

**Transport and Sustainable Transport SPD  
Regulation 18 (4) (b) Statement  
Town and Country Planning (Local Development) (England) Regulations 2004  
Town and Country Planning (Local Development) (England) Regulations 2008**

Regulation 18 (4) of the regulations to the Planning and Compulsory Purchase Act reads as follows:

***(4) A local planning authority shall not adopt an SPD until-***

***(a) they have considered any representations made in accordance with paragraph (2); and***

***(b) have prepared a statement setting out-***

***(i) a summary of the main issues raised in these representations, and***

***(ii) how these main issues have been addressed in the SPD which they intend to adopt.***

All comments and representations received during the consultation on the Transport and Sustainable Transport Supplementary Planning Document were evaluated.

This statement confirms that the Transport and Sustainable Transport Supplementary Planning Document was considered by the Cabinet at its meeting held on 2 June 2009.

At that meeting, a summary of all representations received, the Council's response to such representations and the proposed changes to the Transport and Sustainable Transport SPD were considered by the Cabinet.

**Milton Keynes  
15 June 2009**

## **Transport SPD**

### **Consultation Representations**

#### **1. Summary**

9 representations received:

- Highways Agency
- Sustainable Transport Working Group
- MKP
- SEEDA
- Whaddon Parish Council
- Shenley Brook End/Tattenhoe Parish Council
- Woburn Sands District Society
- MKC Transport
- MKC DC

#### **2. Main Issues**

Noting that there are necessary editing, syntax and information data changes, the main issues raised during consultation are as follows:

- **Main Report**

- Limited cover and short time-span of Transport SPD will result in funding deficiencies.
- There are discrepancies between contributions in Transport SPD and MKP Tariff which need explanation/resolution.
- It is important that the evidence base is robust and up-to-date.
- An Infrastructure Delivery Plan should identify transport projects required in Transport SPD.
- There is a need for clearer relationships between required transport infrastructure and development projects contributing to that infrastructure.
- There is a need for a monitoring programme for the Transport SPD.
- The operational issues for collection (ringmaster) and distribution (banker) of monies needs to be clarified.
- Clarification required of the need for Travel Plans as part of the Transport SPD.
- The traffic impact of Milton Keynes growth on adjacent rural communities and the need to protect these communities needs resolution.
- There is a need to generally review all thresholds in the Transport SPD.

- **Sustainability Appraisal**

- There is no mention of rail in the SA, especially East-West Rail.
- The thresholds in the SA need to be reviewed.

Representation	Council Response	Proposed Change
<b>2.1.Highways Agency</b>		
<b>• Background</b>		
<ul style="list-style-type: none"> <li>- How will the Transport SPD evolve in line with transfer from Local Plan to Core Strategy?</li> </ul>	<p>The Transport SPD is aligned to the Local Plan and applies to development proposals submitted before December 2011. MKC intends to review and consolidate all Planning Obligations SPD with the Core Strategy and therefore align the “new” Planning Obligations SPD to the Core Strategy.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- There is a discrepancy between the Transport SPD that requires contributions of £8,500 and the MKP Tariff that requires contributions of £6,500.</li> </ul>	<p>The contributions required for residential and non-residential development in the Transport SPD have been reviewed and are now less than the MKP Tariff. It is not expected that the contributions for the Transport SPD are identical to the MK Tariff as each requires contributions for different purposes.</p>	<p>See Table 1</p>
<ul style="list-style-type: none"> <li>- Note the requirement for Travel Plans for the whole of Milton Keynes. (Not just the area covered by the Transport SPD.)</li> </ul>	<p>Noted. No action required.</p>	<p>No change.</p>
<b>• Policy Context</b>		
<ul style="list-style-type: none"> <li>- Acknowledge policy set out in Circular 05/2005, Community Infrastructure Levy and PPS12 and the key principals that should guide the Transport SPD:</li> </ul>	<p>Noted. No action required.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>o Transport impact based on cumulative effect of all development proposals coming forward in the area.</li> </ul>	<p>The Transport SPD does assess the cumulative effect of all development proposals, and also allows for the pooling of contributions. The MKP Business Plan, the LTP and other MK transport strategies take into consideration the cumulative effect of development proposals and for the pooling of contributions.</p>	<p>No change.</p>

