

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Alan Brown	U31 Wellington Place	This would be a great use of land that has been unused for many years.	No	Comments are noted.
Anglian Water	SAP1,5,6,7,10,18,20	Improvements to the foul sewerage network is expected to be required to enable the development of this site. It is therefore suggested that Policy SAP1 should include the following wording: 'Demonstrate there is adequate capacity in the foul sewerage network'	Yes	Comments are noted. The allocation of a site only establishes the principle of development and in most cases a further planning application will be required to confirm how proposals address issues such as infrastructure or rights of way. Anglian Water would also be consulted in the event a planning application is submitted. For sites where 'permission in principle' is granted, consideration of the issues raised could be included in the site particulars meaning a modification to the plan would be required.
Anglian Water	SAP11,14,19	Improvements to the water supply and foul sewerage networks are expected to be required to enable the development of this site.  An existing sewer is located within the boundaries of this site. Therefore it is important to that this is considered as part of the design of these sites.  It is therefore suggested that the policies should include the following wording: 'Demonstrate there is adequate capacity in the water supply and foul sewerage networks'  It is also suggested that the policies or related supporting text should include the following wording:  'A sewer crosses this site, therefore the site layout should be designed to take this into account.'	Yes	
Anglian Water	SAP12,13,21	Improvements to the foul sewerage network are expected to be required to enable the development of this site.  An existing sewer and water main are located within the boundaries of this site. Therefore it is important to that this is considered as part of the design of these sites.  It is therefore suggested that these policies should include the following wording: 'Demonstrate there is adequate capacity in the foul sewerage network'  It is also suggested that these policies or related supporting text should include the following wording:  'A sewer and water main crosses this site, therefore the site layout should be designed to take this into account.'	Yes	
Anglian Water	SAP16 - Manifold Lane, Shenley Brook End	Improvements to the water supply and foul sewerage networks are expected to be required to enable the development of this site.  An existing water main is located within the boundaries of this site. Therefore it is important to that this is considered as part of the design of this site.  It is therefore suggested that Policy SAP16 should include the following wording: 'Demonstrate there is adequate capacity in the water supply and foul sewerage networks'  It is also suggested that Policy SAP16 or related supporting text should include the following wording:  'A water main crosses this site, therefore the site layout should be designed to take this into account.'	Yes	
Anglian Water	SAP2 - Wellington Place car park, Bletchley	Improvements to the foul sewerage network is expected to be required to enable the development of this site.  An existing sewer is located within the boundaries of this site. It is therefore suggested that the policy should include the following wording: 'Demonstrate there is adequate capacity in the foul sewerage network'	Yes	
Anglian Water	SAP3,4,17	Improvements to the foul sewerage network is expected to be required to enable the development of this site.  An existing water main is located within the boundaries of this site. Therefore it is important to that this is considered as part of the design of this site.  It is therefore suggested that the policies should include the following wording: 'Demonstrate there is adequate capacity in the foul sewerage network'  An existing water main is located within the boundaries of this site. Therefore it is important to that this is considered as part of the design of this site.  It is therefore suggested that the policies or related supporting text should include the following wording:  'A water main crosses this site, therefore the site layout should be designed to take this into account.'	Yes	

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Anglian Water	SAP8,9	Improvements to the water supply and foul sewerage networks are expected to be required to enable the development of this site. It is therefore suggested that the policies should include the following wording: 'Demonstrate there is adequate capacity in the water supply and foul sewerage networks'	Yes	
Aylesbury Vale District Council	General	Support.	No	Comments are noted.
Barry Steadman	SAP4 - Land East of John Lewis car park	Disappointed by the John Lewis Multi-Storey Car Park being granted planning approval and now not particularly impressed by it being linked to and the proposed development of the adjacent infrastructure site in this SAP.	No	Comments are noted.
Barry Steadman	General	Pleas sites in the previous version of the SAP which were of concern such as those in areas of particular sensitive open green space and flats in CMK station square have been removed.	No	Comments are noted.
Barry Steadman	General	Disappointed no SAP proposals exist in the CMK blocks A2 and A3 and multi-storey car park to the south of the station despite previous comments.	No	Comments are noted. Blocks A2 and A3 of the CMK Neighbourhood Plan are already proposed for non-residential use in the indicative land use proposals map and it has therefore not been considered appropriate to allocate the sites for residential use in the SAP. The purpose of this SAP has been to allocate new sites for residential development to help meet housing need (i.e. it does not necessarily need to have been identified in the Local Plan or CMK Neighbourhood Plan).
Bedford Borough Council	General	Do not wish to make representations at this stage.	No	Noted.
Bradwell Parish Council	Site bounded by Hampstead Gate, Arbrook Avenue and Wimbledon Place, Bradwell Common	While Bradwell Parish Council appreciates the desperate need for more housing, especially social housing, locally, it requests that some grass recreational area be maintained on this site if development does take place. It also requests that any development be for housing in keeping with the existing local area.	No	Comments are noted. This site is a reserve site (from 2005 Local Plan) with both housing and open space listed as potential uses. The principle of development for housing is therefore already established in policy terms. The site is currently vacant however feedback suggests that it has existing value as open space, as mentioned in the site assessment. The key principles of this allocation require that proposals should include provision for play and contributions to improve access to and signposting of formal open space elsewhere in Bradwell Common. This will help maximise access to open/play space for residents. The plan allocates the site for up to 16 dwellings so there is scope to balance residential land-use with amenity space needs if necessary.
Campbell Park Parish Council	SAP6 - Gurnards Avenue, Fishermead	In support of the site being developed for retirement living accommodation.	No	Comments are noted.
Remitone Properties (CBRE)	Omission site	CBRE have submitted a site on behalf of Remitone Properties and Octavia Homes for inclusion in the SAP. The site was previously submitted but not included and subsequently a planning application (16/02451/FUL) has been submitted. The site should be included in the SAP. The site is within Bletchley Town Centre boundary. See detailed response for further details of the site.	Yes	Comments noted. However, at this stage of plan preparation it is too late for the site to be considered for inclusion in the SAP. The site is also already allocated in the 2005 Local Plan.
Celia and Ian Sherratt	U27 - Land west of Bow Brickhill (not in current version of SAP)	Objection to any development around this site based on the following: - high congestion through and around Bow Brickhill; - primary school capacity in the area and increased traffic/parking as a result of the development; - lack of adequate sewerage facilities.	No	Comments are noted. None of the sites allocated in the SAP is in the Bow Brickhill area. Site U27 is also not in the SAP.
Central Bedfordshire Council	General	Sites are small to medium size and are likely to have a limited impact on CBC.	Yes	Comments are noted.

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Claire Ranger	SAP4 - Land East of John Lewis car park	If houses are built here there will be issues for parking for lorries and coaches as well as residents of the new dwellings. There are not enough car parking spaces around CMK at present.	No	Comments are noted. A multi-storey car park has been approved adjacent to the site. The 'key principles' section of the site allocation in the document state that development should not commence until the completion of the adjacent multi-storey car park. The site would also be required to provide its own parking and make provision for the parking of goods vehicles that service theatre productions. The allocation only establishes the acceptable principle of development and a planning application would need to be submitted at which point a transport assessment would also be required.
CMK Town Council (plus support from Peter McDonald)	SAP4 - Land East of John Lewis car park	The site is neither a key site identified in the Local Plan or the CMK Neighbourhood Plan nor is it a site that is deliverable for various reasons (see detailed response). It is therefore incapable of contributing to the objective of the Site Allocations Plan of rectifying the identified deficit in the Council's 5 year housing supply. Development sites C4.4 and D4.1 of the CMK Neighbourhood Plan were previously suggested and are more suitable to deliver housing.	No	Development sites C4.4 and D4.1 of the CMK Neighbourhood Plan are already proposed for residential use in the indicative land use proposals map and so it has not been considered necessary to allocate the sites again in the SAP. The purpose of this SAP has been to allocate new sites for residential development to help meet housing need (i.e. it does not necessarily need to have been identified in the Local Plan or CMK Neighbourhood Plan). As stated in the site assessment, MKDP are promoting the site and have confirmed that the site will be available within the next 5 years.
Hewlett Packard Enterprises (HPE) (Colin and Coward)	U83 - Hewlett Packard East Site (not in current SAP version)	The Employment Land Study is fundamentally flawed in respect of HPE's land and this has incorrectly informed the SAP in respect of the assessments of sites U82 and U83. Both HPE sites are suitable for housing allocations and should be included in the SAP.	Yes	It is acknowledged that the site assessment for U82 has an error and that the assessment should have stated that the site is ranked 75th rather than 17th in appendix B of the ELS which rates employment sites from best to worst based on a number of criteria, and this changes the rank for that particular deliverability constraint from red to green. This site however has planning permission for housing. A planning application at site U82 for housing has already been approved and this precludes its inclusion in the SAP. Site U83 is still ranked 17th as confirmed by the ELS and so as a high value employment site it is not suitable for inclusion in the SAP.
Connolly Homes	General	Not positively prepared. The SAP seeks to deliver housing to cover the five year housing supply shortfall however falls short of the Core Strategy housing requirement and does not meet objectively assessed need and is therefore not positively prepared.  Not justified. There is no explanation other than in the sustainability appraisal as to why the land at Oakgrove School site was not taken forward following the Emerging Preferred Options consultation. The approach taken in the Site Allocations Plan in respect of the sites proposed to be allocated in not the most appropriate when considered against the reasonable alternatives, based on proportionate evidence. Proportionate evidence was provided at the Emerging Preferred Options stage, which indicated the land at Oakgrove School should be allocated.	Yes	The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will make up what is remaining of the Core Strategy target up to 2026 after existing allocations/permissions are taken into account. A new Local Plan (Plan:MK) is being prepared which sets out how the Council will meet the objectively assessed housing need (OAHN) for the Borough. The OAHN has also recently been updated.  With regards to the Oakgrove School site it was found that there is a restrictive covenant in place which may prevent delivery of the site in the short-term, and so the site was removed from the Plan.
Baytree/AXA (David Lock Associates)	General	A significant number of the proposed sites are either vacant or existing employment sites. This is clearly short sighted as MKC currently do not have a supply of market ready medium and large employment sites. This strategy is unsustainable in that it would distance the close link MKC have previously established between employment and residential land. We query the veracity of the statement expressed in para 3.8 of the SAP. The removal of future job creation opportunities in MK will lead to increases in commuting and additional traffic generation on an already overstretched road network. We therefore consider that the sustainability appraisal put forward by MKC to justify this plan is not fit for purpose and does not meet NPPF standards. Certain sustainability objectives are missed off the site scoring table for unexplained reasons.	Yes	NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.  The Council also proposes to allocate additional employment land through the Council's next Local Plan - Plan:MK - to ensure that there is an adequate supply to meet future need.
Baytree/AXA (David Lock Associates)	General	There are discrepancies between the red outlines on the satellite images and OS base images and these need to be corrected.	Yes	Comments noted. Any discrepancies will be corrected.

