

Milton Keynes City Council

By email

to ncp.engagement@milton-keynes.gov.uk

Date: 22/12/2025

Dear Sir/Madam

Milton Keynes City Plan 2050 – Regulation 19 Consultation

Thank you for consulting Central Bedfordshire Council (CBC) on the Milton Keynes City Plan 2050 - Regulation 19 plan. We have provided comments below in relation to the Growth Strategy as well as some of the detailed policies within the proposed Submission Plan which we hope you will find helpful in finalising the MK City Plan 2050.

Ambition and Objectives

We support the ambition and objectives of the draft Plan, which recognises the positive role planning can make in delivering people-friendly and healthy place to live, work and enjoy. We also note the positive commitments made towards providing affordable and accessible ways for people to get around the city as well as tackling climate change and reducing emissions.

Strategy Comments

In April 2020, CBC responded to your consultation on Ambitions and Objectives for the MK New City Plan, raising some significant concerns around the MK 2050 Growth Study, including those relating to 'possible long-term development locations outside of the scope of the Strategy for 2050' identified within Central Bedfordshire. We were pleased that these concerns have been addressed and note that the proposed submission Local Plan does not identify any potential locations within Central Bedfordshire on the proposals map.

We note that the regulation 19 plan continues to propose significant levels of housing over and above the identified housing need. Through discussions with MK Officers, CBC have queried the potential for this over-provision to, in part, be attributed to meeting future unmet housing need that may arise from nearby Local Authorities areas which are more physically constrained by national and local designations, as they progress with their own plan reviews. However, MK Officers have identified that this is not the case as no nearby Local Authority has, to date, requested help meet any identified unmet needs. Given the standard method for calculating housing needs indicates that many local authorities within close proximity to Milton Keynes are seeing a sharp increase in their annual housing target, CBC considers that the MK City Plan could be

proactive and helpfully make reference to the over provision potentially supporting any future unmet needs that may arise elsewhere as neighbouring Local Plans are developed. This would align with the principles of the emerging Spatial Development Strategies, which require consideration of regional needs and impacts.

We also note that the over provision is also now being identified within the submission plan as a buffer to the identified housing need for MK. Whilst CBC recognises the need and benefit of identifying a buffer for the plan period, a 19% buffer is considered to be substantial, and significantly in excess of the 5%, or 10% maximum, that would usually be applied to a Local Plan.

CBC considers if a buffer of 19% is to be applied to the plan period, that the MK City Plan should be modified to identify that 10% would be to ensure the needs of MK are met, with the remaining 9% of the over-provision identified to contribute to meeting any unmet needs from nearby Local Authorities if they arise.

CBC would reiterate the point we made in our response to the Regulation 18 plan in October 2024, that as the Council is making a choice to over-provide in terms of its housing needs, it is absolutely essential that Milton Keynes Council ensures that **all** of the infrastructure required to support this level of growth can be and will be delivered, including ensuring all impacts beyond the boundary of Milton Keynes are mitigated. We note the 'infrastructure-first approach' set out in the key principles, though the principles do not currently refer to any impacts that may be felt outside of the city which is important for such a tightly bound authority where growth will be so high.

Whilst outside of the MK City Plan area, our concerns are compounded by the recent Government approval for Universal Studio's which will no doubt have implications for the wider area, particularly in relation to impacts upon the strategic and local road network.

CBC considers that the first Key Principle set out within the MK City Plan (paragraph 6) should be modified as set out below to ensure all impacts beyond the boundary of Milton Keynes are mitigated.

Taking an 'infrastructure first' approach that ensures the necessary infrastructure and facilities (e.g. local and strategic highways, health, education and community) are provided as part of all developments, and to ensure any cross-boundary impacts are mitigated.

We recognise, that recent national guidance updates may mean that MKC will no longer be required to meet the Duty to Co-operate, due to submitting under the current plan system. However, as discussed at a recent DtC meeting, CBC considers that there is merit in progressing with a Statement of Common Ground between the two authorities, given the concerns that CBC have raised previously, and continue to raise within this response.

Policy GS1: Our spatial strategy

As noted within our Regulation 18 response (October 2024), whilst CBC supports the sequential 'tiered' approach to the distribution of growth, it is unclear why the Eastern Strategic City extension area is already included within the proposed new limits of the City Boundary.

As a proposed allocation, that will take a significant amount of time to build out if taken forward, it seems premature for this area, which is rural in nature, to already be included within the new City boundaries.

The Council considers that there should be a third tier included for proposals such as this to sit under – as proposed/planned extensions to the City Boundary.

Policy GS2 Strategy for Homes

The Council welcomes the identification and breakdown of sites that are proposed to deliver the 59,779 homes planned within the plan period and we note that this includes 2,990 homes to be delivered through 'other small opportunity sites (windfall).

Paragraph 23 of the submission plan, prior to Policy GS1 states, '...we expect relevant Town and Parish Councils to identify opportunities to deliver the growth their communities need through a locally prepared Neighbourhood Plan'. Confirmation is therefore sought as to whether any growth identified through Neighbourhood Plans would be in addition to the significant over provision that is already proposed within the plan. If this is the case, this would have implications for the quantum of infrastructure required to support new homes within the Plan Period. As noted above, CBC considers it essential that **all** of the infrastructure required to support this level of growth can be and will be delivered, including ensuring all impacts beyond the boundary of Milton Keynes are mitigated. The contribution of housing identified through Neighbourhood Plans and the implications for infrastructure delivery, should therefore be clarified within the MK City Plan.

The Council also supports the inclusion within Policy GS2 for the provision of 69 new pitches for Gypsies and Travellers over the plan period and the broad distribution across strategic sites.

