



The Civic Society For Milton Keynes

**MILTON KEYNES EAST  
STRATEGIC URBAN EXTENSION  
  
DEVELOPMENT FRAMEWORK  
SUPPLEMENTARY PLANNING  
DOCUMENT**

**A Response to  
Milton Keynes Council's  
Consultation Draft**

**October 2019**

## INTRODUCTION

1. We are concerned at the quality of the proposals contained within the Consultation Draft of the Development Framework Supplementary Planning Document for the Milton Keynes East Strategic Urban Extension (the Draft) and do not think that they are fit for purpose. As a supplementary planning document, the Development Framework must be in conformity with Plan:MK. In certain aspects, particularly relating to the highway layout, it is not. A strategic objective of Plan:MK and enshrined in Policy SD1 (Place-Making Principles for Development) requires that the grid road pattern is extended into major new development areas. We do not consider that the Draft demonstrates this and therefore the document in its current form is flawed and should be withdrawn, corrected and reissued for consultation.
2. Furthermore, we think that there are a number of fundamental strategic questions to be answered:

### **QUESTION 1: WHAT ABOUT THE REST OF THE LAND EAST OF THE M1?**

One of the key priorities enshrined in the Council's adopted strategic plan (2016 - 2020) is securing the future of Milton Keynes by continuing to support Plan:MK and supporting the aspiration that MK should grow to a population of 500,000 and beyond by 2050. We believe that it is clear that, once the M1 is breached, then there will be pressure to develop land further east and further south towards Junction 13. We feel that it is vitally important therefore to understand the context into which MKE will fit. We are pleased to note the inclusion of a Grid Road on the east side of the Plan Area but this is only part of the picture - we need to be able to see the full context. It seems a realistic assumption, in the absence of any evidence to date, that this land will be developed as part of the growth towards 2050 and a city of 500,000 people. It therefore seems a mistake to plan MKE in isolation and in the absence of a strategic overview for the area.

### **QUESTION 2: WHAT DO WE DO ABOUT JUNCTION 14?**

- a. The Draft makes little mention of M1 Junction 14 and we understand that the main highway network within it is predicated on the belief that it will discourage traffic that does not need to access the motorway from using the junction. We do not consider it likely that significant amounts of traffic will be diverted from the junction by a slightly more circuitous route for the A509. We think that this is both short sighted and a mistake. Junction 14 is vital to MK and it is important that it functions effectively. It must be one of the few early junctions on the M1 Motorway that has essentially remained unchanged in its basic layout from the day that it opened in 1959. Given the growth of Milton Keynes, it is surprising that this junction has not been substantially remodelled or replaced.
- b. We consider that it is therefore important that planning and design work is undertaken **now**, in conjunction with Highways England, to understand how Junction 14 will be remodelled at a future date so that we can ensure that, even if the work is not done in the immediate future, suitable land is reserved so that the work can be undertaken at the appropriate time. We note the comment made by Council Officers in the Public Meeting held by the Forum on 3 October that there is sufficient land reserved within the Draft to accommodate future work to improve the junction but this is not evident from the documents: it should be made explicit. We believe that there is a real risk that plans for MK

East will close off potential good solutions for upgrading J14.

### **QUESTION 3: HOW DO WE CROSS THE M1?**

It is our view that the proposed new bridge crossing of the M1 motorway is in the wrong place and that the crossing should be made at the Tongwell Roundabout on H4. As proposed in the Draft, the link onto Grid Road V11 makes an awkward and uncharacteristic grid road network connection: the justification being provided that it facilitates journeys to Central Milton Keynes. However one of the key functions of the MK grid is to spread traffic loads, particularly at peak times, by offering motorists alternative routes. H4 should be seen as an alternative route to the H3 for traffic entering MK from the north-east and as a more direct route to CMK. It has the provision to be dualled if the need arises. It also offers alternative routes for residents as they move about the city itself. The reservation for a second carriageway also offers the alternative of using that reservation for mass rapid transit.