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Baytree/AXA (David Lock Associates)	SAP11 - Builders' Merchants, Simpson Road, Fenny Stratford	This existing employment site is one of the few larger sites proposed for future residential use. As a larger site it is more flexible in how it can be used or potentially re-developed for commercial use. It should form an active and ongoing role in the range of commercial sites available within Milton Keynes and should not be allocated for housing.	Yes	The western section of the site was previously allocated in the 2005 Local Plan for housing. This part of the site is also regarded as one of the least best ranked employment sites according to the ELS. The owner of the site has also confirmed that they wish both parts of the site to be considered for housing as stated in the site's assessment and there is no overriding need to retain all land currently in industrial use.
Baytree/AXA (David Lock Associates)	SAP13 - Former MFI unit, Watling Street, Bletchley	This existing large format retail building in an existing retail cluster which remains popular to retail operators and customers alike. Accordingly, unless supported by a significant and extensive marketing statement, as would be required should the site come forward as a planning application, then it should not come forward for residential use and could still play an important part in the diversification of the Milton Keynes retail offer.	Yes	The site was submitted during a 'call for sites' exercise. At present there aren't any planning policies in the Development Plan which protect retail uses outside of town centres.
Baytree/AXA (David Lock Associates)	SAP15 - Timbold Drive, Kents Hill	This existing employment allocation is wholly undeveloped and located next to the university. As such it offers a unique opportunity for an easily delivered site next to a seat of learning. We therefore consider that such a large site should continue to form part of the commercial allocations within Milton Keynes.	Yes	<p>The Open University owns a site immediately to the north of their current site which could be used for such purposes if required. According to the site's development brief, discussions with the Open University and the Education department in MKC, sites C and D1 are not needed for further education or Science Park related purposes and residential uses are seen as more appropriate and suitable. Site A (south) is considered larger than that which could viably provide commercial uses and therefore residential led mixed use development on the site is considered to be more viable.</p> <p>NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.</p> <p>The Council also proposes to allocate additional employment land through the Council's next Local Plan - Plan:MK - to ensure that there is an adequate supply to meet future need.</p>
Baytree/AXA (David Lock Associates)	SAP18 - Land at Towergate, Groveway, Wavendon Gate	This is a large employment site located directly opposite an established and thriving employment site. As such it is one of the most important and best available employment sites within Milton Keynes due to the proximity to the strategic road network (A421 & M1), the inherent benefits of clustering and undeveloped form. It therefore appears preferential to retain its status as a designated employment site which continues to provide logical space into which this established cluster can expand.	Yes	<p>Although the Walton Neighbourhood Plan does not formally alter the allocation, this policy has been prepared to reflect the likely change in designation of the site to residential-led use by Milton Keynes Council.</p> <p>Appendix B of the Employment Land Study (2015) ranked the Council's employment sites from best to worst based on a set of criteria. This site falls within the bottom 50% of ranked sites - generally land that is not valued at a premium and is underused or not in use.</p> <p>HCA have also said that the site is available now for development.</p> <p>NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.</p>

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Baytree/AXA (David Lock Associates)	SAP19 - Land at Walton Manor, Groveway/Simpson Road, Walton Manor	This is another large undeveloped employment site adjacent to an existing globally important employment operation. It offers good connectivity to the grid network in a central accessible location. Sites like this are easy to develop and materially assist in delivering a sustainable development where employment sites are within easy access of residential areas. This site offers a bridge between those other sites in Caldecotte and Wavendon and should be retained less the centre of Milton Keynes be hollowed out of employment sites.	Yes	<p>The Council's Employment Land Review and Economic Growth Study identifies this land as 'suitable for alternative uses' due to constraints which make it less attractive for employment use. The site's development brief allocates 2.2ha in the northern section of the site for employment use.</p> <p>The made Walton Neighbourhood Plan has a site specific policy for this site and supports residential and employment mixed use or solely residential use.</p> <p>NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.</p> <p>The Council also proposes to allocate additional employment land through the Council's next Local Plan - Plan:MK - to ensure that there is an adequate supply to meet future need.</p>
Baytree/AXA (David Lock Associates)	SAP2 - Wellington Place car park, Bletchley	This former lorry park has an employment use and is well related to existing employment uses. It is capable of redevelopment but should be retained for commercial use given its relationship to surrounding development. It would be a poor location for residential development given the potential for contamination, proximity to the railway line and distance from other nearby properties & services. This site should not be released for housing.	Yes	<p>The site has extant planning permission for an office block but is currently underused and the owner has confirmed that they wish the site to be considered for residential use.</p> <p>NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.</p> <p>The Council also proposes to allocate additional employment land through the Council's next Local Plan - Plan:MK - to ensure that there is an adequate supply to meet future need.</p>
Baytree/AXA (David Lock Associates)	SAP20 - Land at Broughton Atterbury, Oakworth Avenue	This large undeveloped site is located adjacent to existing employment areas close to the M1 junction. It is a preferable location for new commercial development close to existing expansion areas. Maintaining a commercial designation would ensure commercial development is closely related to residential development helping to maintain a sustainable pattern of development. Its loss should be resisted.	Yes	<p>The site's adopted development brief proposes residential use on the site largely because it's surrounding uses are residential. It does not have any existing employment allocations.</p>
Baytree/AXA (David Lock Associates)	SAP4 - Land East of John Lewis car park	The delivery of this site requires that the approved multi-storey car park for John Lewis is constructed prior to this site commencing. Given there is no surety on when this car park will be delivered, we are unsure how the Council can accurately consider that this site could reasonably contribute to the delivery of housing over the next 5 years. Linking two sites in separate ownership will rarely result in quick delivery and therefore should fail the deliverability requirement as set out in Para 3.5. This site should not be released for housing. Further, it would result in the removal of valuable bus parking spaces and may be difficult to deliver given the topography of the site.	Yes	<p>It is agreed that the site could be more appropriate for mixed use given it's location in CMK. MKDP have also confirmed that they wish the site to be considered for mixed use. A modification to the plan will be required.</p>