Policy GS3: Strategy for Economic Prosperity

The MK City Plan sets out that there are several challenges and trends to consider when it comes to economic growth within MK. The plan uses the Mid/Medium scenario identified through the HEDNA, which is identified as aligning to the revised local housing need figure. This indicates that the plan should provide for 530,000sqm (gross, 380 sqm Net) of office and research and development floorspace to 2050, most of which is expected to be delivered within Central MK. The HEDNA also identifies the need for 310sqm (gross, 210sqm Net) of Industrial floorspace and 1,600,000sqm (gross, 1,100,000sqm net) for warehousing and general industrial purposes. It is calculated that the area required to deliver these requirements are 66ha for office, 57ha for industrial and 310ha for warehousing and logistics.

The total land requirement of 433ha to meet the identified needs is identified as significantly exceeding the supply of employment land available at around 207.5 hectares. The available supply is approximately 70ha less than that reported within the Regulation 18 consultation – clarification is sought on whether this is due to completions and commitments being excluded over the first three years of the Plan (2022-2025) to the end of March 2025?

Whilst the inclusion and breakdown within Policy GS3 of the 207.5ha of employment land supply is welcomed, as noted above and recognised within the plan, it is significantly below the quantum of land required to meet identified employment need. During previous, as well as more recent discussions held with CBC, MK Council have indicated that the MK City Plan will not meet its full requirement for warehousing and general industrial purposes due to the limited number of suitable sites being submitted through their Call for Sites process.

In line with the requirements of the National Planning Policy Framework (NPPF), for the plan to be positively prepared, MK Council should be meeting all of the employment needs identified within the supporting evidence base. To not do so results in a level of unmet need, both at a local and wider regional level, that could be unofficially displaced to other neighbouring authority areas which do not have the capacity to deliver in excess of their own identified needs. Paragraph 38 of the submission plan directly alludes to this, stating 'if suitable sites for warehousing development are not available in Milton Keynes, developers will seek to develop sites where suitable sites are available'.

As previously noted, it is also not clear whether MK Council have asked any neighbouring authorities for assistance in meeting this need, or whether they have looked to accommodate additional land over and above that already identified within their strategic site allocations, particularly since their growth strategy proposes such a substantial buffer to their housing need requirement.

CBC support the identification of sites and proposals to ensure there are affordable and appropriate premises for start-ups and smaller businesses. However, we would still be keen to understand how the proposed under-delivery of employment land and jobs within MK - and the likely impact this would have on travel to work patterns within the wider area - balances with the proposed significant over-provision of housing within the Plan period.

Policy GS11: Adjacent and cross-boundary growth

CBC previously raised during the regulation 18 consultation that we do not support this policy and have concerns about the way its worded, particularly the inclusion of the reference to development sites that are 'wholly or partly within the administrative boundary of a neighbouring authority' and that they will be 'expected to follow the principles' set out within the policy. Our concerns over this policy therefore remain.

Whilst it is recognised that any development outside of, but in close proximity to, MK, may benefit from infrastructure, services and facilities within the City; it would be expected that at the planning application stage, discussions between the relevant local authority and the site promoters, along with detailed masterplanning and s106 Agreements, would be used to ensure that commensurate infrastructure is provided on site and any impacts further afield appropriately mitigated.

CBC are at the early stages of a new Local Plan for Central Bedfordshire and would not wish to pre-empt where any future growth may be located. We would however expect any growth delivered within our boundary to be delivered in accordance with Central Bedfordshire policies, albeit in discussion with neighbouring authorities where appropriate.

As previously stated, the Council considers it is highly inappropriate for an authority to try and dictate how other authorities developments should be delivered and the requirements they would be expected to achieve/deliver. It would be for the relevant planning authority to determine how a site comes forward, not a neighbouring authority. We would reiterate our previous question as to how, if a proposal is within another authority area, MK Council propose to enforce such a policy.

Should, in the future, there be any opportunities for neighbouring or cross-boundary applications, it would be expected that the relevant planning authorities would work collaboratively to ensure the proposals were delivered in a manner that was sensitive and appropriate to the relevant locations, rather than being dictated to replicate the character, structure and layout of one authority which may not reflect the character or existing settlements of the other.

Policy GS14: Eastern Strategic City Extension

As previously identified, given that this is a substantial proposal which extends directly up to the administrative border with Central Bedfordshire, if the proposals are to be taken forward, CBC would expect to be included in on-going discussions regarding the delivery and phasing of the site and to ensure that any cross boundary impacts upon our local communities and residents are appropriately considered and mitigated. It is, therefore, disappointing that our previous requests for the Policy and/or supporting text, to explicitly state that the Council will actively engage with Central Bedfordshire Council in relation to bringing this development proposal forward, have not been taken on board and included within Policy GS14. For this reason, we can only find that the plan does not meet the 'effective' soundness test relating to the need to demonstrate effective joint working on strategic matters.

Policy GS14 references the need for development proposals within the Eastern Strategic City Extension to be in accordance with a Framework Masterplan and site-based area Design Code that are consistent with the criteria set out within the policy as well as wider plan policies.

Given the length of time that Masterplans and Design Codes can take to develop, it is anticipated that these documents are yet to be written and consulted upon by the Council.

It is also unclear how these proposed documents will relate to the existing Milton Keynes East Development Framework which was adopted by MK Council in March 2020.

As noted above, CBC would wish to be kept informed of progress in relation to the new Framework Masterplan and site-based area Design Code documents and provided with the opportunity to comment and input to proposals at the earliest opportunity and prior to any Council approval.

As set out within our Regulation 18 response, CBC considers that MK City Plan and specifically Policy GS14, should be clear that the proposed Eastern Strategic City Extension should not come forward before the allocated Eastern Expansion Area is completed, or at a stage where this site can be properly integrated. We would be concerned that if this site were allowed to progress ahead of the Plan MK allocated Eastern Expansion Area being completed or at least developed to a point to allow good connectivity, that this new site may start functioning as a standalone site rather than a city-extension.

