks as a key structural component of MK and forming interconnecting green corridors and linkages between other types of open space is continued and to contribute to meeting, where relevant, the objectives of policies FR1, FR2; FR3; NE1; NE2; NE3; NE4; HE1; HE2 and L3'.
 - Characteristics:
 - Suggest to make the following changes:
 - Key structural component of MK, **usually but not always** following the water bodies across the city, they have an important green infrastructure role: mitigating flood events; preserving archaeology; as pedestrian and cycle corridors; **ecological corridors** for wildlife; and **space for informal outdoor** recreation. The **feet character** of the ~~corridors~~ **linear parks** changes across the city, more formal in urban areas and more agricultural on the periphery. They are often multi-functional ~~to include for example~~ **and incorporate other types of open space such as** playing fields, play areas, paddocks and allotments.
 - Destination, Country Parks and District Parks
 - Suggest this category to be split into two separate categories: Destination Parks and District Parks.
 - Destination Parks
 - Minimum Size and Catchment Area or Standard:
 - Think that the minimum size would need a further open space assessment, but suggested to be 50 hectares.
 - Suggest the Catchment Area or Standard to be set as 10 km.
 - Characteristics:
 - Suggest to include the following text:
 - These parks have a function and range of recreational facilities serving catchment areas beyond the district level. They are larger, strategically important sites that offer a range of outdoor recreational and leisure

22 . Appendix B

activities and attractions, space for larger outdoor events and fairs as well as café, toilet facilities and children's adventure play area(s).

- Principles:
 - Suggest the following text:
 - Wherever possible should be part of a linked network of open space.
 - Must have adequate parking and be accessible by public transport.
- **District Parks**
- Minimum Size and Catchment Area or Standard:
 - Suggest a minimum size of 20 hectares.
 - Suggest the catchment area or standard to be set at 1200 m.
- Characteristics:
 - Suggest the following text:
 - Parks open to the general public that provide opportunities for sport and recreation containing playing fields and other activities as listed for Local Parks.
- Principles:
 - Containing playing fields, but at least 12 hectares for other pursuits (as in Local Parks) and some car parking.
 - Must have public transport accessibility.
 - Other principles as for Local Parks apply.
- **Local Parks**
- Principles:
 - Suggest to make the following changes:
 - Normally would be part of linked network of open space unless local circumstances would justify a standalone local park.
 - Must be **prominently located and easy to access to serve the local catchment** ~~in accessible location and accessible from various locations.~~
 - ~~Must have very good public transport accessibility.~~
 - ~~If segregated Pedestrian routes provide access to the park they must feel safe and be overlooked~~ **must have good surveillance from surrounding areas.**
 - Should have the fronts of housing facing at least 1 side of park.
 - If includes playing fields requires adequate provision of parking.
 - Must include **park furniture to facilitate use and enjoyment of the space** ~~seating, teenage shelters and picnic tables~~
 - Must include surfaced paths to facilitate year-round access for all ~~paths on and around the edge of site~~
 - Must include **welcome and orientation signage** ~~signs/map of park~~
 - Must include adequate **provision for management of litter and dog** ~~wastebins and dog waste bins~~

- **Pocket Parks**
- Characteristics:
 - Suggest the following changes:
 - Includes small areas of inviting public space ~~that has~~ **planned within** an overall coherent landscape design approach and ~~tend to be~~ **are** well integrated into and have a positive relationship with the surrounding development.
 - Provides for informal **children's** play and passive recreation.
 - Should include seating.
 - Can include a play areas but ~~they~~ such provision should not take up more than 50% of the park **and must be of a type and scale that has been appraised against the potential noise impact on nearby residential properties.**
- Principles:
 - Suggest to make the following changes:
 - Adjacent development must front onto and overlook the park **to provide good surveillance.**
 - Must include adequate ~~seating, picnic tables and~~ provision of bins park furniture.
- **Green Access Links**
- Principles:
 - Suggested the following changes:
 - **May be** most appropriate to associate with and follow ~~historic~~ **existing landscape features** such as hedgerows or **watercourses** to be retained in the new development.
 - Must be clearly mapped in the masterplan for the development.
 - Should be ~~fairly considerable in length (100m +)~~ **provide good connectivity between public spaces and destinations within the development and to adjoining areas** ~~direct access to reach key opportunities within a development.~~
 - Should include a surfaced main path and good accessibility from adjoin areas along the route.
 - Should be of sufficient width and accessible for upkeep and landscape maintenance.
 - ~~Should be made as accessible as possible.~~
 - **Should benefit from good natural surveillance from adjacent housing or public areas** ~~wherever possible should be overlooked by adjacent housing.~~
- **Areas of Wildlife Interest**
- Catchment Area or Standard
 - Suggest to set at 500m. Such that no resident is more than 500m from an area of land managed to promote and support for wildlife of at least 0.5 ha in size.
- Characteristics:

22 . Appendix B

- Suggest to make the following changes:
- They can include formal or informal pedestrian routes **where these are compatible with the objective of conserving wildlife** ~~and have or have not public access.~~
- Principles:
 - Suggest to make the following changes:
 - Existing wildlife sites in areas of **development should be protected and buffered and the development structured around them** ~~used to structure a development such that wildlife site is well integrated into the development, can continue to function and be managed for wildlife and provides visual amenity.~~
 - ~~In this regard~~ Development should **face front** onto wildlife sites to **provide natural surveillance.**
 - ~~New development surrounding publicly accessible wildlife sites should be master-planned to maximise ease of access to the wildlife site.~~
 - **Accessible sites should include provision to manage public access so as to protect and conserve wildlife.**
- Transport Corridors
- Principles:
 - Suggest to add an additional bullet point:
 - **Provision must be made for the maintenance of the landscaping in the corridor to ensure consistency with the established management of the grid road landscaping across MK.**
- Paddocks
- Characteristics:
 - Suggest to make the following changes:
 - ~~Includes small fenced outdoor pasture area where a horse is kept. A paddock may have a dirt or grass surface.~~
 - Fenced enclosure of at least 0.5ha (minimum size for a small horse or pony). Should have a **grazeable grass sward; good land drainage; a water supply (agricultural trough); and be accessible for delivery of supplies/removal of manure.**
 - **Should have good links to bridle paths or a permissive horse trail.**
 - For the purpose of the Open Space Assessment only paddocks within the settlement boundaries are being considered.
- Principles:
 - Suggest to change as follows:
 - Could be included in linear parks or **transportation corridor extension reserves.**
 - ~~Not expected within developments within the existing city boundary.~~
 - ~~Their private usage means they can be located in secluded places.~~
- Local Play Areas

- Minimum Size:
 - Concerned that a minimum size of 0.04 ha will promote nucleated sites of cramped-in play equipment.
 - Suggest the minimum size to be kept at least as per the 2005 policy requirement, which is 0.2 ha if set within parkland or 0.35 ha if surrounded by housing.
 - Suggest the supporting text to be amended as follows:
 - ~~(excluding 20m separation buffer between activity zone and residential properties)~~**The space available for children to play must include an activity zone with play equipment and space for children to run around and play informal games. There must be a minimum buffer distance of 20m between the activity zone and the nearest residential property boundary.**
- Principles:
 - Suggest to make the following changes and add an additional text:
 - Activity zone to be at least 20m from residential property boundaries and **at least 30m from major roads or other potential hazards such as ponds.**
 - **Should include approximately 5 items of play equipment to provide a range of play experiences and a small games/informal play area.**
- Neighbourhood Play Areas
- Minimum Size:
 - Concerned that a minimum size of 0.1 ha will promote nucleated sites of cramped-in play equipment.
 - Suggest to be kept at least as per the 2005 policy requirement, which is 0.6 ha.
 - Suggest to make the following amendments in the following text:
 - ~~(excluding 20m separation buffer between activity zone and residential properties)~~**The space available for children to play must include an activity zone with play equipment and space for children to run around and play informal games. There must be a minimum buffer distance of 30m between the activity zone and the nearest residential property boundary.**
- Principles:
 - Suggest to make the following changes in the second pullet point:
 - **The active zone to be at least 30m from residential property boundaries and 30m from roads or other potential hazards such as ponds. Where play sports facilities that generate higher levels of noise, e.g. wheeled sports facilities, are included within NPAs then greater than 30m buffer zones may be required to address potential noise problems an assessment of the potential noise impact upon residential properties or other sensitive land uses must be undertaken and a sufficient buffer distance must be allowed for and/or other noise mitigation measures incorporated to avoid the noise generated by the play facility being a nuisance.**

23 . Appendix C

23 Appendix C

Appendix C - Comments relating to Plan:MK - Horse-related Development

23.1 1 response was received from Town and Parish Council, which is a general comment.