The layout shown in the Draft, with an intermediary roundabout on V11 between H4 and H5 (H4.5?) and no E-W grid road within MK East removes the function of the grid for traffic from MKE who are travelling to the northern half of MK. Furthermore, the geometry of the road layout in the Draft area east of the proposed Willen roundabout tends to assume that traffic is flowing south (because there is no convenient E-W grid road to link to H4).

### **QUESTION 4: WHERE ARE THE GRIDSQUARES?**

- a. Policy SD1 of Plan:MK could not be clearer: "Proposals for new strategic extensions....should demonstrate that the following place-making principles have been considered.....The structure and layout of development within or adjoining the urban area of Milton Keynes is based upon the principles that have shaped the original city , especially the grid road system".
- b. The grid layout of Milton Keynes arose from a number of factors, amongst which were the need to plan for the growth of the car (a central plank of Government policy at the time) and a desire to promote a high level of interconnectivity for residents and others across the urban area (envisaging a "community without propinquity" as foreseen by Melvin Webber (1920-2006), who was MKDC's consultant upon urban society).
- c. The grid is important to MK because underpins two of MKDC's "Goals" in the planning of Milton Keynes: "Opportunity and Freedom of Choice" and "Easy movement and access, and good communications". Free-flowing grid-roads readily accessing many routes also serve public transport, van deliveries, HGVs and other commercial traffic.
- d. Therefore, "The Grid is Milton Keynes: Milton Keynes is the Grid".
- e. However, whilst it is apparent that MKE will have roads that might be thought of by many as "grid roads" because they see them as non-frontage high-speed roads within landscaped corridors, they are not "grid roads" in the proper sense of the term because they are not knitted together to form "gridsquares". Grid roads and gridsquares go hand in hand: one cannot have one without the other. It is what Plan:MK describes as "the grid road pattern" (Strategic Objective 12 p9 - Appendix F; Monitoring Framework Objective 12 p255).
- f. This dilemma is illustrated by Fig 3.1 in the Draft which shows three "Grid Roads", all independent of one another but without any links between them. They therefore cannot function as "grid roads" because they do not allow the multiplicity of route choices to users. Most damagingly, there are no East-West connections between them.
- g. We therefore believe that the basic structure of MKE needs to reflect the basic gridsquare/grid road model that has served Milton Keynes so well and we illustrate a possible way of achieving this in the Forum Plan at the end of this document.

**QUESTION 5: WHAT IS THE BEST LOCATION FOR THE PARK AND RIDE?**

Whilst the proposed location within the Draft would suit traffic coming into the MK urban area from the north-east it does not cope with traffic from the M1. It seems short-sighted to develop a second site so close to the existing Park and Ride at Junction 14 and we would argue that, rather than build a new, additional site, it is preferable that the latter should be enlarged: we understand that it is perfectly feasible to do this by building a road underneath H6 into Pineham east of the Broughton Brook.

**QUESTION 6: HOW FEASIBLE IS THE PROPOSED RAPID MASS TRANSIT ROUTE (RMTR)?**

The SPD has been prepared in the absence of an agreement upon the precise nature of "Rapid Transit" (ie fixed track or capable of upgrading to fixed track as illustrated in the concept options 35, 36 and 37 of the Council's draft Transport Infrastructure Delivery Plan) and its route in CMK and the wider network. There may be some merit in the route calling at the Coachway and the J14 Park and Ride site, which is a major city portal.

The thinking that underpins the proposed route should be explained. We note, for example, that the proposed new M1 bridge is to be a dual carriageway (ie four lanes) whereas we would expect six lanes if it is to contain a dedicated RMTR in addition to the cars.

We think it vital that the RMTR has to be considered as a citywide totality and it cannot be the subject of the type of piecemeal thinking evidenced within the SPD.

Furthermore any RMTR must be provided from Day One to enable its use by the first residents and development should closely relate to it and its stopping points.