Representation	Council Response	Proposed Change
o Transport interventions to mitigate impact should be consistent with regional/local objectives.	The transport interventions in the Transport SPD are consistent with regional/local objectives.	No change.
o Transport interventions to mitigate impact should consider all policy responses embracing Influencing Transport Behaviour (ITB), Integrated Demand Management (IDM) and new infrastructure as a last resort.	The Transport SPD proposes very little new highway infrastructure, but rather concentrates on sustainable transport solutions.	No change.
o The process to determine transport interventions should be considered in wider infrastructure planning and the LDF process.	The Transport SPD takes into consideration wider infrastructure planning and the LDF process. The proposals and recommendations of the Transport SPD are not considered in isolation.	No change.
o Transport measures must be evidence based and be identified in an Infrastructure Delivery Plan (IDP).	The transport measures contained in the Transport SPD are evidence based and are identified in an Infrastructure Delivery Plan, principally the MKP Business Plan, but also the LTP and other MK transport strategies.	No change.
o The level of developer contributions in the IDP should reflect planning obligation guidance, take into account the proportionate impact of development, the availability of public funds and the impact of contributions on the viability of that development.	The MKP Business Plan, the LTP and other MK transport strategies do reflect planning obligation guidance, take into account the proportionate impact of development, the availability of public funds and the impact of contributions on the viability of that development.	No change.
o The funding gap must be identified to enable forward funding of priority transport infrastructure on the basis of subsequent payment (Banker).	Forward funding is an integral part of the MKP Business Plan, and therefore of the Transport SPD, and does identify the funding gap based on subsequent future payments.	No change.
o Delivery of the IDP will require on-going monitoring review to respond to changing circumstances in the transport network.	Notwithstanding the short time-frame of the Transport SPD, the MKP Business Plan, in particular, but also the LTP and other MK transport strategies provide for annual and other monitoring review to respond to changing circumstances.	No change.