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Baytree/AXA (David Lock Associates)	SAP6 - Gurnards Avenue, Fishermead	This vacant employment site has an important role to play in the ongoing delivery of sustainable development within Milton Keynes. Smaller sites such as this provide valuable opportunities for smaller mixed use developments and employment generating uses to be located adjacent to residential areas. Whilst we consider that this site should not be released, given its proximity to residential areas, it could reasonably come forward for a mixed use development or SME uses.	Yes	NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.  The Council also proposes to allocate additional employment land through the Council's next Local Plan - Plan:MK - to ensure that there is an adequate supply to meet future need.
MSD Animal Health (David Lock Associates)	SAP19 - Land at Walton Manor, Groveway/Simpson Road, Walton Manor	The proposed allocation refers to a site area of 5.14ha and also refers to an adopted Development Brief, which also outlines a residential area of approximately 5.14ha. The plan outlined in the SAP however refers to a site that is approximately 9.5ha. This fails to reflect the development brief and does not take account of the to be adopted Walton Manor Neighbourhood Plan which allocates the site for residential and employment development.  The boundary on the plan should be amended to reflect the residential area outlined within the development brief retaining the employment provision to the east of the site.	Yes	Comments noted. The site particulars will be amended to reflect the development brief/Walton Neighbourhood Plan and clarify that the proposed allocation for the site is residential/residential-led mixed use.
David Lock Associates on behalf of Suisse Property Holdings	SAP0	Policy SAP0 should include a site specific policy for Galleon Wharf (U11) in similar vein to the existing SAP policies for up to 14 units. The respondent has demonstrated that the site is deliverable despite what the sustainability report concluded (see detailed response) and so should be included.	No	The site assessment of U11 identifies a few constraints which may prevent delivery of the site. It is currently being used for employment purposes and the existing business would need to relocate before development could commence. Existing schools and healthcare capacity are also not sufficient to accommodate the likely additional demand from this site. Access to the site is also considered to be a fundamental constraint. Together these issues make the site less deliverable in the short term.
David Wilson Homes	General	The plan fails to provide the housing required to meet the objectively assessed development requirements and is based on a strategy not advocated by the Core Strategy Inspector and which does not consider the whole authority area as required. It fails to provide all appropriate sites consistent with the requirements of sustainable development.	Yes	The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will deliver the objectively assessed housing need.  The Core Strategy outlined a rural housing target of 613 to be met by the SAP. In the period since the Issues & Options consultation, several neighbourhood plans in the rural area have made excellent progress, most significantly Newport Pagnell's which has now been adopted. There was strong support at the Issues & Options stage for focusing rural allocations in Newport Pagnell, Olney and Sherington, rather than Woburn Sands, which already had an adopted Neighbourhood Plan at the time. To avoid prejudicing Neighbourhood Plans, the emerging Preferred Options focused only on urban sites. Furthermore, the land supply requirement in the rural area is met and exceeded by the Newport Pagnell Neighbourhood Plan and groups in Olney and Sherington are actively working on their own plans. For this reason it was considered that allocation of sites in the rural areas to meet the Core Strategy target could be met by adopted and soon to be adopted neighbourhood plans. PlanMK will also seek to help deliver further housing in rural areas.
David Wilson Homes	General	The Plan is not based on appropriate evidence utilising known to be outdated requirements, despite new evidence being available as part of the Plan:MK process (evidence in question is that relating to the OAN).	Yes	The last SHMA was published in 2014 and is intended to cover the period 2011-2031, which is not considered to be out-of-date. The 2014 SHMA stated a 1,750 per annum housing requirement for the Borough. The most recent SHMA produced in January 2017 states a similar figure of 1,765 from 2016-2031.

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David Wilson Homes	General	The Plan has a couple of sites (SAP4, SAP14) which are reliant on external factors and a number of sites (SAP2, SAP13) which are considered to be at best undesirable; given the short term nature of the plan (up to 5 years) it is at least questionable whether these are deliverable within the time period. The non-delivery of these site would mean the Plan failing to meets its objectives. It is David Wilson Homes' assertion that the Plan as set out at present does not meet its objectives and will not deliver the required objectively assessed housing needs.	Yes	The site assessments for all the sites mentioned indicate that they are deliverable. SAP4 is being promoted by MKDP who have confirmed that the site will be available within the next 5 years. The owner of SAP2 has confirmed that they wish the site to be considered for residential development. The SHLAA states that SAP13 is under lease for retail until 2017 after which to owner is willing to explore other uses. Its location outside Bletchley town centre means that residential development could also be supported. SAP14 is being promoted by MKDP who have confirmed that it is available immediately.
David Wilson Homes	General	It is impossible to state whether the Permission in Principle elements of the Plan are consistent with national policy as the secondary legislation is yet to be prepared. The Plan is not based on full assessed needs as required by the Framework.	Yes	Permission in Principle regulations will take effect on 15 April 2017 through The Town and Country Planning (Permission in Principle) Order 2017. Reference to the new legislation will be made in the Plan. It is considered that the Plan complies with these regulations.
David Wilson Homes	General	In the absence of an up-to-date SHMA to identify the full objectively assessed need, David Wilson Homes has instructed Bidwell's to undertake a review of housing needs in Milton Keynes (report submitted as a separate document). It states that between 2010 and 2036 the Full Objectively Assessed Need would be 53,000 dwellings or 2,035 dwellings per year. This results in a housing land supply between 3.4 and 3.8 years and the Site Allocations Plan does not meet the Full Objectively Assessed Needs of the Milton Keynes or its Housing Market Area.	Yes	The Council has recently produced a SHMA in January 2017 for Plan:MK and for the plan period from 2016-2031, the OAN is 1,765 homes per annum.
Deloitte on behalf of a hotel operator	SAP4 - Land East of John Lewis car park	It is considered that the site should be allocated for main town centres uses alongside residential. A mix of uses should be supported on this Site given its location in the Primary Shopping Area and the surrounding uses such as retail, offices, restaurants and culture. This is necessary to help meet the Council's aspirations for a mix of uses within Central Milton Keynes. It is not considered to be justified to solely allocate the Site for residential nor effective as this would not represent the most deliverable option for the Site given current negotiations with a hotel operator for use of the site. On this basis we consider the Plan to be unsound.	Yes	It is agreed that the site could be more appropriate for mixed use given it's location in CMK. MKDP have also confirmed that they wish the site to be considered for mixed use. A modification to the plan will be required.
Deloitte on behalf of a hotel operator	SAP4 - Land East of John Lewis car park	There is a small discrepancy regarding the red line of the site. This needs to be clarified.	Yes	Comments noted. Any discrepancies will be corrected.
Deloitte on behalf of a hotel operator	SAP4 - Land East of John Lewis car park	It is requested that the requirement for development to wait until the adjacent car-park development is completed is removed as it is too restrictive.	Yes	Comments noted. This requirement will be removed from the prescribed particulars.
Grand Union Housing (DLP)	General	MKC underestimates the amount of housing need. Issues with the five year housing supply in particular include use of the Liverpool method rather than the Sedgefield method; significant over-optimistic delivery rates on a number of sites, including key sites such as the Western Expansion Area; inclusion of a number of sites that are unlikely to commence development as expected by MKC.	Yes	Expected delivery rates on sites are based on discussions with housebuilders, landowners and agents; quarterly monitoring of on-site progress and completions; and quarterly reviews of all sites through the Councils Joint Housing Delivery Team. These figures are therefore updated regularly.  A recently undertaken SHMA (January 2017) has provided the Council with an OAHN figure of 1765 homes per annum over the plan period from 2016 to 2031. Evidence on the Borough housing need is therefore up to date and closely aligns with the previous Core Strategy housing target of 1,750 homes per annum. It is therefore not considered that MKC is underestimating housing need.  The Council favours the Liverpool method of accommodating shortfall, which means spreading the backlog over the remaining plan period rather than within the next 5 years. The specific circumstances of Milton Keynes mean that most new housing is delivered in a number of large strategic sites which take many years to build-out. This was acknowledged by the Core Strategy Inspector in her report.  Sites included in the SAP have been assessed on their deliverability.

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Grand Union Housing (DLP)	General	Revise para 3.7 to increase the shortfall in land supply to at least 4,000 homes and acknowledge a true reflection of the land supply position, and include additional sites to meet the increased housing requirement.	Yes	The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will deliver the objectively assessed housing need. The shortfall in land supply figure included in the SAP is based on an up-to-date SHMA and a recently undertaken SHMA confirms OAHN to be around 1,765 homes per annum between 2016 and 2031.
Grand Union Housing (DLP)	General	The site assessment process is not backed up sufficient evidence to justify the conclusions made (see detailed response). The plan is therefore unsound and not justified. The evidence for the SAP should be reviewed and "land at north of Little Linford Lane" should be included as another site in the SAP (see detailed response).	Yes	The Council believes the assessment to be robust. A number of significant constraints were identified which would affect the suitability of site U28 "land at north of Little Linford Lane" for development.
Templeview Developments (DLP)	General	The SAP fails to allocate sufficient suitable housing sites to meet the needs of Milton Keynes in the short to medium term.	Yes	The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will deliver the objectively assessed housing need. The Council has also identified other sources of housing to help meet the Borough's housing need.
Templeview Developments (DLP)	General	The proposed allocations are not justified by a robust evidence base, nor are they consistent with the basic information available to MKC, nor have the Council properly considered alternative sites such as Linford Lakes as demonstrated by its analysis of the site which is flawed and incorrect.	Yes	<p>Expected delivery rates on sites are based on discussions with housebuilders. These figures are updated regularly.</p> <p>The Council favours the Liverpool method of accommodating shortfall, which means spreading the backlog over the remaining plan period rather than within the next 5 years. The specific circumstances of Milton Keynes mean that most new housing is delivered in a number of large strategic sites which take many years to build-out. This was acknowledged by the Core Strategy Inspector in her report.</p> <p>Sites included in the SAP have been assessed on their deliverability. A number of sites have been assessed during the process of producing the SAP as evidenced by the site assessments in appendix 3 of the sustainability appraisal report. At the first stage in the development of the SAP a 'call for sites' exercise was undertaken where a range of groups were invited to submit sites for consideration. These alongside sites identified from other sources such as the SHLAA among others were considered at the Issues and Options stage, and after further sites were suggested through representations these were considered as well at the Preferred Options stage. How representations were considered is summarised in the consultation statement.</p>
Templeview Developments (DLP)	General	The Plan fails to proactively drive the delivery of homes needed in Milton Keynes to meet housing needs or to support 'planned' economic growth, nor does it respond positively to wider opportunities for growth, one of the Core Principles set out in the NPPF.	Yes	The SAP is primarily concerned with helping meet the shortfall in the five-year housing land supply. The Inspector's Report for the 2013 Core Strategy clarified that the role of the SAP was in providing short-term flexibility and contingency as well as ensuring that the housing requirement for the Borough will be met by 2026. The Council put forward modifications at the time which explain that by allocating sites for about 1000 dwellings based on 2012 forecasts, the SAP would ensure that a deliverable five-year land supply plus a 20% buffer would be maintained. The SAP is now allocating 1133 homes to meet what was a 479 homes shortfall in the five-year land supply at the time of publishing the SAP, plus additional homes. The shortfall to the five-year housing land supply changes regularly as permissions are granted or expire, sites are built out and construction timelines change. The shortfall figure can therefore go up or down and is updated regularly.



Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Templeview Developments (DLP)	General	MKC should fully review the evidence base which is not sufficient or accurate, reassess the site assessments, review the proposed allocations and amend the plan as necessary. Linford Lakes (further details provided in submission) should also be allocated as a site.	Yes	With regards to identifying sites in rural areas, the role of the SAP in doing this and reasons rural sites were not included in the most recent version of the SAP are explained in the Emerging Preferred Options document which was consulted on in 2015. Dealing with the five-year supply is not a recently added purpose. The Inspector's Report to the Core Strategy clarified that the role of the SAP was in providing short-term flexibility and contingency as well as ensuring that the housing requirement for the Borough will be met by 2026. The Council put forward modifications at the time which explain that by allocating sites for about 1000 dwellings based on 2012 forecasts, the SAP would ensure that a deliverable five-year land supply plus a 20% buffer would be maintained. The SAP is now allocating 1133 homes to meet what was a 479 homes shortfall in the five-year land supply at the time of publishing the SAP, plus additional homes. The shortfall to the five-year housing land supply changes regularly as permissions are granted or expire, sites are built out and construction timelines change. The shortfall figure can therefore go up or down and is updated regularly.
Education Funding Agency	General	SAP should signpost relevant strategic policies from the Core Strategy and NPPF in the document. Milton Keynes Council should also have regard to 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) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.	No	It is not considered necessary to signpost the relevant strategic policies from the Core Strategy and NPPF in the SAP as any planning applications for SAP site allocations would be determined in accordance with these and other development plan documents anyway.
Education Funding Agency	General	The EFA would like to see Milton Keynes Council safeguard land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF.	No	The purpose of the SAP is to allocate sites for housing to ensure the Council meets its 5-year housing land supply however the Council's next Local Plan - Plan:MK - will set out the Council's planning policies on education.
Education Funding Agency	General	The Local Plan must therefore ensure that sufficient land is allocated for school use to meet the needs of this significant growth, with robust forecasts to identify the medium to long-term capacity requirements. As such, the EFA welcomes the policy support for one secondary school and four primary schools within the Western Expansion Area and can advise the two Free School applications for new 2FE primary schools have been approved for this location.	No	The purpose of the SAP is to allocate sites for housing to ensure the Council meets its 5-year housing land supply however the Council's next Local Plan - Plan:MK - will set out the Council's planning policies on education.
Education Funding Agency	General	Whilst no comments on the individual sites have been included within this representation, the EFA suggests that the document should make explicit reference to addressing the cumulative infrastructure needs arising from them. Proposed sites SAP 15, 18, 19 and 20 for example have a potential for delivering approx. 630 dwellings. Reference to allocating new school sites (if required) to address cumulative impact of smaller sites should therefore be included within the document.	No	Any development planned as a result of the SAP should not have an impact on strategic infrastructure as it is essentially helping to deliver the level of growth already planned for in the Core Strategy, the impacts on infrastructure provision of which have already been considered in the Local Investment Plan (LIP). Since the SAP is a policy for short-term development, the capacity of local schools in relation to each site has been checked during the assessment of sites and is evidenced in Appendix 3 of the sustainability appraisal.
Education Funding Agency	General	In developing policies for new schools, consideration should be given at an early stage in the site appraisal process as to how the use of public transport, cycling and walking can be encouraged to help reduce the number of car journeys to and from new schools. The inclusion of a well-developed green travel plan can help to ensure that new schools are better integrated with existing communities.	No	The purpose of the SAP is to allocate sites for housing to ensure the Council meets its 5-year housing land supply however the Council's next Local Plan - Plan:MK - will set out the Council's planning policies on education. Your comments will be taken into consideration.
			No	
Elizabeth Rawley - Mill Residents Association & Consortium of Bletchley Residents Association	General	Welcome use of suitable brownfield sites for housing in preference to greenfield sites. There are concerns however about the amount of development in Bletchley, particularly over the last five years, without any significant improvements to infrastructure. The condition of Highways and parking provision are both inadequate to support existing expansion. Healthcare provision is at breaking point and surgeries are closed to new patients. This situation is getting worse. Development that will help meet local and national housing shortages and regenerate our town is welcomed, but it is important that MKC recognise that the limit to sustainable expansion in Bletchley has already been met. Bletchley cannot absorb more development without a substantial investment in infrastructure.	No	Any development planned as a result of the SAP should not have an impact on strategic infrastructure as it is essentially helping to deliver the level of growth already planned for in the Core Strategy, the impacts on infrastructure provision of which have already been considered in the Local Investment Plan (LIP). Future plans for the Borough will however take account of your comments and updated infrastructure assessments will be carried out to inform future development in the Borough. Comments by Anglian Water about water and sewerage infrastructure have been taken on board and school capacity in the area has been checked. The SAP is allocating two sites in Bletchley totalling just over 60 dwellings. The planned expansion of a surgery elsewhere in the city will also soon free up some capacity in Bletchley as some patients move there.

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Environment Agency	SAP20 - Land at Broughton Atterbury, Oakworth Avenue	The site is a former landfill and will require appropriate assessment to ensure its acceptability as a housing site.	No	Comments noted. The Council's adopted development brief for this site also identifies this.
St Modwen (GL Hearn)	U20 - Wolverton Railway Works (not included in current version of SAP)	<p>The Sustainability Appraisal that supports the Draft Site Allocations Document references the Site and notes that it has been discounted from allocation because: "Current schools' capacity prohibits allocation (Schools)." The same reason is given for discounting all other identified sites in the Wolverton area.</p> <p>We fundamentally disagree with the reason for discounting the Site as being considered suitable for residential development. The resolution to grant planning permission for the Site provides appropriate mitigation in the form of a financial contribution towards education to support new school places. It is the responsibility of the Local Authority to ensure that new infrastructure, including school places, is delivered to mitigate development, through the S106 monies currently being collected. This should not be presented as a barrier to prevent development, particularly given the long timescales that are being considered by the policy document. Further, there appears to be no examination of the potential routes to securing new school capacity in a creative manner. We assert that the sustainability appraisal be reconsidered to amend this reason for discounting the Site from the 5 year housing land supply.</p>	No	The site was removed from the SAP after it was granted planning permission in November 2016.
Gladman	General	The Council should not be relying on Neighbourhood Plans to deliver housing outside of the urban area. GDL note that there is roughly 50% coverage in terms of parishes that are progressing work on neighbourhood plans which means that there will be some settlements without a positive allocation in MK, and no guarantee those with a neighbourhood plan will make housing allocations. The SAP should allocate sites in rural areas. The SAP is failing to recognise the housing needs of the entire Borough.	Yes	<p>The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will deliver the objectively assessed housing need.</p> <p>The Core Strategy outlined a rural housing target of 613 to be met by the SAP. In the period since the Issues &amp; Options consultation, several neighbourhood plans in the rural area have made excellent progress, most significantly Newport Pagnell's which has now been adopted. There was strong support at the Issues &amp; Options stage for focusing rural allocations in Newport Pagnell, Olney and Sherington, rather than Woburn Sands, which already had an adopted Neighbourhood Plan at the time. To avoid prejudicing Neighbourhood Plans, the emerging Preferred Options focused only on urban sites. Furthermore, the land supply requirement in the rural area is met and exceeded by the Newport Pagnell Neighbourhood Plan and groups in Olney and Sherington are actively working on their own plans. For this reason it was considered that allocation of sites in the rural areas to meet the Core Strategy target could be met by adopted and soon to be adopted neighbourhood plans. PlanMK will also seek to help deliver further housing in rural areas.</p>
Gladman	General	Gladman submit that both land off Olney Road, Lavendon and the land west of Bow Brickhill should be included in the SAP (details of sites included in submitted response).	Yes	<p>Land west of Bow Brickhill (U27) was previously submitted however it was removed from the SAP. The site assessment identified that "development would present a noticeable intrusion into open countryside and present coalescence issues between Bow Brickhill and the urban area of Milton Keynes."</p> <p>Land off Olney Road, Lavendon has not been previously submitted as part of the SAP process and at this stage it is considered too late in the process to start considering new sites.</p>
Gladman (GDL)	General	MKC needs to be clear what scale of housing this document is seeking to provide. The SAP needs to set out specifically what scale of delivery the Council is seeking to achieve from Neighbourhood Plans, what scale of development is committed and how many dwellings the SAP needs to deliver.	Yes	The SAP identifies the shortfall in the 5-year housing land supply and also identifies how much housing the SAP is seeking to provide to make up that shortfall.
Gladman (GDL)	General	The current consultation document does not specify the land requirement to be met by the SAP, therefore GDL are now unclear what MKC consider this to be.	Yes	Section 3, paragraph 3.7 of the SAP states that the SAP seeks to deliver above the 479 homes shortfall in the five-year housing land supply.

