

WS **Woburn Sands and District Society**

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**MK Plan Consultation
Development Plans
Milton Keynes Council
1, Saxon Gate East
Central Milton Keynes
MK9 3EJ**

16th November 2014

Dear Sirs

We have been through all the documents and attach our answers to the questions raised for information. Please note we are totally opposed to:

- To the expansion plans set out in the very biased map on P24 or The Way Forward for further blanket development around Woburn Sands, Bow Brickhill and Wavendon.
- The proposed expansion into Central Bedfordshire at Aspley Guise and to the north of Salford.

Our answers to the questions raised clarify our position and are set out below under the headings of the numerous documents, which we have reordered from the format set out by MKC. Namely “The Way Forward” then “Duty to Co-operate” followed by the topic papers that inform “The Way Forward”

We hope you find our responses informative.

Yours sincerely

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MK PLAN

“The Way Forward” Preparing a Vision and Development Strategy for Plan MK

Q1 Format of the Vision

What format do you think the Vision for Plan MK should take?

As you are not re-writing the MK Core Strategy, just extending it to 2031, why would the existing Vision as set out in the MK Core Strategy be changed? For choice we would have preferred a continuation of the 2005 vision into the existing Core Strategy, but would support a continuation of the existing Core Strategy rather than starting the whole process all over again. .

Q2 Content of the Vision

Do you think the Plan MK Vision should be based on a Vision from the past?

The existing Core Strategy to 2026, is fine. We do not consider that the whole of the Core Strategy needs re-writing just revisiting to extend the period to 2031. Bearing in mind the existing Core Strategy has only recently been examined and adopted.

- *If so, which vision should form a the starting point?*
- *If so, which Vision should form the starting point?*
- *And what updates or addition would you propose to make it fit for purpose moving forward?*
- *Are there any principles of elements from the existing Visions that you think should be carried through to the Plan MK Vision?*
- *Alternatively, do you think the Plan MK vision should start afresh?*
- *What should a new Vision contain?*
- *What are the key principles or goals that future development in the Borough should be aiming to achieve?*

See our answer to Q1 and the first part of Q2.

Q3 Land Requirements

Do you have any views on the total level of land that will need to be provided to meet housing need in the Borough up to 2031.?

The SHMA assessment identifies a need of 1650 dwellings to be built a year out of a range of 1,400 – 1,800 and therefore concludes that the existing Core Strategy number of 1,750 is appropriate. We would regard that as high – only 50 short of the maximum requirement and would rather that the total is adjusted to reflect the SHMA total. There is sufficient land identified or being built/completed for 27,800 leaving a shortfall of between 4,000 and 6,000 dwellings (depending on which figure is used) to take forward to 2031. A combination of regeneration of existing estates, and redesignation of some of the 40 year old employment sites should provide land for 1,500 – 2,000. Leaving land for 2,000 – 4,000 dwellings to be found on either as an urban extension east of the M1 or our preferred option, of a series of smaller developments at Newport Pagnell and Olney and some selected villages.

We would not wish to see further development to the SE around Wavendon and Woburn Sands with its existing adopted neighbourhood plan, and where the current level of development threatens to overwhelm the infrastructure of:

- CBC provided schools, and health care, and high street. .
- EW rail proposal will only increase the problems with its 50% increase in passenger trains, and increased freight train transportation.

We do not consider that MKC whilst rightly considering the wider Housing Market Area needs to plan for that. In particular Central Bedfordshire has planned to meet its own needs

within its boundaries with no development allocated near to the MKC boundary, planning additional homes at Wixams and Ampthill to meet the SEMLEP requirement as part of their submitted draft Core Strategy. Central Bedfordshire met its EE Plan requirement in its existing CBC Core Strategy (North) 2009

We should highlight at this point that the Map shown on P24 is highly misleading, omitting most of the MKC unitary authority land east of M1 (including Olney) and including:

- Sites around WS which is in conflict with the adopted neighbourhood plan.
- Sites around Wavendon and Bow Brickhill which have not been allocated.
- Sites in Central Bedfordshire for which there is no justification, no agreement, and certainly no consultation.
- No indication that part of the site put forward for Aspley Guise is actually Greenbelt

We are well aware of the old MK2031, which was rushed through in 6 months with little robust consultation or technical detail and ignoring the Peer Group report, informed the now abolished SE Plan and it appears that planning officers at MKC are determined to try and force through development to the SE of MK – protecting their own substantial authority area east of the M1, without properly consulting about the directions for growth.

Q4 Urban/Rural Split

Do you think we should continue/maintain the strategy of the urban area of Milton Keynes being the main focus of housing development?

Yes we agree with that. However we also consider there should not be a separate development figure for the rural area. Under the NPPF having a separate rural figure provides the developers with too much power to develop on inappropriate sites under the “presumption in favour of development” should the rural figure not be achieved, or there is a shortfall.

Of the overall housing need, broadly how many homes do you think it would be appropriate to plan for in the rural area and why?

See our answer above. However if a rural target is what must be – then we would support the SHMA target of 80 dwellings per annum.

Q5 Urban Extensions

Do you think there is a case for further urban extension area? If so where do you think these are best planned and why? If you have land you wish considered please submit details using the proforma n Annex: Call for Sites Proforma.

We reiterate our comments in respect of the map shown on P24.

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MKC has additional 4,000-6,000 dwellings to accommodate on top of those already allocated under the existing MK Core Strategy. Where those sites should be should be part of a separate consultation. However we would support further growth East of the M1 around Newport Pagnell, and some limited growth around Olney and to the West and North . We do

not accept that the M1 is a barrier, as it is seamlessly crossed already and we would remind MK Council that over half the authority area is east of the M1. . We also refer MK Council to the Peer Group Report on MK2031.

We do not support further expansion South East around Woburn Sands, Wavendon and Bow Brickhill as it is unsustainable and would have a negative impact on the infrastructure, separate identities and environment of these communities. EW Rail plans will additionally have a negative impact on Woburn Sands as the crossing will be closed for much longer periods with increased passenger/freight trains and indeed further development in the area will compound the already significant transport difficulties at this pinchpoint. Developers will use the argument of supporting the EW rail link but this will not do that as the rail link is to Bletchley, not MK and not London. Additionally Woburn Sands has an adopted Neighbourhood Plan which we supported. .

We would certainly not support the sites in Central Bedfordshire as set out in Map on P24, for which there is no planning or other justification, and no consultation or agreement with Central Bedfordshire and do not form part of Central Bedfordshire submitted Core Strategy which replaces the existing Central Bedfordshire (North) Core Strategy 2009 adopted whilst the EE Plan was in place and complied with which did not include MK expansion, and committed in principle to the later SE Plan – both since abolished.

Reflecting where you think urban extensions should be located, do you have any thoughts as to how they can be planned innovatively for example in the use of public transport, energy use, communications, construction techniques or other technologies?

No comment

Do you have any views of the appropriate scale of any urban extensions ? if required, do you think one larger site is preferable to several smaller sites?

We are of the view that several smaller sites is preferable to one larger sites to accommodate that additional 5 years growth.

Q6 Employment Sites

Do you have any thoughts on the loss of allocated employment sites for housing?

Bearing in mind that employment sites are not as profitable to developers as residential sites, we would support redesignation of employment sites on a site by site basis that are clearly not appropriate for that purpose some 40 years on. However, we would wish to see the Council, not developers making that assessment – we remember that the only reason the Nampak site in Woburn Sands was allowed to change to residential was that there would be employment land as part of the development, that has now shrunk considerably and even that last site is under threat from Messrs Taylor Wimpey’s final phase.

Are there any particular underdeveloped sites where you think housing could be suitable? Please submit details using the proforma in “Annex: Call for sites!.

