



The Civic Society For Milton Keynes

PLAN:MK

LOCAL PLAN FOR MILTON KEYNES

**A Response to
the Draft Plan Consultation by
Milton Keynes Council**

June 2017

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EXECUTIVE SUMMARY

Our argument is this:

Plan:MK has many faults and omissions: it has the feel of a document that has been written and assembled in haste.

Major decisions seem to have been made at the last moment without their implications being fully worked through: for example, the period covered by the plan was reduced from 2017-36 to 2017-31 and the northern expansion area was omitted.

The reduction in the plan period gives it a life of only fourteen years.

The evidence base is lacking; for example, there is no explanation for the rapid growth in employment figures over the last few years and the weaknesses in the associated housing output.

But there are some good policies in this draft plan, which we would like to see implemented. However, Milton Keynes is at a critical phase where uncontrolled growth is mainly in the hands of the large developers: this would see the continued erosion of aspects of and values behind the original city we hold dear. For example, the plan should require that there be a continued development of linear parklands and local landscapes to be transferred to the highly valued Parks Trust with endowments to manage them in perpetuity.

Our concern is that we do not think that local authority planning and development control systems are an adequate vehicle for realising many of these policies.

We do not think the Duty to Cooperate is a strong enough basis for the making of major developments of high quality across local authority boundaries. The proposed Statement of Common Ground is similarly weak.

Our conclusion is that we need to work with adjacent local authorities to:

- **agree the preferred directions of growth;**
- **establish a Development Corporation to cover the general areas of growth;**
- **task it with drawing up a fifty-year plan for growing Milton Keynes and the surrounding area, crossing local authority boundaries as necessary; and**
- **use its powers to implement the plan using many of the policies in Plan:MK including those put forward by the Forum.**

This strategy has implications for Plan:MK:

- **land must be allocated now for development during the period between its adoption and the establishment of the Development Corporation without compromising the fifty-year plan, whether it be the rolling five-year allocation for housing or allocations for other immediate land and transport uses;**

- **its policies would be bolder as Development Corporations have greater flexibility in the way in which they work and can set about a development strategy avoiding the restrictions on a local authority;**
- **if it is granted the powers to purchase land at agricultural rates with some hope value, and then sell that land for other uses, the Development Corporation will have a resource that can shape development in a way that a local authority is unable to. The need to use compulsory purchase powers would have to be demonstrated in relation to a 50 year strategy in all its complexity and qualities which could not be implemented by the private sector.**

We have therefore taken the view that Plan:MK must continue through the adoption process but, if it is to be used as the policy base for a fifty-year plan and for development control decisions either before the Development Corporation is set up or for sites outside its remit, then it must have as strong a policy base as is possible.

What follows are our proposals for creating just that.

For this strategy to be implemented, it is essential that the relevant local authorities approach Central Government with the request, referred to in their White Paper, to establish the Development Corporation for Milton Keynes and the surrounding area quickly.

GENERAL COMMENTS

- 01 Milton Keynes Forum is the civic society for Milton Keynes and the surrounding area. It was founded in 1987, which was before the Milton Keynes Development Corporation was wound up in 1992.
- 02 It has a long record of commenting on draft local plans, design briefs, development plans, and planning applications. It has observed and commented on the development of planning policy within the Council and its application since it was founded.
- 03 The Milton Keynes Forum has always had high aspirations for the development of the new city. It has supported its growth on condition that such growth is done well.
- 04 In this context the Forum is concerned about the version of Plan: MK, which is the subject of this consultation. It is lacking in:
- an understanding of the challenges that Milton Keynes faces in the long-term.
 - an adequate evidence base;
 - an overall Proposals Map;
 - consistency in both the text and the proposed policies; and
 - any practical vision, particularly failing to acknowledge the existing successful characteristics of land use such as the Linear Parks.
- 05 The challenges facing Milton Keynes include:
- ensuring that the impact on climate change and environmental damage is minimized in new developments and reduced in existing settlements;
 - responding to the pressure on housing and the growth in jobs without compromising on quality;
 - ensuring that local authority boundaries do not impede a coherent pattern of growth;
 - achieving the annual growth rate in housing when having no control over the rate of delivery;
 - achieving in the areas of future growth the best qualities of the earlier areas of Milton Keynes;
 - achieving design quality across the city;
 - reducing or eliminating homelessness;
 - upgrading an inadequate public transport system that if just extended to cover new development will fail to meet the needs of the new city;
 - responding to the need to properly maintain and manage the infrastructure of highways and green space;
 - growing public services and community development as the city grows; and
 - putting in place appropriate governance to ensure that these challenges are met.
- 06 Plan:MK refers to significant documents not available as part of this consultation which will form part of the evidence base for the Plan. It refers for example to the Milton Keynes Retail Capacity and Leisure Study 2017 and to an Open Space Assessment being prepared: neither is publicly available.
- 07 There is no Proposals Map: for most areas of the Borough, the impact of Plan:MK on a property or locality cannot be seen on the Map, which is not reassuring.

- 08 There seem to be parts of Plan:MK where there is a lack of consistency between the supporting text and the proposed policies. For example, it describes the substantial infrastructure put in to managing and reducing flood risk as part of the development of the new city, on a scale not seen elsewhere in the Borough. It then seeks to steer all new development towards areas with the lowest probability of flooding. If interpreted literally 'all new development' would be located into the urban area. This contradicts the growth policies set out elsewhere.
- 09 Throughout Plan:MK there is a lack of vision, for example not seeing what Milton Keynes could do to significantly reduce its contribution to climate change; or failing to acknowledge the existing successful characteristics of land use such as the Linear Parks.
- 10 The draft is evidently rushed and needed more time for its proper preparation. Only a few months before this version of the plan was issued for consultation, the Council were proposing a Plan:MK for the period to 2036 and now, it is only to 2031.
- 11 Plan:MK should acknowledge and respond to proposals of adjacent Local Planning Authorities, and to co-operate actively with those authorities. Likewise it should acknowledge and respond to sub regional proposals such as the Cambridge-MK- Oxford Corridor and the work of both the National Infrastructure Commission and the MK2050 Futures Commission. It is clear that the Duty to Cooperate does not achieve what is required.
- 12 The Forum considers it unreasonable to be consulted by Milton Keynes Council on such an incomplete plan. However a detailed response follows.

Conservation of the Environment

- 13 Climate change scientists are most concerned that the increase in temperature of the planet will exceed the critical 2⁰C earlier than previously predicted and that the targets agreed at the Paris Conference are inadequate. In 2013 CO² levels surpassed 400 ppm (405.6 ppm in March 2017) for the first time in recorded history.
- 14 In the first decade of this century CO² emissions rose faster than ever before; global temperatures are rising; and recent events have demonstrated shortcomings in way in which land and settlements are designed and managed to cope with, for example, periods of intense rainfall.
- 15 We need to reduce and eliminate the emission of CO² but climate change is happening and we therefore also have to mitigate its effects.
- 16 Some argue that the UK, which has historically been polluting the planet disproportionately, should set itself the target of zero carbon emissions by 2030 (see *Zero Carbon Britain*, Centre for Alternative Technology, 2007).
- 17 (When we say zero carbon we mean:
*A **zero carbon** building, activity, business, etc., is one that does not cause any carbon dioxide to be added to the atmosphere;*

not:

*If a person, organisation, event, etc. is **carbon-neutral**, it does things such as planting trees to reduce carbon dioxide by the same amount as it produces it.*

(Cambridge Dictionary on-line)

18 While UK targets are outside the scope of this plan, given the proud history of Milton Keynes in developing and implementing energy conservation in buildings and the recycling of waste, the Forum believes that strong environmental policies are possible in a local plan and that this plan should include them.

19 For example:

- the policy from the Core Strategy that the implementation of higher than national requirements for sustainable homes and buildings is not included in Plan:MK;
- areas are identified for growth without any assessment being made that ensures the easy use of public transport; and
- proposals are made to build on agricultural land without mitigation for damage caused.

20 The Forum therefore puts reducing the impact of new development on the environment at the heart of the Plan. Strategic Objectives should include:

The overriding objective of the plan is to achieve Zero Carbon by 2030. Policies that ensure that all new development avoids adverse impact on the natural environment, slows the growth in CO² and mitigates the impact of climate change include:

- *no development above 100 houses or above 1000 m² of non-residential uses to be permitted without easy access to good public transport (a reasonable service would be a route within 5 minutes walk with vehicles running at ten minute intervals, going either to your destination or to an interchange onto the route to your destination);*
- *all new buildings to be built to passivhaus (passive house) standards or the equivalent for non-residential buildings;*
- *all new buildings to be used to generate 50% more electricity than is needed by its occupiers;*
- *new developments to mitigate the effects of the inevitable changes in our climate by, for example including drainage systems that can withstand current and anticipated rain storms;*
- *new developments to include green space that encourages biodiversity and links them to a network of linear parks of a size and standard similar to existing green spaces in Milton Keynes.*

Policies that ensure that the existing building stock in Milton Keynes is brought up to equivalent standards to those in new developments include:

- *a review of public transport to be carried out to create a system that would attract car users away from their cars and uses electric vehicles with electricity generated from sustainable sources;*
- *an extension of policy D5 of the Local Plan to provide additional funding for improving the performance of the existing stock, especially the standards of thermal insulation;*
- *to enable local energy generation, (including district heating schemes) throughout the Borough in order to compensate for the unacceptably high CO² emissions from the existing stock.*

The Council will encourage farmers to adopt practices that make their farms habitats for wildlife again and that move Milton Keynes towards Zero Carbon 2030.

