

# **LOCAL DEVELOPMENT FRAMEWORK ADVISORY GROUP**

**3 SEPTEMBER 2008**

## **ADDITIONAL PAPERS**

### **ITEM 4**

#### **LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY**

A table of Councillor comments and officer responses in respect of the Core Strategy (**Pages 2 to 23**).



ITEM 4  
ADDITIONAL PAPER

ADDITIONAL REPORT for LDF ADVISORY GROUP 3<sup>rd</sup> September 2009

COUNCILLOR COMMENTS	OFFICER RESPONSE
<p>1. This (first few chapters) is INFINITELY better than the previous version and is getting pretty good now. Well done to whoever did it.</p>	<p><b>Add clear definitions for MK Borough, MK City and MK Rural Area at beginning of document and check for consistency in rest of document.</b></p>
<p>2. Foreword: Skills bit. I'd suggest replace "young people born and raised in MK" and replace with "MK's young people" to be more clearly inclusive of all who now count themselves as MK.</p>	<p><b>Agree, replace as requested.</b></p>
<p>3.Connections - in various places: Start off the foreword bit with: We need to improve connections with our local towns, and east-west connections...</p>	<p><b>Agree; add this phrase to sentence following Connections bullet point in Foreword.</b></p>
<p>4.Chapter 2. I'd suggest an additional 3rd paragraph under "Getting Around: "Within the Borough and its immediate environs, road and rail links are poor, with a struggling rail service eastwards, none westwards, and congested roads leading to nearby towns and villages. As growth increases local commuting, these links will need improvement."</p>	<p>This overlooks the fact that the grid roads are significantly better for car use than traditional settlements' road systems. The M1 and the West coast mainline are nationally important routes. The East West rail situation is summarised in the second paragraph of this section. <b>An alternative addition is suggested: add the following after the third paragraph 'Beyond the built up area of the city there are local connections which will require improvement when the growth impacts on this network.'</b></p>
<p>5.Grid roads v buses: The 4th para under chapter 2 Getting Around, and in Weaknesses, it is still maintaining that it is the grid itself which makes access to buses difficult - an obvious nonsense given the number of estates where buses do run through the estates despite the grid outside. It's the design of the newer estates</p>	<p><b>Agree;</b> buses do penetrate the grid squares. Suggest that a phrase is taken from the approved Bus Strategy: <b>'In most cases residential streets within the grid squares were not designed for the bus. This makes it difficult to provide fast frequent and attractive bus services', to replace first part of 4<sup>th</sup> paragraph and third weakness in SWOT table2.1</b></p>

<p>that's the problem there. And it doesn't bring out the challenge of the distribution of "attractors" and the low density. This needs amending in both places. I'd suggest:</p> <p>Chapter 2:</p> <p>The low density and wide distribution of "attractors" makes it difficult to run bus services that are fast, cost-efficient and reliable. The design of some estates makes easy access to bus stops difficult. This means....</p>	
<p>6.Weaknesses:</p> <p>Poor public transport due to the unique design of the city and the lack of co-ordination powers disadvantages some residents.</p> <p>Low overall density and the segregation of some estates affects the viability of shared services.</p>	<p><b>Agree; poor public transport is picked up in change agreed above.</b></p> <p>Lack of co-ordination powers is for Central Government, not MKC.</p> <p><b>Add 'Low overall density and the segregation of some estates affects the viability of shared services' as a weakness.</b></p>
<p>7.MK At Work</p> <p>Can we delete the unemployment figures please. Picking a random month and then doing no analysis does us no favours.</p> <p>The first phrase of the next paragraph is also meaningless.</p> <p>What is an "average" skills base, and why is that wrong? Can we get something more explicit on the skills profile please?</p> <p>About the high proportion of low-skilled workers among the current population &lt;also suggest add and the dearth of medium-level professional jobs to give career progression.</p>	<p>Unemployment figures are included to reflect recession and qualify first three paragraphs. Average skills base reflects the findings of the MK Economy Review January 2009 by SEEDA. It shows the skills of the resident population are lower than the rest of the South East. <b>Agree, add footnote to reference this source document to provide more information.</b> The MK Economic Vision 2009 sets the need for a skilled workforce as its first foundation. It will be shown in the Economic Prosperity chapter. The dearth of medium-level professional jobs is related to the recession but is more of a corporate issue for companies.</p>
<p>8.Quality of Life</p> <p>- this section is two sections put together, and there is more that would fit better here too. Please can we take the first 3</p>	<p>This section is trying to give an overview of MK and it covers the environment and social issues. It flags the green qualities as an important element for quality of life.</p>