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>• <b>Transport Requirements</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Welcome the approach of planning obligations in the Transport SPD, but there are a number of concerns:</li> </ul>		
<ul style="list-style-type: none"> <li>o The evidence base is unclear (no why, priorities or timescales for delivery).</li> </ul>	<p>The Transport SPD evidence base comes principally from the LTP, the MKP Business Plan and other MK transport strategies and does not rely on its own evidence base.</p>	<p>Reference is made to the source of the evidence base.</p>
<ul style="list-style-type: none"> <li>o The relationship between development and the transport measures.</li> </ul>	<p>It is difficult to be precise about the relationship between development and the transport measures in the Transport SPD. This is because the Transport SPD relates to the narrow focus on non-growth areas of Milton Keynes where it is difficult to directly identify the relationship between unknown and unspecified development and their respective direct transport measures. Rather, the Transport SPD relates to the remaining development transport impacts after the growth development transport impacts have been accounted for.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>o SRN schemes and the flexibility to shift implementation elsewhere.</li> </ul>	<p>As the Transport SPD has a short time-frame it is difficult to give consideration to a shift in the emphasis of the implementation of infrastructure elsewhere. Furthermore, due to its narrow focus, implementation of infrastructure is allocated to areas of highest priority.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>o The level of detail of transport schemes is inconsistent.</li> </ul>	<p>Noted and acknowledged. However, the level of detail of transport schemes is dependent on the status, priority and stage in the planning process of the projects. The planning of some projects is complete with all available detail, while other projects are still in concept with little available detail.</p>	<p>No change.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>o Parking provision is inconsistent with the encouragement of sustainable travel.</li> </ul>	<p>Due to its long term nature, its focus on CMK only and its funding through other MKC strategies and policies, the provision of parking (multi-storey car parks) in CMK is no longer a part of the Transport SPD.</p>	<p>Reference to multi-storey car parks has been removed.</p>
<ul style="list-style-type: none"> <li>• <b>Scale of Contributions</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Limited cover of development projects and the time span of the Transport SPD will lead to funding gaps.</li> </ul>	<p>Acknowledged, but MKC intends to review and consolidate all Planning Obligations SPD with the Core Strategy and therefore align the “new” Planning Obligations SPD to the Core Strategy and in doing so, extend the life of the transport related obligations.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Contributions in Transport SPD are higher than in the MKP Tariff.</li> </ul>	<p>The contributions required for residential and non-residential development in the Transport SPD have been reviewed and are now less than the MKP Tariff. It is not expected that the contributions for the Transport SPD are identical to the MK Tariff as each requires contributions for different purposes.</p>	<p>See Table 1.</p>
<ul style="list-style-type: none"> <li>• <b>Calculation of Contributions</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Trip rates are acceptable to determine contributions but do not reflect impact of developments nor does it reward sustainable land use decisions.</li> </ul>	<p>In the preparation of a city-wide formula based contribution, considering the whole transport network holistically, it is difficult to make exceptions between contribution rates – rewarding sustainable decisions and penalising unsustainable decisions, which are determined on a case-by-case basis.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Rather link charges to sustainability of development and relate levels of contributions to deliverability of sustainable thresholds.</li> </ul>	<p>As above.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>• <b>Operational Issues</b></li> </ul>		
<ul style="list-style-type: none"> <li>• Who will be the “ringmaster” and “banker” in collection and allocation of developer contributions? (Cannot be LTP but should be MKC/MKP.)</li> </ul>	<p>All contributions in terms of the Transport SPD will be made to the Council who will secure and distribute the funds in accordance with accepted existing Council policy and procedures.</p>	<p>Reference made to ringmaster and banker roles of MKC.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>Refer to transition from Local Plan to LDF.</li> </ul>	Noted and acknowledged.	Reference made to transition from Local Plan to LDF.
<ul style="list-style-type: none"> <li><b>Travel Plans</b></li> </ul>		
<ul style="list-style-type: none"> <li>Is Transport SPD Travel Plans section not the same as existing guidance on Travel Plans, thus it is not necessary? (Or need some local context.)</li> </ul>	The Travel Plan section does complement existing guidance on Travel Plans. Notwithstanding extensive national guidance on Travel Plans, it is considered necessary to explicitly include Travel Plans in the Transport SPD. This is to make Travel Plans applicable to the whole of Milton Keynes, not just the area covered by the rest of the Transport SPD, to make Travel Plans Milton Keynes specific and to confirm the Council's commitment to the need for the preparation of Travel Plans.	No change.
<ul style="list-style-type: none"> <li>The main objective of travel planning is defined as a reduction in the number of single occupancy vehicles. However, the main objectives of Travel Plans are established on a site-by-site basis. (This needs to be reflected in the Transport SPD.)</li> </ul>	Noted and acknowledged.	Reference made to site-by-site evaluation in the preparation of Travel Plans.
<ul style="list-style-type: none"> <li>The thresholds for Travel Plans in the Transport SPD are different to the thresholds for Travel Plans in guidance. (80 units, not 100 units)</li> </ul>	Noted and acknowledged.	The thresholds for Travel Plans are now consistent with guidance.
<ul style="list-style-type: none"> <li>Other requirements concerning the need to prepare Travel Plans are ambiguous and a more detailed breakdown is required.</li> </ul>	In addition to 3 added scenarios, the Transport SPD relies on the Local Plan and local and national guidance on the need to prepare Travel Plans. It is considered that these ancillary documents contain sufficient detail and are not ambiguous.	No change.

Representation	Council Response	Proposed Change
<b>2.2. Sustainable Transport Working Group</b>		
- Note that this is a new transport tariff excluding CMK/expansion areas.	Noted. No action required.	No change.
- Travel Plans should not be part of Transport SPD, but a separate SPD. Travel Plans as part of Transport SPD is not a robust, legal solution. (DCLG advice to Council is confusing.)	The Transport SPD includes sustainable transport solutions. Travel Plans are a sustainable transport solution and therefore are correctly included in the Transport SPD. The Travel Plans section has also been prepared to be applicable to the whole of Milton Keynes, not just the area covered by the rest of the Transport SPD, to make Travel Plans Milton Keynes specific and to confirm the Council's commitment to the need for the preparation of Travel Plans. (Some representations have questioned the need to include Travel Plans in the Transport SPD due to the extensive availability of national guidance on Travel Planning.)	No change.
- Good work in the report and welcome cycle contributions.	Noted. No action required.	No change.
- Page 31: what units of measurement?	Noted. The units of measure are /m <sup>2</sup> or /dwelling.	The units of measure have been added to Table 1.
- No figures to show how summary figures are made up.	Noted. The summary figures are made up of past Annual Monitoring Report development rates.	An explanation is given of the source of the summary figures.
- How realistic, achievable and consistent are assumptions of projected floor area and housing numbers.	Other than relying on past floor area and housing numbers, it is difficult to use any other assumptions. It is considered that the projected floor area and housing numbers are realistic, achievable and consistent. (This is particularly applicable during the present economic crisis.)	No change.