- 21 The Forum is aware that some of these policies fall foul of the National Planning Policy Framework's requirements for local plans, but consider this to be an additional argument in favour of establishing a Development Corporation – see the Summary above and the section on Governance, below.

Growth

- 22 The rate of growth in jobs in Milton Keynes shows that it remains an excellent location for business and the consequential provision of housing, public services and other facilities.
- 23 This rate of growth has always been a substantial challenge for Milton Keynes. It has always had to ensure a balanced supply of land and that public services keep up with the growing demand for homes.
- 24 Until 1997 local plans reflected the land uses inherited from the Development Corporation. The promotion of the east and west flanks by the Commission for the New Towns was the first significant addition of land to the original master plan for Milton Keynes.
- 25 Disappointingly, decisions were taken to depart from the principles of the master plan and at the same time to ignore the strong probability that Milton Keynes was destined to continue to grow.
- 26 We must not make the same mistakes again. Any immediate plans for growing the city must be taken within a long-term strategy, at least for fifty years.
- 27 The Forum considers it essential that a long-term plan for the development of MK be prepared (the MK master plan was after all drawn up in the late sixties and is still more or less being implemented, despite departures from its principles on the east and west flanks). This fifty-year plan would inevitably cover parts of Aylesbury Vale, Central Bedfordshire and perhaps South Northants, all within the catchment area of Milton Keynes and perhaps beyond.
- 28 This is consistent with the report into the examination of the Milton Keynes Core Strategy (2013) which said that 'the most significant policy deficits and planning challenges that may arise...are related to cross boundary issues and the ability of the borough to respond to demographic and economic change' and that 'an early review is needed for greater clarity about the role that Milton Keynes and its hinterland will play in the longer term', a sentiment repeated in the report of the MK2050 Futures Commission (July 2016).
- 29 Until this long-term strategy has been prepared, it will not be clear that the suggested sites for growth will fit in with it. There are therefore two areas of uncertainty which should be resolved urgently:
- growth areas that might be deferred or dropped altogether as a result of the adoption of the fifty-year plan; and
 - agreeing the route of the Oxford to Cambridge expressway, which will prevent some growth areas going ahead.

It is essential therefore that a Development Corporation be established with the fifty year strategy and the route of the expressway settled within the first few years of Plan:MK, that is to say by 2020. It is urgent.

- 30 Our preference is for new development to relate to the East - West development corridor, with the East - West rail link and the Oxford to Cambridge expressway rather than to the West Coast mainline and the M1 motorway.
- 31 Within the fifty-year strategy, high level jobs such as science parks would need to be distributed along the corridor which should not be used for housing only, as this would make the growth areas for Milton Keynes dormitory settlements for London, Oxford and Cambridge which is not desirable either socially or for the pressure it would put on the transport system.
- 32 As most of the proposed urban extensions are deferred to 2026 and beyond, the long-term strategy can be prepared and adopted without interrupting the intended supply of new housing (about which we are sceptical, see below).
- 33 Keeping the impact of new development on the environment at the heart of the Plan, the Strategic Objectives should therefore include:
Within the overriding objective of achieving Zero Carbon by 2030, policies for the extension of Milton Keynes include:
- *the urgent preparation of a fifty year long-term strategy for the development of Milton Keynes and the surrounding areas;*
 - *until this is in place, only development that does not compromise the long-term development strategy will be permitted;*
 - *this precludes the following strategic sites for which permission to develop will not be granted before the long term strategy has been approved, and then only if they form part of the strategy:*
 - Strategic Urban Extension Milton Keynes East;*
 - Strategic Employment Allocation South Caldecotte;*
 - Strategic Urban Extension Milton Keynes South East; and housing sites in Aylesbury Vale (outside the boundary of this Plan) identified as WHA001 and NLV001.*

Governance

- 34 There is one serious difficulty with the approach to the expansion of Milton Keynes suggested in the previous section: the local authority boundaries within which Plan:MK has to work. In places the new city is built to the local authority boundary and elsewhere up to areas where it would not be acceptable to build. The conclusion reached in the Plan is to add urban extensions to the existing city where it is possible, for example East of the M1, rather than preparing a master plan that crosses local authority boundaries.
- 35 There is a limit to how long this approach can be pursued without undermining the original intentions of MKDC's master plan.
- 36 However, the Duty to Cooperate between local authorities is not strong enough to deal with a long-term strategy that crosses local authority boundaries.

37 The Government White Paper (February 2017) says:

We will also legislate to allow locally accountable New Town Development Corporations to be set up, enabling local areas to use them as the delivery vehicle if they wish to.

(We are not aware that new legislation is required, as we believe that the powers to set up Development Corporations has never been repealed.)

38 The Forum considers that a long-term strategy not restricted by local authority boundaries can only be prepared by a body such as a Development Corporation. A joint approach to Government by the authorities referred to above would be desirable, so long as a sense of urgency was maintained.

39 One of the advantages of a Development Corporation under existing legislation is that it has the resources it needs. It can then use these resources, for which forward funding would be required to cover the gap between land purchase at existing use values plus hope value and sales, to invest in whatever is necessary, including social provision, to create housing and employment developments of quality and at a rate that it is able to determine.

40 We note the reference in the 2017 Housing White Paper to locally accountable Development Corporations, which we support: the Oxford to Cambridge corridor is a national project requiring an independent Board and staff of the highest calibre which must not get distracted by local politics, yet needs to be aware of local sensibilities.

41 The Forum therefore proposes that the strategic objectives include:

In parallel with the preparation and adoption of Plan:MK, Milton Keynes and the other relevant adjacent authorities should approach Central Government as quickly as possible with the objective of creating a Development Corporation covering land around the city and beyond for which its first task would be the preparation and adoption of the long-term strategy.

Design Quality

42 The quality of design of individual buildings and places is a key issue for both the National Planning Policy Framework and Plan MK. They both give general descriptions as to what good design might be, but give little detail as to how this could be achieved through the planning system.

43 Through its work, the Design Council/ CABI has been offering advice on good design which it defines as (in summary):

By good design we mean design that is fit for purpose, sustainable, efficient, coherent, flexible, responsive to context, good looking and a clear expression of the requirements of the brief.

44 CABI and NPPF use the term urban design, whilst Plan:MK uses the term place-making, a more general approach that can cover not merely the physical manifestation of a place but also the social, such as its management. We welcome this holistic approach.

45 What is not clear in Plan:MK is how design quality and great places are to be achieved. There is no mention of design panels, a policy requirement in NPPF and often enabled by CABE.

46 The Forum supports the CABE view that:

When we evaluate a project, we need to understand the nature of the client and the design team, and how the project is being organised.

A successful project will be the result of teamwork as much as of individual effort. The role of the client as a member of the team is important; a good client is a patron whose defining characteristic is a commitment to excellence. A successful project will owe as much to this commitment as to the skill and ingenuity of the design team.

The appointment of the design team is, nevertheless, a key moment for a project. CABE believes strongly that there is no substitute for the skills of the architect and the other members of the design team. They are the people who, after careful analysis of the opportunities, will bring to the project the creativity which produces great designs, transforming the quality of the environment and bringing rewards over the long term to the user. In this light, CABE will consider, as part of its assessment, whether the design team appears well suited to the demands of a project.

47 A Development Corporation would have the powers to insist that its land would be developed to high standards by designers who are demonstrably capable of taking on the challenge: the local authority would be forced to fall back on development briefs and design guides, which do not guarantee quality, see for example the East and West flanks.

48 Keeping the impact of new development on the environment at the heart of the Plan, the Strategic Objectives would therefore include:

For larger and/or significant developments, the development team of either the Council or the Development Corporation would insist on being involved in the early stages of the scheme such as the briefing, the appointment of consultants, the exploration of options and the preparation of a planning application, with a view to ensuring the design quality required by the Plan is being achieved.

The Council, to comply with the requirements of NPPG, will set up a design panel to work closely with the development team, the panel to have at least 50% lay representatives to avoid it being dominated by professionals in the construction industry.