<p>paragraphs as one section, titled maybe A Green Cityscape or something.</p> <p>And WHERE has the point about green streets gone AGAIN? I propose (again!) an amendment: after the first sentence of the 2nd paragraph, insert "Every home has a garden, and most roads have gardens or landscaping and this is much valued by residents."</p>	<p>Green streets are defined as 'extensively landscaped' grid roads in 'Layout and Design'</p> <p><b>Agree to add amendment after first sentence of 2<sup>nd</sup> paragraph: 'Every home has a garden, and most roads have gardens or landscaping and this is much valued by residents.'</b></p>
<p>9. The last three paragraphs would then sit in a separate section about Quality of Life</p> <p>In the first sentence of the second paragraph, I'd suggest "and often some poor quality housing" as none of the estates are all poor quality. I would then finish that section with a short paragraph: "Faced with these challenges, the residents of these estates have often generated an enviable community spirit, that they are now directing towards regeneration."</p>	<p>Last 3 paragraphs remain and <b>agree to add 'some' to phrase about poor quality housing in sentence starting with 'Some of the early New town' ....</b></p> <p><b>Agree, add sentence at end of this section about the strong community spirit generated.</b></p>
<p>10. Layout and design</p> <p>The second paragraph implies that early estates were all one character, and that that was good. However there are reservations about having 2000 houses all of one character, and it can also be limiting in design and therefore housing type options. The 2nd wave larger estates had several distinct character areas, which most people would identify as good, combining distinctiveness, sense of place, and wide options. Only after that did the identikit housing, or anything goes muddle with each developer of 15 houses picking their own style, start to set in. And the grid roads did not separate early communities as much as they did the wave 3 and 4 communities! CNT lost the plot! Can we agree some basic ideas to be encapsulated here tonight, and then ask that the wording be corrected to reflect this please? (It would be very useful to have a reference map colour coded to show the main phases of design approach,</p>	<p>Sentence explains each are had its <b>own</b> distinctive character. The need to consult with the local community is included to ensure we respond to the views of the people living in these areas.</p> <p>Much of the detail will be for the Development Management DPD and subsequent SPDs.</p> <p>Information about the age of the various estates in Milton Keynes city is held in the Spatial Planning Division and this will</p>

<p>so that people could relate their knowledge of different estates to what is being said, as well as a tool for training for planning and development control members. And it would appear that some officers need educating on pre-new city estates!)</p> <p>On the other hand, in the next paragraph, an adverse mention of "identikit national housing designs" would be useful to give weight to that objection for the future</p> <p>What does the last sentence in that section refer to?</p>	<p>be used in the preparation of the above DPD and SPDs.</p> <p>This sentence refers to the opportunities for the creation of linear parks and the restoration of landscapes after minerals or waste developments.</p>
<p>11. Major projects: future list</p> <p>Bletchley Park is already a world Heritage Site, isn't it?</p> <p>The next point is about 3 useful points which need separating</p> <p>12. Weaknesses:</p> <p>Correct the sentence about grid roads and public transport as above please.</p> <p>The housing stock sentence is confused. There are two points: Some of the older housing stock is now in poor condition. (ie new estates and old towns) Some of the more recent estates have poor design that many need alteration to meet requirements for public transport etc.</p> <p>Need for a greater variety of housing types, including executive homes and more varied provision for single people.</p> <p>13. Chapter 3 Policy Drivers</p> <p>Can we take out the one about housing in rural areas? Infill is hardly a key policy that drives change!</p> <p>(I'd agree with David's comment later on that SPD for rural infill seems possibly inappropriate! Subject of a future discussion perhaps on what we would want to constrain or encourage and what mechanisms there are</p>	<p>Bletchley Park is not a World Heritage site. <b>Agree to separate three points</b></p> <p><b>Agree; see change at point 5 above.</b></p> <p>This relates to the early parts of the New Town and the fact that some of the houses are difficult to insulate given their original construction methods.</p> <p>The need for Executive homes is included in the table and greater diversity will include provision for single people.</p>
<p>Can we take out the one about housing in rural areas? Infill is hardly a key policy that drives change!</p> <p>(I'd agree with David's comment later on that SPD for rural infill seems possibly inappropriate! Subject of a future discussion perhaps on what we would want to constrain or encourage and what mechanisms there are</p>	<p>This is a requirement from the South East Plan. Table 5.3 (to be renumbered as 5.6) shows that the scale of housing to be found in the rural area (page 62 of the LDFAG agenda for 3<sup>rd</sup> September), will require some allocations, not just windfall. PPS3 also restricts the options for just relying on windfall in the short term.</p>