**QUESTION 7: HOW IS MOULSOE TO BE TREATED?**

It seems a reasonable assumption (but see Question 1 above) that Moulsoe could be surrounded by development in due course as MK continues to grow to be a city of 500,000 and we feel that this ought to be recognised as part of this SPD in conformity with the aspirations of the Council Plan 2016 - 2020. We note that, in contrast to the development of villages in the original New Town Designated Area, it seems to be the intention to enclose the village in a green buffer, which raises a number of particular questions:

- a. What will be the function of Moulsoe? Although outside the Plan Area, the village provides key facilities - the Carrington Arms, the Millennium Hall and the Church of St Mary's - that will be used by the residents of MKE. The latter two will perform a particularly important social function, especially in the period before facilities are built within the Plan Area.
- b. We understand the concerns that residents will feel about the approaching development, which were also shared by residents of the villages within the Designated Area for the New Town. However, we would argue that such fears were unfounded and that both the villages and the city as a whole has benefitted from the sensitive integration that occurred.
- c. Development of MK East may well increase traffic through Moulsoe. How is this to be handled?
- d. We feel that the use of the term "green buffer" is a somewhat nebulous concept that raises a number of questions:
  - i. What is its function? Is it purely a visual screen so that the effects of new development cannot be seen from the village or does it have an additional function eg noise protection?
  - ii. What is its nature and width? A tree belt, open space or a mixture of the two?

- iii. How will it be secured in the long term? Will it be owned by the current landowner or will it be passed (with a suitable endowment) to a third party such as the Parks Trust or Milton Keynes Council?
- iv. Is it in the correct position? If it is seen as a "*cordon sanitaire*" to shield the village from development then we suggest that it is in the wrong place. Given the long term pressure upon development in the area the provision of such a buffer now would lead to an area of "no-man's land" between it and the village which would come under pressure for development in due course as Council officers have acknowledged when considering other development proposals. Therefore, if it is the wish to shield the village from development, we would suggest that the "buffer" take the form of a tree belt around the existing village envelope. However, given that this is outside the Plan Area it is logical that it be addressed at some suitable point in the future. We would suggest that, if a visual barrier is all that is needed at the present time, then there should be an active programme of reinforcing the existing hedgerows at the edge of the Plan Area with trees at the earliest opportunity.
- e. The Church of St Mary, Moulsoe is a noted building in the local landscape and can be seen from within the Milton Keynes urban area eg from Campbell Park and the H5, east of V8. A full landscape assessment should be undertaken to protect and enhance such views, as well as create others through the shaping of development in MK East.

We therefore think that the treatment of Moulsoe should be an integral part of the plan for MK East, if not necessarily as part of the Draft, then as part of a separate, concurrent Village Plan to show how it can be incorporated into development in a sensitive manner in due course. This is too important a matter to be ignored now.

**QUESTION 8: HOW DOES TRAFFIC CROSS THE GRID ROADS?**

By "traffic" we mean vehicles, cycles and pedestrians and "grid roads" includes the A509.

- a. The gridsquare development pattern established by MKDC, as set out in the Milton Keynes Planning Manual, was based upon a Main Local Route (for cars, buses and cycles) that connected gridsquares with one another, usually passing either above or below the intervening grid roads (see eg NEMK - Willen, Willen Park, Bolbeck Park and Giffard Park). Together with this, facilities were located at the gridsquare entrances so that they could be shared between gridsquares in accordance with the principles underpinning the Plan for Milton Keynes whilst also being easily available to those from outside the immediate area. It is a model that has served the city well and we would expect it to be replicated in MKE.
- b. The A509 forms a major barrier to the north of MKE and, while we would not expect the provision of grade separated crossings for cars, it is critical that there should be some for cyclists. The "Opportunities" shown on Figure 4.8 should be "Requirements".
- c. The opportunity that should be taken to create a road into MK East through a junction with North Crawley Road east of its bridge over the A509. This will enable buses, cyclists and pedestrians to cross the A509 safely between MK East and Newport Pagnell, and the provision of a more efficient bus service connection, as well as providing better access to the MK grid

**QUESTION 9: WHAT IS THE SCALE OF RETAIL PROVISION?**

- a. We are concerned about the nature of the retail provision. The Draft refers (eg 4.4.9) to a "District Centre" forming the heart of the community. Plan:MK has a defined retail hierarchy (Table 6.2) which defines the "District Centres" in MK as being Newport Pagnell,

Olney, Stony Stratford and Woburn Sands. We also note the comments in 4.4.10 about MKE not impacting upon the viability of Newport Pagnell. We suggest that this is muddled thinking.