49 Appendix B considers issues of design in greater detail and sets the context for the comments that we have made in the Detailed Comments section that follows.

Housing

50 The number of houses to be built in the period of the Plan, their timing, quality and location, is critical to the proposals. The involvement of the local community in their delivery is essential.

51 Housing developers are failing to deliver the target of 1,750 dwellings a year, delivering typically 1,300 dwellings a year (1,247 in the most recent period 2016 to 2017). They are not building a large enough stock of genuinely affordable homes (in relation to household

incomes) nor are they creating places of character and quality. For Milton Keynes, the near total dependence on strategic developers coordinating the mass housebuilders building out their standard product has failed and only a new approach to delivery can fix it.

- 52 In addition, an unachievable housing target has an adverse affect with the shortfall accumulating year on year as the five-year requirement is not met.
- 53 The inability to meet unachievable housing targets is shared by adjacent local authorities. This reinforces the need for a comprehensive long-term strategy prepared and carried out by a Development Corporation to implement the quantity and quality of housing sought by Central Government.
- 54 We do not understand how the proposed totals have been arrived at nor their allocation to specific sites. Little of the housing land supply identified in Plan:MK is site specific apart from the South East Growth area which is for the last five years of the Plan period; East of M1 which is outside the Plan period; and Eaton Leys which will be determined before this Plan is made. It is not clear how and where the allocations to Central Milton Keynes, the rest of Milton Keynes City and the rural areas have been determined.
- 55 There should also be a commitment to engage the community in at least part of the improved delivery mechanism needed. Many other communities have successfully united council and community to deliver high quality affordable housing through Community Land Trusts and co-operative models. Without an explicit commitment to a range of different procurement methods, on sites both large and small, all new developments will gravitate towards very large developers who will siphon profits out of the local economy.
- 56 Our recommendation therefore is:
- The proposal to establish a Development Corporation is especially relevant to the supply of housing in and around Milton Keynes. Its core commitments should be to creating environments of quality and to innovating in forms of ownership and procurement that harness local commitment as well as achieving realistic housing numbers.*
- 57 Without a sound basis for delivering the number of houses required, there is no plan.

Employment

- 58 In developing its employment land calculations, Plan:MK refers to three categories: offices, industrial, and warehousing. It is not clear how other categories of employment fit into these three, such as retail, education and healthcare.
- 59 The plan does not recognise the land areas for employment for which consent has already been given. It is therefore unreliable with respect to the allocation of employment land.
- 60 We are concerned about the potential high land take for warehousing in the absence of information about job generation. We feel that the allocation is being led by demand from developers rather than an assessment as to what is in the best interests of MK. A report should be commissioned that looks at the job generation from Magna Park and future trends in the sector such as the increasing use of robotics. We are not convinced, as it stands and with pressure upon land within the Borough, that it is appropriate to allocate

such a large area of land for such a use without an indication of a true benefit to the residents of MK

- 61 Additionally large warehouses are not attractive additions to the cityscape.
- 62 The assumed rate of jobs per household in the Plan is 1.02507, the current rate: the previous rate was 1.5 jobs per household. At a time when the number of jobs created in MK is greater than anticipated, this puts increasing pressure on housing numbers and commuting distances. The rate of increase in the number of jobs is going up whilst the number of jobs per household is falling.
- 63 Employment must be at the heart of any plan. We accept that this is a notoriously difficult field in which to predict numbers but at least the plan within itself should be consistent. There are also loose assumptions made about the quality of jobs created in Milton Keynes.
- 64 We need to draw on the increased potential for attracting the kinds of innovative businesses that are flourishing in and around Cambridge and Oxford, such as information technology, bioscience and medical sectors.
- 65 MK already has several Data Centres and needs to consider conditions and locations for more of these. These could also be connected to heat networks to absorb their excess heat, which would reduce their cooling costs and contribute to reducing their impact on climate change gases.
- 66 Without reliable employment figures there is no plan. A more detailed appraisal of employment policies can be found in appendix B.

Transport and Movement

- 67 The proposed growth of Milton Keynes needs to be underpinned by a sound transport and movement strategy. Traditionally urban form has largely been shaped by the conventional means of transport: trains, buses, and mainly cars for people; trains and mainly lorries for freight. It is not clear what the impact on potential urban form will be of developing technologies such as autonomous, driverless vehicles.
- 68 In Plan:MK development proposals should seek to minimise the need to travel. However, the principal element of the spatial development strategy takes the form of dispersed urban extensions around the fringe of the existing urban area: it is inevitable this will create a high travel demand especially for journeys to work.
- 69 Hence, as the stated aim of Plan:MK is to manage the growth in car travel and thereby reduce increases in traffic growth, this can only be realistically achieved by a transformation of public transport in whatever form, or forms, that transformation takes.
- 70 Bearing in mind the proposed overall strategy of protecting the environment and reducing CO² emissions, the growth of Milton Keynes must in part be shaped by the assumed public and private transport provisions.
- 71 New technology may or may not be used to reduce the city's CO² emissions from transport. If we are to achieve Zero Carbon 2030 we need to decarbonise the transport system within

the city immediately. In the growth areas we need to plan for Zero Carbon transport systems. As the city grows, there is a danger of increased road congestion caused by the inefficient use of all kinds of vehicles.

- 72 The Forum's view is that a four pronged attack on the transport system is needed as a matter of urgency:
- more efficient use of the current infrastructure by shared vehicle use whether public, private or freight;
 - an intelligent use of improved public transport vehicles with a view to increasing their market share and reducing the number of empty buses running around the infrastructure;
 - a substantial increase in vehicle sharing generally; and
 - greatly increased support for low pollution vehicles which does of course assume electricity generated from renewable sources.
- 73 The ill-considered growth of Milton Keynes without an adequate transport strategy that underpins it is not acceptable. For example, we understand that:
- no assessment has been made of the limitations on growth of building across the external ends of grid roads and at other key locations (such as the eastern end of H10 Bletcham Way and around junction 13 and the recently consented Eagle Farm North) or land reserved to ensure that other future options are not blocked by development;
 - no study has been done into the potential for East-West Rail to achieve a commuting modal shift from private cars to rail into Milton Keynes Central Station and how this would be assisted by provision of Parkway Rail Station car-parking at various points along East-West Rail or land reserved;
 - no land has been reserved for later acquisition to enable a chord to be inserted at Bletchley to link the rail route from Bedford northwards to the West Coast Mainline.
- 74 In the meanwhile, until the long-term strategy is in place, possible links and facilities that provide access to proposed development should be identified and be reserved, not built over, especially:
- potential crossings of the M1;
 - the route(s) of the Oxford to Cambridge Expressway;
 - expanded facilities at stations, including park and ride arrangements, on the East West Rail Link;
 - any other Park and Ride facilities; and
 - strategic pedestrian and cycle routes.
- 75 Patterns of land use should be carefully considered so that demand for the use of public and private transport is minimised with a positive consequential effect on carbon emissions.
- 76 Keeping the impact of new development on the environment at the heart of the Plan, the Strategic Objectives would therefore include:
- The design of the growth area is to be integrated with a decarbonised transport and movement strategy for Milton Keynes as a whole*
- 77 Without such a strategy, the plan is not sound.

Green Setting

- 78 The green setting of Milton Keynes is one of the key components of the plan for the city. Without its grid road reserves, its linear parks, its district and local parks, and its woods it would be an impoverished place for wildlife and residents alike.
- 79 The creation of an endowed Parks Trust to manage most of this green setting has ensured that they are improving as they mature and that they are well managed and well used.
- 80 The Forum considers that this is a successful model that should be continued into the growth areas. All the green setting must be handed over to the Parks Trust with the required capital endowment to avoid burdening residents of these new areas with on-going charges for landscape management, unless it is retained by Milton Keynes Council. The Forum is opposed to landscape being subject to housing area management companies: the space is then paid for by those residents for their use and for no one else's. This would fragment public access to open space across the city.
- 81 In the development strategy for the expanded Milton Keynes, the Forum expects to see incorporated the same standards of provision of linear parks, balancing lakes and other parks and woods as was originally provided in MK.
- 82 All this should be shown on the Proposals Map for Plan:MK, as well as in plans for the long-term development strategy.
- 83 Open space has potentially a number of roles, such as flood prevention, playing fields, wildlife corridors, play areas, leisure paths and general recreation. Each use must remain viable without being compromised by overlapping uses. For example, playing fields must be located so that they are not subject to flooding for more than brief periods; they will still contribute to flood prevention as their soft surfaces will absorb and retard water run-off.
- 84 Around new settlements abutting open countryside, Plan:MK perpetuates an old idea that development should be hidden by planting. Landscaping should never be viewed just as 'screening' and for hiding things. Its integrity is in its inherent qualities. Development simply needs good design with an integral landscape structure that is accessible and of value for wildlife.
- 85 This new landscaping should link to wildlife corridors or to farmland that has been converted to become wildlife friendly. Such an approach would mitigate rainwater run-off, accelerated by contemporary farming practices for drainage, ploughing and cultivation that encourages rather than impedes the flow.
- 86 Keeping the impact of new development on the environment at the heart of the Plan, the Strategic Objectives would therefore include:

The green setting of Milton Keynes is to be extended into the growth areas with road reserves, linear parks, woodland, wildlife corridors, balancing lakes, and district and local parks, as was originally provided in Milton Keynes.