<p>14. Regeneration - can we add on the Rural Strategy and the SPDs for Wolverton and Bletchley please. New town estates aren't the only areas affected</p>	<p>This statement applies to the whole of the city which includes Wolverton and Bletchley. The Development Frameworks for Wolverton and Bletchley will remain in place and updated as explained in the CS 8 policy delivery section. The Social Atlas does not identify any rural parish in the most deprived parts of the Borough. It is recognised that rural deprivation is more likely to be small scale and less amenable to an area-wide approach. <b>Agree to change the word 'city' to 'Borough', to cover both urban and rural areas.</b></p>
<p>15. Spatial Vision Item 4 - This level of bragging, while actually minimising the achievements, is odd, to say the least! How about: "MK has a history of leading the development of national standards in sustainable building design and will continue to do so, with all new developments benefiting from improved energy efficiency standards and low carbon technologies. New options in energy efficient and low-carbon transport will also be utilised to reduce the impact of the city's low density."</p>	<p>This reflects the achievements from Policy D4 in the Local Plan and earlier achievements such as 'Energy World'. It is worded to emphasise the benefits from the scale of growth here.</p>
<p>16. Item 5. reword: "An increased focus on the knowledge-based economy will <b>add to the current diversity of employment opportunities in the area</b> as the local..."</p>	<p><b>Agree to add additional phrase as highlighted and the deletion of 'be supported'.</b></p>
<p>17. Item 7. Delete the word "iconic" please - has overtones of being showpiece rather than functional! Last bit needs to apply to "all" new developments - the EEA and WEA need salvaging as far as possible! Bullets seem to have disappeared but are perhaps not appropriate to this style anyway.</p>	<p><b>Agree, delete 'iconic'.</b> <b>Agree, add the words 'congestion and' to Vision point 8 after the word 'reducing' in the first sentence of the point</b></p>

And the separation of pedestrians from high speed traffic has also disappeared again and needs reinstating	Pedestrian routes are covered by the reference to Redways, which effectively separate pedestrians from high speed traffic, in point 8.
18. 11. Remove the reference to "New Town" (Lakes isn't) and the three estates please. It's not true and there will be others.	These are identified in the Regeneration Strategy. <b>Agree; add reference about additional areas in the CS time period. Change 'New town' to 'city'.</b>
19. Core Strategy Objectives (Including this bit is why it feels repetitive, but I guess it's compulsory to spell them out. Might it be better if they were structured as boxed insertions in the previous chapter?)	Presentational matter, this can be considered when the document has been agreed by the council.
20. 4. and development of the College. FE is also critical for this	<b>Agree, add to objective 4.</b>
21. 7. Add on "and in the smaller pockets of rural deprivation by a strong Rural Strategy.	None of the rural wards are identified as the most deprived in the Social Atlas, however they can be covered by <b>adding a statement to explain any areas with social deprivation in the future will also be covered.</b>
22. 9. Improving the transport links between MK and the surrounding rural towns	This is covered in the last line in objective 9 with the addition: <b>'and the A509' to the end of the last point in objective 9.</b>
23. 10. Add on sustainable transport initiatives	<b>Agree add as suggested to objective 10.</b>
24. 16. Add in "and other health facilities"?	<b>Agree add expansion of 'health facilities including' MK Hospital to objective 16.</b>
25. p14. – Title should be 'The Story of the Place'?	<b>Agree, revise as suggested.</b>
26. p30-32. – Is this level of detail needed in the strategy document? Three pages of such a breakdown seems a bit more than necessary.	<b>Agree this detail will be moved to an appendix.</b>
27. p68. – I think there are 4 permanent sites in the Local Plan (Calverton, Willen, Fenny Lock and Bottledump).	The site at Calverton is an existing site to be extended. <b>This will be clarified in this part of the CS to explain there are 3 NEW sites at Fenny Stratford, Bottle Dump and Newton Leys.</b>
28. Policy CS1 makes no reference to the SW area at all, and for completeness and readability, it should refer to it, I'd have	This is not within the MK administrative area and we have no authority over the allocation of the site. It has to remain in