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Targets must be realistic, achievable and consistent with other MK tariffs.</li> </ul>	<p>As above. (Similar assumptions have been made for other MK tariffs.)</p>	<p>No change.</p>
<p><b>2.3.MKP</b></p>		
<ul style="list-style-type: none"> <li>• <b>General</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Support objectives of guidance for transport infrastructure contributions.</li> </ul>	<p>Noted. No action required.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- What is the “business planning” that underpins the Transport SPD.</li> </ul>	<p>The “business planning” that underpins the Transport SPD is principally the LTP and other MK transport strategies, in particular the recently adopted Transport Strategy Review. In time, the MKP Business Plan (which contains many of the transport infrastructure in the Transport SPD) will also be relevant.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- How will Transport SPD stand alongside other SPD.</li> </ul>	<p>The Transport SPD stands alongside, and is complementary with, other MK SPD and is not in addition to other MK SPD. Generally, the Transport SPD does not cover geographic areas already covered by other MK transport related SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Transport SPD must be based on robust/up to date information on highway capacity and needed improvements.</li> </ul>	<p>The evidence base is considered to be robust and up-to-date – the projects are current projects; the MKP Business Plan, the LTP and other MKC transport strategies are used to manage and monitor the delivery, finance, viability and risk of projects; reasonable thresholds apply and there is compliance with relevant local, regional and national guidance.</p>	<p>No change.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Transport SPD must support Core Strategy and other transport statements.</li> </ul>	<p>The Transport SPD does support the Core Strategy and other transport statements. The Transport SPD uses the same background transport statements (and adopted MK strategies) as the Core Strategy and other MK transport strategies have informed the preparation of the Transport SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Is there an opportunity to include CMK in Transport SPD to replace existing CMK SPD?</li> </ul>	<p>It is not possible, other than starting the SPD process from the beginning, to include CMK in the Transport SPD to replace the existing CMK SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>• <b>Representations</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Clarify the area covered by the Transport SPD on the Map/Plan.</li> </ul>	<p>Noted. The geographic area covered by the Transport SPD has been clarified and corrected.</p>	<p>See Map 1.</p>
<ul style="list-style-type: none"> <li>- The Transport SPD has limited coverage resulting in small developer contributions.</li> </ul>	<p>Acknowledged, but MKC intends to review and consolidate all Planning Obligations SPD with the Core Strategy and therefore align the “new” Planning Obligations SPD to the Core Strategy and in doing so, extend the life of the transport related obligations.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Transport SPD contributions should be included in the MKP Business Plan.</li> </ul>	<p>Noted. Acknowledge the need to include those Transport SPD contributions not already included in the MKP Business Plan in the MKP Business Plan.</p>	<p>Reference is made to include Transport SPD contributions in the MKP Business Plan.</p>
<ul style="list-style-type: none"> <li>- The details and costing of infrastructure in the main report is too detailed: summarise in main report and detail in an annex.</li> </ul>	<p>Noted. The detail and costing of the infrastructure is contained in Appendix 1, with a summary in the main report.</p>	<p>See Appendix 1.</p>
<ul style="list-style-type: none"> <li>- Transport SPD should note other transport funding/contribution sources.</li> </ul>	<p>Noted. Other transport funding/contribution sources have been noted.</p>	<p>Reference is made to other transport funding/ contribution sources.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Transport SPD includes transport projects not supported by adopted policy.</li> </ul>	<p>Noted. Acknowledge the need that transport projects are supported by adopted policy.</p>	<p>All transport projects are supported by adopted MK transport policy.</p>
<ul style="list-style-type: none"> <li>- LTP and SITS information to be updated and add reference to CMK Parking Strategy, Bus Strategy and Transport Strategy Review.</li> </ul>	<p>Noted. Acknowledge the need to update LTP and SITS information and add reference to CMK Parking Strategy, Bus Strategy and Transport Strategy Review.</p>	<p>Reference is made to LTP and SITS information as well as CMK Parking Strategy, Bus Strategy and Transport Strategy Review.</p>
<ul style="list-style-type: none"> <li>- Check annexes to ensure comparable baseline data.</li> </ul>	<p>Noted. The annexes have been checked to ensure comparable baseline data.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- The detail and content of Travel Planning in the main report is too detailed: summarise in main report and detail in an annex.</li> </ul>	<p>Noted. The detail and content of Travel Planning is contained in Appendix 2, with a summary in the main report.</p>	<p>See Appendix 2.</p>
<ul style="list-style-type: none"> <li>- Transport SPD SA should reflect Proposed Changes to the South East Plan and its SA.</li> </ul>	<p>Noted. Acknowledge that Transport SPD SA reflects Proposed Changes to the South East Plan and its SA.</p>	<p>Transport SPD SA reflects Proposed Changes to the South East Plan and its SA.</p>
<ul style="list-style-type: none"> <li>- Transport SPD SA should ensure that targets cover latest LAA transport targets.</li> </ul>	<p>Noted. Acknowledge that Transport SPD SA targets cover the latest LAA transport targets.</p>	<p>Transport SPD SA targets cover the latest LAA transport targets.</p>
<ul style="list-style-type: none"> <li>- {Later representation: Discrepancy between Transport SPD &amp; MK Tariff.}</li> </ul>	<p>The contributions required for residential and non-residential development in the Transport SPD have been reviewed and are now less than the MKP Tariff. It is not expected that the contributions for the Transport SPD are identical to the MK Tariff as each requires contributions for different purposes.</p>	<p>See Table 1.</p>