CBC supports the identification that the Eastern Strategic City Extension will help to meet identified needs for Gypsy and Traveller pitches through the delivery of 31 pitches by 2035 and the identification of the need for two sites to accommodate identified needs.

We have provided specific comments on Policy GS14 in relation to Transport and Highways, as well as in relation to landscaping, below.

Policy GS15: East of Wavendon Strategic City Extension

The proposed East of Wavendon Strategic City Extension, which is intended to provide 2,250 new dwellings, is also a significant proposal which extends directly up to the administrative border with Central Bedfordshire.

The Council supports the removal of direct references to cross-boundary growth within Central Bedfordshire from the supporting text and policy wording. However, it is considered that part C of the proposed policy is still misleading and could be seen to be pre-empting the new Central Bedfordshire Local Plan.

CBC considers that part C of Policy GS15 should be modified to remove reference to potential future growth on land adjacent to the allocation outside of Milton Keynes.

The layout and design of development and transport infrastructure within the Strategic City Extension should enable sustainable linkages with Milton Keynes.

As previously identified, the Council are at the early stages of preparing a new Local Plan, and whilst recognising the potential opportunities that could arise through a collaborative approach to growth in the area **if** the new Local Plan for Central Bedfordshire proposes allocations within the vicinity of the East of Wavendon Strategic City Extension, the Council would not wish to pre-empt the outcomes of our Call for Sites and site assessment process, or the future strategy for growth within Central Bedfordshire at such an early stage.

As with the proposals for the Eastern Strategic City extension, given the close proximity of the East of Wavendon Strategic City Extension to Central Bedfordshire, should the proposals be taken forward, CBC would expect to be included in on-going discussions regarding the delivery and phasing of the proposals to ensure that any cross boundary impacts upon our local communities and residents are appropriately considered and mitigated. It is therefore disappointing that, as requested within our Regulation 18 response, the Policy and/or supporting text, does not explicitly state that the Council will actively engage with Central Bedfordshire Council in relation to bringing this development proposal forward and mitigating any cross boundary impacts.

CBC considers that the following wording should be included within Policy GS15:

Due to the close proximity of the East of Wavendon Strategic City Extension to Central Bedfordshire, the Council will engage with Central Bedfordshire Council on an on-going basis to ensure that any cross-boundary implications of the proposals are mitigated.

We note that the specific requirement for a comprehensive infrastructure assessment which would ‘...need to account for both the allocation’s own demands upon infrastructure and those of other development sites within the wider area once they are substantially complete, notably but not limited to the Strategic Land Allocation, Church Farm and South East Milton Keynes’ has been removed from the policy wording. However, we recognise that new policy INF1 Infrastructure First Principles supersede the need for specific references in individual policies.

We have provided specific comments on Policy GS15 in relation to Transport and Highways, as well as in relation to landscaping, below.

Policy GS16 Wavendon Strategic Buffers

The Council does not have any specific comments on the introduction of Strategic Buffers to the south of Wavendon, however, the policy wording as proposed is slightly confusing as the two points are very similar. It is suggested that including the need to enhance its open space function and landscape quality within part A, could simplify the policy and remove the need for part B.

CBC considers that the following modification should be included within Policy GS16:

To retain Wavendon’s character as a distinct and historic settlement within the wider built-up area of Milton Keynes City, only development proposals that enhance the Wavendon Strategic Buffers open space function and landscape quality will be supported. Development proposals ~~within the Wavendon Strategic Buffers~~ that significantly harm the open character of land (at the time of this plan’s adoption) within the ~~Wavendon Strategic Buffers~~ will be refused.

It is also unclear why the wording ‘at the time of this plan’s adoption’ has been included within the policy and what its purpose is.

Policy GS17 South of Bow Brickhill Strategic City Extension and Policy GS18 Levante Gate Strategic City Extension

We also note the proposed sites at South of Bow Brickhill and Levante Gate of 1,300 and 1,250 dwellings respectively and would also wish to be kept informed given the relative proximity to Central Bedfordshire.

Both Policies GS17 and GS18 state that development proposals 'should be in accordance with a Framework Masterplan and site-based area Design Code'. However, it is unclear if these documents would supersede or sit alongside the Council's adopted South of Bow Brickhill / Levante Gate Strategic City Extension Development Framework Supplementary Plan/Supplementary Planning Document. This should be clarified within the MK City Plan.

Infrastructure First

The Council recognises that specific references within policies to the provision of infrastructure has been superseded by the inclusion of new policies – INF1 'Infrastructure First Principles' and INF2 – 'Infrastructure Planning and Delivery Principles for Strategic Allocations.

Whilst the Council consider this to be an appropriate way to ensure all growth proposed through the MK City Plan delivers the necessary infrastructure, we would reiterate our comments made within our Regulation 18 response and above, that if the Council choose to retain the significant over provision of housing, it is essential that in making such a choice, the Council must ensure that **all** of the infrastructure required to support the growth can be funded and delivered, not only to support such high levels of growth, but to ensure any impact outside of Milton Keynes is also mitigated. This must all be identified within the Infrastructure Study and Infrastructure Delivery Plan.

CBC considers that an additional point should be added to Policy INF1 as follows:

Infrastructure requirements arising outside of Milton Keynes as a direct result of development proposals set out within the MK City Plan will be identified in conjunction with relevant neighbouring authorities and mitigated.

Given the close proximity of some of the proposed allocations including two significant proposals which directly border Central Bedfordshire, CBC would wish to engage in any future discussions relating to timings of infrastructure delivery as well as any trigger points, to ensure that any impacts upon Central Bedfordshire and our residents are mitigated at the earliest opportunity.