No comment.

Q7 Regeneration

Do you have any thoughts on how regeneration can best be supported through the Development Strategy and other Plan MK Policies?

No comment

Do you think the Development Strategy should include regeneration to help meet housing need, or should any homes delivered through the Regeneration Programme be seen as windfall and additional to planned supply?

No comment

Q8 Standalone Settlement

Do you have any views on planning for a standalone settlement somewhere around Milton Keynes?

We would strongly oppose such a proposal. There is insufficient demand (4,000 – 6,000 additional dwellings required) and insufficient land area without a) considerable environmental and rural community damage and b) substantially increasing flooding risk.

If you think it is a good idea, do you have any thoughts on where it would be most suitably located, what size it should be and the development principles that would underpin it?

See previous answer

Q9 Wider Housing Market Area

Do you have any thoughts on how additional housing need across the HMA should be planned for?

Whilst under Duty to Co-operate MKC is correct to consult with neighbouring authorities in respect of the wider housing market area, however as far as Central Bedfordshire is concerned their SHMA took account of the SEMLEP in its assessment of housing need, discussed with neighbouring authorities, and planned for it, in addition to planning for the boundary constrained Luton. At that time MK had no need for housing development that could not be met within its own boundaries, and there is no evidence in these topic papers to demonstrate a change in that view as all MK Plan is, is an extension of the time period by 5 years to 2031. Certainly there is nothing in the Duty to Co-operate that permits MK Council to unilaterally plan for the housing need in another authority, and unilaterally plan for where that housing should occur. We are not in a position to comment in respect of Aylesbury Vale whose submission Core Strategy was withdrawn, so limit our comments to Central Bedfordshire.

Do you think there is merit in seeking to provide some of Milton Keynes' 1650 housing need in extensions into neighbouring areas (which would clearly need to be investigated and planned with our neighbours)? If so, what do you think the just justification is for this?

There is no justification for seeking to offload some of MK housing requirements onto a neighbouring authority when MK, unlike Luton is not boundary constrained. The urban area of MK only occupies under a half of the total authority area. Just because MK wants to protect its rural area east of the M1, and expand to the SE into rural Central Bedfordshire, is not sufficient justification and there is no requirement under the Duty to Co-operate for Central Bedfordshire to agree to this land grab. Seeking to use the farcically bounced through, non-evidenced based MK2031 between November 2005 and June 2006, is no justification.

Question 10 Rural Settlement Hierarchy

Do you think that current settlement hierarchy with Newport Pagnell, Olney and Woburn Sands as Key Settlements remains appropriate?

Yes in part. Woburn Sands has already taken more than its share of rural development. When finished, Parklands plus other smaller sites, in particular Greens Hotel and Sandy Mount sites will have increased the town by over 50%. We would be against further development in this

area as the infrastructure is at capacity and the town in grave danger of being swamped by a combination of the amount of development and the east west rail link potential increase of rail, both passenger and freight traffic with the crossing being closed for considerably longer than at present, bringing the high street to grid lock. We would suggest MK Council respects Woburn Sand's adopted Neighbourhood Plan.

Should a more dispersed pattern of housing development be considered? If so which other rural settlements do you think could take some new housing development?

No comment

Are there any sites you think we should be considering in developing a strategy for accommodating rural housing need (please use the proforma in Annex Call for Sites Proforma).

No comment.

Q11 Employment Allocations

Do you have any thoughts on the reallocation of land allocated for employment use for alternative uses?

If sites allocated for employment under the original MKDC have not been utilised for that for 40 years, then we would support reallocation of these sites for alternative uses.

Are there any employment allocations which you think would be better put to an alternative use?

No Comment

Q12 Employment Land

Do you think there is a benefit in looking to provide larger employment areas, that may be easier to serve effectively by public transport?

No. We do not wish for any more logistic and distribution ware housing with huge footprint and low skills. Headquarters are better located in the centre of MK. Most other employment sites should be more like business parks encouraging small start ups.

Do you have any thoughts on how innovative approaches to incorporating employment land into the future Development Strategy for Milton Keynes?

No comment.

Would you support the reallocation (and re provision elsewhere) of some existing vacant employment land to other uses to enable the provision of a more accessible development strategy, even if the EGELS suggest existing designations are sufficient in quantitative terms?

No

Q13 Open Space

Do you have any views on the considerations set out above?

We would not want to see any erosion of the existing linear parks and we would like to see linear parks extended into any news developments,

Q14 Environmental constraints

Do you have any views on particular environmental constraints that limit where Milton Keynes could grow and the issues we should be investigating?

We are concerned about proposals for development between Bow Brickhill and Woburn Sands as any development in this area would ruin the landscape setting of ridge and this AONB.

Q15 Transport

Do you have any views on the considerations set out above? In particular:

- *If urban extensions are needed, do you think there are any areas we should be prioritising in terms of accessibility and wider transport implications?*

If urban extensions are considered, we would wish to see full and open consultation in respect of the preferred directions for growth of such extensions and not the fait accompli set out in the map on P24, as MK planners seek to bounce their views through in the same way as MK Partnerships in the farce that was MK2031.

- *Do you believe Plan MK should be seeking to extend the grid road pattern into any new development no matter what the cost?*

Yes. MK was built for the car and future innovative transport methodology. Trying to make MK something it can never be by trying to impose city streets on new residents just will not work except at the margins.

- *Do you have any views on realistic innovative transport solutions to support growth?*

The grid road with their width lend themselves to such solutions from a fully automated step on step off transportation to automated trams etc.

- *What are your thoughts on how we can encourage cyclists to use the Redway network?*

Ensure they are lit and overlooked to improve perceived safety but until it is more inconvenient to use the car and more convenient to use a bike, there is a limit to the use Redways more than 2 miles from the centre MK will be used for daily work travel.

Q16 Retail and Leisure

Do you think the existing retail hierarchy is fit for purpose or does it need amending? If so, how should it change?

No comment

How do you think the role of CMK as a regional centre is best protected and enhanced?

No comment

Should we be seeking to limit the trend towards increased size of retail stores in local centres to protect their role?

Yes, the more variety of small units and small convenience stores the more they will be used – the more footfall, the less need to travel to shop.

Are there any issues relating to retail and leisure that you think we should be taking into account in developing the overall development strategy?

No comment except for the increasing on line market, shopping centres, whether local or central need to be places people enjoy going and not just to shop.

Q17 Flexibility of Uses

Would you support a more flexible use of underdeveloped employment sites to meet unforeseen needs emerging in the future?

Yes as long as those employment sites have not been used for a substantial amount of time. Once lost there will be no going back and there is a danger of MK losing too much as developers want to maximise their profit by turning them into the more lucrative residential units.

If so, would you prefer a general criteria based policy covering all sites, or would a more site specific approach be appropriate.?

We would prefer a more site specific approach that could address the locality's particular needs. We find a one size fits all general criteria based policy too unspecific and leaves no room to meet a particular locality's needs.

Q18 Reserve Sites

Do you have any views on the future of community reserve sites?

We are the view that future community reserve sites should be close or in the local centre and that they should be, as before , 0.75ha per 1000 population.

MK PLAN

Duty To Co-operate

Q1 Housing

Are there any other issues relating to housing which you think we should be engaging with other public bodies on? If so, please give details.

No and we consider that MK errs in its interpretation of the Duty to Co-operate where Central Bedfordshire is concerned. See our answer to the second part of this question. We understand Aylesbury Vale may be proposing development adjoining the MK authority boundary, and therefore there will need to be co-operation between authorities on this issue.

Do you have any thoughts on how the Council is currently considering housing issues with other public bodies?