- b. It is our view that the area does not need a "District Centre" but that it requires three Local Centres – one "Major" and two "Minor". The former would be in close proximity to the area denoted as the "District Centre" and Shenley Church End Local Centre is a good example of the nature and scale of provision required, albeit with a smaller supermarket (the Sainsbury's was a later addition). There should be one "Minor" Local Centre in the west (see eg Walnut Tree West) and one in the east, where a larger range of units is appropriate given the proximity of the employment areas and Moulsoe: Heelands and Walnut Tree East Local Centres are appropriate models of the range of provision that we think appropriate.
- c. Whilst we support the requirement not to compete with Newport Pagnell Town Centre this should not be at the expense of providing a vibrant range of facilities for the residents of MKE. As an example, Greenleys Local Centre has a good range of shops and sits quite happily between Stony Stratford and Wolverton without having apparently impacted upon the viability of either. We would suggest that this matter can be controlled by limiting the amount of retail floorspace and, if appropriate, the maximum unit size. We would presume, for example, that a supermarket of 3,000 sq ft would be acceptable whereas one of 30,000 sq ft would not.
- d. We think that it would be helpful to look at the new and existing local centres in MK to analyse how they work, their assets and their shortcomings. For example, Neath Hill contains a car repair workshop – an excellent asset for the local area but not a use that one would traditionally associate with such developments.

**QUESTION 10: WHAT DO WE DO ABOUT COMMUNITY BUILDING?**

Recent development in MK shows that we seem to have lost the art of community building, which underpins the development of successful cities. This is particularly demonstrated by the Western Expansion Area, where there are now over 1,000 homes but no shops or permanent health centre (although one is currently under construction, as is a secondary school).

We think that the SPD (or subsequent documents) should indicate a clearly agreed pattern of development, potential timescale and provision of facilities – shops, schools and meeting places, using temporary accommodation if necessary.

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**QUESTION 11: HOW DO WE RECOGNISE ELECTRIC BIKES?**

The use of electric bikes will increase and should be encouraged and accommodated within the planning for the growing city. Whilst this is not necessarily the function of this SPD we feel that it would be appropriate to increase the width of redways in MK East to accommodate them.

**QUESTION 12: WHAT ABOUT COTTON VALLEY?**

There is no mention within the document about the fact that MKE is downwind of Cotton Valley Sewage Works (the prevailing wind direction in MK is from the south-west). We understand that odours are particularly noticeable in the Plan Area and ask what specific assessments have been made regarding this particular aspect, whether mitigation measures are necessary and, if so, the nature and programme for them.

**QUESTION 13: WHAT ABOUT CLIMATE CHANGE?**

MK Council has declared a climate emergency. It has said that 'Milton Keynes will strive to be carbon neutral by 2030 and carbon negative by 2050 while creating one of the world's most truly sustainable economies and models for growth'. There is no mention of this anywhere within the draft documentation.

For MK East to contribute to 'carbon' reduction:

- a. All housing could be designed to Passivhaus or equivalent standards. This would substantially reduce the need of energy for heating or cooling and should reduce the risk of indoor over-heating in a warming world. To build to a lower standard would necessitate expensive thermal retrofitting at a later stage that would be costly and less effective.
- b. Each home should be provided with individual electric vehicle re-charging points (re-charging during the night uses off-peak electricity, which is beneficial for the grid-system load, reduces cost to the consumer and ensures a full recharge. It will also reduce conflict between residents). Water efficiency measures should also be installed, as water supply has significant energy use.
- c. Housing should be orientated to optimise solar gain. All roof-space possible should carry Photovoltaics on industrial and commercial buildings as well as housing
- d. Industrial and commercial buildings should be designed to high thermal efficiency standards and assessed against BREEAM or equivalent standards.
- e. The layout and landscaping of housing should achieve high levels of shading by provision of plentiful street trees, grassed areas, and areas of woodland that provide shade, improve humidity and reduce the 'urban heat island effect'.

