

MKC RESPONSE TO THE WEST NORTHAMPTONSHIRE STRATEGIC PLAN SPATIAL OPTIONS CONSULTATION

Introduction

Milton Keynes Council welcomes the publication of the West Northamptonshire Council's (WNC) Spatial Options Consultation document and the opportunity to engage proactively in WNC's emerging plan.

We recognise there are aspects in the consultation document that broadly align with possible future long-term development locations within the Milton Keynes Strategy for 2050 and offer cautious support based on the principle that West Northamptonshire Council and Milton Keynes Council work closely together to ensure the potential impact of the allocations on Milton Keynes are fully understood and proper mitigations are enabled.

We would like to stress the critical importance of identifying and assessing any impact that growth within WNC has on infrastructure within Milton Keynes and the need to secure funding to address this.

We would like to highlight policy SD15 of Plan:MK (reproduced in our response on question 28) as being a key consideration we would expect WNC, where relevant, to be aware of.

Consultation Question 2: Are the spatial objectives 1 to 4 - Green and Clean - appropriate for guiding development and growth in West Northamptonshire? (Yes/No) What changes or other objectives would you like to see?

Milton Keynes Council Response: Milton Keynes Council are supportive of the approach listed under Strategic Plan Objectives 1-4 (Consultation Question 2). In particular, ensuring that strategic development allocations are located and designed to be resilient to future climate change and the risk of flooding; as well as designing green and blue infrastructure into development.

However, we would like to see a new strategic plan objective added to the spatial objectives section, which references the provision of necessary infrastructure to mitigate the impacts of development on existing communities.

Consultation Question 25: Do you agree that spatial option 4b - Towcester South and Racecourse Expansion has the potential to deliver residential development? (Yes /No) Please provide comments to support your answer.

Milton Keynes Council Response:

Yes, however there may be an associated impact on local infrastructure and an impact on Milton Keynes given the quantum of proposed development.

There is particular concern that the cumulative impact of development at Towcester and Old Stratford (spatial option 5b) could worsen traffic congestion and adversely affect the functioning of the A5 and the Old Stratford roundabout and the local highway network unless properly planned and moderated. The junction is a key gateway to Milton Keynes.

We would want WNC and National Highways (who control the A5 and Old Stratford roundabout) to work with us on modelling and assessing the implications of this development and with partners such as the Central Area Growth Board, SEMLEP and England's Economic Heartland to ensure that proper infrastructure and funding is in place for early, sustainable, and funded solutions, such as our proposed Mass Rapid Transport System (MRT).

Consultation Question 28: Do you agree that spatial option 5b - Milton Keynes North West (Old Stratford) Expansion has the potential to support a new settlement. (Yes /No) Please provide comments to support your answer.

Milton Keynes Council Response: Yes, and we offer cautious support on the basis of an accepted offer to work collaboratively to develop this option, as identified in the Milton Keynes Strategy for 2050.

MK Council acknowledged in that Strategy document it cannot allocate development outside of its boundaries but that if the option was to come forward it should be recognised that there will be impact on Milton Keynes unless properly planned.

Policy SD15 of Plan:MK, reproduced below, and a Development Framework SPD produced for this spatial option would be our basis for such engagement. The application of these principles would help to better integrate this development into the local surroundings and mitigate any impacts it might have on Milton Keynes.

Plan:MK Policy SD15 (PLACE-MAKING PRINCIPLES FOR SUSTAINABLE URBAN EXTENSIONS IN ADJACENT LOCAL AUTHORITIES)

- A. It is expected that development proposals on the edge of Milton Keynes are likely to have significant impacts upon the infrastructure and services of Milton Keynes, particularly given the significant attractor Milton Keynes will be for any future residents.
- B. When and if development comes forward for an area on the edge of Milton Keynes which is wholly or partly within the administrative boundary of a neighbouring authority, this Council will put forward the following principles of development during the joint working on planning, design and implementation:
 - 1. The local authorities will work jointly, and with infrastructure and services providers, to achieve a coordinated and well designed development.
 - 2. A sustainable, safe and high quality urban extension should be created which is well integrated with, and accessible from, the existing city. Its structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, redways and the linear parks and strategic, integrated flood management.
 - 3. A strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation) should be taken.
 - 4. The design of development should respect its context as well as the character of the adjoining areas of the city.