Comments on Transport and Highways

During the drafting of the Regulation 19 plan, MKC have engaged CBC in useful dialogue around emerging sites, scope of modelling assessment work and other transport related matters. We welcome the opportunity to comment on the final submission plan and the supporting evidence, picking up issues previously raised in our formal response to the Regulation 18 plan.

Our comments are made both in the context of the plan's proposals but also reflecting on strategic cross boundary issues such as current and forecast capacity constraints at M1 junction 13 and the additional potential impact of schemes such as East West Rail and Universal Studios, both of which highlight the requirement for the issue to be acknowledged by all parties involved in proposals that may affect this area of the highway network.

Policies and Wording

The majority of our transport related comments on policy position and wording raised during the Regulation 18 consultation do not appear to have been addressed. For clarity, the concerns and requests we raised previously are reiterated below, along with some commentary on newly introduced or amended policies.

Policy GS4: Strategy for people-friendly and healthy places

The transport hierarchy in policy GS4 is supported, but the availability of options must align with longer distance trips, so the mitigation benefit of travel choices is realised outside of the MK urban area.

Policy GS9: Supporting transit-oriented development and estate regeneration

The refocusing of policy GS9 around transit-oriented development is understood from the 'vision led' plan making perspective, but in any case, still does not alleviate our concerns over the acknowledgement of cross boundary infrastructure requirements in the IDP.

CBC considers that an additional criteria should be added to part A of Policy GS9 as follows:

Major development proposals.... will be supported where they comply with the criteria below:

- *Any cross-boundary impacts of the proposals are identified with the relevant neighbouring Authority, and appropriate mitigation identified and delivered.*

GS11: Adjacent and cross-boundary growth

As noted above, Central Bedfordshire Council Objects to Policy GS11.

We stated at Regulation 18 that we do not support this policy and have concerns about the way it was worded, particularly the inclusion of the reference to development sites that are 'wholly or partly within the administrative boundary of a neighbouring authority' and that they will be 'expected to follow the principles' set out within the policy. From a transport perspective, the principles laid out in policy GS11 should apply where there are expected cross boundary impacts and not solely when a site straddles a boundary. This particularly applies to point 7 of the current policy as worded. Policy GS11 continues to require local authorities promoting development adjacent to MK to robustly assess and mitigate their impacts within Milton Keynes, whilst there is little comparative policy requirement for development within Milton Keynes and bordering

other authorities to do the same, despite the largest of the proposed allocations directly bordering and significantly impacting upon the CBC network.

We have continued concern over the lack of acknowledgement of potential cross boundary impacts of the proposed strategic allocations, two of which directly abut the CBC boundary. In summary, following on from our comments at Regulation 18 stage:

GS14 Eastern Strategic City Extension

We previously stated in our Regulation 18 response, that the proposed Eastern Strategic City Extension is both significantly larger than the MK East development area, and in closer proximity to the Central Bedfordshire boundary and associated settlements and highways network and for that reason a robust assessment of development traffic, with a focus upon cross-boundary impacts taking into account the likely draw to and from the A421 and J13 of the M1 was vital.

We also highlighted significant concern for the impact on our own network and expected to see a full assessment of this wider impact, with an associated draft scheme in the IDP. As noted above, whilst outside of the MK City Plan area, our concerns are compounded by the recent Government approval for Universal Studio's which will no doubt have implications for the wider area, particularly in relation to impacts upon the strategic and local road network.

As our wording changes and the scope of assessment does not appear to have changed, our significant concerns relating to this allocation stand.

Central Bedfordshire Council therefore Objects to Policy GS14 Eastern Strategic City Extension for the reasons stated above and expanded further upon below.

We have some further detailed comments on the modelling of the site which are detailed in our modelling review.

GS15 East of Wavendon Strategic City Extension

We previously stated in our Regulation 18 response, that we had various concerns on the potential allocation of this site, including increases in traffic flows through Woburn Sands and Aspley Guise, with traffic routing to J13 of the M1. We also raised significant concern for the impact on our network (Woburn Sands, routes via Salford Rd/ Bedford Rd/ Aspley Guise towards M1 junction 13 for example) and requested a policy commitment to addressing these issues by including wording to the effect of: 'wider highway network, including local cross boundary routes towards M1 J13'. As our wording changes and the scope of assessment does not appear to have changed, our significant concerns relating to this allocation stand.

Central Bedfordshire Council therefore Object to Policy GS15 East of Wavendon Strategic City Extension for the reasons stated above and expanded further upon below.

We have some further detailed comments on the modelling of the site which are detailed in our modelling review.

GS17 South of Bow Brickhill Strategic City Extension

We previously stated in our Regulation 18 response, that we had various concerns on the potential allocation of this site and, as such, requested that the policy wording be extended to include the 'wider highway network, including cross boundary local routes' to allow for the assessment of impact to be widened. With reference to the A5, our primary concern relates to the existing capacity issues at the A5/Woburn Rd/ A4012 Leighton Road junction. This junction was identified as overcapacity in the 2035 Local Plan scenario in the modelling supporting the CBC adopted Local Plan and it is likely that there may be significant southbound traffic routing on the A5 from this proposed allocation, including through Hockliffe which would exacerbate the junction capacity issues. For this reason, we would reiterate that there should also be a direct reference to the Strategic Road Network and associated mitigation in the policy wording. As our wording changes and the scope of assessment does not appear to have changed, our concerns relating to this allocation stand.