**QUESTION 14: WHAT HAPPENS NEXT?**

It is clear from the comments of the attendees at our Public Meeting and from speaking to others that some of the key points expressed in our response to the draft SPD are shared by others, particularly the abandonment of the gridsquare concept pattern that has underpinned the successful development of MK, which is contrary to Plan:MK. We note other failings eg Plan:MK Policy SD12(4) refers to a "grid road connection to H4" and yet nothing is shown. We need to understand why the Council is apparently ignoring its own plan, or whether this is just an oversight.

We would therefore hope that the Council recognises the depth of concern and responds accordingly by arranging a public meeting/workshop at which these matters can be discussed in further detail. The Forum would be pleased to be part of these discussions.

## SPECIFIC COMMENTS

We have the following specific comments and questions upon the documentation:

Figure 1.2	We feel that the eastern boundary of the area which, we understand, follows an ownership boundary, is perverse and does not make for good planning. There are strong hedgerows in this area which make natural boundaries and should be followed. This is particularly important when considering the nature of the 'green buffer' to Moulsoe (see our earlier comments). The boundary should therefore be amended to match existing field boundaries.
1.4.1	The statement about Community Engagement should be altered to denote its limited extent: the scope of the group was limited, meetings were not publicly advertised and invitations were not made to properly constituted citywide amenity groups such as MK Forum. The wording of the opening sentence should be amended to <i>".....by Milton Keynes Council, following limited consultation with some local stakeholders and the major landowner interests (but not including groups and civic societies with a citywide remit"</i> .
1.4.2	See 1.4.1: amend wording to add at end <i>"The Group did not include citywide groups and organisations such as Milton Keynes Forum"</i> .
1.6.6	<p>The reference to the NPPF and "following Garden City Principles" is welcomed. However, such principles, as defined by the Town and Country Planning Association are demanding: "Garden City Principles are an indivisible and interlocking framework for their delivery, and include:</p> <ol style="list-style-type: none"> <li>1. Land value capture for the benefit of the community.</li> <li>2. Strong vision, leadership and community engagement.</li> <li>3. Community ownership of land and long-term stewardship of assets.</li> <li>4. Mixed-tenure homes and housing types that are genuinely affordable.</li> <li>5. A wide range of local jobs in the Garden City within easy commuting distance of homes.</li> <li>6. Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.</li> <li>7. Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.</li> <li>8. Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.</li> <li>9. Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport." <p>Many of these principles are not evident in the Draft eg land value capture, community ownership of land and this issue must be addressed through further engagement with the landowners and the local community as part of the revision to this document.</p> </li></ol>
1.7.1	It should be noted that the HIF bid was based upon a road layout that had not been subject to public consultation nor indeed an approved SPD. Add following wording at the beginning of the section: <i>"In advance of the SPD and prior to submitting the draft SPD for public consultation, ....."</i> Also, if the HIF bid is successful, can that bid be