Central Bedfordshire carried out its own Strategic Market Assessment, to inform its submission Core Strategy as to where and how much development should take place. At that time MK Planners had no need for expansion into Central Bedfordshire, as it had sufficient land to meet its assessed development needs both then and in the future to 2031, unlike Luton which is constrained by its authority boundary and must expand across authority boundaries.. Central Bedfordshire took into account the needs of the wider area, including SEMLEP as required by the Duty to Co-operate in planning the total numbers of housing required in its authority area.

It is a gross misinterpretation on MKC planners part, to unilaterally decide how much housing they judge is required outside of the MK authority area, and unilaterally plan for additional housing in another authorities area to extend the existing Core Strategy to 2026 by 5 years. Particularly given the lack of any work and agreement with Central Bedfordshire, in respect of this and taking into account that MKC urban area, only occupies under 1/2 of the total MK authority area.

It is accepted that at some time in the future MK may need to explore future directions for growth, which may mean expansion across boundaries, but this is not required as part of MK Plan, when the existing Core Strategy is til 2026, and MK Plan is planning at the same level of growth for the additional 5 years – namely 1750 homes a year based close to the maximum assessed need by the SHMA (1400 – 1800) – which is well able to be absorbed within MK boundaries..

Q2 The Economy and Jobs growth

Are there any other issues relating to the economy which you think we should be engaging with other public bodies on? If so, please give details.

No.

Do you have any thoughts on how the Council is currently considering economic issues with other Public Bodies?

In respect of Aylesbury Vale, there is a need if development is planned adjacent to the MK border that cross boundary planning will be required in respect of this development and the jobs that residents will need. In respect of Central Bedfordshire, whilst some limited liaison is required, particularly where transport infrastructure – road and rail - is concerned, the two authorities are basically in competition for employment etc so this is not required.

Q3 Infrastructure

Do you have any views on how the Council is currently approaching the provision of strategic infrastructure with public bodies?

No additional comment

Do you think there are gaps in the discussions? If so where are they and who should we be engaging with?

No additional comment.

Q4 Culture and Tourism

Are there any other issues relating to culture and tourism that you believe the Council should be engaging with other Local Authorities or Public Bodies on? If so, where are they and why are they strategically important?

No additional comment

Q5 Duty to Co-operate

Do you have any general comments on how the Council is addressing the Duty to Co-operate and any gaps that may remain?

We would rather that the Council had followed both the letter and spirit of the NPPF's duty to Co-operate rather than taking the same bullying stance of the old Government statutory agency, Milton Keynes Partnership in the 6 month preparation of MK2031, by seeking to impose its will on its neighbouring authority for its own self serving agenda.

MK PLAN CCONSULTATION 2014

Growth in Housing Paper:

Question 1

Do you have any views on the conclusions of the SHMA particularly in relation to the assumptions regarding demographic change and migration?.

The SHMA, relating to MKHA needs, suggests objectively assessed need for 1,650 homes per year, (of a range between 1400 and 1800) and that therefore MK Core strategy figure of 1,750 homes per year is appropriate. We consider that this is on the high side and the figure should be lowered to the figure objectively assessed by SHMA of 1650 homes per year. Otherwise why bother undertaking an objective assessment.

It is worth noting that using the lower figure will mean that MKC will have a greater likelihood of meeting its housing targets. It will be less likely to become a hostage to fortune if the rate of housing completions drops at any stage because of reasons beyond MKC'S control or influence , and hence less likely to end up with a situation of unfortunate and costly 'planning by appeal'

Do you have thoughts on how need across the Milton Keynes HMA is being established? Does it give a robust outcome?

The topic papers states officers then worked on the needs of arising from the whole HMA (CBC, Northants and Ayelsbury) estimating that there is a need for an additional 550 homes per year for the wider HMA. We consider that this is an incorrect interpretation of the Duty to Co-operate particularly where CBC is concerned. It is not for MK to assess the need in other authority areas and incorporate them unilaterally into its plan, unless approached and agreed with a neighbouring authority so to do.

CBC (North) has an existing Core Strategy which was compliant with the old EE Plan requirements, and has submitted its submission Core Strategy for the whole of Central Bedfordshire taking into account the needs of the boundary constrained Luton authority and the old South Beds, and the wider housing market area in discussion with neighbouring authorities including MK. At that time MK had no need for assistance with meeting its housing needs, which it would meet within its own boundary we can see no reason why this has changed. This submission Core Strategy has dealt with the housing numbers required by its SHMA, SEMLEP, including incorporating the needs of Luton to expand beyond its boundaries and does not look to MK to accommodate any of its assessed need, though recognising and accommodating that MK may at some point in the future wish to expand further and may at that time be constrained by its boundary. Nor is there a proposal to develop land close to the MK boundary that requires a joint approach to planning such development under the Duty to Co-operate. MK Plan's addition requirement for 4,000 – 6,000 dwellings to 2031 can and should be accommodated within MK's not inconsiderable authority area including the half east of the M1.

Question 2

Do these development statistics suggest we should be adding an 'upward adjustment' to the DCLG projections?

No there is no indicator that would justify such an upward adjustment

Are there any other statistics on completion and rates of development we should be taking into consideration?

No, except for the ever present threat of developers land banking development by noting permitted sites where no development has occurred or where development has stalled with no reason identified.

Question 3

What do you think the data on completions, house prices, rents and affordability tells us about housing need?

That supply and demand is about right - comparable with the chosen comparators and nationally as well – even with the decrease in completions.

Do you think it requires justifies any ‘upward adjustment’ from the DCLG housing requirement?

No there is no indication for an ‘upward adjustment’

Is there any other data we should be taking into consideration?

No, we cannot think of any.

Question 4

Are there any other specific strategic issues relating to housing that you think we should be addressing with other authorities under Duty to Co-operate?

No comment.

How do you think the economic growth of Milton Keynes affect the level of housing we should be planning for in the Borough?

We consider that the SHMA annual assessment is appropriate to dictate the level of growth in the Borough, namely 1650 homes per year.

Do you agree with the initial conclusion that 2,200 homes per year should be planned across the wider HMA is broadly in balance with likely job growth?

No – as stated before we do not consider that MK should be unilaterally planning across other authority borders unless a neighbouring authority is consulted and agrees or proposes development on or close to MK authority border. MK does not have the boundary constraints of Luton and is well able to absorb the 1650 dwellings assessed as required by the SHMA, or even 1750. It is not for MK to unilaterally decide without consultation or agreement the housing required in other authority areas and unilaterally plan where they should go in the neighbouring authority.

Do you think that the data and forecasts suggest the need to vary the housing figure for the Borough from the DCLG projections?

No.

Question 5

Should MKC be considering supporting any unmet need from other areas? If so, where and what is the evidence for this?

No. Central Bedfordshire Council is planning for its own needs, – taking into account inward and outward migration, and the London effect. Central Bedfordshire additionally is meeting the need of boundary constrained Luton but is meeting both Luton and its own housing need. It does not need MK to provide additional housing or jobs.

Do you think that are likely to be any issues with the deliverability of the housing numbers suggested in this paper that would lead to MKC needing to approach other authorities for support? If so, where is evidence for this?

No. MKC has sufficient land and potentially deliverable sites both sides of the M1 to meet its housing need for the long term foreseeable future. It is of note that over 1/2 of MK Authority area is east of the M1. The M1 is not a barrier as has been claimed in the past, particularly with the seamless crossing in North MK, nor are other major transport routes through the city.

Question 6

Which of these options do you think is most appropriate?

We consider that the option of “planning for the housing need figure set out in the SHMA, which has looked in more detail at migration and demographic change in the Borough”. For clarity we consider an upward adjustment is not necessary, there is little evidence to support this and indeed it is, we consider, unachievable.