5. Linear parks should be extended into the development where possible to provide recreational, walking and cycling links within the development area and to continue the city's extensive green infrastructure and.
6. Technical work should be undertaken to fully assess the traffic impacts of the development on the road network within the city and nearby town and district centres and adjoining rural areas, and to identify necessary improvements to public transport and to the road network, including parking.
7. A route for the future construction of a strategic link road(s) and/or rail link should be protected where necessary.
8. New social and commercial facilities and services should be provided, and existing facilities improved where possible, to meet the day to day needs of new and existing residents.
9. The opportunity for new 'Park and Ride' sites for the city should be fully explored and where possible provided, and efficiently and effectively linked to the city road system.
10. The local authorities and their partner organisations should produce an agreement on appropriate mechanisms to secure developer contributions towards improvement and provision of infrastructure to support the development, including facilities in the city that will be used by residents of the development area.

We would also like to make several specific points regarding development at Old Stratford for WNC to consider.

Specific points regarding development at Old Stratford

A) Strategic Infrastructure

Milton Keynes is one of the fastest growing local authorities in the country and services such as health and education require continual investment to avoid bottlenecks and pressures. In general terms any future development around Old Stratford should provide local infrastructure and facilities to cater for its own needs. However, a development of the size at Old Stratford so close to an urban conurbation would inevitably have an impact on Milton Keynes Strategic Infrastructure (such as the University Hospital and Further Education Facilities). It would therefore be essential that impact is fully understood, planned for, and funded appropriately. MKC wishes to be assured that in any future large-scale development at Old Stratford we would work together to properly mitigate the impact and offers to work together on this issue.

Milton Keynes Council has already started work preparing a Milton Keynes Infrastructure Study to consider the implications of growth, up to 2050, on infrastructure provision within MK. It will also take into account of potential growth options within neighbouring authorities. We would therefore welcome an opportunity to work collaboratively with you on what infrastructure is required to serve future growth needs and the possibility to jointly commission studies.

B) Flooding and Drainage

We wish to highlight that some of the developments are proposed in areas designated as flood zones and/or may result in additional surface water runoff discharging into watercourses that are within the catchment of the River Great Ouse and thus may impact on the Borough.

As such, it is recommended that the parties associated with any strategic location engages with the relevant Lead Local Flood Authority as well as the Environment Agency at the earliest stages of proposed allocation. As per NPPF, Sustainable Drainage Systems (SuDS) should be implemented and be considered early enough in the design process to inform the overall layout of the site.

In particular, Spatial Option 5b - Growth at Milton Keynes North West/ Old Stratford (Consultation Question 28) is located directly upstream of Stony Stratford. The proposed location includes a watercourse that discharges to the River Great Ouse at the boundary between the two areas. This arterial watercourse falls within the drainage district of the Buckingham & River Ouzel Drainage Board. The IDB have strict discharge rates and byelaws within their drainage areas, which should be adhered too. Option 5b general location is adjacent to Stony Stratford that experienced significant flooding in Winter 2020 (as did much of the Upper Great Ouse). Stony Stratford is a Critical Drainage Catchment (CDC), as identified in the Milton Keynes Surface Water Management Plan (2016). Any proposed development must not increase the flood risk to the CDC and should be designed so that opportunities provided by the new development and improvements to green and other infrastructure reduce the causes and impact of flooding on settlements such as Stony Stratford as part of an integrated approach to flood risk management. (See NPPF paragraph 161 c.)

WNC and any prospective applicant should be made aware of Policies FR1 – FR3 of Plan:MK that includes locally specific strategic flood risk management policies to maintain and continue the exemplar sustainable drainage model of Milton Keynes, which prohibits development within the floodplain and seeks flood management and drainage infrastructure to be provided as strategically as possible and as part of a maintained, multi-functional blue-green infrastructure. Any proposed development should incorporate a surface water drainage system with acceptable flood control and demonstrate that water supply, foul sewerage and sewage treatment capacity is available or can be made available in time to serve the development.