Representation	Council Response	Proposed Change
<b>2.4. SEEDA</b>		
<ul style="list-style-type: none"> <li>• <b>Background</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Supports Transport SPD as it provides developers with certainty, and complements RES.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- Proactive approach to improving planning performance and speed.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- Milton Keynes is identified in RES in the Diamond for Investment and Growth.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- SEEDA recognises the valuable role that transport infrastructure will play to ensure that the Diamond realises its potential.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>• <b>Comments: SEEDA make only general representations</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Transport SPD generally well aligned to the RES.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- Support the principle of planning obligations to fund transport infrastructure. (Target 8 of RES.)</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- Welcome the statement – “viability of contributions weighted up with all related development costs and if scheme economically unviable, can negotiate”.</li> </ul>	Noted. No action required.	No change.
<b>2.5. Whaddon Parish Council</b>		
<ul style="list-style-type: none"> <li>- Comments are restricted to Policies P01/P02 and their effects on Whaddon in regard to highway problems.</li> </ul>	Noted. No action required.	No change.

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Concerns of the impact of new major development on nearby rural communities where the result is an increase in traffic, especially at peak times.</li> </ul>	<p>The Transport SPD relates to the narrow focus on non-growth areas of Milton Keynes where it is difficult to directly identify the relationship between unknown and unspecified development and their respective direct transport impacts and transport measures. Rather, the Transport SPD relates to the remaining development transport impacts after the growth development transport impacts have been accounted for. The development that will contribute to the Transport SPD is unlikely to have any significant impact on the nearby rural communities. It will be the development in the Eastern and Western Expansion Areas and, in time, the South East and South West Strategic Development Areas that will impact on the nearby rural communities and will therefore contribute to these necessary transport measures. The LTP and other MKC transport strategies will also provide funding for transport impacts on the nearby rural communities.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Accept that it is commendable and proper that new development areas are subject to traffic calming in the Transport SPD, but nothing is being done to overcome the problems of traffic on nearby communities.</li> </ul>	<p>As above.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- The Transport SPD is a perfect opportunity to address this oversight, including an acknowledgement that traffic problems do exist, and that Village Improvement Schemes can be financed from Transport SPD developer contributions/tariff funds. This needs to be done now, or it will not be possible to do so later due to a lack of funds.</li> </ul>	<p>As above. Village Improvement Schemes cannot be financed from Transport SPD developer contributions/tariff funds.</p>	<p>No change.</p>