- This section should not be in the plan, as horses are not suitable with movement between premises.

24 Appendix D

Appendix D - Comments relating to Plan:MK - Proposals for the Provision of Childcare Facilities

24.1 1 response was received from Town and Parish Council, which supported the policy guidance.

- Support the policy guidance for the provision of childcare facilities.

25 Appendix 1 - Consultation Statement

Specific Consultation Bodies

- Adjacent neighbouring authorities and County Council (Aylesbury Vale District Council, Bedford Borough Council, Buckinghamshire County Council, Central Bedfordshire Council and West Northamptonshire Joint Planning Unit)
- Anglian Water Services Ltd
- British Gas Properties
- British Gas Southern
- Coal Authority Environment Agency
- English Heritage
- Historic England
- Highways England
- Homes and Community Agency
- Marine Management organisation
- MK Clinical Commissioning Group
- MK Primary Care Trust
- National Power Plc
- National Grid
- Natural England
- Natural Environment Partnership for Buckinghamshire and Milton Keynes
- NHS England
- Network Rail
- Parish councils - inside and adjacent to MK
- **Town and parish Councils Adjacent to MK** (e.g. Bozeat Parish Council, Buckingham Town Council, Clifton Reynes and Newton Blossomville Parish Council, Cranfield Parish Council, Dacorum Borough Council, Daventry District Council, Deanshanger Parish Council, Great Brickhill Parish Council, Northamptonshire County Council, Northampton Borough Council, Oxfordshire County Council, Great Brickhill Parish Council, Buckinghamshire County Council, Central Bedfordshire Council, Bedford Borough Council, Bedfordshire County Council, Aylesbury Vale District Council, Harrold Parish Council, Hackleton Parish Council, Hartwell Parish Council, South Bucks District Council, South Northamptonshire Council, South Northamptonshire District Council, Borough Council of Wellingborough East Midlands Councils, Gloucestershire County Council, East Sussex Country Council, Hartwell Parish Council, Leighton-Linslade Town Council, Luton Borough Council, Weston Underwood Parish Council, Yardley Gobion Parish Council, Cherwell District Council, Nash Parish Council, Paulerspury Parish Council, Stagsden Parish Council, Stewkley Parish Council, Stoke Hammond Parish Council, Turvey Parish Council).
- **Town and Parish Councils within MK**, including Milton Keynes Council, (e.g. Bradwell Parish Council, Bow Brickhill Parish Council, Broughton and Milton Keynes Parish Council, Campbell Park Parish Council, Castlethorpe Parish Council, Central Milton Keynes Town Council, Emberton Parish Council, Great Linford Parish Council, Wolverton and Greenleys Town Council, Wootton Parish Council, Woburn Parish Council, Woburn Sands Town Council, Old Stratford Parish Council, Olney Town Council, Newport Pagnell Town Council, Ouzel Valley Parish Council, Haversham cum little Linford Parish Council, Heath & Reach Parish Council, Abbey Hill Parish Council, Ashland and Simpson Parish Council, Shenley Brook End Parish Council, Soulbury Parish Council, Sherington Parish Council, Newton Longville Parish Council, Shenley Brook End &

25 . Appendix 1 - Consultation Statement

Tattenhoe Parish Council, Astwood and Hardmead Parish Council, Aspley Guise Parish Council, Lathbury Parish Council, Lavendon Parish Council, Little Brickhill Parish Council, Wavendon Parish Council, West Bletchley Council, Loughton and Great Holm Parish Council, Yardley Hastings Parish Council, Ravenstone Parish Council, Stantonbury Parish Council, Stony Stratford Town Council, Stoke Goldington Parish Council).

- Scotia Gas Networks
- Southern Gas Networks
- Thames Valley Police
- Western Power Distribution

General Consultation Bodies

- Aecom
- Abbeygate Development Ltd
- Ablethird
- Age concern Senior Voice and Age UK Milton Keynes
- Aggregate Industries UK Ltd
- Agrivert
- Aitchison Raffety
- Alan Hancock Associates
- Alliance Planning
- Altus UK LLP
- Alyn Nicholls & Associates
- Ancell Trust
- Andrew Martin Associates
- Anglian (Central) Regional Flood and Community Coastal
- Apt Planning Ltd
- Aragon Land and Planning
- Armstrong Rigg Planning
- Arriva
- Art and Heritage Alliance - Milton Keynes
- Aston Martin
- Barker Parry Town Planning Ltd
- Barratt Strategic
- Barton Willmore Planning Partnership
- Barwood Development Securities Ltd
- Barwood Lane & Estates Ltd
- Bedford & Milton Keynes Waterway Trust
- Bellway Homes
- Berkeley Group
- Berkeley Strategic
- Berks, Bucks and Oxon Wildlife Trust
- Better Bletchley Campaign
- Bidwells
- Biffa
- Big Local Conniburrow
- Bletchley Park Area Residents Association
- Blue Sky Planning
- Bluestone Planning Ltd