CBC considers that additional wording should be added to part C (10) of Policy GS17 as follows:

10. The phased introduction of a comprehensive transport network and infrastructure across the wider highway network, including cross boundary routes, that follows the movement hierarchy set out in Policy GS4, and to specifically include:

GS18 Levante Gate Strategic City Extension

We also previously stated in our Regulation 18 response that the location of this proposed allocation raised concerns over the increased traffic volumes on the A5 and A4146, which cross the boundary into Central Bedfordshire. As with policy GS17, our primary concern relates to the existing capacity issues at the A5/Woburn Rd/ A4012 Leighton Road junction. This junction was identified as overcapacity in the 2035 Local Plan scenario in the modelling supporting the CBC adopted plan and it is likely that there may be significant southbound routing on the A5 from this allocation, including through Hockliffe which would exacerbate the junction capacity issues. In section C 9 iii. we requested the wording to be extended to 'wider highway network, including cross boundary routes' to allow for the assessment of impact to be widened. We would suggest that there should also be a direct reference to the Strategic Road Network (the A5 in particular). As our wording changes were not incorporated, our concerns relating to this allocation still stand.

CBC considers that additional wording should be added to part C (9) of Policy GS18 as follows:

9. The phased introduction of a comprehensive transport network and infrastructure across the wider highway network, including cross boundary routes, that follows the movement hierarchy set out in Policy GS4, and to specifically include:

Policy INF2 Infrastructure planning and delivery principles for strategic allocations

From the point of view of capturing all infrastructure requirements rather than those just related to Milton Keynes, new policy INF2- B. should also include a reference to 'off site' for instances where an allocation wide IDP is unworkable.

In general, there remains very limited references within either policy wording or the IDP to any sustainable links outside of the Milton Keynes network (for example through Woburn Sands) or proposals for wider public transport connectivity beyond the authority area (for example public transport connections, to, from, or through Cranfield).

The requirement for the various requested wording changes at Regulation 18 to include cross boundary issues and concerns about the limitation of the Infrastructure Delivery Plan (IDP) in dealing with cross boundary issues are further reinforced when considering the modelling assessment which has been presented to support the plan.

CBC considers that additional wording should be added to Policy INF2 as follows:

In order to coordinate programmes of infrastructure planning and delivery both on-site and off-site in relation to ~~across~~ Strategic Allocations and Central Milton Keynes in a fair, transparent.....

'Infrastructure First' and the Infrastructure Delivery Plan

The introduction of the chapter on 'Infrastructure First' is welcomed, on the proviso that the right infrastructure is planned for the right location. In terms of transport infrastructure requirements, the principles of 'infrastructure first' should reiterate the identification of the full impact of the plan and associated mitigation requirements, captured in the IDP to enable this infrastructure to come forward in a coordinated way. Cross boundary infrastructure mitigation schemes (or references to locations near the CBC boundary which may require mitigation identified through future assessment) is lacking in the submitted IDP.

The previous CBC response to the Regulation 18 consultation expressed concern that there was only limited information related to J14 of the M1 within the IDP, and no reference at all to J13, which is considered to be a fundamental requirement necessary to support a number of the largest proposed allocations. CBC also previously requested that all cross boundary impacts were quantified, and mitigation measures secured via the IDP.

The 'Further commentary' section of the Regulation 19 IDP now does acknowledge the potential negative impacts of further pressure at J13 and J14, but this doesn't appear to translate to proposals for mitigation or other strategies (i.e. contributing to schemes led by other stakeholders such as National Highways for example) to address these issues within the schedule of works.

J14 is largely referred to within the detail of the IDP in terms of relatively minor short-term improvements in Tr.H12, with Tr.H37 referring only to 'possible' development related highways improvements which 'could' include works to M1 J14, whilst the IDP

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includes no reference to works or developer contributions being required for improvements at J13.

MKMMM, Forecasting and Site-Specific Concerns

Given the pronounced weighting of major development to the east of Milton Keynes, with the Eastern Strategic City Extension and the East of Wavendon Strategic City Extension both directly abutting the Central Bedfordshire boundary, and the further development sites to the south of Bow Brickhill Road also expected to result in additional cross-boundary impacts; there is an expectation of significant cross-boundary traffic impacts.

It is understood that at this stage, a scenario with a full mitigation package has not been tested. CBC have ongoing interest in the results of any future mitigation testing to understand whether a 'with mitigation scenario' would include capacity improvements to the links and junctions indicated as approaching or over capacity and if so, what the benefits of the schemes would be, including for the more rural highway network and links into CBC.

From the forecasting report it would appear that the Reference Case modelling details elements of the network as being severely congested, with a section of the A421, one of the A421 approaches to J13 of the M1 and several of the routes connecting the development areas north of the M1 to the southern side, including London Road and Monks Way all forecast as being over 100% of link capacity, whilst the M1 mainline is forecast to also be operating at close to link capacity. CBC have previously expressed concerns over how well junction 13 and the A421 / M1 are represented within the MKMMM, noting that these are towards the periphery of the model and are not confirmed as validating well to observed conditions.

Notwithstanding this more general concern, it would therefore appear that the low increases in flows on the strategic network may be related to the forecast lack of capacity on these routes in the future year scenarios rather than a lack of demand, with the result being that the model assigns more traffic to local and more minor roads. CBC would have serious concerns that the IDP does not appear to react to this, with limited reference to improvements to strategic routes, and with a resultant apparent significant increase on rural roads, including those within Central Bedfordshire (which are notably not acknowledged or addressed within the IDP of policy wording, aside from one reference to cross boundary routes in 14c of Policy GS14).

With regards to the Eastern Expansion Area, it is noted that Table 2-5 of the City Plan Model Forecast Report details Broughton Grounds Lane as having been closed to private motorised vehicles in the forecast modelling assumptions.

Table 2-6 of the same report details junction capacity being increased in the model at several locations to release traffic associated with the Western and Eastern Expansion Areas. It is however noted that these locations are not included within the IDP for the works that would be necessary to enable these increases in capacity, and there does not appear to be wording within the related site policies to require improvements to these locations.