The Parks Trust is to own this green setting and is to be endowed to manage it.

Any proposals or long term strategy plans are to show the form the green setting is to take. Preferably, it will be laid out with involvement and approval of the Parks Trust in advance of any adjacent development.

Central Milton Keynes

- 87 The Forum welcomes the commitment to neighbourhood plans, and the acceptance that any amendments to it have to have the agreement of the promoters of the plan. This way these plans will retain their strong local legitimacy and continue to engage local people.
- 88 In this context, it is essential that Plan:MK is explicit where it proposes any departure from a neighbourhood plan or questioning policies in the adopted plans.
- 89 In the case of the Central Milton Keynes the adopted Business Neighbourhood Plan (CMKAP) continues to be contradicted by Milton Keynes Council. Plan:MK refers for example to a central business district whereas CMKAP was careful not to zone the city centre but to propose mixed use development on all sites. Plan:MK does not give wholehearted support to CMKAP and goes into too much detail in describing an alternative prospectus for CMK.
- 90 In this context, it is inappropriate to refer to the redevelopment of specific sites such as Station Square, which is not proposed in CMKAP: instead the focus should be on the development of over 50ha of undeveloped or underdeveloped land in CMK.
- 91 Likewise, the edge of centre boundary of the Primary Shopping Area within CMK differs from that shown in CMKAP. This was specifically examined in public and the examiner concluded that CMKAP's proposal was sound. Plan:MK does not clearly set out why this change was made and provides no evidence to support their decision, the retail capacity study having only recently been commissioned.
- 92 The strategic policy for CMK should simply be the adoption into Plan:MK of the whole Business Neighbourhood Plan including its descriptive passages as well as all of the individual policies. This will give investors the certainty and stability they seek and which CMKAP offers them.

Conclusions

- 93 The Forum therefore does not think Plan MK is ready to put before an inspector.
- 94 The evidence base is not sufficient. It lacks for example:
- an open space assessment;
 - a retail and leisure capacity study; and
 - a transport strategy.
- 95 There is no explanation for the consistent failure to deliver the dwellings target; for the number of jobs created in recent years; and for the implications for land use and transport planning.

- 96 It does not reasonably consider the alternative of a proper sub-regional approach and in practice its short termism is likely to jeopardise the future potential of the sub region and the ability of the City to expand in a sustainable way.
- 97 The draft does not convince us that it will achieve the requirements of the National Planning Policy Framework which include:
- a strong and competitive economy;
 - the vitality of town centres;
 - a prosperous rural economy;
 - sustainable transport;
 - high quality communications infrastructure;
 - a wide choice of high quality homes;
 - good design;
 - healthy communities;
 - protection of Green Belt land;
 - meeting the challenge of climate change such as flooding;
 - conservation and enhancement of the natural environment;
 - conservation and enhancement of the historic environment; and
 - sustainable use of minerals.
- 98 Plan:MK does not seem to us to be:
- positively prepared (i.e. based on an objectively assessed requirements), for example there is no current retail strategy;
 - justified (i.e. the most appropriate of reasonable alternatives), for example significantly different alternative options for growth are not considered;
 - effective (i.e. deliverable) for example no way of effectively delivering a large increase in the number of houses built each year is demonstrated; and
 - consistent with national policy (e.g. the NPPF), for example the Council has no panel to support it in ensuring high quality of design.
- 99 In preparing the plan, compliance with the duty to co-operate does not seem to have been demonstrated, especially over the need to grow MK beyond its own local authority boundaries.
- 100 The only way in which the high aspirations we have for Plan:MK will become a reality is if the policies we advocate are embedded in the adopted plan; and if the 50 year strategy is prepared and implemented by a Development Corporation covering an area that crosses local authority boundaries.
- 101 The section that follows contains detailed comments upon the draft plan, including recommendations for policy changes in addition to those identified above.

DETAILED COMMENTS

Para	Comment
2.3	<p>It is suggested that the Vision could be reworked to include the six guiding principles for the original Plan for Milton Keynes, which are as valid today as they were in 1970, when they were first published:</p> <ol style="list-style-type: none"> 1. Opportunity and freedom of choice 2. Easy movement and access, and good communication 3. Balance and variety 4. An attractive city 5. Public awareness and participation 6. Efficient and imaginative use of resources <p><i>“Regeneration of the most challenged estates will be well under way”</i>: If the best that can be achieved by 2031 is that regeneration will be <i>“well under way”</i> then the strategy will have failed and the Council will have failed its citizens. Regeneration should have been completed well before 2031.</p> <p>Also see comments about the Strategic Objectives made within the General Comments section.</p>
2.4	<p>We have four major concerns in relation to open space:</p> <ul style="list-style-type: none"> • Lack of maps of future open space provision and linear park extensions which can be used for long-term planning • Lack of ambition to expand, enhance, and add entirely new pieces to the larger green infrastructure features of Milton Keynes (e.g. new linear parks, or new large balancing lakes). • Policies that can lead to unsatisfactory provision of open spaces because they are required to serve dual and sometimes conflicting roles. • Lack of any mention of the role of The Parks Trust in relation to future management of parklands.
2.5	<p>We believe that there should be a strategic objective relating to the growth of jobs.</p>
4.13	<p>It is unclear as to whether the 3,500 dwellings in CMK is in addition to the numbers proposed in the CMK Alliance Plan.</p>
Policy DS2	<ul style="list-style-type: none"> • Although it is not stated specifically, the requirement for 26,500 new homes suggests that 3,000 will be provided within the existing city and, by implication, that they will come from the <i>“Regeneration Estates”</i>. We do not believe that this is possible without causing a serious impact upon valuable open space. • The eighth bullet point should be amended to <i>“The regeneration of some existing city housing estates as brought forward by the Your:MK regeneration programme, subject to the policies of made Neighbourhood Plans, local Referendums and consideration of the design and heritage value of these new town estates”</i>.
4.31	<p>The growth in jobs over the period 2010-2015 needs to be investigated to determine the underlying trends and whether the growth of 11,000 jobs in 2012-13 was an abnormal spike or indication of a more fundamental underlying shift. Without such an understanding, it will be dangerous to rely upon an annual average of the figures for future planning because of the pressures that it may place elsewhere in the Plan.</p>

4.41	There is a need to produce a clear set of metrics that link workers, floorspace, people and dwellings. For example, the floorspace figures in Table 4.4, when linked to the job densities in 4.45 produce job creation figures of 29,320 - 38,350 cf 50,500 in 4.31.
4.44	The land requirement is misleading because it refers back to 2011 and does not seem to take account of land that already has planning consent (at Fen Farm). The figures should make clear (as with housing supply in Table 4.1) the amount of land that has existing consents.
Policy DS4	The fourth bullet point (CMK) should be amended to <i>"Take the lead role in ensuring the appointment of exceptional architects for significant sites by, for example, holding international design competitions, to ensure that high standards of design are achieved in CMK and elsewhere in the expanded Milton Keynes"</i> .
Policy SD1	<ul style="list-style-type: none"> • It should be made clear that the extended areas of MK should enjoy the same level of connectivity (eg underpasses/bridges/redways/footpaths) as that in the original New Town. We should not have a repeat of the situation on the Western Flank where such links are having to be retrofitted as an afterthought rather than as an integral part of the planning process. Point 7 should be amended to <i>"Development must be well connected into adjacent areas to ensure that areas beyond the original New Town boundary enjoy the same level of inter-connectivity as those area within the boundary. This should include the provision of subways and bridges and redways as appropriate"</i>. • We do not think that Point 12 is strong enough regarding design and propose that it be amended to <i>"The design of new neighbourhoods and character areas to be used to create a distinctive sense of place; their design to be guided by a lead architect to ensure that each development is consistent with the design principles agreed with the Council for the neighbourhood; consistency of approach to be demonstrated; development parcels to be less than 100 houses; up-to-date drawings of the complete neighbourhood to be publicly available at all times, demonstrating how each part contributes to the whole"</i>.
5.14/5.15	The suggestion of redevelopment in Station Square raises a potential conflict with the CMKAP, which does not preclude potential redevelopment of the area but, as with other areas within the Plan that, like Station Square, are noted as being "Classic Infrastructure", it sets a high bar for any proposals via Policy G11. Plan:MK makes no reference to this and could be taken as implying that it will override the CMKAP policies, through being the later plan. We believe there is no need to include a reference to redevelopment in Plan:MK as it can be dealt with adequately via the policies in the CMKAP: however, if there is a wish to retain the reference here, then it should be accompanied by a clear statement that any redevelopment will take full recognition of the policies in the CMKAP. The Council's support for all Neighbourhood Plans must be unequivocal.
5.28	Planning for crossing the M1 should be seen as a priority.
Policy SD16	<ul style="list-style-type: none"> • The amount of floorspace should be expressed in sq m to be consistent with areas quoted elsewhere in the Plan. • There should be a requirement for a bridge to replace the level crossing at Bow Brickhill as part of the development.
6.15	Table 6.1 indicates that there is 160 ha of vacant employment land compared with a demand for 124 ha in Table 4.4. This indicates clearly that there is a surplus of employment land within the Borough and that no more is needed in