	used to finance a bridge in a different location over the M1, such as that strongly advocated by the Forum, or would that have to be referred back to the DfT?
2.2.3	See comment on Figure 1.2 above. The eastern boundary should be amended to follow existing hedge lines and field boundaries.
2.3.6	Amend wording if decision taken to amend eastern boundary - see Figure 1.2 above.
2.4	There is a key view of the site from H5 east of V8, where Moulsoe Church is particularly prominent.
2.8	Figure 2.11 should be amended to: a) include the churches b) identify Newport Pagnell as a District, rather than a Local, Centre c) include the Green Park Local Centre d) identify Ousedale and Green Park Schools as separate facilities and with separate catchment areas.
2.9	Figure 2.12 identifies the Caldecote Deserted Medieval Village site, but this does not feature in any of the subsequent land use planning drawings. Other such sites within MK have been protected and incorporated into areas of parkland, rather than destroyed, and the same should happen here. We suggest that the land use for this particular area should be put in abeyance until detailed archaeological work has been undertaken. It is an important local feature that should be exploited. It should therefore be shown on Figs 3.1; 4.1; 4.7 and 4.8.
2.11	The precise nature of the Tunnel Sewer easement should be explained as it is a major constraint upon development. Can it be incorporated into private gardens, for example, or must it stay in public land? The sewer easement should be shown on Figs 3.1; 4.2; 4.7; and 4.8.
2.12.1	The wording of the first bullet point on p30 should be changed from " <i>could be extended</i> " to " <i>should be extended</i> ". The wording of the first bullet point under "Heritage" should be amended to read " <i>....hotel within the site, the Deserted Medieval Village and the Grade I....</i> " Under "Utilities" add suitable wording to clarify the extent to which land within the easement area can be treated eg can roads be built over it; can it be incorporated into private gardens? etc
3.1.1	See comment on 1.4 above regarding public engagement. Amend wording to add " <i>, subject to 1.4.1 above</i> " after "Local Stakeholder Group".
3.2	The Vision is flawed in that it does not recognise the fact that MKE should be an integral part of the wider Milton Keynes urban community. Whilst it may be appropriate to have a separate architectural identity, MKE should not turn its back upon the rest of Milton Keynes - its residents should feel part of the larger city and should welcome those from elsewhere. The Vision seems to be based around an assumption that MKE is a primarily a residential area and ignores the substantial employment areas that will primarily relate to the M1. The Vision should recognise that there are four separate character areas - M1 corridor; Ouzel Valley; Ouzel Valley West and Ouzel Valley East. It should recognise the reality that the width of the Ouzel valley will lead to the creation of separate communities on either side of it, as witnessed in eg Furzton (where the width of the valley is less than it will be across the Ouzel and its floodplain in MK East). Amend wording to add a new opening paragraph..." <i>Milton Keynes East will be planned to be an integral extension of urban Milton Keynes and provide a high level of</i>

	<i>connectivity with the rest of Milton Keynes (including Newport Pagnell) for both its own residents and the residents of the wider city who wish to visit Milton Keynes East".</i>
3.3	<p>Insert new opening bullet point: <b>Climate Change:</b> <i>Milton Keynes Council has declared a climate emergency and the development should be designed to be, at worst, carbon neutral and, preferably, carbon negative".</i></p> <p>"Strategic routes and connections" should recognise the need for residents of MKE to access facilities across the whole of the urban area of MK west of the M1 and vice versa.</p> <p>"Quality placemaking" should be amended following reconsideration of the nature of the Green Buffer (see Question 7 above).</p> <p>"Green and blue infrastructure": The opportunity should be created to use this in a dynamic way eg by considering the SUDS requirements across the whole area as one to see if it is feasible to create for significant facilities than would be otherwise possible.</p>
3.4.1	<p>Delete reference to "District Centre" and replace with "<i>Major Local Centre</i>" and add additional bullet point "<i>minor local centres in the east and west of the Plan Area adjacent to the Primary Schools</i>".</p> <p>Amend penultimate bullet point to read "<i>Willen Road to be retained and upgraded to full Grid Road status</i>".</p>
Figure 3.1	<p>We are concerned about the interfaces between the employment and residential areas, particularly in the light of recent experiences in Blakelands. We therefore think that further consideration needs to be given to this, particularly in the area west of the Ouzel Valley. We think that the opportunity should be taken to reconsider the land uses and we feel that the parkland setting could offer a good site for campus offices. If there are to be adjoining sites for residential and warehousing, a minimum distance between the two should be specified together with the width, nature and long term ownership of any intermediary tree belt.</p>
4.2.3	<p>We are concerned about the impact of the grid road on the eastern boundary of the Plan area, which needs to be designed sensitively to avoid it dominating the landscape. The following wording should be added: "<i>The grid road on the eastern side of the Plan area should be designed sensitively to avoid it dominating the area. The scope for a linear landscape of trees and hedgerows to the east of the road would enhance the area when viewed from all directions and create a connected feature to benefit biodiversity</i>".</p>
4.2.6	<ul style="list-style-type: none"> <li>• Traffic speeds on the A422/A509 are not "unrestricted" but subject to the national speed limits. Amend wording to read "<i>subject to national speed limits</i>".</li> <li>• The "noise measures" should be identified. MKDC used to have a restriction that no dwellings should be placed within the 68dB(A) corridor.</li> <li>• Investigations should be undertaken to determine the extent to which noise may "leak" through the gap formed by the River Ouzel</li> </ul>
4.2.7	The Plan should identify the height and nature of any noise bund.
4.2.8	See earlier comments about the nature of the "Green Buffer".
4.2.9	<p>Presumably this means ""west" of Moulsoe rather than "south"?</p> <p>See earlier comments about the importance of identifying the nature of this boundary at the outset.</p>
4.2.24	<p>The opening sentence should be deleted. Given that, at the outset, there will not be residents and, therefore, there will not be "waiting lists" it could be used as an excuse not to provide any at all. Amend sentence to read "<i>Allotments should be provided on the basis of 0.25/ha per 1,000 population</i>" - which is the standard in the Milton Keynes</p>