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As these modelled (but not committed or proposed) improvements, in the case of the Eastern Expansion Area, would appear to release capacity constraints for traffic routing west, it is the view of CBC that the modelling may therefore overestimate routing to the west (and underestimate routing to the east towards the CBC network) as a result.

Furthermore, the retained policy wording for GS21 includes reference in C4 to new / enhanced vehicular crossings of the M1 for the Milton Keynes East development, but Policy GS14 Eastern Strategic City Extension, which is considerably larger in scale, refers only in 14(d) to: New and/or upgraded active travel and vehicular crossings of the M1 to ensure appropriate connectivity with land west of the M1 and the Eastern Strategic City Extension, connecting into and improving where necessary existing routes and the wider network.

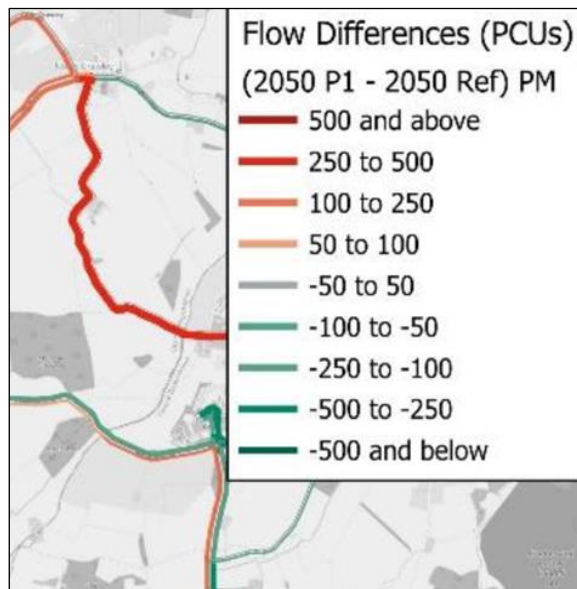
In combination with the assumptions within the forecast model that Broughton Grounds Lane is closed to vehicular traffic and the IDP referring in Tr.AT42 to the use of the Broughton Grounds Lane bridge as a sustainable rather than vehicular link, this would strongly indicate an intent for the main vehicle links for the Eastern Expansion Areas to either be to the west, via connections to, and through, the MK East allocation; or to the east and south, which would impact significantly upon the sensitive highways through the villages of Salford and Cranfield within Central Bedfordshire.

With regards to the above it is noted that there is no policy requirement within GS21 for future connections to the further Eastern Expansion Area to be secured and future proofed with Milton Keynes East, or for any land to be secured and reserved for future corridor or junction improvements to accommodate increased flows related to the further Eastern Expansion. Nor is there a requirement within the policy wording for vehicular connections to be secured via Milton Keynes East within the policy wording for the Eastern Expansion Area, which refers only to active travel routes and interchange hubs that integrate well with Milton Keynes East.

As such and taking the combination of current modelling work and assumptions, policy wording, and proposed IDP schemes, into account, CBC have a significant concern that whilst sustainable connections to the west and south are secured, the same is not the case for vehicular connections. It would therefore appear to be the case that whilst the proposed strategy limits vehicular impacts within Milton Keynes, a significant proportion of the vehicular traffic impact of the proposed extension will be borne by the CBC highway network.

Based upon the acknowledgement within the IDP that Junctions 13 and 14 are under increased pressure, and the notable disparity between forecast growth on strategic and local roads, (for example an increase in flow on Crawley Road, Cranfield being greater than the increase on the M1 in the AM peak hour, and the single track Bedfordshire Lane being greater than that of the M1 in the PM peak), the lack of proposed investment or policy support for strategic improvements for connections to, from and on the Strategic Road network is an area of significant concern, as the net result appears to be significant levels of routing on inappropriate local roads.

With regards to some of the flow changes forecast within the modelling report, CBC would strongly question the likelihood of the lane (labelled as Bedfordshire), running between North Crawley and Folly Lane carrying the levels of additional traffic forecast (these being somewhere between an additional 150 and 350 additional vehicles in the AM peak hour and between 350 and 750 additional vehicles in the PM peak hour, noting the single track and passing space nature of the lane (extract below)



If the coding of the lane within the model was to replicate the considerable constraints in place on this section of highway, it is a reasonable expectation that there would be a substantial change in the balance of flows between routes in this area, with a potential for further significant increases in flows on Crawley Road through Cranfield beyond those currently forecast and which are already unlikely to be acceptable.

The East of Wavendon allocation provides 2,250 houses. The policy wording in GS15 refers to primary access connecting into Keightley Gate, but how this is to be achieved appears unclear, with any connection to the north appearing to be onto Lower End Road, with no direct vehicular connection onto Keightley Gate (with only a sustainable link directly through). Moreover, the majority of the residential development appears to access directly onto Cranfield Road rather than Lower End Road (which is bordered largely by landscaping in the indicative plans included within the Reg19 submission). Based upon route finding software in the morning peak periods, any traffic routing south of the M1 or north on the A421 appears most likely to route north on Cranfield Road, then passing through the village of Salford, which would not be considered an appropriate route for significant additional traffic flows, both in terms of the nature of the conurbation and capacity constraints at junctions within the village.

Traffic routing to the A5 to the south is liable to do so via Woburn Sands, and then Woburn, whilst traffic routing north on the M1 may also route via Woburn Sands and then Aspley Guise and Church End, where changes in flows are again expected to be significant in scale.

CBC would also query how the East of Wavendon development has been coded into the model for the purposes of development testing, noting that the difference plots for the Priority 1 minus Reference case show no change in flow on Cranfield Road, where a significant change would be expected (extract below), whilst there is a change in flow of 500+ vehicles on the stub serving Wavendon House, which would appear to suggest that the development traffic has been loaded here rather than at the likely points of highway connection.