	the plan period.
6.27	It is clear that there are very few (if any) vacant sites within the areas currently identified for Bad Neighbour uses and we believe that a further site needs to be identified.
Policy ER10	No mention is made of MK1 or retail parks within the Shopping Hierarchy.
6.54	It would be helpful to define what is meant by "Local Centre".
9.15/9.16	Although the plan correctly identifies Biodiversity Opportunity Areas, these areas are not translated into a vision of future green space which will capitalise on these opportunities. Wildlife corridors are of significant value, as is mentioned in point 9.11, but, without a map designating such corridors and prioritising substantial room for green space along those corridors (as in the Ouzel Valley and the Ouse Valley), there remains an opportunity for corners to be cut and provision to be sub-standard due to a lack of a vision of a larger scale landscape. Decisions now will fundamentally affect what is possible in the future. In particular, the Ouzel Valley from Pineham towards the River Great Ouse at Newport Pagnell should contain significant areas of publicly accessible linear parkland, extending the Ouzel Valley Park northwards, as designated in the Landscape Character Assessment as the Ouzel Urban river valley (area 2D). Given the biodiversity and public access value of linear parkland, especially in the context of climate change, it would also be appropriate to confirm what has been in previous plans to extend the Ouse Valley linear parkland towards Newport Pagnell. Continuous linear parkland should also be designated along the entire western edge of current development, corresponding with and extending beyond the route of the North Bucks Way.
Policy NE3	This policy should begin with a more positive statement such as " <i>Development proposals will be required to enhance biodiversity</i> ". Throughout Plan:MK there is an appreciation of the importance of landscape-scale ecology. Such an approach is particularly needed in relation to climate change, as mentioned in this policy. When considering the impact of new developments on biodiversity it is important to consider how the proposed development fits into a wider vision of a connected landscape. This policy could be considerably strengthened by the provision of a map demonstrating a connected landscape. Off-site provision for biodiversity should be a last resort, avoided wherever possible, as evidence shows that it is often not effective. The wording of the policy should reflect this. Another key factor in achieving connectivity and biodiversity enhancement is securing the long-term management of green spaces, which can be provided by The Parks Trust. The Parks Trust should be brought into all discussions relating to Policy NE3's implementation and this should be mentioned in the policy.
Policy NE4	Maps need to be included to demonstrate where landscape and open space will be provided. Developers are currently provided with unacceptable scope not to make adequate provision of new open space and landscaping by the statement that: " <i>Development proposals will provide new, or if it is not possible will contribute to existing green infrastructure</i> ". All developments should provide new green infrastructure. Policy NE4 currently states " <i>Development proposals will seek to ensure that existing ecological networks are identified and wherever possible maintained to avoid habitat fragmentation</i> ". A stronger statement is required. Proposals must not only " <i>seek</i> " to ensure, they must " <i>ensure</i> ", and proposals should not simply

	<p>avoid habitat fragmentation <i>"wherever possible"</i>, they must <i>"avoid"</i> habitat fragmentation.</p> <p>With the city expected to grow to 2050 and beyond, new linear parkland will be required and this should be reflected in this policy.</p>
11.16	<p>Evidence suggests the target of 0.52ha of playing pitches per 1,000 population is not currently being met. Nor is there a protocol in place to prevent developments mixing uses of playing pitch land (e.g. doubling up playing fields or play areas as flood zones). This requires a policy in Plan:MK, reiterating the target, and setting out the requirement that playing pitches must be accessible year-round and not dual-use.</p>
Policy L3	<ul style="list-style-type: none"> • Linked to the above point, additional text should be added to Policy L3 stating <i>"Where appropriate the Council will encourage developing play areas, sport and leisure facilities within the existing or proposed parks providing such siting does not result in a conflict with the area's other functions (e.g. flood mitigation, biodiversity enhancement)"</i> • Policy L3 makes reference to <i>"New housing development will be required to provide new or improved open space and recreational facilities in accordance with the Council's adopted standards in Appendix B."</i> which is a crucial policy. For the benefit of the public, greater clarity should be given about what this specifically means. Presumably, the council intends to "require" that any new development be within 3,200m of a linear park, 1,200m of a 'destination'/country park, 600m of a local park etc. Greater clarity is needed as to whether parks may duplicate roles (i.e. does a 'linear park' double up as a 'local park'?). In addition, this policy sets out no minimum green space provision, i.e. if a development is already within all the required distances of parks it will not be required to provide green space. Milton Keynes has always sought to maintain a high ratio of green space to population but this has been eroding. All developments should be required to create landscaped areas over and above provision for play areas, and a minimum provision per home should be set. • As the council's minimum standard for provision of 'areas of wildlife interest' has not been set (currently listed as TBC) it is not possible to gauge how ambitious Plan:MK intends to be. An ambitious target is required. Plan:MK should locate potential sites for future 'areas of wildlife interest' in the expansion areas (both in Plan:MK and for expansion beyond Plan:MK, as decisions now will affect future options). A feature of Milton Keynes is its variety and quality of different wildlife sites around the city, there has been sufficient prior work, in the many linked reports, to designate areas targeted for addition to this network. • The current proposed maximum distance from a linear park of 3,200m, set out in Appendix B, suggests that residents could be two miles and more from the edge of a linear park, or over three-quarters of an hour's walk. Linear parks should be capable of being reached on foot, so a shorter distance from new development should be set. • This policy should cross-reference with Policy NE4 for clarification. In addition, it is not enough that provision of open space simply be <i>"considered at the beginning of the [developer's] design process"</i>. Provision of open spaces and linear parklands for the new expansion areas need to be considered strategically rather than piecemeal, development by development. A clearer vision is required within which developers can plan for open spaces to

	<p>connect up to citywide corridors of accessible landscapes, linking to open countryside.</p> <ul style="list-style-type: none"> The final paragraph of the policy states <i>"Proposals for new areas of open space and parks should include a long-term maintenance plan that can be implemented by (preferably) local contractors or organisations"</i>. This would be a fundamental change from what has proved to work well and which has proved an essential aspect of Milton Keynes' success. The Parks Trust has successfully managed large areas of open space of Milton Keynes over the past 25 years for public access and for wildlife' alongside the Council's management of more local open spaces. The quality of Milton Keynes's open spaces benefit considerably from joined-up and efficient landscape management, which is much more than mere landscape maintenance by contractors. To ensure high standards of ongoing provision of new strategic parklands and landscapes, The Parks Trust should be consulted and involved in the design process of new landscapes and open spaces from the earliest stage.
Policy L7	<p>The National Bowl sits across a strategic connection between Tattenhoe Valley and the Teardrop Lakes, Policy L7 should place stronger emphasis on any new development enhancing the ecological and public access connectivity through The National Bowl site, as it provides the only practical connection between the Tattenhoe Valley Linear Park and the Loughton Valley Linear Park and is Route 51 of the National Cycle Network. It is not only an important movement corridor but should be an attractive and integral part of the citywide network of accessible open spaces.</p>
12.3	<p>We feel that it is important to emphasise that high quality of design is being sought for all new developments and propose that the following wording (from the CABE 2006 paper <i>Design Review: How CABE Evaluates Quality In Architecture And Urban Design</i>) be incorporated within Plan:MK: <i>"By good design we mean design that is fit for purpose, sustainable, efficient, coherent, flexible, responsive to context, good looking and a clear expression all of the requirements of the brief. High standards in architecture and urban design should be promoted everywhere. People who live in low quality environments should be entitled as anyone else to demand high standards in new projects that affect them. Poor designs are unacceptable wherever they may be proposed"</i>.</p>
Policy D1	<ul style="list-style-type: none"> It is important that the standard of design of new developments in Milton Keynes should be of the highest quality to help reinforce the reputation of the city as a "designed place". We believe that there should be a commitment to introduce a design panel along the lines suggested by CABE and propose the following new policy: <i>"The Council, to comply with the requirements of NPPF, will set up a design panel to work closely with its development team, the panel to have at least 50% lay representatives to avoid it being dominated by professionals in the construction industry."</i> Subsection ii) Amend wording to read <i>"An adequate surface water drainage system is proposed with acceptable flood control and foul sewer capacity that can cope with rainfall increasing due to global warming"</i>. Subsection iii) Amend wording to read: <i>"Buildings are to be orientated to benefit fully from natural lighting and solar heating"</i>. As draft the policy "mitigates" sunlight, which is clearly an error. Subsection iv) Amend wording to <i>"No pollution is to emanate from buildings that could damage human health as determined by the environmental health"</i>