	Planning Manual. Amend Figure 4.1 accordingly.
4.3	See earlier comments about the Movement Framework. The High Street is at the natural location for a grid road and should be changed to a grid road as show on the Forum Plan which relocates the district centre (redefined as a major local centre) immediately to the south- west, thereby making the high street unnecessary. Additionally, we are concerned that the sketch of the 'high street' at Figure 4.3 looks very similar to Countess Way following the removal of the bus lanes and their replacement with parking bays. We hope that the Council does not wish to repeat the errors of the EEA.
4.3.6	There is inconsistency as to whether Willen Road is to be upgraded to a Grid Road and whether it is to be dualled along its entire length, including the bridge over the motorway - fig 3.1 show that it is whereas 4.3.3 <i>et seq</i> is silent on the matter. The local distributor road linking Willen Road to the grid road leading to the new M1 bridge performs a vital function because it is the only east-west route through MKE. It will need to be a full link to enable all of the residents of the area to access the facilities in MKE and cannot be severed eg with a bus gate.
4.3.13	<ul style="list-style-type: none"> <li>• Indicative redway routes should be shown on Fig 3.1 (Concept Plan).</li> <li>• Running a redway along the middle of the High Street needs to be carefully considered - how will cyclists cross the road at the end of the High Street, for example, where it meets the grid road.</li> <li>• There should be a redway link to Moulsoe and beyond.</li> </ul>
4.3.14	The route of the bridlepath on the eastern side of the Plan Area (see Figure 4.2) will be severed by the construction of the easternmost grid road. It should be made clear that the bridlepath will be realigned prior to the start of construction work to enable a continuous route to be maintained, incorporating grade-separated crossings of the grid road as necessary.
Figure 4.3	The precise nature of the "High Street" needs to be properly considered. As designed, it should be severed for car traffic with a "bus only" link in the middle as being the only way to prevent "rat running". Note, however, that this will inconvenience residents living in the eastern part of MKE who might want to travel by car to the western half.
Table 4.2	<ul style="list-style-type: none"> <li>• The Grid Road design speed should be 85kmph (even though the speed limit may be higher) - see MK Planning Manual (p47).</li> <li>• The Grid Road corridor should be 40m from the centreline when passing through a housing area, 30m though other areas (MK Planning Manual p47). Some of the grid roads, principally sections of the major dual carriageways were designed to a higher speed: V8 Marlborough Street being one. Since a grid road link is provided from the dual carriageway Newport Pagnell bypass (which is a national primary route) links to M1 J14 and to H5 Portway and H6 Childs Way beyond (both dual carriageways) and on to CMK, this is such a (grid) road where one would be looking to achieve a higher design speed of 100kph if and where possible.</li> <li>• There is confusion in the table between what is described as 'design speed' and 'speed limit: what is set out appears to be the desired speed limit. By way of illustrating this point, many country lanes are subject to the national speed limit of 60mph although of course they are not by their nature designed for a speed of 60mph. Also it is unreasonable to expect the primary street as sketched to have a speed limit of 20mph. The primary streets illustrated are generally straight and some are quite long. Where 20mph speed limits have been tried, national research shows that the speed limit is ignored for roads like the illustration.</li> </ul>