Are there any other option we should be considering?

No

Question 7

Considering the contest provided what do you suggest the housing figure for Plan MK should be?

We consider the SHMA figure of 1650 homes per year to 2031 is the most realistic and deliverable figure.

Question 8

Do you think having a prescriptive policy on housing mix, maybe tied back to the mix suggest by the SHMA is justified and needed?

No – the SHMA mix should be used as a guide and this should be used when deciding planning applications for small or large sites to influence the housing mix.

How do you think the need for smaller properties is best addressed. Should the council be looking to identify sites where a higher concentration of smaller sites could be provided?

We think generally on larger sites the need for smaller properties can be addressed as part of the mix at planning application stage, and small sites should be predominantly for smaller properties.

How could the Council increase the provision of executive housing to support economic development aspirations? Should it be considering specific sites for the purpose of executive housing provision – if so where?

We would be uncomfortable with sites specifically for executive housing provision, which would we feel be in the nicer parts of MK thus excluding the hoi poloi – we consider that this type of provision should be part of the mix of housing on any of the larger sites.

Question 9

Do you agree with the SHMA conclusion that the affordable housing target should be set at 35% of a housing target of 1750 homes per year? If not how you think the affordable housing requirement should be adjusted?

Yes as long as there is a mix of social and other affordable housing to rent and intermediate affordable. Affordable being 80% of the market rent or price, there is a need for social housing as part of the mix. Note our previously expressed views on the 1750 housing target. .

Should the Local Plan and Core Strategy threshold for affordable housing remain at sites of 15 or more units?

No we consider it should be lowered to 10 or more units.

Do you have any views on how to provide flexibility in the application of planning obligation policies? Should affordable housing be seen as a priority above other sorts of “infrastructure”?

We consider that for a developer to reduce or avoid planning obligations the council will need particularly in respect of viability develop a strict criteria for assessing such arguments. This will allow the council to be flexible in some respects but not too flexible.

Do you think we should consider the approach of using different affordable housing targets for different parts of the Borough and/or type of site , depending on development viability?

No – we consider that if stringent criteria is drawn up to assess all such arguments in respect of planning obligations that will permit a more even and open approach.

Question 10

Do you agree that reserve sites remain the most appropriate locations to meet specialist housing need across the city or do you think there is a more appropriate alternative way of enabling delivery?

No comment

Should the Council be looking to allocate specific sites for extra care provision? If so where do you think this might be appropriate?

No comment.

Would you support a more flexible approach to land use designations to support the delivery of specialist housing in appropriate locations?

No comment

Are you aware of any particular housing need that is not specifically set out above?

No

Question 11

Do you agree with the analysis of future provision of Gypsy and Traveller need set out in the SHMA? If not why?

No comment.

Do you agree that it is appropriate to carry forward the existing allocations and that there is no need to allocate any new site to need the needs of Gypsy and Travellers and Travelling showpeople.

No comment..

Do you agree that it is logical to have a criteria based policy to consider any applications for Gypsy and Traveller/Travelling Show people provision in developing such a policy what issues does MKC need to consider?

Whilst the Gypsy and Traveller/Travelling Show people are a declining population MKC need to ensure that both its assessment and provision meets the needs of these peoples.

MK PLAN CONSULTATION 2014

Employment and Economic Growth

Question 1

How should MKC plan pro-actively to meet the development needs of business and support an economy fit for the 21st century?

We would suggest that MKC concentrate on:

- less emphasis on distribution and logistic sites which occupy large footprint sites and contribute little to the economy of MK particularly in the way of skilled employment.
- discussions with existing local businesses in respect of the skills they need and planning to meet that needs as one route to prevent haemorrhaging business to other areas.
- discussions with existing local businesses in respect of conditions they need to both stay and expand in MK
- discussions with existing local businesses about what attracted them to MK so that MK works to what would attract new businesses to MK based on their views.

What planning policies for employment do we need to future to manage the MK economy?

We would suggest that the retained policies are still appropriate to MK needs, and no additional planning policies are required.

Are there any planning policies for employment that should be retained, even though they be in a modified form; what policies can be discarded; are any new employment policies need in future which might include planning policies of the development of strategic employment sites?

We would suggest that all the retained policies listed are still appropriate to MK needs, unless superseded in full by Government planning. We can think of only one new employment policies that would contribute to MK economic growth by having a policy that in any development over 100 homes reserves some land to micro/small business to set up.

Question 2

How can we promote and encourage the provision of accommodation fit for micro and small businesses?

We would suggest that a small % of land is set aside as part of planning for all of the new larger sites residential sites coming forward bearing in mind the retained policy E9. We were unhappy with the Parklands site having one of the conditions of development i.e that there would be land retained for employment on what was a full employment site, reduced to next to nothing in violation of retained policy E1.

Question 3

How can we encourage the development of CMK to play its full role as the primary focus for knowledge based employment growth within the Borough?

See previous answers to questions 1 and 2

Question 4

How can we encourage the growth of homeworking within the Borough?

Ensuring that all new homes are connected to superfast broadband as part of building requirements. But other than that there is nothing else that we can think of.

Question 5

Should the Council permit more D1 uses such as places of worship in a limited number of industrial estate locations throughout the city? Which buildings/locations might be suitable for this use?

No comment

Question 6

Should the Council intervene to promote office type development at the expense of development such as warehousing?

Yes – sites suitable for warehousing are also sought after for office and other employment development, with associated landscaping. Warehousing/distribution contributes little to MK aspirational image, requires little in the way of skills from most of their employees and due to pay levels mean a number of employees have to be transported in from other areas. With increasing automation they offer little in the way of local work. The development of regional distribution hubs just underlines our view

Alternatively, should the Council not intervene and continue to allocate additional employment land for warehousing purposes, assuming that it is required?

No – if the Council has a view of what type of city MK should become, then it should do everything it can to promote that vision. Leaving it to market forces is not acceptable.

Question 7

If additional employment sites are needed within the Borough upto 2031 for whatever reason, where should they be located and how much land is required?

We would rather wait for the EGELS before commentating on this.

Question 8

Is there any other employment or economic growth issue not addressed in this Topic Paper that needs to be considered in Plan MK?

No Comment

MK PLAN CONSULTATION

Town Centres and Retail

Question 1 Retail in town centres

Should the Council focus on developing CMK as a regional shopping centre?

Yes – for clarity that should be not just retail, but should include bars, restaurants and other consumer enhancing items to increase the attraction of visiting CMK. Improving access by non car beyond Christmas time should also be a high priority.

What vision should we have for the city centre in the future and what type of shops, facilities and activities do we want to see within it?

A great place to visit, whether for shopping or a fun day out.

Should the public spaces (boulevards and other public areas between buildings) be improved from a pedestrian perspective so as to provide a better integrated offer to shoppers/consumers and thereby improve dwell time and consumer spend?

Very definitely yes.

Question 2 Town Centre Policies

No comment

Question 3 Retail Hierarchy

Does the retail hierarchy within the Borough need to change?

No – although care needs to be taken in respect of Woburn Sands with the effect of EW rail link and any increase in traffic congestion and lack of parking having a detrimental effect on the high street. Plus the expansion of the Kingston shopping area is also impacting on the high street compounded by the effect of increased congestion and lack of parking.

Are there any centres whose role has changed since the last review of the retail hierarchy, whose position within the retail hierarchy needs to reflect this change?

No except for our comment above.

Question 4 Town Centre Regeneration

Should the Council be more proactive in supporting and facilitating town centre regeneration initiatives in Bletchley and Wolverton?

No comment.