	<p><i>officers</i>".</p> <ul style="list-style-type: none"> • Subsection v): <i>Any damage to protected species, buildings, natural features and wildlife habitats will not be accepted: mitigation for this damage will only be accepted in exceptional circumstances</i>
Policy D2	<ul style="list-style-type: none"> • Subsection i) Amend wording to read: <i>"The development proposals, whether large or small, shall be based upon a comprehensive analysis of the brief and the surroundings; the design team will have to demonstrate its capacity to prepare proposals that will respond positively to this analysis"</i> • Subsection ii) Amend wording to read <i>"An analysis of the design will demonstrate that degrees of privacy and enclosure are appropriate for the approved brief; on larger developments where there is significant public realm, it will be closely integrated with the design of the buildings that surround it"</i>. • Add new subsection ix): <i>high standards of design, as defined by CABE, are expected for both large and small developments: if not achieved the proposals will not be approved"</i>.
Policy HE1	<ul style="list-style-type: none"> • The Council should also consider the establishment of new Conservation Areas for the three "Exhibition Village" of Homeworld, EnergyWorld and Futureworld • There should be a standard clause within planning consents for the redevelopment of "Phase 1" New Buildings that they should be properly recorded prior to demolition • There should be a requirement that the replacement of a building that is on the Local Heritage Register must be of a similar quality to the building that is being lost ie that it should also be capable of being added to the LHR - this will ensure against the gradual diminution of the quality of modern architecture in the city.
12.30	"Waterway Park" needs to be defined.
13.11	Milton Keynes used to be one of the country's leaders in the provision of self-build housing. Evidence from elsewhere indicates that there could be a big demand for this strand of housing supply and we believe that specific target should be introduced as at eg Teignbridge (where an SPD requires that sites of 20+ dwellings should include a minimum of 5% of plots for such use).
14.19	One of the ways in which MK will reinforce its reputation in the future is through the continuing provision of public art. We believe that "Percent for Art" should be just that ie 1% and not 0.5%. We believe that greater prominence should be given to such provision, which tends to be the most vulnerable when financial viability statements are considered through the planning application process. We believe that this topic should be given greater visibility, that all developers should be made aware of the provision and and that all planning applications should contain an appropriate comment about whether or not it complies with this policy.
15.4	There are no direct services to Gatwick.
15.9	<p>Add new second bullet point:</p> <ul style="list-style-type: none"> • <i>"The low occupancy rate of cars" (the average vehicle occupancy to CMK is just 1.15, ie at least 85% of cars carry just the driver (Transport Strategy Review, MKC, 2008)".</i>
Policy CT1	<p>To ii) add "This could include priority measures on roads and at junctions for buses"</p> <p>Insert new v) "Encourage care sharing, to reduce congestion, emissions and the</p>

	amount of parking spaces required, by giving priority to multiple occupant cars over single occupant cars in the allocation of road space and parking spaces" (NB This already happens with CMK employee parking through lower charges for multiple occupant cars and some reserved spaces closer to offices). Renumber subsequent bullet points.
15.24	Services 2,6,14 and 300 are part of the Core Routes - there is no Route 4A.
15.27	There needs to be a commitment to fund these routes if they are not commercial.
15.33	Add " <i>and will give public transport priority on congested parts of the grid road network</i> ". Policy CT4 B(ii) add: "note: some of the priority measures may be outside the development". B(iii) Delete and replace with "All houses and developments should be no more than 400m from a bus stop".
15.40	Policy CT6: Add " <i>Work should be undertaken to establish the feasibility for rail connected warehouse sites within Milton Keynes eg at Caldecotte South</i> ".
15.45	Policy CT7: Add new paragraph: " <i>The grid roads should be managed to provide more priority for buses and multi-occupant vehicles in areas and at times of peak demand</i> ".
Policy CT7	The original planning of Milton Keynes proposed a non-hierarchical open-ended grid with outer ends of 'grid roads' retained to allow for potential extension of the city in response to national or local planning policy. Since the late 1990s, planning consents have permitted developments that have made ten grid road ends impossible for extension or difficult to achieve, but has left ten 'grid roads' ends that that potentially could be extended outwards. Plan:MK Policy CT7 second paragraph says: " <i>Opportunities for extending the grid road system into any major new development areas will be encouraged to manage increased travel demands</i> ". This is a weaker policy than Policy CS11 in The Core Strategy which says: " <i>6. Maintaining and future-proofing the city's grid road network and extending it into new development areas whilst safeguarding the corridors for possible mass transit schemes</i> ". The policy in Plan:MK needs to be strengthened to safeguard existing grid road ends for future extension and require rather than encourage extension of grid roads. We suggest the following policy wording: " <i>Outer ends of grid roads must not be blocked by developments. Where development is proposed these grid roads should be extended into and through developments to provide for increased travel demand, and to enable future urban expansion</i> ".
Qu 1	We believe that this policy should be retained to act as a benchmark in case changes are sought to the Frameworks.
Appendix A	<ul style="list-style-type: none"> It should be made clear, following the Council's interpretation of a similarly worded clause (Policy G3 of the CMK Business Neighbourhood Plan) during the course of the intu public inquiry, that planning permission will only be granted if all of these conditions are met. We suggest that the introductory wording be amended to "<i>.....into private land, if all of the following conditions are met:</i>" Point 6 should be deleted as it is completely different to the other criteria, which are about the values that the areas have for people and wildlife. Point 6 relates to costs and has a high level of subjectivity.

APPENDIX 1

Detailed Response to Section 4 (Development Strategy For Homes, Employment, Retail and Leisure) on Housing and Employment

Housing

- 01 The 2012 National Planning Policy Framework (NPPF) Section 6 requires Plan:MK to deliver a wide choice of high quality homes; to fully meet the local needs for market and affordable housing and to identify the key sites that will deliver the strategy.
- 02 The NPPF also requires the Local Planning Authority to identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing. Despite identifying sites for 28,445 dwellings, for the period 2010 to 2026, in the 2013 Core Strategy, Milton Keynes has notably failed to provide a sufficient five years supply and the consequence is to set aside all planning policy other than the sustainability test when determining residential planning applications.
- 03 The 2013 Core Strategy proposed an average annual delivery of 1,750 dwellings and the 2010 Local Investment Plan proposed a total of 14,655 housing completions between April 2010 and 2017 with 3,119 in the year 2016/17. In reality developers have completed only 9,094 in these seven years, at an annual average of 1,300, and only 1,247 in 2016/17.
- 04 The Local Investment Plan projects a total of 1,806 completions in the Western Expansion Area by April 2017, over 25% of the total capacity of 6,550 due supposedly to be completed by 2025. In the real world the developers completed only 424 dwellings by April 2017.
- 05 It is evident that the failure to deliver is due to the performance of housing developers and neither the availability of land nor the planners.
- 06 This accumulating shortfall is added to the five year requirement with an associated 20% additional buffer to produce the unachievable five year supply target. Hence 2016's Site Allocations Plan, which proposed another 21 sites for up to 1,133 additional dwellings, which will shortly be subject to public examination.
- 07 The National Infrastructure Commission (NIC) identifies Milton Keynes as one of the most affordable areas in the Oxford-MK-Cambridge Corridor: the local house price (£280,000) to household incomes (£41,000) ratio is approx. seven, slightly below the national average of 7.6. Nevertheless this speaks volumes about the national failure on affordability as the national average was 3.6 only 20 years ago.
- 08 The NPPF defines affordability as social rented, private rented and intermediate housing offered at a rent of no more than 80% of the local market rent with no reference to income or the actual ability to pay.
- 09 Numbers of homelessness families and rough sleepers, although relatively small, have increased dramatically in recent years.