25 . Appendix 1 - Consultation Statement

- Bovis Homes Ltd
- Boyer Planning
- British Pipelines Agency
- British Waterways
- Bryant Homes
- Buckinghamshire Health Authority
- Bucks & Milton Keynes Biodiversity Partnership
- Canal & River Trust
- Carter Jonas LLP
- Cemex
- Charles F Jones & Sons
- Charles Wells
- Chiltern Railways
- Citizens:MK
- City Discovery Centre
- Clayson Country Homes Ltd
- Colliers International
- Collins and Coward Ltd
- Community Action: MK
- Community and Regional Planning Services
- Community Impact Bucks
- Community Safety Partnership
- Compass Land and Planning
- Connell Land and Planning
- Connolly Homes plc
- CPRE Bedfordshire
- Cranfield School of Management
- Crest Nicholson
- Crown Estate Office
- Crystal Homes
- CWS Property and Development
- David Coles Architects
- David Grindley Architects
- David L Walker Limited
- David Lock Associates Ltd
- David Russell Associates
- David Wilson Homes South Midlands
- Defra
- Deloitte LLP
- Denton Wilde Sapte
- Department for Communities and Local Government
- Department for Education
- Department for Trade and Industry
- Department for Transport
- Destination Milton Keynes
- Development Land Planning
- DLA Town Planning Ltd
- DLP Planning Ltd

25 . Appendix 1 - Consultation Statement

- DPDS Consulting
- Drivers Jonas Deloitte
- East of England Development Agency Association
- East of England Local Government
- Environmental Services Association
- Fisher German LLP
- Forest of Marston Vale
- Forestry Commission
- Framptons
- Francis Jackson Homes
- G L Hearn Holdings Ltd
- Gallagher Estates and Taylor Wimpey
- Gladman Developments Ltd
- Gleeson Strategic Land
- GP Panning Ltd
- Gregory Gray Associates
- GVA Grimley
- Halcrow Group Ltd
- Hallam Land management Ltd
- Hampshire Developments Ltd
- Harris Lamb Property Consultancy
- Hazeltree Housing Ltd
- Heaton Planning Ltd
- Impact Planning Services Ltd
- Indigo Planning Ltd
- Jackson Planning
- Linden Homes Strategic Land
- Local Enterprise Partnership (SEMLEP)
- London Luton Airport Ops Ltd
- Malcolm Scott Consultants Ltd
- Marrons Planning
- Martin Grant Homes
- Milton Keynes Association of Urban Councils
- MK Organisations (e.g. MK City Centre Management, MK Community Foundation, MK Heritage Association, MK Higher Education Board, MK Hospital, MK Local Strategic Partnership, MK Museum Trust, MK Parks Trust, MK Private landlords Association, MK Transport Partnership, MKWSC, MK Theatre).
- Ministry of Defence (Aldershot)
- Nathaniel Lichfield and Partners
- National Federation of Gypsy Liaison Groups
- National Housing Federation
- National Landlords Association
- Netherfield Residents Association
- NHBC
- NP 'Culture Cluster Group'
- Oxon and Bucks rail Action Committee
- Paradigm Housing Group
- Pegasus Panning Group

25 . Appendix 1 - Consultation Statement

- Persimmon Homes
- Phillips Planning Services
- PJ Planning
- Pomery Planning Consultants
- Portchester Planning Consultancy
- Preserve Bow Brickholl
- Rapleys LLP
- Rectory Cottage Trust, Bletchley Cottages Trust, Bletchley Archaeological Homes Society
- Red Bull Racing
- Redrow Homes
- Religious Organisations
- RIA Planning
- RPS Planning
- RWE npower renewables
- Sansome Hall Architects
- Sapphire Development Ltd
- Savills
- Scotia Gas Networks
- Sport England
- St Modwen Properties
- Stagecoach East / Bedford
- Streetcare Localities team/MKC
- South East England Regional Assembly
- The British Horse Society
- The Open University
- The Planning Bureau Limited
- The Planning Inspectorate
- thecentre:MK
- Transform
- Transition MK
- Turley Associates
- University of Bedfordshire
- West Coast Energy Ltd
- Wolverton and District Archaeological and Historical Society
- Wolverton Preservation Trust
- WYG Planning & Design
- YMCA