It is possible that loading development traffic onto Cranfield Road would result in a change in local traffic patterns and distribution from that currently forecast and due to the proximity of the site and the likely impacts upon the CBC network, CBC would request that the model is updated to accurately represent the development and its likely access locations and arrangements.

In the scenario comparing Priority 2 with Priority 1, it would appear that there is a substantial increase in flow forecast to route towards the A4146. CBC would ask for additional information on the forecast flows beyond the area shown on the plan extracts, to determine the potential for impact upon the junctions south of Leighton Buzzard.

We would suggest that a development zone select link analysis for the major allocation sites would potentially give CBC indication of the desired distribution of traffic related to the development sites and whether those development trips are displacing existing traffic onto local roads.

Transport Conclusion

The MK City Plan 2050 should acknowledge the likelihood of impact upon the strategic network, including J13, and that any strategic approach to highway mitigation should be seeking to proactively protect the rural road network within CBC, by recognising and addressing the strategic network capacity constraints referred to.

At present the policy wording in the plan provides little to no protection for the communities within CBC liable to be impacted. The modelling output and resulting schemes in the IDP offer little commitment to identifying and addressing cross-boundary impacts. This is despite the strategy proposed appearing to make these impacts more likely, with sustainable connectivity inward focused back into Milton Keynes, and with vehicle connections and impacts arising from major allocations appearing to more heavily impact routes to the north and east crossing into Central Bedfordshire.

Based upon the above commentary on our concerns relating to cross-boundary implications within Central Bedfordshire, the Council considers the MK City Plan 2050 as submitted, to be unsound.

Landscape comments

CBC welcomes the identified need for comprehensive landscape surveys and impact assessments in relation to the Strategic City Extensions proposed within the City Plan. It is considered essential that all strategic sites, particularly those to the east of MK and in close proximity to Central Bedfordshire, must also include an evaluation of their effects on both the landscape as a resource as well as on views and visual amenity. It is considered that strategic sites should be landscape-led and informed by detailed landscape assessments.

For all strategic sites to the east of Milton Keynes, there needs to be a clearer approach to assessing projected building heights and massing. It is essential to use both Townscape and Visual Impact Assessments (TVIAs) and Landscape and Visual Impact Assessments (LVIAs) to determine the appropriateness of these factors for major development proposals.

Policy GS14: Eastern Strategic City Extension

As previously identified, if an allocation is taken forward at this location, it is essential that future development respects local character and that proposals deliver, and integrate, on-site landscape mitigation measures that reflects and respects the local landscape.

Any future proposals should address the strategic landscape and visual sensitivities of Central Bedfordshire's Landscape Character Areas (LCAs) 1A and 5C to prevent permanent urban sprawl affecting these rural areas. Special attention is needed to protect the settlement of Salford and land to the east of Wharley End and Cranfield

Airport, which are both vulnerable to coalescence, urbanisation and erosion of their distinctive characteristics due to the proximity of the boundary with Milton Keynes Extension.

It is considered that a significant landscape buffer or setback is required upon the eastern edge of the Extension to integrate the development within the strong rural landscape, protect the identity of Salford, isolated farmsteads and Cranfield Airport which are all key characteristics within the Central Bedfordshire local landscape.

To ensure a landscape led approach, CBC considers that a Landscape and Visual Impact Assessment (LVIA) should be undertaken to ensure any future proposals do not detrimentally affect Central Bedfordshire as the neighbouring authority area, and that additional wording should be added to Policy GS14 part C, point 15 to require this.

15. Be informed by appropriate surveys and assessments of built heritage and ecology as well as a Landscape and Visual Impact Assessment (LVIA) with appropriate mitigation of impact; and...

Additionally, opportunities to enhance and strengthen Green Infrastructure with Milton Keynes and Central Bedfordshire should be explored and encouraged as part of a Green Infrastructure Strategy within Policy GS14.

As requested within our response to the Regulation 18 plan, given the close proximity and potential significant impacts of the proposals for Central Bedfordshire, CBC would wish to be kept informed of progress in relation to an LVIA relating to the new Eastern Strategic City Extension and provided the opportunity to comment and input to proposals at the earliest opportunity.

Policy GS15: East of Wavendon Strategic City Extension

As previously identified, if an allocation is taken forward at this location, it is essential that future development respects local character and that proposals deliver, and integrate with, on-site mitigation that aligns with the surrounding landscape and settlement forms.

Figure 2 Framework Masterplan indicates the 'Likely Residential Area' without the provision of a significant landscape buffer to the east. Landscape mitigation measures are required for Aspley Triangle to the east, beyond the Milton Keynes boundary, to integrate the Extension into the landscape whilst reducing landscape and visual harm.

To ensure a landscape led approach we would recommend that a Landscape and Visual Impact Assessment (LVIA) is undertaken to ensure any future proposals do not detrimentally affect Central Bedfordshire as the neighbouring authority area, and that this requirement is included within Policy GS15.

To ensure a landscape led approach, CBC considers that a Landscape and Visual Impact Assessment (LVIA) should be undertaken to ensure any future proposals do not detrimentally affect Central Bedfordshire as the neighbouring authority area, and that additional wording should be added to part E of Policy GS15 to require this.

Be informed by a Landscape and Visual Impact Assessment (LVIA) with appropriate mitigation of impact.

Additionally, opportunities to enhance and strengthen Green Infrastructure with Milton Keynes and Central Bedfordshire should be explored and encouraged as part of a Green Infrastructure Strategy within Policy GS15.

Policy GS7: Wind and solar development spatial strategy

It is understood that the principle for low-carbon and renewable energy generation proposals such as these will be established by Policies GS7 & CEA6. Areas of Search for wind and solar development are likely to impact land within the rural parts of MK, as indicated on the proposals map. Where these border open countryside within Central Bedfordshire, areas of search should have regard for CBC's existing technical guidance documents on wind and solar farm developments and the Local Plan Policy SP5: Important Countryside Gaps and Preventing Coalescence.