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Gladman (GDL)	General	Sedgefield method should be being used to calculate the 5 year housing land supply rather than the Liverpool method.	Yes	The Council favours the Liverpool method of accommodating shortfall, which means spreading the backlog over the remaining plan period rather than within the next 5 years. The specific circumstances of Milton Keynes mean that most new housing is delivered in a number of large strategic sites which take many years to build-out. This was acknowledged by the Core Strategy Inspector in her report.
Gladman (GDL)	General	Scale of housing allocated within the SAP needs to have consideration of the significant slippage in timescales of PlanMK and that the housing provided through the SAP should be increase to help ensure that a 5 year housing land supply is maintained. SAP should also allocate more sites to account for non-delivery of some sites.	Yes	The SAP is now allocating 1133 homes to meet what was a 479 homes shortfall in the five-year land supply at the time of publishing the SAP, plus additional homes. The shortfall to the five-year housing land supply changes regularly as permissions are granted or expire, sites are built out and construction timelines change. The shortfall figure can therefore go up or down and is updated regularly. The SAP is allocating more than the shortfall which will account for the non-delivery of some sites.
Gladman (GDL)	General	Lack of detail and explanation provided within the consultation document in relation to the sites identified as being granted Permission in Principle and those which have not.	Yes	Comments noted. It can be more clearly identified in the SAP document which sites have permission in principle and which do not.
Highways England	General	The plan identifies locations for 1133 additional dwellings in Milton Keynes Borough. These dwellings are distributed amongst 21 sites across the urban area and accumulatively generated traffic may have a moderate impact on parts of the strategic road network with some additional queuing. However this is not considered significant given the potential location and size of the individual sites.	No	Comments noted. Any development planned as a result of the SAP should not have an impact on strategic infrastructure as it is essentially helping to deliver the level of growth already planned for in the Core Strategy, the impacts on infrastructure provision of which have already been considered in the Local Investment Plan (LIP). However, all housing developments are expected to contribute, through S106 obligations or S278 highway works agreements, towards highway infrastructure as required and this will be assessed at the time of the planning application.
Highways England	General	Separately to consideration of the 1133 dwellings, Highways England noted that when taking into account the likely five year housing supply requirements for the Borough over the coming years, the total volume of required housing will likely have a significant effect on the volumes of transport on the highway network and without some infrastructure intervention and considerations for modal shift will have a detrimental effect on its operation. The impact is likely to affect both the local and strategic road network.	No	Any development planned as a result of the SAP should not have an impact on strategic infrastructure as it is essentially helping to deliver the level of growth already planned for in the Core Strategy, the impacts on infrastructure provision of which have already been considered in the Local Investment Plan (LIP). The Council's existing Local Plan and Core Strategy seek to encourage walking and cycling and other sustainable modes of transport. Transport infrastructure improvements will be planned for with Highways England and other relevant bodies to ensure likely traffic increases can be managed and other modes of transport encouraged.
Highways England	General	As the Borough continues to develop its local plan, Highways England will look forward to working with you to help understand the consequences of future anticipated and planned growth and to identify ways of ameliorating its impact on the highway network within available funding opportunities.	No	Comments noted.
Historic England	General	Historic England would like to see a reference to conserving and enhancing heritage assets in the Vision and/or Objectives section. Specifically Historic England would like to see in the third paragraph of the Vision read: " Any greenfield development will have been sensitively planned to sit within the urban landscape and conserve or enhance heritage assets".  Also, the fourth objective should read: "To ensure any Greenfield development is necessary and planned in a sensitive manner having respect for the local landscape and the significance of heritage assets".	No	Comments are noted. Adopted planning policies seek to conserve and enhance heritage assets across the Borough. As a statutory consultee, Historic England will be consulted when planning applications are submitted for the allocated sites.

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Historic England	SAP1 - Our Lady of Lourdes Church, Lloyds, Coffee Hall	<p>SAP1 is not consistent with national policy. Our Lady of Lourdes Church is a candidate for addition to the Council's proposed list of locally important buildings. As a site with a non-designated heritage asset SAP1 is contrary to NPPF paragraphs 126 and 135. Paragraph 126 requires local planning authorities to recognise (in their local plans) that "heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance".</p> <p>The policy should either be deleted or a requirement within the policy for the retention of Our Lady of Lourdes Church as part of any redevelopment scheme should be added, or a requirement for retention of the church unless it can be clearly demonstrated that this would not be possible.</p> <p>Paragraph 135 requires the effect of an application on the significance of non-designated asset to be taken into account in determining the application, with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset (on the one side, with the public benefits of the proposal on the other).</p>	No	Comments are noted. The site assessment reports that the site has major structural issues. When an application is submitted for the site it will be assessed in accordance with the Development Plan and NPPF. At this stage it can't be determined whether there is scope to retain the site's heritage value.
Milton Keynes Community Foundation and MK Community Properties (Hornbeam)	General	The SAP does not consider other available land. Consideration should be given to the inclusion of sites owned by the MK Community Foundation and MK Community Properties. These sites have been subject of earlier discussions with MKC regarding housing.	No	At this stage in the plan-making process it is too late to consider adding new sites to the Plan. No specific sites for inclusion in the SAP are mentioned in the representations.
Milton Keynes Community Foundation and MK Community Properties (Hornbeam)	SAP3 - Land off Singleton Drive, Grange Farm	Milton Keynes Community Foundation Limited owns the land immediately to the east of SAP3, it is designated for community use, such development will be prejudiced by the allocation of SAP3 for housing. Consideration should be given to either allocating both or neither of the sites for housing.	No	SAP3 is a reserve site in the 2005 Local Plan with housing identified as one possible use of the site. It is not considered that development on SAP3 will impact development of the land to the east of SAP3 for community use.
Ian Short	General	The proposals seek to develop cities rather than countryside to some extent but there will be a loss of green space. New development should be more sensitive to the environment than existing developments. Public transport should also be considered.	No	Comments noted. The Council's other adopted planning policies in the Development Plan seek to mitigate the negative environmental and other effects of new development and also enhance the natural environment where possible. Public transport and shifts to more sustainable modes of transport are also encouraged by existing policy.
Oxford Diocesan Board of Finance (Impact Planning Services)	General	<p>The document only allocates land for housing in or on the edge of the urban area and appears to be leaving the decision to allocate sites in the rural areas to neighbourhood plans. Wavendon neighbourhood plan and others in rural areas are progressing slowly. In response to the June 2015 consultation of the Wavendon neighbourhood plan it is clear that many respondents do not want to see any further development in Wavendon. If this view is taken forward then it is up to the Site Allocations Plan to allocate sites in Wavendon and other rural areas. As such the SAP fails to plan positively and is unsound.</p> <p>Furthermore the plan is not positively prepared as it fails to plan to ensure objectively assessed housing needs for the whole administrative area are met (including rural areas). The plan is not justified since the 'urban only' approach is not the most appropriate strategy if neighbourhood plans cannot be relied upon to deliver housing in rural areas.</p> <p>The plan should be recast to identify site allocations in rural areas as well. As part of that process the previously submitted site on the land on the northern edge of Wavendon (known as Wavendon Glebe) should be identified as one of the proposed rural allocation sites.</p>	Yes	<p>The purpose of the SAP is to help the Council with its shortfall against the five year housing land supply and contribute to the Core Strategy housing target. It is not intended that the SAP alone will deliver the objectively assessed housing need.</p> <p>The Core Strategy outlined a rural housing target of 613 to be met by the SAP. In the period since the Issues &amp; Options consultation, several neighbourhood plans in the rural area have made excellent progress, most significantly Newport Pagnell's which has now been adopted. There was strong support at the Issues &amp; Options stage for focusing rural allocations in Newport Pagnell, Olney and Sherington, rather than Woburn Sands, which already had an adopted Neighbourhood Plan at the time. To avoid prejudicing Neighbourhood Plans, the emerging Preferred Options focused only on urban sites. Furthermore, the land supply requirement in the rural area is met and exceeded by the Newport Pagnell Neighbourhood Plan and groups in Olney and Sherington are actively working on their own plans. For this reason it was considered that allocation of sites in the rural areas to meet the Core Strategy target could be met by adopted and soon to be adopted neighbourhood plans. PlanMK will also seek to help deliver further housing in rural areas.</p>
HCA (Lambert Smith Hampton)	SAP18 - Land at Towergate, Groveway, Wavendon Gate	HCA is pleased to note that this site is proposed for residential development. This site has been identified as suitable for inclusion within the HCA's Accelerated Construction programme.	No	Comments noted.
Martin Furminger	General	Milton Keynes has had more than its fair share of development and its infrastructure would not be able to cope with anymore.	No	Any development planned as a result of the SAP should not have an impact on strategic infrastructure as it is essentially helping to deliver the level of growth already planned for in the Core Strategy, the impacts on infrastructure provision of which have already been considered in the Local Investment Plan (LIP). However, all housing developments are expected to contribute, through S106 obligations or S278 highway works agreements, towards highway infrastructure as required and this will be assessed at the time of the planning application.