Representation	Council Response	Proposed Change
- Both the MKC and MKP have indicated sympathy and support, but nothing has been done.	As above. This is not an issue addressed by the Transport SPD.	No change.
- {In passing reference made to Policies EA10/EA11 and Westcroft, Tattenhoe and Kingsmead, which all impact on Whaddon. The Whaddon traffic problems are acknowledged in the WEA Development Framework. Also acknowledged at recent meetings with MKC and MKP, but no feedback yet received.}	As above. This is not an issue addressed by the Transport SPD.	No change.
- Policy P01 is a platform to launch Village Design Statements and therefore the Transport SPD can include a procedure for planning and establishing village traffic calming schemes and levels for their implementation.	As above.	No change.
- The level for the implementation of a Village Improvement Scheme has been reached for Whaddon.	As above.	No change.
- {In passing query concerning the accuracy of the map on Page 8 – Area 10.4 is in the jurisdiction of MKC and not MKP.}	Noted. The geographic area covered by the Transport SPD has been clarified and corrected.	See Map 1.
<b>2.6. Shenley Brook End/Tattenhoe Parish Council</b>		
<b>• Policy T11- Transport Assessments</b>		
- No thresholds for Use D1 (non-residential institutions).	There is no threshold for Use D1 in the Transport SPD as Use D1 uses are not included in Table 2 of the Local Plan. However, the Transport SPD accepts the thresholds determined by the Department for Transport, which does have thresholds for Use D1.	No change.

Representation	Council Response	Proposed Change
- Previous applications for public meeting places over 500m <sup>2</sup> , classified as D1, but no threshold and therefore no Transport Assessment.	The Department for Transport threshold for Use D1 is 500m <sup>2</sup> and therefore the Council will require a Transport Assessment for any D1 use over 500m <sup>2</sup> .	No change.
- The impact of these developments on surrounding areas requires the same D1 threshold as for D2, requiring a Transport Assessment.	Noted and confirmed. The Transport SPD threshold for Use D2 is 500m <sup>2</sup> .	No change.
<ul style="list-style-type: none"> <li>• <b>Public Transport Improvements</b></li> </ul>		
- Welcome improvements at Westcroft District Centre.	Noted. No action required.	No change.
- Reservations concerning bus only access on Barnsdale Drive.	Noted. The major improvements required at the Westcroft Stopping Area relates to improvements to the bus stopping facilities. The bus only access on Barnsdale Drive is only a possible option, which will be consulted upon before implementation. A final decision will only be taken to proceed after the consultation process, and this representation can be considered at that time.	No change.
<ul style="list-style-type: none"> <li>• <b>General</b></li> </ul>		
- Expecting Parking and Other SPD to be published/advertised for consultation, and as they are interlinked with Transport SPD, extend Transport SPD consultation to coincide with Parking and Other SPD consultation.	Noted. There was no need to link the Transport SPD to the (CMK) Parking and Other SPD. The Transport SPD stands alongside, and is complementary with, other MK SPD and is not in addition to other MK SPD. Generally, the Transport SPD does not cover geographic areas already covered by other MK transport related SPD. The Parking and Other SPD were adopted by Cabinet in December 2008.	No change.
<b>2.7. Woburn Sands District Society</b>		
- Broadly support the scope of the Transport SPD.	Noted. No action required.	No change.