For a landscape led approach we would recommend LVIAs are undertaken to ensure that any future green energy proposals do not significantly impact upon the landscape character and visual environment of CBC's open countryside.

To ensure a landscape led approach, CBC considers that a Landscape and Visual Impact Assessment (LVIA) should be undertaken to ensure any future proposals do not detrimentally affect Central Bedfordshire as the neighbouring authority area, and that additional wording should be added to Policy GS7 to require this.

Proposals for solar and wind development should be informed by a Landscape and Visual Impact Assessment (LVIA) with appropriate mitigation of impact identified.

With respect to paragraph 72, we would also expect 'excluded areas within buffer zones around existing residential dwellings due to the likely amenity impact of wind turbines' to be not restricted to areas within MK but also within Central Bedfordshire.

CBC considers this should be clarified within the MK City Plan through additional wording:

72. With respect to wind turbines specifically, we have excluded areas within buffer zones around existing residential dwellings, *including within neighbouring authority areas*, due to the likely amenity impacts of wind turbines.

Policy HQH1: Healthy Homes

In relation to Self-Build and Custom homes, it is considered that the policy requirement as drafted does not provide clear certainty to planning applicants and developers. It is unclear if the policy supports applications for single plots upwards, or if it only relates to proposals involving 10 dwellings or more.

It is also considered that the proposed policy does not provide appropriate detail on the planning obligations required if a self / custom build application was submitted for 10 dwellings or more. This would trigger the affordable housing threshold as well as threshold for other planning obligations. It is unclear if onsite affordable housing self / custom build would be sought in these circumstances (i.e., shared ownership custom build) or would a financial contribution in lieu of the onsite affordable housing provision be required?

In relation to accessible and adaptable homes, it is considered that there is a fundamental difference between a dwelling completed to the accessible standards and a dwelling completed to an adaptable standard.

The current wording, whilst positive in intention, does not provide clear certainty to a developer. For clarity, it would be beneficial to state a percentage requirement for M4(2) accessible and M4(2) adaptable or provide for all 75% as M4(2) adaptable, enabling the property to be easily adapted by the occupier for their changing needs and requirements over time.

It would also be beneficial to provide consideration for the requirements for M4(2) and M4(3) to be applicable to applications of fewer than 10 dwellings. These should also contribute to the delivery. Central Bedfordshire Council successfully secure provision for M4(2) adaptable homes and M4(3) adaptable homes via condition from planning permissions providing for fewer than 10 dwellings.

Policy HQH2

In relation to affordable Homes, whilst we recognise the benefits of identifying different affordable housing percentage requirements based upon viability, CBC would question if this could lead to developers targeting development schemes within locations of a lower affordable housing percentage requirement (viability areas 2 and 3), maximising the market provision and Gross Development Value from a development? This approach could potentially result in development within Viability Area 1, where 40% affordable housing would be required, from being delivered until much later within the plan period.

The Council considers that additional wording should be added to Policy HQH2 to ensure developments across all Viability Areas are delivered in tandem throughout the plan period.

CBC considers that it would be beneficial to provide clarity to developers on cluster sizes and whether there is a requirement for clusters to provide for a mixed tenure approach to avoid developers delivering for mono tenure clusters. It may also be beneficial to detail whether viability assessments will be referred for independent review, and if so, that this should be at the cost of the applicant.

In relation to delivering more than 50% affordable homes (other than on exception sites) CBC considers it would not be advisable to implement additional barriers for a developer to work through if a developer proposes to deliver an application providing for an increased level of affordable housing provision.

There is nothing preventing a developer obtaining planning permission to a policy compliant position for affordable housing, with the eventual Registered Provider accessing grant funding from Homes England, enabling significant levels of affordable housing additionality with the conversion from market housing to affordable (post planning permission). Encouraging developers to deliver through a planning application for a higher percentage of affordable housing provision provides Local Planning Authorities with greater control with the planning application to ensure it provides for a mixed and sustainable community, compared to a policy compliant position, with

significant additionality enabled through RP's accessing grant funding, which happens post planning permission.

The Council supports the requirements in relation to 'Adjacent sites' as the policy provides clear guidance with the approach taken which cumulatively should be treated as one (triggering the affordable housing threshold).

Policy HQH6: Pitches for Gypsies and Travellers

The Council supports the inclusion of Policy HQH6 within the MK City Plan, particularly the identification of how the identified needs of the Gypsy and Traveller community will be met within the plan period.

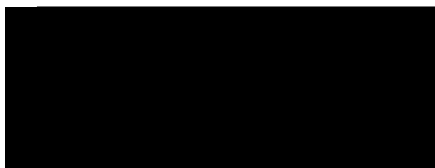
Policy HQH8 Exception Sites

It is suggested that greater flexibility could be considered to provide for more than 10 homes on a rural exception site if a more significant affordable housing need has been identified from a housing needs survey. This could be incorporated into policy with wording along the lines of 'Usually limited to 10 dwellings in order to preserve the character of the settlement. However, if a housing needs survey supports a demand for more than 10 dwellings and it can be demonstrated that a larger development will not have an adverse effect on the character of the settlement, larger sites may be considered'.

In relation to point B, the allowance for up to 35% market provision (if evidenced viability demonstrates the requirement for market housing) seems high when traditionally rural exception sites have delivered for small scale 100% affordable housing developments.

Thank you for the opportunity to comment on the MK City Plan. CBC would be happy to meet to discuss any of the points raised within our response and to seek to agree solutions to remove our objections through Statements of Common Ground.

Yours sincerely



Andrew Davie

Service Director – Development & Economy