"Our broken housing market is one of the greatest barriers to progress in Britain today"
Theresa May, the Prime Minister

"We need radical, lasting reform"
Sajid Javid, Secretary of State for Communities & Local Government
(Housing White Paper, February 2017)

- 10 The original (DCLG) aspiration expressed in the October 2004 South Midlands Sub-Regional Strategy was for 44,900 dwellings in Milton Keynes over the period 2001 to 21 at an average of 2,245 per year. The October 2006 Local Housing Assessment (LHA) published by the Council and English Partnerships proposed an even higher annual target of 4,196 dwellings or 20,978 over five years.
- 11 However the 2013 Core Strategy reduced the annual target to 1,750 to provide a total of 28,445 for the period 2010 to 2026 including 27,298 dwellings in the urban and 1,147 in the rural area: with an excess of 1,058 in the urban but a shortfall of 613 in the rural area.
- 12 The Council published a series of topic papers to inform the development of Plan:MK in September 2014 including *Growth in Housing*. This identified an annual local need for 1,650 dwellings in addition to a further 550 in the areas immediately adjacent to the City in South Northants, Central Beds and Aylesbury Vale. It recognised the importance of working closely with these neighbouring authorities. This need for co-operation was emphasised in the examination of the Core Strategy in 2013; identified in the NIC work to date on the Oxford-MK-Cambridge Corridor; and is a requirement of the NPPF. However there is no evidence of such genuine co-operation in Plan:MK or in any associated work.
- 13 *Growth in Housing* acknowledged that over the last five, ten and fifteen years the average number of completions hovered around 1,500 and that this was a good indication of the number that realistically will be built across the Borough in future years.
- 14 Nevertheless the November 2016 Strategic Housing Market Assessment (SHMA) proposed 26,483 dwellings (or 26,493 in the final February 2017 SHMA) for the period 2016 to 2031 (or 34,473 for 2016 to 2036): an extra 6,775 in addition to existing allocations. However it is not apparent that the contribution of the October 2016 Site Allocations Plan is included in this number and it would be helpful to clarify this.
- 15 The November 2016 draft SHMA originally assumed a 20 year development period (to 2036) but this is cut to 15 (to 2031) in the final February 2017 version. Neither version, produced by ORS who also produced the 2006 LHA in 10 above, appears to respond to the curious reduction in the jobs to household ratio in para 3.1 of Plan:MK (1.04 jobs per household compared with the existing ratio of 1.7).
- 16 Table 4.1 in the Draft Plan:MK shows that the requirement for 26,500 dwellings for the period 2106 to 2031 needs the allocation of land for a further 6,775 dwellings, assuming that the existing land is already committed for 19,725. However, the source of this number is not clear as the Council's June 2016 Assessment shows existing commitments, excluding windfalls, for up to 22,536 dwellings. It would be helpful to

clarify the number of already committed dwellings and whether, or not, the land allocated in the Site Allocations Plan is included.

- 17 Table 4.3, which appears to be part of policy DS2, then proposes a total extra supply of 7,600 dwellings from four identified sites together with 3,500 from brownfield, infill, regeneration etc. and 1,000 in the rural areas. Clause 4.1 of the Development Strategy notes that this equates to an annual target of 1,766 dwellings: a number not achieved since the 2007 crash and significantly above the realistic delivery number acknowledged by the Council's own Growth in Housing topic paper.
- 18 Unfortunately, even the additional sites proposed by the Site Allocation Plan will not provide much respite. The 2016 Assessment lists the allocated or committed sites of which only 12,290 dwellings are deemed deliverable within the five years from April 2016 and with a 10% slippage this supply reduces to only 11,630.
- 19 The Assessment predicts that the supply (without slippage and excluding the numbers from this Site Allocations Plan) increases to 13,161 at April 2017 but steadily declines then to April 2020. The total requirement is expected to increase to 12,358 at April 2017, declining to 10,541 at April 2020.
- 20 However this is based on the assumption that housing completions will increase from 1,644 in 2016/ 17 to 2,863 in 2018/ 19. There is no evidence whatsoever for this assumption, other than wishful thinking, and in the likely economic climate of the next few years, it is much more likely that developers will increasingly fail even to approach the 1,750 target.
- 21 Failure to achieve the target of 1,750 completions will increase the accumulated shortfall and the five year requirement. If, as seems likely, housing developers continue to complete only around 1,300 dwellings a year (i.e. the actual real average for the last five years) then by April 2019 the requirement will again exceed the supply even with the additional land provided by this Site Allocations Plan.
- 22 Once again Milton Keynes sets an unachievable housing target which can only have a detrimental impact on the local planning regime.
- 23 The allocation in table 4.3 exceeds the requirement identified in 4.1 but there is no evidence that much of table 4.3 is deliverable.
- 24 Plan:MK is not explicit as to whether the 1,500 dwellings proposed for Central Milton Keynes are in addition to the Core Strategy allocation of 5,000 dwellings thereby increasing the requirement to 6,500. Section 11 of the June 2015 Central Milton Keynes Business Neighbourhood Plan identifies specific sites for 5,050 dwellings although it has proved difficult to generate much market interest in this existing allocation which is mainly flats.
- 25 If Plan:MK is proposing an additional allocation in Central Milton Keynes then it evidently conflicts with the Neighbourhood Plan, which is part of the Development Plan. Plan:MK should not only clarify any proposed changes to the Development Plan but be site specific.

- 26 The 3,500 dwellings proposed for brownfield, infill, regeneration etc. are also non-site specific. Plan:MK says that they are identified through (an unreferenced) urban capacity study but it would be helpful to clarify the site specific locations of this number. The only available study is that produced in 2006 by EDAW and Grimley which, probably coincidentally, also proposed 3,500 extra dwellings through the demolition and re-development of estates along the V7 Saxon Street corridor. This was vigorously opposed at the time, is likely to encounter similar resistance today and appears to be quite unviable as a means of delivering much additional housing over the next few years.
- 27 The South East Growth Area (policy SD13) proposes 1,000 dwellings in the period 2026 to 2031 but its availability depends on the outcome of Highways England's study on the A421 expressway and given that Plan:MK expects further development of this site after 2031 it is difficult to be confident about the delivery of much of it within the Plan:MK period.
- 28 No numbers are allocated to the site east of M1 (policy SD14) and it is not clear why this site, to be developed after 2031, is even in Plan:MK.
- 29 The land for 600 dwellings at Eaton Leys is currently subject to a possible call-in by the Secretary of State. This site should be resolved before the completion of Plan:MK which seems to be reacting rather than leading development.
- 30 The 1,000 dwellings proposed for the rural areas are also non-site specific. They are supposedly to be allocated within Neighbourhood Plans but without site specific direction it is difficult to see how this is to happen and it would be helpful to clarify the site specific locations of this number.
- 31 The lack of clarity of so much of the key sites gives no confidence in the ability of Plan:MK to deliver this housing and this inability to deliver is likely to be a significant issue at the Examination in Public, rendering Plan:MK unsound. It will therefore be vulnerable to unsatisfactory alternatives such as Hayfield Village or even MKNorth, which was in the Draft until the plan period was arbitrarily cut from 2031 to 2036 sometime around the end of 2016.
- 32 Housing tenure is probably outside the scope of Plan:MK. Nevertheless the increasing trend from freehold to leasehold in housing should be of concern. There appears to be no specific data for Milton Keynes but nationally the proportion of leasehold new build registrations has increased from 22% in 1996 to 43% in 2015 while the proportion of flats has increased from 18% to only 26%, from a peak of 50% in 2008/09.
- 33 This trend, evidently driven by the developers rather than the customers, has profound implications not only for the ongoing cost of housing but also for the future management and maintenance of the associated "public space". Traditionally this space would have been adopted and maintained as Public Open Space, Public Highway etc. by the local authority with the payment of an appropriate commuted sum.
- 34 It appears that in future much of this "public space" will remain in the ownership of the developer, managed and maintained by a bespoke company. The future of such an

arrangement seems unreliable and experience suggests that in practice it will become uneconomic and the “public spaces” will deteriorate. The continuing private ownership also has implications for their use and it is likely that this will be more restricted than spaces in public ownership.

- 35 Milton Keynes has a very successful model in the Parks Trust for the management and maintenance of green space and Plan:MK should require new developments to continue with the traditional arrangement of public ownership and commuted sums.