Question 5 Town Centre Decline

Are there any centres in the Borough, which are in decline where redevelopment may be necessary?

See comment under Question 3 in respect of Woburn Sands. Woburn Sands high street is a vibrant mixed use rural town. But it is already showing the strain of the amount of development in the local area.

How should the Council manage the decline of a centre?

In respect of Woburn Sands stop further development in the area until the effect on the infrastructure can be fully assessed, and remedial action if possible be taken.

Question 6 Restricting uses

No comment

Question 7 Provision of Local Convenience Stores

Should the Council still encourage the provision of local convenience stores in close proximity to most new residential development?

No – local centres, including a convenience store works well in some places, but a convenience store on its own is often financially unviable unless combined with other retail services. We consider that this should be decided on a case by case basis taking into account the particularity of the new residential development.

Question 8 Restricting food store size

Should the Council restrict the size of food store permitted in an existing and proposed local centre and what size should they be?

Yes they should be restricted to the size of an average convenience store or other retail unit in the local centre.

Question 9 Retail Impact Assessment

Should the threshold for a retail impact assessment (to assess retail planning proposals) be lowered from its current 2,500 sq.m figure to 1000 sq.m?

Yes – particularly where food stores are concerned

Question 10 Other Issues

Are there any other issues related to town centre and retailing that need to be addressed?

No other comment.

MK PLAN Consultation

Transport and Travel

Q1 Walking and Cycling

What features can be incorporated into new development to maximise the number of people walking and cycling especially for short journeys?

We think the redways and indeed grid roads with wide landscaping are important to retain to ensure flexibility for future transport solutions, but consider that perhaps separating walkers and cyclists would be worth considering too – the two do not really mix well. However there is an unfounded perception that the redways are dangerous, particularly after dark – how that can be changed through lighting, landscaping, increased overlooking by houses etc – we are not sure.

Q2 Public Transport

What would encourage people to use public transport for more journeys?

MKC has to live with the fact that MK is designed for the car, with grid roads and employment and others key sites spread throughout the city etc. So unless the Council can ensure buses go where people want them to go irrespective of financial viability or unless someone comes up with an innovative way of transporting people flexibly using the grid roads there is little that can be done by MKC to force people to relinquish the convenience of their car other than ensure that what alternatives it can provide are provided – redways, buses etc. and work on “blue sky” thinking to come up with something people find more convenient than driving.

Most traditional towns and cities are deeply envious of MK – however we are sorry that MKC finds itself not able to enforce its fully consulted, examined and agreed plans – undermined by changing Government policy, Planning Inspectorate, and of course Developers looking to maximise profit.

Question 3 Personal Mobility

How else can new developments encourage more sustainable travel behaviour and reduce the need to travel?

Beyond providing employment areas within any new developments, extending the redways, grid roads for flexibility, you're not going to as you are unable to apply the appropriate levers (congestion/increased cost v appropriate alternative) to ensure this change of behaviour.

Question 4 Sustainable travel

How can we ensure that sustainable travel is at the heart of all new development proposals?
Nothing to add therefore no comment.

Question 5 Rail

How do you think new developments can contribute to the use of rail and capitalise on the additional capacity generated by East West Rail and HS2?

It is difficult to see how clustering development around Woburn Sands will be of benefit to MK travel and transport. Any increase of passenger use of the EW rail link is likely to be minimal as it routes to Bletchley and Bedford as it is currently not CMK. So the only change as far as Woburn Sands is concerned is that they now have a one hourly fast train rather than a one hourly poorly used stopping train

The disadvantages of clustering development around Woburn Sands will be significant:

- The loss of Woburn Sands distinct identity and becoming just a part of the urban area of Milton Keynes

- Increasing congestion from both increased closure of the rail crossing from both passenger and freight traffic and increased road traffic generated will kill the high street as a retail facility as people will be unable to park, unable to drive through etc. Grid lock.
- Local infrastructure will be unable to cope and has limited ability to expand.
- Increased local traffic at the known congestion points will lead to increased rat running through surrounding communities with no benefit to them at all.

Bow Brickhill Station will not see any increase in capacity, and therefore we see little benefit in increasing the development in this area, in fact the railway acts as a natural boundary protecting Bow Brickhill village and its landscape value to MK.

Question 6 Freight

What more can be done in new distribution and industrial development to reduce the impact of road based distribution movements?

We do not support any further logistic and distribution warehousing as they contribute little to the economy as previously stated. In the main low skilled jobs and very few of them for the footprint they occupy. Whilst understanding that logistic and distribution will be a pressure for any town on major road transport, the market is changing as set out in the MK employment and economic growth topic paper.

We do not support the provision of more off site lorry parking – logistics and distribution warehousing should provide lorry parking as part of any new development.

We need to make clear at this point that we do not support SEMK consortium's proposal of a rail/road interchange in Aspley Guise/Husborn Crawley in Central Bedfordshire Council as part of their grand plan, though clearly MK Planners have been working with the consortium as judged from their map in The Way Forward topic paper, as that map fails to identify that land south of the railway line is greenbelt.

Question 7 Funding

How can the planning system ensure that contributions to sustainable transport options are guaranteed and easily secured from development proposals?

We have no answer to this. This is a political decision. Whilst understanding fully the current planning constraints that MKC is having to function e.g. of developers claiming financial viability and the Council not having the resources to challenge this, we are an apolitical organisation.

Question 8 Roads

Should the principles of grid roads be maintained?

Yes – they provide MKC the flexibility to explore other forms of transport that the city streets design does not do. A city street removes any flexibility for sustainable transportation now or in the future, a mistake that we would not wish to see replicated in any new development.

Should speed limits on the grid roads be reduced?

Yes except on the main through routes like the A421. All other grid roads should have a maximum speed of 40 and bus lanes for all dual carriageway roads that are not part of the through route system. The current hit and miss system is not sustainable and increased congestion is one of the levers that MKC can apply to make more sustainable travel a viable alternative.

MK PLAN Consultation 2014

Provision of Physical and Social Infrastructure***Q1 Broadband***

Should MKC include a similar policy in Plan MK which puts the responsibility for providing the infrastructure necessary to deliver high speed broadband with the developer?

Yes – in the same way as providing power, water, sewerage etc it's a utility, and should be provided in any development.

If so, how could that requirement be managed (e.g. through conditions or legal agreements)?
A condition of planning permission in the first instance, but if too many try to many wriggle out of it than a legal agreement that can be enforced.

Or should provision in new developments be delivered by other means, as with the existing parts of the Borough?

No, it should be a condition of any new development. Leaving to be rolled out with existing parts of the Borough is just kicking the can into the long grass. High speed broadband was required years ago, and it is still not in place.

Q2 Reserve sites

Should we be more flexible about the sort of uses that are considered appropriate on reserve sites?

No – those reserve sites were identified for particular purposes for particular reasons. This should only be flexed if it can be demonstrated at the time of reviewing the Local Plan, that that purpose and those reasons will never or not for the foreseeable future, be required – particularly for land designated for social, voluntary or community use. Each such change should be fully consulted on as most communities will be unaware of the designated use of their reserve sites.

Should this only be on vacant sites in long established areas or should potential uses also be flexible on reserve site allocations?

See above. If a proposal is made to change the reserve site use to another purpose it must be clearly demonstrated that there is no prospect of it being developed as intended, and be fully consulted on. Once lost it is lost forever.

Are there any alternative uses that Reserve sites could be put to?

See above

Do you think that the principle of residential development on Reserve sites is acceptable?

Only if that is what they were reserved for. If they were reserved for employment, or social, voluntary or community use then no except in exceptional circumstances. See above.