C) Leisure, Community and Sport

To mitigate the impact of a new population on the north western boundary of MK near Old Stratford, on site playing field provision and appropriate ancillary facilities (changing rooms and toilets) should be provided. The standards in Plan MK is 0.52ha per 1000 population equating to about 7.8ha of new playing fields. Without new on-site playing provision for this area, there is likely to be substantial additional pressure on the existing MK Playing fields network.

Any development around Old Stratford should also provide sufficient on-site winter training provision for sports, comprising of an Artificial Grass Pitch with floodlighting, that is accessible to the local community in the evenings. This could be provided within a local school if a robust community use agreement was put in place prior to opening.

An area of this size warrants a strategic leisure facility of its own, such as a community sports pavilion with a sports hall, second meeting hall and additional ancillary facilities. MKC would also expect that a development of this scale would have suitable community health hub akin to the proposed facilities in MK East. With further assessment, research and consultation, there is the potential for there to be one large facility that could address multiple health needs, promoting healthy lifestyles, and importantly, helping to prevent and combat health conditions through physical activity.

As standard, we would expect to see the open space and leisure facilities designed to meet Sport England Active Design principles, be Dementia Friendly, and as carbon efficient as possible.

D) Transport and Highways

In its previous response on question 25 we have highlighted that we would want to work with partners to model and assess the implications of development on the highway network including the A5, Old Stratford Roundabout and other roads in the Borough of Milton Keynes and to investigate measures to mitigate that impact.

We would also comment that any development around Old Stratford should be designed to link into pedestrian, cycle, redway* and public transport routes into Milton Keynes including the Mass Rapid Transit (MRT) system that Milton Keynes Council is seeking to develop.

Any works to the A5 and Old Stratford junction should not prejudice the provision of bus/ MRT vehicles serving a park and ride site that might be provided locally in the future. The Milton Keynes Strategy for 2050 outlined a potential realignment of the A5 as part of growth proposals here. This could bypass the Old Stratford junction and form a bypass of Potterspury. The potential for this should be considered as part of any potential development at Old Stratford.

* Redways are a network of paths usually surfaced with red tarmac used by cyclists and pedestrians that criss-cross the city of Milton Keynes.

E) Green Infrastructure

The Milton Keynes Strategy for 2050 identifies the area around Old Stratford as an area where the strategic green infrastructure network outside Milton Keynes could potentially be expanded and linked to the existing strategic green infrastructure network (including linear parks) in and around the city. Old Stratford is identified as where a Green City Gateway could be established. Milton Keynes Council requests that WNC consider these points as it progresses further technical work to develop a new settlement at Old Stratford.

F) Scale of retail provision provided in spatial option 5b -Milton Keynes North West (Old Stratford) Expansion

Any retail floorspace provided in this expansion should be commensurate to the needs of the new community. It should not adversely affect the vitality and viability of Stony Stratford town centre or any other district or town centre within Milton Keynes.

Consultation Question 31: Are there any other comments you would wish to make at this stage.

Milton Keynes Council Response: Page 8 of the Spatial Options consultation document identifies that there is uncertainty about the requirements for strategic warehousing and the conclusion of the Housing and Economic Needs Assessment (HENA) study was that the requirements for strategic warehousing should be considered in a separate study or plan update, which incorporates wider sub-regional issues of logistics demand and supply. Should WNC undertake work on the requirements for strategic warehousing, this Council would like to participate in such a study. In November, SEMLEP contacted local authorities across the SEMLEP area seeking expressions of interest about participating in a SEMLEP wide study on the supply and demand for logistics floorspace. You may wish to consider participating in such a study.

In conclusion we would comment that the provision of new employment land as part of the strategic growth locations should not be at a scale which competes with the role and function of Central Milton Keynes as a major office and employment centre for knowledge intensive business uses within the Oxford to Cambridge arc.