Economy and Retail

- 36 Plan:MK plans for an additional 27,500 jobs in the period to 2031.
- 37 Since 2009 jobs (full time, part time, self-employed) have actually increased 22% by 33,000 and the number of active enterprises 16.3% by 1,680. The number of dwellings meanwhile has increased by only 8%. Surprisingly the failure to deliver the housing target has not restricted the growth of the local economy.
- 38 The actually existing ratio of jobs to dwellings is 1.7 and the actual ratio of new jobs to new dwellings in the six years since 2009 is four to one. Neither the Draft nor the November 2016 Employment Land Survey acknowledge this reality.
- 39 If jobs growth is to continue at its current rate then Milton Keynes should plan for 45,000 to 100,000 extra jobs for the 26,500 new homes proposed in para 3.1.
- 40 In practice, neither the Draft nor the Employment Land Survey understand or explain the jobs growth over the last few years. It is therefore difficult to have confidence in their projections for future land requirements or the implications for transport. It is evident that a proper analysis is required before Plan:MK proceeds.
- 41 Consequently there seems no evidence to support the allocation of the land south of Milton Keynes for B2/B8 when, if anything, the available evidence and experience suggests that this would produce few jobs and be little more than a waste of valuable land within the urban area.
- 42 And there is no analysis, or even discussion, of the impact of Brexit.
- 43 It is remarkable that nowhere in Section 6 on the economy is there recognition of the significance of the creative industries not only to improve the quality of life but also as an employer and creator of wealth.
- 44 This lack of recognition is even more remarkable given the experience of the creative industries in regenerating communities and the potential that now exists over the period of Plan:MK to attract artists and similar to Milton Keynes. For example in London artists have been a victim of their own success and are now increasingly priced out of communities that they have helped to improve and attract private investment.
- 45 About 11,500 artists are currently based in London contributing over £20 billion a year to the capital's economy yet it is predicted that more than a third of London studio space will vanish within the next ten years. Artists need basic, flexible space that is low

cost and it should be possible for Milton Keynes to provide this and attract a significant number of artists to Milton Keynes.

- 46 Plan:MK should therefore recognise the economic benefits of the creative industries. It should identify those areas where retention or conversion of existing buildings is feasible or where there may be potential, including through planning obligations, to provide appropriate new facilities.

APPENDIX 2

Good Design

- 01 Milton Keynes is a designed place, so since its designation in 1967, design decisions has been made by a multitude of decision makers, from the master plan and its grid roads down to the ironmongery selected for its buildings.
- 02 The quality of these new buildings and the infrastructure and landscaping that serves them varies enormously: from buildings which after about 30 years were listed, to housing using standard developer house types.
- 03 The design quality of recent development is it possibly at present at its lowest ebb since 1967. What memorable buildings have been completed since 2000?
- 04 The question then arises: can Plan MK be used to improve the quality of design in new developments?

What is good design?

- 05 When the Commission for Architecture and the Built Environment (CABE) was in full flight, it is published documents on the design all new developments and ran design panels to discuss new buildings on sensitive sites. In 2006 it published a paper *Design review: how CABE evaluates quality in architecture and urban design*.
- 06 Although written in the context of design panels, which is another issue, the paper defines quite well what it means by high-quality design and the need for a commitment of both clients and their architects to quality
- 07 To quote: *By good design we mean design that is fit for purpose, sustainable, efficient, coherent, flexible, responsive to context, good looking and a clear expression all of the requirements of the brief.*
- 08 And: *CABE believes that high standards in architecture and urban design should be promoted everywhere. People who live in low quality environments should be entitled as anyone else to demand high standards in new projects that affect them. Poor designs are unacceptable wherever they may be proposed.*
- 09 How does the planning system respond to this challenge from CABE?

National Planning Policy Framework

- 10 The Framework, refers repeatedly to securing good design, which works with rather than undermines economic development. For example:
- 11 Para 8
Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental

gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

12 Para 56

The government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better to people.

13 Para 57

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

14 Paras 59 to 66

Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stop innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness. .

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design.

They should also when appropriate refer major projects for a national design review.

In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.

In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.

Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.

Conclusions

- 15 Good design does not happen by accident: it is carried out by good designers generally working for appreciative clients.
- 16 However a lot can be achieved by being clear about the definition of good design and having firm policies that promote it.
- 17 As with the National Planning Policy Framework, Plan:MK mentions good design as being an essential objective of the Plan and our suggested policy amendments in the Detailed Comments section help to put design at the heart of the Plan.

APPENDIX 3

Milton Keynes Grid Roads and City Expansion

- 01 The City Roads (popularly known as 'grid roads') were designed to provide for cross-city movement between individual grid-squares and to connect into the regional road network. Also *"The grid pattern of roads provides several choices of route between any two points and spreads traffic as evenly as possible across the system"* ('The Milton Keynes Planning Manual' 1992, page 43). To achieve this the city was provided with eleven City Roads on an approximate north-south axis and ten on an approximate east-west axis.
- 02 The original planning of Milton Keynes proposed a non-hierarchical open-ended grid with outer ends of 'grid roads' retained to allow for potential extension of the city in response to national or local planning policy. 'Grid roads' were capable of further connection to surrounding roads. Since the late 1990s, planning consents have permitted developments that have made ten grid road ends impossible for extension or difficult to achieve. The ten 'grid roads' ends that now block outward expansion are set out in Table A below.
- 03 What is not clear is what evidence relating to long-term expansion of the 'city' led to effective blocking of outward development as a result of these decisions. It has made the next stages of expansion of Milton Keynes far more difficult and will inevitably imbalance traffic movements within the 'city' so that the City Roads network is no longer able to 'spread traffic as evenly as possible across the system'. This has implications for all forms of road transport, including public transport.
- 04 Table B below shows ten 'grid roads' that potentially could be extended outwards to serve expansions to Milton Keynes, but makes no judgement on the practicability or desirability of these, which would have to be subject to careful evidence-based assessment.
- 05 Plan:MK (and longer-term plans that are needed to follow this) has the difficult task of remedying these short-sighted decisions while ensuring that future outward expansion achieves movement of all forms of transport as effectively as could be achieved by an open-ended network of roads. What Plan:MK must do is ensure that no more ends of grid roads are blocked from serving future extensions of the 'city'. A 50-year perspective is needed to ensure that short-term decisions don't pre-empt better long-term planning and that expansion of the 'city' is achieved through extended grid roads.
- 06 Plan:MK Policy CT7 second paragraph says: *"Opportunities for extending the grid road system into any major new development areas will be encouraged to manage increased travel demands"*. This is a weaker policy than Policy CS11 in The Core Strategy which says: *"6. Maintaining and future-proofing the city's grid road network and extending it into new development areas whilst safeguarding the corridors for possible mass transit schemes."*
- 07 The policy in Plan:MK needs to be strengthened to 'safeguard' existing grid road ends for future extension and 'require' rather than 'encourage' extension of grid roads.

A: Blocked Grid Road Ends

	Grid road number and end	Grid road Name	Blocked by
1	H2 west	Millers Way	Fairfields (WEA) housing development
2	H3 west	Monks Way (A422)	Whitehouse (WEA) housing development
3	H7 west	Chaffron Way	Tattenhoe Park city street, Hayton Way, with housing facing a reduced width road
4	H7 east	Chaffron Way	Chaffron Way extension as city street Countess Way with weight limit and speed-humps; and Brooklands housing blocking extension across Fen Street
5	H10 east	Bletcham Way	Although a grid road reservation (a paddock managed by The Parks Trust) extends further eastwards between Old Farm Park and Wavendon Gate, planned development of sites east of here, including Eagle Farm have blocked extension of H10 as a grid road eastwards
6	V1 north	Snelshall Street	Oxley Park housing extends across this, but so does the Oxley Mead SSSI
7	V2 north	Tattenhoe Street	A grid road reservation (a paddock managed by The Parks Trust) extends northwards from Oakhill Roundabout past Hazeley Academy and through the edge of Hazeley Wood to cross North Bucks Way, but this would be blocked by planned westward extension of Whitehouse
8	V3 north	Fulmer Street	North of Grange Farm roundabout, Whitehouse housing development, with Longhorn Drive extending beyond the grid road
9	V 10 north	Brickhill Street	Redhouse Park housing
10	V12 south	Fen Street	Developments planned for Fen Farm and Eagle Farm will block extension of Fen Street south of the eastward extension of the A 421 from grid roads H8 and H9 at Kingston Roundabout. In turn this has prevented an optimal crossing of the M1 Motorway to enable urban expansion east of the Motorway

B: Grid road ends with theoretical potential for extension

	Grid road number and end	Grid road Name	Access to
1	H1 west	Ridgeway	Was once planned to extend across the River Ouse to the A 422, which could have relieved several areas of traffic on unsuitable roads, such as: Calverton and the Wealds, Passenham and Beachampton
2	H4 west	Dansteed Way	Shenley Dens, but would cross the southern edge of Hazeley Wood
3	H5 west	Portway (A509)	Shenley Dens & north of Oakhill Wood
4	H6 west	Childs Way	Snelshall ridge
5	V6 north	Grafton Street	Haversham & north of the Ouse
6	V11 north	Tongwell Street	Willen Road which extends north from Tongwell Roundabout would be capable of widening
7	H4 east	Dansteed Way	East of the M1 motorway
8	V1 south	Snelshall Street	Capable of extension if development were approved in areas of Aylesbury Vale south of Buckingham Road (B4034)
9	V10 south	Brickhill Street	Capable of extension if East-West Railway was bridged south of Tilbrook Roundabout
10	V11 south	Tongwell Street	A grid road reservation (a paddock managed by The Parks Trust) extends south between Brown's Wood and Old Farm Park, but Holst Crescent and the East West Railway would have to be crossed