26 Appendix 2 - Consultation Statement

Picture 1 Text for Parish Councils



Carole Mills
Chief Executive

Anna Rose
Director – Growth, Economy and Culture

Reply To: Development Plans
Direct Line: 01908 252358
Email:
development.plans@milton-keynes.gov.uk

17th March 2017

Dear Sir/Madam

DRAFT PLAN:MK - PUBLIC CONSULTATION

Milton Keynes Council has progressed to the next stage of developing a new Local Plan for Milton Keynes, called Draft Plan:MK. When it is adopted, it will be the new Local Plan for Milton Keynes, setting out how and where development will occur up to 2031.

Please send us your views between Friday 17th March and Friday 9th June 2017.

To support Town and Parish Councils in their discussions on Plan:MK, a consultation pack is attached which includes the following:

- A presentation providing an overview on Plan:MK
- Map extracts
- A poster about the consultation
- A summary consultation leaflet
- Frequently Asked Questions (FAQ) leaflet

We would be grateful if you could distribute this information to your Councillors and other local groups.

With over 50 Parishes throughout the Borough, unfortunately we are unable to attend every meeting and discussion; instead we would welcome your attendance at our planned events.

Details of the events will be available at www.milton-keynes.gov.uk/Plan:MK. We will be sending out further information to you during the consultation on these events.

26 . Appendix 2 - Consultation Statement

We will also update our website with information about drop-in sessions and opportunities to speak to officers. You can also get updates by following [@mkcouncil](#) if you are a Twitter user.

We hope you will take this opportunity to get involved in planning for the future of Milton Keynes.

Yours sincerely

John Cheston

**Development Plans Team Leader
Milton Keynes Council**

27 Appendix 3 - Consultation Statement

Picture 2 Text for Stakeholders

Carole Mills
Chief Executive

Anna Rose
Director – Growth, Economy and Culture

Reply To: Development Plans

Direct Line: 01908 252358

Email:
development.plans@milton-keynes.gov.uk

17 March 2017

Dear Sir/Madam

DRAFT PLAN:MK - PUBLIC CONSULTATION

Milton Keynes Council has progressed to the next stage of developing a new Local Plan for Milton Keynes, called Draft Plan:MK. When it is adopted, it will be the new Local Plan for Milton Keynes, setting out how and where development will occur up to 2031. It will also include new development management policies that all planning applications will be determined in accordance with.

Draft Plan:MK is the culmination of work carried out so far on the development of a new Local Plan for the Borough. It draws together the work undertaken on the Topic Papers, Vision Workshops and Strategic Development Directions consultation as well as the evidence base studies.

What will Draft Plan:MK do?

- Draft Plan:MK contains the preferred strategy for meeting the Borough's development needs until 2031.
- Informed by comments from earlier consultations and independent evidence studies.
- Once adopted Plan:MK will replace the Core Strategy and the 2005 Milton Keynes Local Plan. This is not the final plan and further consultation will follow.

What is happening now?

- Draft Plan:MK is now being consulted on for 12 weeks and we need your views and comments on the proposals for development.
- If you want more information and to see all the questions we are asking, please see the complete document.

27 . Appendix 3 - Consultation Statement

Please send us your views between Friday 17th March and Friday 9th June 2017.

All of the consultation documents and further information about what these plans will do, how we will use your comments and what happens next, can be found on our website at www.milton-keynes.gov.uk/Plan:MK. You can also view all the documents at the Council's Civic Offices in Central Milton Keynes and at any of the libraries in the Borough.

We will update our website with information about future events, drop-in sessions and opportunities to speak to officers about these plans. You can also get updates by following [@mkcouncil](https://twitter.com/mkcouncil) if you are a Twitter user.

You have received this email as you have at some stage asked to be kept up-to-date with our plan preparation. We hope you find this information useful and interesting, however if you no longer wish to be included on our mailing list, please let us know using the contact details above, and again quote your reference number. M17023.

We hope you will take this opportunity to get involved in planning for the future of Milton Keynes.

Yours Sincerely

John Cheston
Development Plans Team Leader
Milton Keynes Council