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Housing targets are driven by Government and its agencies, which allow developers to dictate planning policy. (Redraft Para 3 of Introduction.)</li> </ul>	<p>Noted. Milton Keynes has accepted its designation as a Growth Area. The adopted Local Plan determines the overall housing numbers for Milton Keynes and sets out policies related to growth. While the pace of development is market/developer driven, this is influenced by the provision of forward-funded infrastructure by MKC and/or MKP. Except on appeal, the Council, not developers, is responsible for planning policy, determines planning decisions and the level of developer contributions.</p>	<p>Paragraph 3 of the Introduction has been appropriately redrafted.</p>
<ul style="list-style-type: none"> <li>- The UDA was imposed on MKC. Areas under the control of MKP are the least sustainable transport infrastructure wise and should also be subject to the Transport SPD.</li> </ul>	<p>The Transport SPD stands alongside, and is complementary with, other MK SPD and is not in addition to other MK SPD. Generally, the Transport SPD does not cover geographic areas already covered by other MK transport related SPD. It is not possible, other than starting the SPD process from the beginning, to include MKP Development Control jurisdiction in the Transport SPD to replace the existing MK Tariff. This is not an issue addressed by the Transport SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Agree that Travel Plans in Transport SPD apply to whole of MKC.</li> </ul>	<p>Noted. No action required.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Suggest that <b>ALL</b> of Transport SPD apply to whole of Milton Keynes with consequential adjustments made to MKP Tariff.</li> </ul>	<p>The Transport SPD stands alongside, and is complementary with, other MK SPD and is not in addition to other MK SPD. Generally, the Transport SPD does not cover geographic areas already covered by other MK transport related SPD. It is not possible, other than starting the SPD process from the beginning, to include MKP Development Control jurisdiction in the Transport SPD to replace the existing MK Tariff. This is not an issue addressed by the Transport SPD.</p>	<p>No change.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- The MKP Business Plan identifies a total infrastructure cost of £1,6 billion, whereas developer contributions total only £311 million. The Society doubts that the remainder of funding is forthcoming.</li> </ul>	Noted.	Reference is made to other transport funding/ contribution sources.
<ul style="list-style-type: none"> <li>- Support Public Transport funding of £18,6million.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- The Growth Area Status of Milton Keynes makes Milton Keynes a soft target for growth; makes such growth non-viable and non-sustainable; shows a lack of strategic long term planning; results in Milton Keynes losing its image as an example of exemplary planning; leading the growth agenda to result in more problems.</li> </ul>	<p>Noted. Milton Keynes has accepted its designation as a Growth Area. The adopted Local Plan determines the overall housing numbers for Milton Keynes and sets out policies related to growth in a comprehensive and holistic way which:</p> <ul style="list-style-type: none"> <li>- relate to viability and sustainability,</li> <li>- takes a strategic long term planning viewpoint,</li> <li>- encourage innovation, evolution and change, and</li> <li>- solve, rather than create problems.</li> </ul>	No change.
<ul style="list-style-type: none"> <li>- 3.5: Transport Assessments is fully supported, but the requirement for Travel Plans for all new development is also supported.</li> </ul>	Noted. No action required.	No change.
<p><b>2.8.MKC Transport</b></p>		
<ul style="list-style-type: none"> <li>• <b>Section 3.2.3</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Wolverton Station: £32,2 million is available for the new station and detail design and project management is ongoing.</li> </ul>	Noted. There is still a shortfall full funding for the Wolverton Station, so additional funding is required.	Reference made to available funds and status of the project.
<ul style="list-style-type: none"> <li>- Bletchley Station: £4,5 million for the station upgrade is on the low side as a 2002 cost estimate indicated a cost of £6,2 million.</li> </ul>	Due to the uncertain status and timescale for the Bletchley Station Upgrade it is no longer a part of the Transport SPD.	Reference to Bletchley Station Upgrade has been removed.