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Michael Moutrie	General	Issue with the 5-year housing land supply and "excessive" housing targets. Without the necessary resources and powers an annual housing target of 1,750 is excessive and is not conducive to the operation of an orderly and properly regulated planning regime. The numerical target does not address issues of quality or affordability. The Council should ensure that any Local Housing Assessments are realistic, providing a view not only of need and affordability but also of deliverability including recognition of the powers and resources actually needed to realise both the quality and quantity above and beyond what housing developers can provide.	No	The Council is required by national policy to plan to meet objectively assessed housing need (OAHN). This is 1,750 homes per annum according to the 2014 SHMA. The OAHN takes into account affordability among other things. Housing delivery will of course depend on capacity and ensuring supporting uses and infrastructure are also delivered and this is set out in existing planning policy.
MKDP	SAP15 - Timbold Drive, Kents Hill	The current development brief supports site A as a mixed retail/residential scheme which MKDP wishes to retain as it believes it will benefit the overall scheme. Also, across the 8.3 hectares MKDP believes some flexibility should be allowed to enable delivery of a proportion of Use Class C2 development. These two elements combined could potentially reduce the total dwellings by 80, to 148.	No	Comments noted.
MKDP	SAP21 - Land off Ladbroke Grove, Monkston Park	Need for a revision to the identified site boundary to reflect correct ownership/development area (see plan submitted with response).	No	Comments noted. Site boundary will be amended to reflect the correct ownership/development area.
MKDP	SAP4 - Land East of John Lewis car park	The site is located in CMK, as such economic drivers should also be taken into account in considering an allocation. The site should therefore more appropriately be allocated for mixed use development which would include an element of residential use but also allow for retail, leisure, hotel and related uses. There is also a discrepancy between the red outline for the satellite and OS base plans.	No	Comments noted. It is agreed that the site would be more suitable for mixed used development including residential and other appropriate city centre uses which would relate better to and help sustain the adjoining uses. A modification to the Plan will be required.
MKDP	SAP9 - Independent school site, Daubeney Gate, Shenley Church End	Need for a revision to the identified site boundary to reflect correct ownership/development area (see plan submitted with response).	No	Comments noted. The site boundary will be amended to reflect the correct ownership/development area.
Mr and Mrs Lock	General	The purpose of the Plan is misrepresented in Section 3 Context. The first purpose is to identify sites for the "rural housing" area pursuant to the Core Strategy 2013, and that role is not explained, neither is the delay in its progression. The second, and a recently added purpose, is to deal with the failure to maintain a five year supply of deliverable housing land because the Council's large allocations (part of one - the WEA - it owns) and land owned by the Council's development company MKDP have not been advanced by the Council pursuant to its duty to secure the proper planning of the area which is not explained, neither is it explained that faster development of some larger allocations could be secured by the Council if it wished, making it unnecessary to allocate all the proposed sites in the Plan. This Plan actually completes an old plan-making cycle, and is also now being used to cover up a failure to deliver on the approved Development Plan. Chapter 3 should be revised to properly explain the purpose of the Plan and why it has been delayed.	Yes	Comments are noted and it is acknowledged that Section 3 could be revised to better explain the role of the SAP.  With regards to identifying sites in rural areas, the role of the SAP in doing this and reasons rural sites were not included in the most recent version of the SAP are explained in the Emerging Preferred Options document which was consulted on in 2015. Dealing with the five-year supply is not a recently added purpose. The Inspector's Report to the Core Strategy clarified that the role of the SAP was in providing short-term flexibility and contingency as well as ensuring that the housing requirement for the Borough will be met by 2026. The Council put forward modifications at the time which explain that by allocating sites for about 1000 dwellings based on 2012 forecasts, the SAP would ensure that a deliverable five-year land supply plus a 20% buffer would be maintained. The SAP is now allocating 1133 homes to meet what was a 479 homes shortfall in the five-year land supply at the time of publishing the SAP, plus additional homes. The shortfall to the five-year housing land supply changes regularly as permissions are granted or expire, sites are built out and construction timelines change. The shortfall figure can therefore go up or down and is updated regularly.

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Mr and Mrs Lock	General	The evaluation leading to selection of the proposed sites does not give any weight to the legal duty placed upon the Council by the Housing and Planning Act 2016 to provide for self build (SB) and custom build (CB). Site U30 is the only site in the assessment which is offered explicitly and exclusively for that purpose, but was not ranked for that and has not been allocated. U30 should be proposed to be allocated following correct planning evaluation, and a currently proposed site with a lower ranking than be de-allocated for future consideration in the context of Plan:MK.	Yes	The Council maintains a self-build register as per the Act to promote opportunities for self-build and custom build development in the Borough.  MKC's draft local plan - Plan:MK also includes a self-build/custom housebuilding policy which requires strategic allocations set out within Plan:MK to make provision for serviced plots of land to contribute towards meeting the evidenced demand for self-building and custom housebuilding in the Borough. The policy also supports the provision of other serviced plots of land within other proposals for housing subject to evidenced supply and demand.
Mr and Mrs Lock	General	The evaluation leading to selection of the proposed sites does not give weight to the "BREXIT" referendum result and the Government's consequential policy to prepare a new national industrial strategy which means that more care should be shown to have been taken in allocating employment land sites for housing in accordance with the Development Plan which is now out of date in that respect, prior to Plan:MK.	Yes	Paragraph 22 of the NPPF states that "planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities". Given what the NPPF says, some of the least well ranked vacant employment sites listed in Appendix B of the ELS have been allocated for housing to help meet the shortfall in the 5 year housing land supply.  The effects and future effects of the BREXIT referendum are unclear at present.
Mr and Mrs Lock	General	Many of the factual points in the previously submitted representations with regard to site U30 have been inexplicably ignored in the evaluation, whereas if they had been properly weighted U30 would have been proposed to be allocated as it would be ranked higher than some proposed sites.	Yes	Based on the site's stage 2 assessment (physical constraints) it was concluded that U30 would not be deliverable within five years because of its dependence on the area to the east of the site (WEA) to be built out to ensure its enclosure character is improved, and would therefore be unable to contribute to the five-year housing land supply.
Mr and Mrs Revill	U30 - Land off Ridgeway, Stony Stratford (not included in current version of SAP)	The Plan fails to make positive provision of land for Self-Build and Custom-Build as required by the Self Build and Custom Housebuilding Act 2015 now augmented by Chapter 2 of the Housing and Planning Act 2016. Land listed as site U30 is promoted by its owner for self-build and custom-build housing. To our knowledge it is the only land so promoted in the plan. It meets all of the requirements of the Sustainability Appraisal though it is sad to note that discrepancies in the assessment have not been rectified since our representations in February 2016. This would demonstrate positive planning to meet the needs of self-build and custom-build developers (see response submitted for detailed assessment of discrepancies in the SAP sustainability appraisal).	Yes	Under the Self-Build & Custom Housebuilding Act 2015, Milton Keynes Council is obliged to maintain a register of individuals seeking to acquire land in the Borough for a self-build or custom-build home. MKC actively manages this register and it allows the opportunity for people wishing to promote self-build plots to do so. MKC's draft local plan - Plan:MK also includes a self-build/custom housebuilding policy which requires strategic allocations set out within Plan:MK to make provision for serviced plots of land to contribute towards meeting the evidenced demand for self-building and custom housebuilding in the Borough. The policy also supports the provision of other serviced plots of land within other proposals for housing subject to evidenced supply and demand.  Site U30 was not included in the most recent version of the SAP because of the findings of Stage 2 of the SAP assessment. In response to the question of whether the site represents a logical extension to a settlement, it was concluded in the SA that once the Western Expansion Area is built out, the site may represent better enclosure character but currently it would potentially appear as 'bolt on' development. This makes the site less likely to be suitable in the short term.