Figure 4.5	The design of the Public Square needs to be carefully considered. The one shown seems to replicate the one in Warwick Avenue, Brooklands, which suffers from a lack of intimacy.
4.4.3	The amount of land for self-build housing is inadequate and does not recognise the demand from this sector.
4.4.9	<ul style="list-style-type: none"> <li>• See earlier comments about the use of the wording "District Centre".</li> <li>• The range of uses should be widened to include small-scale offices and workshops - see eg the workshops alongside the Cross and Stable Church in Downs Barn as well as the car repair workshop in Neath Hill Local Centre. Such uses should be encouraged to enhance the vitality of the centre.</li> <li>• Provision for co-working office spaces should be made in the larger local centre.</li> </ul>
4.4.19	See earlier comments about the scale of this Local Centre.
4.6.1	This needs to be expanded in the light of the Council's emerging "carbon neutral" policies. What do we do, for example, with the spoil that arises from the siteworks? Will it be used to create noise bunds along the M1?
4.6.7	We are concerned about the general treatment within recent schemes of SUDS areas and the way that they can appear as unattractive, steep sided "bomb craters". We think that, in an area such as MKE the opportunity should be taken to develop a combined SUDS network that provides a genuine landscaped environment of benefit to the whole city. The following wording should be added " <i>The opportunity should be taken to think creatively about the SUDS requirements from the whole area and there should be a single co-ordinated plan for this from the outset to ensure the most efficient use of resources and the establishment of a meaningful area of water, if that proves feasible</i> ".
5.1	We are particularly concerned about phasing and the build-up of community facilities to support the population - see earlier comments.
5.4.3	We support the early involvement of the Parks Trust and the open space management strategy and its long-term financial endowment is a key matter that should be considered at the outset. It is important that proper walking routes are planned within the new Linear Park incorporating plentiful crossings of the River Ouzel to enable residents and visitors to make circular walks (which is a failing of the parkland on the upper Broughton Brook, north of Magna Park).

## THE FORUM PLAN

As a result of our concerns, a working party from the Forum has prepared a draft plan, as below, of an alternative way to develop MK East. It should be noted that it is a sketch plan only and is based upon information contained within the draft SPD: we have not consulted any of the landowners or interested parties. We are all too conscious that it will have shortcomings but feel that it is important to submit some form of diagram to accompany our comments.

It is based upon the experience of our members and, we believe, indicates a realistic general approach to development using the principles that have served the city so well in the past as well as those set out in Plan:MK.

It contains the following features:

1. The Grid Roads are numbered for ease of identification.
2. A Major Local Centre at the junction of H4 and V12 with a mixture of shops, offices and residential uses. It should also contain at least one of the two proposed schools and provide easy access to the other. Shenley Church End Local Centre is a good model for its range of uses and the way that it connects under V4 to the school and pub in Loughton.
3. A Minor Local Centre at the junction of H4 and V11 to incorporate a convenience store and the primary school. This will also provide facilities for the employees of the adjacent employment areas.
4. A Minor Local Centre at the junction of H5 and V14 to contain a convenience store with, possibly two/three other units as well and the Primary School to serve both MK East and Moulsoe as well as the adjacent employment area.
5. The redesignation of the area south of H4 (formerly residential) for employment - we suggest a site for a campus office overlooking the valley of the River Ouzel.
6. We note the proposal in the Draft to downgrade London Road, on the basis that it will not provide a through route for vehicles other than public transport. We feel that there might be merit in providing a new grid road east of the Holiday Inn, which we have shown on our plan.
7. Indicative extensions for H4, H5 and V13 outside the Plan Area to address the requirement in the Plan for future-proofing.
8. Whilst proposing a new bridge over the motorway as a grid road extension of H4 Danstead Way, we propose to keep the historic Willen Road bridge over the motorway for pedestrians and cyclists. Removal of this route for vehicular traffic will avoid reconfiguration of Tongwell roundabout, enabling it to accommodate the proposed new crossing of the motorway as a direct extension of the H4 grid road.



**SKETCH PLAN SHOWING POTENTIAL ALTERNATIVE WAY TO DEVELOP MILTON KEYNES EAST**