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- Marston Vale: its aims include rider-ship, profile and local involvement, and a wide membership profile.</li> </ul>	Noted.	Reference made to aims of the Marston Vale Community Rail Project.
<ul style="list-style-type: none"> <li>• <b>Section 3.2.4</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Extension of X5 to Oxford/Cambridge Rail Stations will require 3 extra vehicles. Traffic congestion causes delays, which requires more time and therefore more busses. (A presence of busses at the station is good.)</li> </ul>	Noted. The Transport SPD is not expected to fund the full cost of the MKC part of the X5 Service.	Reference made to additional vehicles required for X5 Service.
<ul style="list-style-type: none"> <li>- Research is good, new technology is good but this costs money that is not readily available.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>- {A new item of Electronic Ticketing Machines needs to be added.}</li> </ul>	Noted. This is not an issue addressed by the Transport SPD.	No change.
<ul style="list-style-type: none"> <li>• <b>Section 3.4</b></li> </ul>		
<ul style="list-style-type: none"> <li>- The MKC application for MK Central Station as a pilot for Travel Plans has been successful.</li> </ul>	Noted. No action required.	No change.
<ul style="list-style-type: none"> <li>• <b>SA</b></li> </ul>		
<ul style="list-style-type: none"> <li>- There is no mention of rail in the SA.</li> </ul>	Noted. There is no baseline indicator for rail usage, which makes it difficult to explicitly include rail in the SA. Rail is indirectly included in Core Objectives 15 and 16.	No change.
<ul style="list-style-type: none"> <li>- Reference to East-West Rail needs to be added to the SA.</li> </ul>	Noted. There is no baseline indicator for rail usage, which makes it difficult to explicitly include East-West Rail, as a future transport project with an unspecified start date, in the SA. Rail is indirectly included in Core Objectives 15 and 16.	No change.
<ul style="list-style-type: none"> <li>- Upgrade of the West Coast Main Line should reduce car usage on the M1 Motorway and increase rail usage.</li> </ul>	Noted. No action required.	No change.

Representation	Council Response	Proposed Change
<b>2.9.MKC DC</b>		
<ul style="list-style-type: none"> <li>- There is an inconsistency between the contribution levels of the Transport SPD and the MKP Tariff.</li> </ul>	<p>The contributions required for residential and non-residential development in the Transport SPD have been reviewed and are now less than the MKP Tariff. It is not expected that the contributions for the Transport SPD are identical to the MK Tariff as each requires contributions for different purposes.</p>	<p>See Table 1.</p>
<ul style="list-style-type: none"> <li>- There is an inherent conflict between the standard formulae in the Transport SPD and the policy tests in Circular 05/2005 – relevant, necessary, directly related, fairly and reasonably related in scale and kind and reasonable.</li> </ul>	<p>The Transport SPD addresses and meets the tests set out in circular 05/2005. Circular 05/2005 does allow for formulae calculations.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Justification is required for transport projects linked to the contributions. (robust, up-to-date information.)</li> </ul>	<p>The evidence base is considered to be robust and up-to-date – the projects are current projects; the MKP Business Plan, the LTP and other MKC transport strategies are used to manage and monitor the delivery, finance, viability and risk of projects; reasonable thresholds apply and there is compliance with relevant local, regional and national guidance.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Policy P02(ii) only relates to redevelopment of existing industrial premises, not new industrial premises. Does the same apply to the Transport SPD?</li> </ul>	<p>Noted and acknowledged. This will be reviewed in the formulation of relevant Core Strategy policies and is not relevant to the Transport SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Development threshold are not clear and explicit. (Is it Policy T11 or Government guidance?)</li> </ul>	<p>Noted and acknowledged.</p>	<p>The thresholds for Travel Plans are now consistent with guidance.</p>
<ul style="list-style-type: none"> <li>- The table at P31 is not clear. Is it /100m<sup>2</sup> or /m<sup>2</sup>?</li> </ul>	<p>Noted and acknowledged.</p>	<p>The units of measure have been added to Table 1.</p>

Representation	Council Response	Proposed Change
<ul style="list-style-type: none"> <li>- The table at P31 uses a different methodology for dwelling units than all other MKC SPD.</li> </ul>	<p>Noted. The method of developer contributions is based on a formulae calculation based only on the number of dwelling units and follows the principles adopted in the MK Tariff. It does not break down dwelling units into number of bedrooms as this does not have an influence on the need or demand for transport infrastructure. In any event, not all MKC SPD is consistent regarding dwelling units and number of bedrooms – it is dependent on the circumstances and criteria of that SPD.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>- Travel Plans, Paragraph 3.6 offers benefits of cash savings to developers due to reduced car parking provision, but DC Committee requires maximum provision.</li> </ul>	<p>Noted and acknowledged. Notwithstanding the views of the DC Committee, two of the critical objectives of a Travel Plan are to reduce the use of single occupancy vehicles and a move to more sustainable travel modes and by implication therefore, a reduction in car ownership. This should have the effect of reducing the need for car parking provision and therefore should remain an integral part of the Travel Plan section.</p>	<p>No change.</p>