Name/Organisation	Site	Comments	Request to attend EiP	Council Response
Mr D Essame	SAP11 - Builder's Merchants, Simpson Road	While more housing is welcome provided it is of the right mix, housing alone is insufficient to meet the needs of Milton Keynes. The amenity value of the Travis Perkins site is considerable and it would be a dereliction of duty to allow the site to be devoted solely to executive properties. The land adjacent to the canal is ideally located to include a promenade and park alongside the canal, and together with a restaurant and tea rooms with sufficient discrete car parking.	Yes	Comments noted. The key principles of the site allocation state that the canal frontage should be publicly accessible and mixed uses to encourage this would be acceptable. As per policy MK22 in the 2005 Local Plan, 0.4ha of open space is also required to be provided.
Mr D Essame	SAP15 - Timbold Drive, Kents Hill	The section of the site between Hammerwood Gate and the Hilton Hotel should be held in reserve for future expansion of either the hotel or the university.	Yes	According to the sites development brief, discussions with the Open University and the Education department in MKC, sites C and D1 are not needed for further education or Science Park related purposes and residential uses are seen as more appropriate and suitable. Site A (south) is considered larger than that which could viably provide commercial uses and therefore residential led mixed use development on the site is considered to be more viable. No need has been identified for a hotel use on the site.
Mr D Essame	SAP2 - Wellington Place Car Park	A change of use from employment to residential is inappropriate for this site and this location. Milton Keynes generally has inadequate provision for small and start-up businesses. This site is already an employment site, and its location makes it ideal for continued employment use. The access is entirely through an existing business site and it is adjacent to the railway line, so unlike all the other (bar one) Site Allocations, this one is in an area where noise is definitely not an issue. Premises should be provided for small/start-up business use.	Yes	NPPF paragraph 22 states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Allocation of these sites is considered to be NPPF compliant and will help the Council meet its housing need.  Permission has been granted for offices but this has not been implemented. There is no shortfall in Class B1 office floorspace and the owner is willing to consider the site for residential use.
Mr D Essame	SAP7 - Land to the rear of Morrisons's supermarket	While more housing is welcome provided it is of the right mix, housing alone is insufficient to meet the needs of residents. The Development Corporation saw its role as one of building communities, and as such recognised the importance of amenities, something sadly lacking in recent years. In particular, the provision of activities for teenagers has been dismal, and this site is well placed to help mitigate this inadequacy by the creation of a skateboard and BMX park Noise is hardly an issue in this location.	Yes	Comments noted. MKC through the Local Plan 2005 seeks to protect a range of facilities for leisure, recreation and the community and also promote new sites for development of these uses. Planning decisions for major housing development also seek to ensure sufficient provision of supporting uses is or will be available to support new and existing residents.
Natural England	General	16 of the 21 sites are on existing green open space, which represents a significant net loss of biodiversity and connected green open space essential for mitigating climate change. Without knowing the details of any development briefs Natural England are unable to assess the suitability of these sites. To help mitigate the loss a focus on implementing connected green infrastructure is advised.	No	Comments are noted. Adopted planning policies seek to ensure any potential negative environmental impacts are mitigated. As a statutory consultee, Natural England will be consulted when planning applications are submitted for the allocated sites. Many of the sites allocated in the SAP were previously allocated for development in the Local Plan (2005) or Core Strategy (2013) meaning that the overall impact on biodiversity for many of the sites has already been taken into account.
Natural England	SAP 3,5,6,7,8,9,10,12,14,15,16,17,18,19,20,21	These sites will result in a net loss of biodiversity if not mitigated. Policies around the development of these areas must include strategic, connected green open/space and/or contributions to maintain Milton Keynes main wildlife corridor or other nearby space. Policies should require a developer to show no net loss of biodiversity, a biodiversity calculator must be applied to prove no net loss for Milton Keynes. Suitable methods can include the DEFRA biodiversity offsetting metric and the environment bank biodiversity impact calculator.	No	Comments are noted. Adopted planning policies seek to ensure any potential negative environmental impacts are mitigated. As a statutory consultee, Natural England will be consulted when planning applications are submitted for the allocated sites. Suggested methods on calculating biodiversity changes are noted. Many of the sites allocated in the SAP were previously allocated for development in the Local Plan (2005) or Core Strategy (2013) meaning that the overall impact on biodiversity for many of the sites has already been taken into account.
Natural England	SAP15 - Timbold Drive, Kents Hill	SAP 15 is located in the wildlife corridor that surrounds the university. It is connected to the main wildlife corridor that runs through Milton Keynes. It is essential that any development maintains and improves these connections by retaining the existing hedgerows and proposing a significant proportion (>30%) of connected green space and Green Infrastructure connections to adjoining green sites.	No	Comments are noted. Adopted planning policies seek to conserve and enhance green infrastructure and biodiversity across the Borough. As a statutory consultee, Natural England will be consulted when planning applications are submitted for the allocated sites. Many of the sites allocated in the SAP were previously allocated for development in the Local Plan (2005) or Core Strategy (2013) meaning that the overall impact on biodiversity for many of the sites has already been taken into account.

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Natural England	SAP19 - Land at Walton Manor, Groveway/Simpson Road, Walton Manor	SAP 19 significantly impacts the central wildlife corridor of Milton Keynes. This is an area Natural England would expect to remain as green space under section 40 of the Natural Environment and Rural Communities Act 2006. If this area were to be developed, any development should carry a conditional requirement that at least 30% of the area be allocated as green open space and that contributions are made towards the improvement and management of the remaining wildlife corridor by the developer to compensate for impacts to rest of the site.	No	The sites already has a development brief adopted which allocates 0.95ha of the site for open space, located in the south section of the site. This equates to 10% of the total site area. The development brief was consulted on and the impacts on biodiversity were also considered at this stage. Many of the sites allocated in the SAP were previously allocated for development in the Local Plan (2005) or Core Strategy (2013) meaning that the overall impact on biodiversity for many of the sites has already been taken into account.
Natural England	SAP3 - Land off Singleton Drive, Grange Farm	SAP 5 states "The planted screening between the site and the grid road should be retained in proposals". This condition should be added to SAP 3 - Land off Singleton Drive, Grange Farm and SAP 16 - Manifold Lane, Shenley Brook End.	No	Comments are noted. The site boundary is to be amended to reflect the correct ownership and development area which excludes the planted screening between the site and the grid road to the south. The key principles of SAP3 can be amended however to take into account the planted screening.
Newport Pagnell Town Council	General	In support of all the proposed sites being allocated for housing.	No	Comments are noted.
Northampton Borough Council	General	Support	No	Comments are noted.
Persimmon Homes Midlands	General	The five year housing supply uses the Liverpool method rather than the correct Sedgefield method and so underestimates how much housing the SAP needs to provide to correct the shortfall. The plan significantly underprovides for the number of new homes required to meet the identified need and maintain a five year housing supply. The plan is therefore not positively prepared.	No	The specific circumstances of Milton Keynes means that most new housing is delivered in a number of large strategic sites which take many years to build out. This was acknowledged by the Core Strategy Inspector in paragraphs 84 to 96 of her report. For this reason the Council favours using the Liverpool method of accommodating shortfall. The report also clarified that the role of the SAP was in providing short-term flexibility and contingency as well as ensuring that the housing requirement for the Borough will be met by 2026. The Council put forward modifications at the time which explain that by allocating sites for about 1000 dwellings based on 2012 forecasts, the SAP would ensure that a deliverable five-year land supply plus a 20% buffer would be maintained. The SAP is now allocating 1133 homes to meet what was a 479 homes shortfall in the five-year land supply at the time of publishing the SAP, plus additional homes. The shortfall to the five-year housing land supply changes regularly as permissions are granted or expire, sites are built out and construction timelines change. The shortfall figure can therefore go up or down and is updated regularly.
Persimmon Homes Midlands	General	During the process a number of suitable sites have been put forward which have not been taken forward in the SAP. Based on this the plan does not represent the most appropriate strategy and is not justified. A suitable site put forward at Shenley Dens should be included in the SAP.	No	Site selection for the SAP was based on robust site assessments which looked at constraints to development and overall deliverability of the site among other things. The Shenley Dens site (U29) was concluded to not be a logical extension to a settlement and significant negative effects on landscape character were also identified. The negative effects on landscape character were also acknowledged by the Local Plan Inspector in 2005.
Peter Boyce	SAP2 - Wellington Place car park	In support of Wellington Place being developed for housing.	No	Comments are noted.
Sport England	General	The occupiers of new development, especially residential, will generate demand for sporting provision. The existing sporting provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, the new residential provision proposed would have an impact on existing sporting provision by increasing demand and therefore development proposals should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.	No	Contributions towards open space provision, including sports halls and associated facilities and playing fields are sought following in line with the guidance in the "Planning Obligations for Leisure, Recreation and Sports Facilities" SPG. Overall contributions from new developments are balanced alongside other needs such as affordable housing and infrastructure provision. A Playing Pitch Strategy produced by the Council in 2015 using Sport England guidance also provides an up-to-date assessment of needs relating to grass pitch provision in the Borough. It has also long been a principle of cost effective provision for joint use sports facilities to be provided on school sites to serve local catchment areas. A new sports facilities strategy including an up-to-date needs assessment will be undertaken to form part of the evidence base for PlanMK.