Should all new reserve sites be time limited, so if a community type use cannot be found within a certain period (c 10 years) the site is returned to the original landowner/developer? Or should reserve sites remain available in perpetuity until they are required?

All employment, and residential reserve sites should be reviewed at the time of the review of the local plan to see if they are still required for that purpose. But that should be a c.20 years, not 10 years. But not the reserve sites for social, voluntary and community land. These latter sites may take decades to be used for the purpose they were intended due to a number of reasons and communities should not lose them.

Should we consider allocating larger reserve sites?

No.

Should we even continue to allocate Reserve sites considering a large proportion of them still remain vacant and unused?

Allocation of new reserve sites for social, voluntary or community land should continue – it's the only way such land would be protected, but we see little point in allocating reserve sites for future employment/residential use except in allocating land within any new development for employment.

Question 3 Community Facilities

How can our planning policies prevent the loss of community facilities, particularly if there are concerns over the economic viability of a use?

In respect of privately owned community facilities, under the Gvt initiative in respect of community naming their community assets, and right to buy such asset there is a degree of protection. However we would like the right to buy to be extended to one year from the current 6 months. Planning policy in respect of these privately owned community facilities built on land reserved for community use should not be used as a back door route for getting that designation changed. In respect of publicly owned community facilities then economic viability should not be in question – e.g. recreation/sports ground, or community hall. There may be periods when usage falls but irrespective these sites need to be kept maintained for the future whether by the community or by local council.

What sort of facilities would you want to see provided alongside new development to create sustainable communities and walkable neighbourhoods?

For any reasonable size development, as a minimum there needs to be sports/recreation land, and a multipurpose community hall. However the other facilities that are needed depends entirely on the size of the development and what nearby facilities are already available that could be extended. Sites for Health centres, schools, a small retail centre including convenience shop, public transport and, most important, open green spaces with trees are just some of the things to be considered but on a strategic level.

Too many of the recent developments (last 15 years) have been crammed, sterile environments with very little open green space, very little community space just lots of soulless boxes all much the same.

Question 4 Education

What can Plan MK do to make provision for education within the Borough, including ensure we have planning policies which ensure we have sites for new schools and help to support the continues development of the universities?

In respect of new sites for schools – identify reserve sites as strategic locations for schools taking into account existing provision and future demand as well as transport. These sites like other community sites should not have their designation removed.

Question 5 Infrastructure

What policies are needed in Plan MK to deliver the infrastructure we need to support growth?

No comment beyond effective joint working.

What do you think are the most important elements of infrastructure to fund?

Open space for leisure and recreation, public transport, and education

Are there any different or innovative approaches we could consider to help fund infrastructure and service provision?

No comment.

MK PLAN Consultations

Culture, Recreation and Quality of Life

Question 1 Art and Public Art

What is the role of arts and public art in raising the profile of a place?

How can arts and public art contribute to quality of life, vibrancy and the built environment?

What is missing culturally from Milton Keynes?

How could we develop a sustainable funding source for arts and culture?

What will we want Plan MK to do in relation to culture, arts and public art?

We would suggest that the 1% levy on gross capital costs of new development is now used for other purposes e.g. open space recreation. MK we would suggest has enough public art.

Question 2 Heritage, Museums and Archives

With the challenges present within the new Heritage Museums and Archives Strategy and how solving those challenges will enhance quality of place and/or life, how could Plan MK assist in solving those challenges?

No comment

What could Plan MK do to promote Milton Keynes as internationally and culturally significant?

No Comment

Question 3 Healthy and Active lifestyles

What else can Plan MK do to help encourage people to lead more active, healthier lifestyles?

Other than provide places where people can enjoy outside activity outside work, extend the redways, provide more allotments and community gardens, and wood/open space for walking and cycling etc. there is not a lot else.

What can planning do to make walking and cycling more attractive options for making day to day journeys including commuting to work?

As your research shows unless people can walk or cycle to their work destination in 10-15 minutes for day to day journeys, then they will use their car particularly in winter. We would suggest that that MKC is better off looking at innovative methods of using the grid roads – to provide a non-car based transportation alternatives. Milton Keynes is not Cambridge and very few day to day journeys can be completed within 10-15 minutes.

How can we ensure new developments contribute to improving the health and well being of residents?

Locally provide a multi-use hall, allotments and equipped recreation ground – natural play preferably. Contribute funds to schools and local organisations that get pupils involved in outdoor activities – a much better use of the 1% gross capital cost of development.

Question 4 Sport and Active Communities

How can Plan MK help to ensure that sport and leisure are realised?

By ensuring that land is allocated as part of each development over 30 dwellings for open air activity, and a sports/recreation site and multipurpose hall for each large development.

How can Plan MK protect existing facilities from changes that affect the over-arching strategic objectives?

By identifying existing facilities and designating them for that function – particularly existing recreations/sports grounds and community halls – and making it clear by policy that a changes of use would only be considered in exceptional and evidenced based circumstances

Should Plan MK consider options around funding and delivery arrangements or opportunities for enabling development in the context of developing MK as an international sporting city?

We consider being clear as to the vision for MK needs to be done first. We are not sure who decided that MK should be an international sporting centre, and whether that is the most important vision for MK or whether other aspects put forward in other topic papers should take precedence. You are in danger of running under too many flags and expecting new development to deliver too much.

Question 5 Community Facilities

How can Plan MK help to ensure that appropriate community facilities are provided and that existing facilities are protected?

See answer to question 4

Question 6 Community Cohesion

What measures do you think could be used to help create and maintain cohesive communities that encourage diversity and reduce inequalities between areas, to help foster good community relations?

No comment.

We were surprised that there was no mention of MK Theatre and The Stables in this topic paper particularly as the latter has received a number of national accolades.

MK PLAN Consultation 2014

Rural Issues***Q1 Population Structure***

What implications does the age structure of the rural areas have for Plan MK?

It is unclear when considering just age alone. It would take a more detailed study of communities taking into account more inclusive parameters and the communities existing resources to see what if any implications age structure would have.

What policies are needed to address these challenges?

See above.

Question 2 Transport and Accessibility

How can planning help support the rural public transport network?

We do not think that supporting the commercial rural public transport network is a prime function of planning unless the town/parish council concerned wish for development for that reason i.e that S106 monies to support an existing service..

Rural exception sites of affordable homes for local residents to remain in their rural community is a function of planning and part of that process looks at access to local infrastructure including public transport.

Should development be focussed on settlements that have access to public transport to help encourage sustainable travel choices?

Yes. Whilst that should not be the only reason, it should be a factor to encourage people to use public transport.

Question 3 Services and Facilities

How can Plan MK support the ongoing viability of its rural towns and villages?

By creating affordable homes in those villages with access to good public transport and some facilities, and encouraging communities to take up their option to designate important community assets and thus right to buy should it be threatened with loss.

How can planning help to protect against the loss of essential rural services and facilities?

See above

Question 4 Employment

Plan MK should include policies to support sustainable growth of all types of businesses and enterprise in the rural area (para28 of the NPPF). How can planning policies ensure that that businesses in the rural area grow in a sustainable manner?

Under permitted development buildings can already be extended so we would suggest that policies reflect this expanded to encourage business expansion. However any such extension or business expansion should not damage the rural physical and aesthetic environment of the rural community.

Should we encourage the conversion of redundant farm building for alternative uses?

Farm diversification should be encouraged, however this should be caveated with farm building erected prior to 2006, and should be subject to a transport assessment. Farmers already can erect buildings without recourse to planning and the caveat will prevent exploitation of this. Farms are by their nature usually in the open country side, and care needs to be taken over this to prevent inappropriate development in the open country side.

