

Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Bradwell Parish Council considers the Local Plan to be unsound.

There are several reasons for this including:

The proposal to deliver 16,000 homes in Central Milton Keynes is not deliverable.

The plan allocates 16,000 houses to Central Milton Keynes and Campbell Park between 2022 and 2050.

Firstly, there are significant concerns that this is not deliverable in terms of the infrastructure requirements involved and the adverse impact on surrounding estates.

Secondly, Appendix 8 of the Strategic Housing Land Availability Assessment demonstrates that this is towards the limit of the assessed capacity of CMK, illustrating the challenge. It would, for example, require a substantial reduction in the number of parking spaces in the area, which would have a big potential impact on surrounding estates if this resulted in excess demand for parking spaces as would be the case unless there is a dramatic reduction in car dependency among the existing population of Milton Keynes.

Thirdly, the viability of the plan is reliant on the development of a residential university in Central Milton Keynes. There are no plans for this and it seems unlikely they will be developed given that both Cranfield University and The Open University have explored it in detail and concluded that there is no business case for it.

Finally, there appears to be a discrepancy in the plan about whether completions in 2022 and 2023 are included within the 16,000 allocation. Paragraph 141 of the Regulation 19 Plan document states that the allocation for Central Milton Keynes is for “Around 16,000 additional new homes (including completions and commitments from 2022)”. However, Figure 1 in the Strategic Land Availability Assessment includes Central Milton Keynes within the figure for completions in 2022/23 and 2023/24.

The local plan is built on unrealistic assumptions about the level of mode shift which is achievable given the high level of car dependency built into Milton Keynes’ design

The Strategy for 2050 highlights that Milton Keynes’ unique identity is rooted in its grid-road heritage and its car-based mobility legacy, describing these features as part of what “makes Milton Keynes special.” While Bradwell Parish Council supports the objective to reduce car dependency, the plan must work with these defining characteristics and improve them for current residents, not assume that they can simply be replaced without strong supporting evidence. As paragraph 2.7 of the Transport and Movement Topic Paper states. “delivering this gradual change in our collective travel behaviours will not be achieved by regulation or restriction of car use, which would be neither popular nor particularly effective”.

Any strategic transport or development proposal must therefore:

1. Improve door-to-door travel time and choices;
2. Maintain and enhance access to essential services;
3. Support an ageing population and those with limited mobility;
4. Deliver zero-carbon and financially sustainable mobility solutions;
5. Be fully evidence-based, especially where significant behavioural change is assumed.

There are several areas where there is little evidence that the plan can achieve its objectives:

Accessibility and Realistic Travel Times

- Public transport times are not door-to-door so do not provide a genuine comparison of journey times.
- Missing evidence on walking distances and catchments to proposed MRT stops.
- Accessibility for an ageing population, with additional mobility challenges faced in walking to proposed MRT stops and waiting for public transport.

- The plan does not demonstrate that there will be improved door-to-door access to CMK facilities for Bradwell residents.

Financial viability and deliverability

- Lack of financial evidence for MRT. Delivering MRT is crucial to the success of the plan. However, the plan does not demonstrate that it is financial sustainable.
- Missing park and ride strategy. Park and ride is referenced but there are very few details about sites, capacities or modelling assumptions.
- Milton Keynes is a city built for the car. High car-dependency is well-documented and the Transport and Movement Topic Paper acknowledges that this is an inherent feature of how the city was designed and that changing this will be very challenging due to the unattractiveness of other modes given the heavy time penalties involved from both public transport & walking and cycling. It is unrealistic to expect significant modal shift, especially among existing Milton Keynes residents.

It is unclear whether Policy HQH5 Houses in Multiple Occupation will be enforceable

Bradwell Parish Council strongly supports the objectives of Policy HQH5 as much of the Bradwell Common has an over-concentration of Houses in Multiple Occupation and this has a negative impact on the amenity of the area.

In recent years, the Planning Inspector has allowed several HMO applications on appeal despite them being in conflict with the over-concentration threshold in the current Supplementary Planning Document (SPD) on Houses in Multiple Occupation. For example, in Planning Inspectorate Appeal APP/Y0435/W/22/3304878 (<https://milton-keynes.moderngov.co.uk/documents/s8931/Item%207%2020230524%20Appeals.pdf>), the Planning Inspector decided that the application would not lead to an over-concentration of HMOs despite it exceeding the threshold used in the SPD because they considered that there were no adverse marginal impacts from allowing the HMO on the basis that it was already unlawfully in operation without the appropriate planning permission.

It is critical that the adopted policy is legally enforceable and will not lead to decisions being overturned by the Planning Inspector.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We propose the following modifications:

1. **A significant reduction in the number of homes allocated to Central Milton Keynes.** This will ensure that the plan can be delivered by ensuring the scale of development is viable, is deliverable in terms of the infrastructure requirements and is not built on the unrealistic assumptions about reduction in car dependency that are being used to remove the vast majority of parking spaces from the outer ring of Central Milton Keynes.
2. **Additional evidence to set more realistic assumptions about the scope to reduce car dependency, with the plan recalibrated to these assumptions.** This should include:
 - Publish door-to-door journey-time analysis (walk + wait + ride) for Bradwell Parish to CMK and other key destinations.
 - Publish clear catchment and accessibility data for MRT stops.
 - Commit to accessible, door-to-door mobility options and show how MRT and buses will accommodate less-mobile users.
 - Provide realistic door-to-door access modelling to key CMK destinations.
 - Publish full cost, funding, and risk assessments for MRT.
 - Publish a detailed park-and-ride strategy including demand forecasts and integration with MRT.
 - Re-evaluate modal-shift assumptions using real-world behavioural evidence.
3. **Ensuring that the specification of the overconcentration threshold in Policy HQH5 on Homes in Multiple Occupation is robust to challenge at appeal.** The specification of the overconcentration threshold in Policy HQH5 needs to be robust to challenge at appeal and considered a binding threshold by the Planning Inspector rather than an advisory threshold which is only binding if adverse marginal impacts of an additional HMO are demonstrated.

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*