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Steven Matthews (Monofloors)	SAP2 - Wellington Place car park	In support of Wellington Place being developed for housing.	No	Comments are noted.
London Luton Airport Operations Limited (Terence O'Rourke)	General	LLAOL suggests that the most southern and eastern proposed allocation sites include the requirement to provide appropriate levels of noise insulation within their respective policies in order to accord fully with NPPF paragraph 123. The importance of LLA should be fully acknowledged in the SAP.	No	Comments are noted. Any planning applications submitted for the allocated sites would be required to demonstrate NPPF compliance and so it is not considered necessary to include a requirement for all of these sites.
Tom Mcevaddy	U31 Wellington Place	Fully support use of this site. We have a shortage of houses and for many years this has been a waste of land.	No	Comments are noted.
Whaddon Parish Council	General	Support.	No	Comments are noted.
Woburn Sands and District Society	General	The Society is disappointed that according to advice given by MKC officers at a DCC meeting on 1/12/16, the development targets for urban and rural sites, and the number of dwellings that are being built or are expected do not have any legal weight when considering whether the Borough can show that it has a 5-year housing land supply, only the overall (urban plus rural) target are legitimate.  Further comments made regarding housing supply and development in rural areas but no comments relating specifically to the SAP.	No	Comments noted for future plan-making.
Kevin McPartland	General	The plan does not comply with SA5 objectives to: a) reduce exposure to harmful emissions in the air b) reduce pollution from traffic c) support specific actions in the designated AQMA  Milton Keynes Air Quality report of 2014 confirms that Nitrogen Dioxide emissions in Olney consistently exceed public health standards/levels.  Previous so-called AQMA Review and Assessment Reports (2007,2009,2012) re-affirm these excesses.  Further MKC's Updating/Screening Assessment Report (2015) identified Olney as failing to meet air quality objectives. In fact AQMA reports since 2000 indicate that NO2 target levels for Olney are not being met.	No	Unfortunately some negative environmental effects as a result of new development are likely. The Borough's overall Development Plan seeks a balance between all the sustainability objectives and seeks to meet development needs whilst also protecting and enhancing the environment. The Council would seek to mitigate the negative effects of new development on air quality through adopted planning policies in the Development Plan.
Kevin McPartland	General	A report commissioned by MKC and carried out by the Transport Research Laboratory in 2009 (PPR407 M90598) informed that a ban on HGVs through Olney would result in a 49% reduction in total Nitrogen Dioxide concentrations.  HGVs should be prevented from using the A509 through Olney.  A weight restriction limit on the bridges located on the A509 Olney south boundary, should be introduced.  N.B. The LAQM Progress Report 2014 states that Planning Permission for development/s will be refused where: D1 (1) Additional traffic generation would overload existing road networks and D1 (1v) where pollution levels in the air reach unacceptable levels.  The proposed development sites for Olney will see a huge increase in local traffic and with it further and dangerous increases on current Nitrogen Dioxide pollution levels.  In turn this will have serious consequences for the long-term health and wellbeing of the local populous particularly the old and young residents.	No	Comments noted. Unfortunately some negative environment effects as a result of new development are likely. The Development Plan will seek to mitigate the negative environmental effects of new development through policies which seek to conserve and enhance the natural environment and promote sustainable forms of transport.
Andi Proudfoot	SAP5 - Land North of Vernier Crescent	A new development here: 1) Would have a significant detrimental environmental impact on local wildlife. 2) Would have a significant impact on traffic ingress and egress for existing Medbourne residents. 3) Would have a significant impact to the mental well being of existing Medbourne residents as it would change the character of the development from a well planned nicely spaced area to overly developed. 4) re points 1-3, whilst construction was undertaken there would be increased disruption.  Development should not be undertaken here at all.	No	Comments noted. Unfortunately some negative environment effects as a result of new development are likely. The Development Plan will seek to mitigate the negative environmental effects of new development through policies which seek to conserve and enhance biodiversity and promote sustainable forms of transport.

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Parks Trust	SAP3	The boundary drawn for SAP 3 includes an area of land leased to The Parks Trust under a Transportation Corridor lease. This is the area nearest the H5 Grid Road. The site should not include this land as the Trust's leasehold land here is not intended for development. Omitting this area will reduce the size of the development site and hence may reduce the number of dwellings that would be deliverable on the site. This same point was made in response to the 2015 consultation.  Amend boundary of SAP 3 to omit Parks Trust land.	No	Comments noted. The site boundary will be amended to omit Parks Trust land and reflect the correct ownership of the land.
Parks Trust	SAP4 - Land East of John Lewis car park	The key principle (i) set out for SAP 4 refers to the development 'taking advantage of the vista Campbell Park provides to the east'. Correspondingly the view to any development here from Campbell Park must also respect the setting of and backdrop to the park, which is a key principle of development included in the Central Milton Keynes Business Neighbourhood Plan. Therefore any development on SAP 4 should only be deliverable if it is of a character and appearance befitting the setting of Campbell Park.  Amend key principles for SAP 4 to include the reference to ensuring the form of any development is appropriate for the setting of Campbell Park.	No	Comments noted. The key principles can be amended to reflect this.
Parks Trust	SAP10	The boundary drawn on the OS base map for SAP 10 includes an area of land leased to The Parks Trust under a Transportation Corridor lease. This is the area nearest the V10 Grid Road. However, this area is not included within the red line on the aerial photograph base for SAP 10, so there is inconsistency in the plan in this respect. The site should not include any of the Trust's land as this is not intended for development. Omitting this area may reduce the size of the development site and hence may reduce the number of dwellings that would be deliverable on the site. This same point was made in response to the 2015 consultation.  Amend/clarify the boundary of SAP 10 to omit Parks Trust land.	No	Comments noted. The discrepancies with the site plans will be corrected.
Parks Trust	SAP18 - Land at Towergate, Groveway, Wavendon Gate	The key principles set out for SAP 18 refer to a potential additional access being taken from Ortensia Drive, which would only be possible by crossing a strip of Parks Trust parkland along Ortensia Drive. Any such access, if this is required to deliver the development on this site, would require the Parks Trust's agreement.  Amend the key principles of SAP 18 to highlight that any access for the development across Parks Trust Land from Ortensia Drive will require the Trust's agreement.	No	Comments noted. The key principles can be amended to reflect this.
Parks Trust	SAP21 - Land off Ladbroke Grove, Monkston Park	The boundary drawn for SAP 21 includes an area of land leased to The Parks Trust under a parkland lease. This is the western edge of the outlined site. The site should not include this land as the Trust's leasehold land here is not intended for development. Omitting this area will reduce the size of the development site and hence may reduce the number of dwellings that would be deliverable on the site. This same point was made in response to the 2015 consultation.  Amend boundary of SAP 21 to omit Parks Trust land.	No	Comments noted. The site boundary will be amended to reflect what is in the adopted development brief.
Andrew Beake	SAP17	To ensure there is due diligence with this site, we need to consider the following: 1) From the lay-of-the-land - the current drainage/local flooding issues around the top-end of the conservation land Bridgemere Close (opposite) linked to Cranborne avenue. There is a reasonable slope here. There needs to engineer/local environmental survey to ensure rain water collection from the new site does not affect both land around Bridgemere Close or affect the underpass.	Yes	Comments noted. These will be considered at the application stage. The site also has an adopted development brief which considers the main issues and opportunities of the site.
Andrew Beake	SAP17	2) Current Exbury Lane local traffic does have issues. Exbury Lane to Nymans Gate, with its tight parking, is difficult to drive any large vehicles.... proposal is to simply open up the "No Through Road" Gate to Kingsmead. The current underpass is used as Red-Way only... there is a pile of earth and a gate stopping access/exit from Westcroft. Further points about 2. above: a) Taylor Wimpy are building in Fishermead and would help access/exit. b) there is already a pavement/road, for the underpass, in situ.	Yes	Comments noted. These will be considered at the application stage. The Development Plan will seek to mitigate the negative environmental effects of new development through its planning policies.
Andrew Beake	SAP17	3) Protection of existing trees (planted in 2005/6) should be important consideration	Yes	Comments noted. These will be considered at the application stage. The Development Plan will seek to mitigate the negative environmental effects of new development through its planning policies.
Apex Planning (Impact Planning Services)	Sustainability Appraisal	The Emerging Preferred Options Plan did not have a Sustainability Appraisal at the time it was published, therefore the Council has failed to comply with the Regulations and legislation. The Plan cannot proceed as published. The Preferred Option stage must be republished and only when the relevant SA of this stage of the Plan is also available for consultation.	Yes	Site assessments which considered the effects of developing on the site were published at the Emerging Preferred Options stage. Furthermore, work on the sustainability appraisal has been ongoing since the start of plan preparation. Publication of the sustainability appraisal report is only required at the Proposed Submission stage according to the Town and Country Planning (England) Regulations 2012.

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Richard Wallace	SAP2 and SAP11	Overall the plans to free up more space are commendable. The sites that are adjacent to or part of an industrial site such as SAP2 and SAP11 need careful consideration of such aspects as what if any chemicals may have been stored or used on these sites previously and is there a need for a deep cleansing before used for housing as in SAP13.	No	Comments noted. A 3 stage assessment of the sites was conducted which is available on the website which considered a range of issues including physical and environmental constraints. The issues raised however would be considered when a planning application was submitted for development of the sites.
Richard Wallace	SAP2	I personally don't think people would want to live in an industrial site with added dangers such as vehicles making deliveries and block access, possible fork lift truck moving around the site. Maybe consider moving it across the park to be adjacent to and with access from Cathay Close and then include the allocated space here back into the park.	No	Comments noted. The design of the development will be carefully considered when a planning application is submitted and assessed and the points raised will be considered.