What can Plan MK do to support the rural economy and the viability of rural businesses?
Ensure high speed broad band is rolled out as quickly as possible.

Question 5 Rural Housing Target

Do you agree that Plan MK should include a separate housing target for the rural area distinct from that for the urban area? If yes what do you think this should be? 85 houses per year or higher to allow for migration?

No we do not believe there should be a separate housing target for the rural area, nor do we believe that 1750 per year is an appropriate total for MK as a whole. We do not consider that allocating separate totals for the rural and urban area is good planning practice. We consider that a fully consulted directions for growth and the site allocation process is a more robust process in terms of sustainable planned development. Having a total for the rural area just permits the presumption in favour of development to kick in if the total is not reached for one reason or another with a detrimental impact on the rural environment. In respect of the 1750 homes per year, the SHMA states the range for of need is for between 1,400 and 1,800 dwellings, and concluded that the 1,650 was what was required and therefore that the existing Core Strategy of 1,750 is appropriate. We are of the view that 1,650 per annum as concluded by the SHMA is the more appropriate figure.

Question 6 Affordable Housing

Should Plan MK introduce a new threshold that would trigger a requirement for affordable housing in the rural area. Should this new threshold be smaller than 15 units?

Yes. The need is for affordable houses in the rural area and 15 units is too high, and indeed is too high for the urban area too where affordability is a problem. We would suggest the threshold is lowered to 10 .

Should Plan MK plan for more larger sites in the rural area that would provide for a fair share of affordable housing?

No. There is a need for affordable homes in some rural communities, and most rural communities can and do deliver small sites. If the threshold is lowered to 10 that should deliver what the rural communities need, without the need for the allocation of larger sites much as the developers would like you to do so. The cost of delivering homes in the rural communities is no different between CBC and MK and economic viability can as in CBC be considered on a case by case basis.

Question 7 Rural Exception Sites

Should small numbers of market homes be allowed on Rural Exception sites at the local authority's discretion, to enable the delivery of affordable units?

In part yes – that in part should be constrained by a policy that states 80% must be affordable, and up to 20% can be market homes. It would be quite ludicrous if one unit of a small rural development of 4 was affordable the remaining three were market.

Question 8 Design

Should Plan MK have specific design policies for the rural dwelling extensions?

No more than urban extensions or indeed permitted development. The extensions of all buildings should be subservient to the main building and should be in keeping with the existing area.

Question 9 Settlement Boundaries

What in your opinion should be the main principles that would shape the settlement boundaries review process?

We are sorry to see the review of settlement boundaries are linked to the site allocation process as this smacks of developer led decision making being imposed. We note you intend full involvement of town/parish councils but wonder how much weight will be given to their views. We would have preferred a review of settlement boundaries to have been a stand alone process as with the conservation boundary review rather than being driven by housing targets. However that said, the main principles should be:

- Working meaningfully with the town and parish councils in such a review so that any change of settlement boundaries are supported by the community.
- Assessment of the impact of any change of settlement boundaries on infrastructure, transport, environment including identity etc.
- Full weight given to any neighbourhood plan whether complete or in progress

Do you think that your town/village needs to be reviewed in order to support the delivery of future development?

The Society represents locally Woburn Sands, Wavendon and Bow Brickhill as far as this process is concerned. Woburn Sands has an agreed neighbourhood plan having already taken much new development, which when complete will increase its size by over 50%, Wavendon's neighbourhood plan is in process accompanied by huge development which threaten to engulf this rural village. Bow Brickhill besides being identified as selected village as far as very limited development is also one of the two areas identified as "Areas of Attractive Landscape". So no, we do not think the settlement boundaries of the areas we represent need review in order to support any further future development.

Q10 Natural Environment

What in your option would be an acceptable method of both improving and benefiting from the ecosystem services?

No comment. As we consider this question has less to do with the natural environment, and much more to do with energy production – biomass, solar and windfarms which we would only consider on a case by case basis due to their negative effect on high grade farmland, biodiversity and the natural environment.

Q11 Sustainability

How could Plan MK help to improve energy efficiency of the existing rural housing?

Provide grants to rural housing and flexible planning policies that would support roof solar panels and other community owned and managed renewable energy that does not impact on the historic or natural environment.

Could Plan MK include policies that would support community run renewable energy developments?

Yes subject to assessment as to any impact on the historic or natural environment.

MK PLAN 2014

Climate Change and Sustainability

Q1 On site renewable energy

Should Plan MK introduce specific requirements for on-site renewable energy in new housing and commercial developments?

Yes as if you don't most developers will not do so. Provide a choice menu of other renewable energy to ensure site and developer flexibility, with the option, if non viability can be demonstrated robustly or off setting to a MKC fund to fund such projects in the existing housing stock. MKC cannot be put in the position of the majority of new developments having no renewable energy as developers walk away with their profits. Insulation should be a minimum requirement on all new builds.

Should there be any thresholds that would trigger this requirement e.g. similar to policy D4 thresholds of more than 5 dwellings or 100m2 in cases of commercial development?

Yes. We would suggest that the D4 threshold is exactly right .

If setting a local on-site renewable energy requirement was a preferable way forward then what proportion of the energy requirement should be off set e.g. 10%, 20% or higher? Should that include both regulated (included in the Building Regulations) and unregulated emissions (from electrical appliances and cooking)?

We would suggest 10% if unregulated emissions are included, and 20% if Building regulation requirements only taken into consideration. It would not be achievable to put the target higher – much as we would like it to be.

Should Plan MK include polices requiring no fossil fuel developments?

It would be nice if they could – ground heating, wind turbine and solar panels with no incoming electricity or gas. However that is not economically viable, or indeed possible, at this time as we understand. However in theory incentives can be included as part of the development conditions to encourage developers to build a proportion of homes that are not reliant on fossil fuels.

Question 2 Allowable solutions

Could the allowable solutions monies be used by the local authority for investment in local renewables (or low carbon) energy infrastructure projects and on projects that result in a reduction in CO2 emissions from existing stock?

We would prefer the allowable solutions monies be used in project that result in CO2 emissions reduction from existing housing stock not in projects that create new local infrastructure projects. There is little point in new projects whilst failing to address the problems with existing housing stock, no matter how attractive in PR terms.

Question 3 Renewable Energy

Should Plan MK support all types of renewable energy schemes provided they are acceptable in terms of their environmental, economic and social impact?

No – all such schemes should be considered on a case by case basis with full community involvement.

How could Plan MK support local community energy schemes?

By having a specific policy for such schemes that encourages local communities to get involved with energy consumption and production.

Could Plan MK require more renewable energy schemes on the council owned land/buildings?

No – all such schemes should be considered on a case by case basis, with full community involvement.

Q4 Flood and Water Management

Do you agree that a locally specific strategic flood risk management policy incorporating the elements outlined above should be developed as part of Plan MK?

Yes **but only** if it incorporates the wider issues contained in the Great Ouse Catchment Flood Management Plan, the elements of which were addressed by Milton Keynes Development Corporation who did not have this document but were aware of the risks, and missing from some MK developments since. MKC has an overarching responsibility not only to its own area and residents but also areas and residents at risk downstream from the MK local area. Therefore the local specific strategic flood risk management policy must continue to ensure that developments at MK do not increase the risk of flooding, or affect water quality further downstream in the Great Ouse CFMP. As you are aware the Society has a particular interest in flood risk and water management.

Are there any of the elements outlined above that you disagree with or feel could be dealt with differently within Plan MK?

Note our answer above, but additionally it should be made clear that economic viability cannot be used by developers in respect of their responsibilities to deliver the requirements of the locally specific strategic flood risk management policy, as has happened in the past.

Are there any additional elements that you feel have not been included and could be covered by the a strategic flood risk management policy of Milton Keynes?

See our answers above. However MK is in one of the driest areas in the UK and water supply can be constrained – whether by supplied Anglia Water or Thames Water. Making the most appropriate use and disposal of water needs to be built into the design of any development. We note a water cycle study is being done but that should have been done at the same time as these topic papers to inform MK Plan not sometime in the future as a separate entity.

MK Plan Consultation

Open Space and Natural Environment

Q1 Open Space Management

How could Plan MK influence open space management so it delivers a robust green infrastructure?

We would support MKC non-interference with the Parks Trust which is entrusted with managing the most of the green infrastructure of MK. We would support MK Plan continuing to provide new balancing lakes and green linear parks as part of any large development, as well as that development being landscaped to enhance the sense of community. However we would wish to see such parks and lakes passed to the Parks Trust with maintenance endowment for future management and thus ensure the legacy of green spaces for future generations.

How do we ensure that development does not result in fragmentation/ or prevent better integration of green infrastructure networked?

By ensuring the grid roads and redways continue in any new development and thus continue to link the green infrastructure network.

Should Plan MK introduce requirements to ensure that playing pitches are fenced in order to prevent their surface being damaged?

No – fences are costly to maintain and prone to vandalism.

Q2 Open Space Assessments

Should an open space assessment be carried out for Plan MK? Should it include all the existing open space?

Yes. If nothing else to provide a base line in addition to the 1970 plan, that whilst it should not be reduced, it would give an idea of what the use or state such open space, in order that it can be enhanced, whether for people or biodiversity.

Should Plan MK identify standards for quality, quantity and accessibility of open space and develop an open space assessment methodology?

Yes – it would provide a framework for future work to build on and enhance the existing and future open space.

Should the existing requirements for open space (Local Plan Policy L3 and Appendix L3) be reviewed or are the standards still effective?

We would view the Local Plan Policy L3 and Appendix L3 to be effective now, however a review to see if they could be further improved could be useful.

Q3 Biodiversity Offsetting

Would you agree that Biodiversity Offsetting could be an efficient and transparent way to ensure there is biodiversity gain through development?

No. Biodiversity offsetting is just another tool in the developers armoury provided by this government to get round objections on the negative impact on biodiversity. Loss of bio diverse land to development should follow a process of:

- Does development have to happen on this site, or are there other more suitable sites which would have less of a negative impact on biodiversity.
- If the only available site, is there a way to mitigate the impact on biodiversity to retain it.

- And then if development of the site is the only option and mitigation is not possible, biodiversity off setting could be considered.

Would you like to see Biodiversity Offsetting becoming mandatory for developments above certain thresholds, if yes, what these thresholds should be?

No – see answer above. We have some very special sites throughout MK authority area, and building on these sites under the guise of biodiversity offsetting just ensures loss of biodiversity – in some sites loss of hundreds of years of ecology.

Should Plan MK promote/prioritise biodiversity and green infrastructure improvement projects located within the broad areas identified in Figure 3 Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire and Figure 5 Major open spaces, 1970 Plan for Milton Keynes of this paper? Should Plan MK include a specific list of high priority projects that should benefit from planning gains or biodiversity offsetting?

A qualified yes, qualified a) by the fact that development impacts on biodiversity and green infrastructure cross boundaries and this should be taken into consideration and b) by the fact assessment may identify areas within MK that should be given priority and added to the list.

Question 4 Area Designation

Do you agree that in order to protect and enhance our landscape a criteria based policy approach is more appropriate than an area designation? Do you think it will allow a more site specific appraisal of impact on a case by case basis?

We could support a criteria based assessment, depending on what the criteria are. An area based designation takes into context the wider setting and contributors to the landscape or landscape feature – to move to a criteria based assessment especially when linked to a landscape capacity assessment, rings our alarm bells. So before we could support a criteria based policy but we would need to consider the criteria first.

MK PLAN

Quality of Place

Q1 What makes MK special

Do you think we should continue to try and maintain the original principles and design characteristics in new development?

Yes – the difference between the developments of the past and those in the last 10 years is marked, and do MKs unique character no service. The grid road provide easy movement with choices throughout the city and ease of adapting to other innovative transport, the separation of main roads from development communities give a sense of identify and community cohesion, the landscaping of grid roads, linear parks and balancing lakes make for a very green city of trees and decrease in pollution and of course the differing design styles within and across estates.

Which characteristics work and which don't?

See answer above for what works. We do not think, that with the spread out nature of employment and retail across the city, that the concept of city streets work as intended and do not give the flexibility that the grid roads do – both in respect of choice of route, or public transport innovation. We deplore the feature less boxes that were erected in the last 10 years as design lost out to housing numbers.

Which are essential to maintain in the future?

We consider it is essential to continue and maintain the grid roads and redways, and the landscaping/balancing lakes/linear parks. We also consider it important that innovative design of buildings is also encouraged.

Q2 Architecture and Design Standards

How can Plan MK ensure new development proposals meet high standards of design quality?

No comment

Should meeting best practice standards be mandatory through planning policies?

Yes, in our experience most developers will not deliver them without it being mandatory.

How should the policies promote or reinforce local distinctiveness?

No comment.

Given the patchwork character across the city in terms of housing design, should new developments seek to build on this legacy so as to create places with interesting and varied architecture that helps create a strong sense of place or identity?

No comment.

Should meeting the principles of flexible and extendable homes be a requirement for a proportion of homes on all major housing schemes?

Yes

Q3 Housing Density

Do you think it is right to continue the approach of having a mixture of housing densities on major development sites which varies with the character and surroundings of the site?

Yes

Do you think the approach of promoting lower densities in the rural villages should continue?

Yes

Are there locations that we should specifically encourage or support higher density developments?

No comment

Should we continue with density zones as in the Local Plan, or should the density for windfall developments be considered on the basis of being sensitive to the surrounding area without providing indicative figures in a policy?

We considered the Local Plan density zones are appropriate to continue.

Q4 Design Codes

Do you think the approach using Design Codes has been successful?

No comment

How do you think they could be improved?

No comment

Should they be more ambitious in terms of sustainability, establishing character or delivering high quality public realm?

Yes.

Should Design Codes be required through policy for use on development schemes of a certain size?

Strongly yes

Q5 Space standards

Do you think requiring new homes to meet a minimum space standard would be beneficial?

Yes – if the Parkland development is anything to go by – requiring new homes to meet a minimum space standard is the only way of ensuring new residents have sufficient space to live a reasonable quality of life.

Or should Plan MK include advisory space standards which set out the room/dwelling sizes we would expect but that would not be compulsory?

No, we consider a minimum space standard requirement is a must to prevent room sizes continuing to shrink as some developers seek to maximise the units they can cram in.

Q6 Self build and Custom build

Do you think the Council should find ways to support self and custom build housing?

Yes we consider this is more sustainable long term.

Should we allocate sites where we would expect development to take the form of self build?

We would suggest self build small sites or 2-3 dwellings could be allocated in rural locations, which would help with the lack of affordability in rural locations.

Should we explore the potential to use a Community Land Trust to help enable group/community self build?

Yes.

Should we require that a percentage of plots on large new housing developments are reserved for self and custom build homes?

No – this is non deliverable.

Q 7 Conservation and the Historic Environment

Are there any heritage issues that you feel are not addressed above?

No comment

Q8 Local Heritage List

Do you support the preparation of the Local Heritage List as a way of establishing the wider significance of Milton Keynes and identifying those assets that contribute to it?

Yes

Q9 Local Design Review

Do you support the establishment of a Local Design Review panel for Milton Keynes

No comment

Do you agree that it should also review heritage related proposals?

No comment