<p>thought. All references to numbers of houses need cross checking - good luck!</p>	<p>Aylesbury Vale's CS. Reference could be made in the preamble to CS1:  <b>Agree, add reference to the both SE and SW SDAs at the end of the first paragraph of Chapter 5 (containing policy CS 1).</b></p>
<p>29. CS3</p> <p>1. Did you really mean R&amp;D in the second bit? There are far more R&amp;D needs for which the appropriate location is not CMK than those which is, I'd have thought - but then I have an engineering perspective on R&amp;D! I'm not sure how much R&amp;D is covered by B1c.</p> <p>2. I am therefore concerned that the wording of CS3 about office/r&amp;d uses is too restrictive - but that depends on the definition of "cannot be accommodated in CMK". I would be happier if this referred to the criteria referred to in the text, and said something like</p> <p>"Central Milton Keynes is the primary focus for the development of large-scale office and research and development (B1a/B1b) floorspace within the Borough. However, it is recognised that some such uses, eg. medical R&amp;D with a need to liaise closely with the hospital, or those which are geared towards the business-to-manufacturing sector may be best accommodated in out-of-centre locations.</p> <p>Criteria will be drawn up to assess the best locations for different types of employment, and B1a/B1c floorspace will also be permitted in some other locations to be identified in the Site Allocations DPD in accordance with table 5.3. Applications for 1000 sq m or xxx employees in B1a/B1c categories outside CMK will need to demonstrate that they meet the criteria and have adequate transport plans in place2".</p>	<p>1. Research and Development offices should be in the city centre, but if manufacturing floor space is required the policy allows that beyond the city centre. R&amp;D is covered in the Use Class B1b ' Use for all or any of the following purposes— for research and development of products or processes.</p> <p>2. The detailed criteria will follow in the Site Allocations and Development Management DPDs.</p> <p><b>Agree; add some of this additional text to the delivery section of this policy.</b></p>

<p>30. Policy CS4 I am becoming more and more concerned about the fact that Bletchley and Wolverton are grouped together with Kingston and Westcroft in this policy. I believe that the type of retail that residents want to see is fundamentally different, and that we do them no favours grouping them together. But John made very strong arguments that that type isn't viable any more anyway. So what are we going to do with our high streets? Do we want to loose them - and what does that do to other aspects of our community? I would like to have a discussion and to see any more detailed evidence we have for the different types of retail and leisure they attract, and to consider splitting that category into two.</p>	<p>The retail study considered by Advisory Group members on 8<sup>th</sup> July 2009, recommended no change to the status of these centres. They comply with the definition of district centres in Government Guidance (PPS6). Current policy is to regenerate Wolverton and Bletchley town centres and diversify the range of uses at Kingston and Westcroft . More detail can be established in the Development Management DPD.</p>
<p>31. I also think we need to recognise that the presence of a specialist shop with a daily or weekly element to its business is one of the factors which seems to promote success in local centres (eg. Phil Corley's Cycles, the pet shop in Netherfield, George Ort's bakers in Heelands). This brings in an element of passing trade, and brings the centre to the attention of those local residents with bigger budgets, who can boost the market for the higher margin convenience goods that help the shops to stay afloat, and gives those shops locations with lower rates than CMK. Similarly, comparison specialist shops with a longer frequency of visit help attract people into and boost the town centres. Olney relies on its antiques, for instance. This category again needs to be recognised in the policy</p>	<p>These detailed changes to retail policy for the centres are a matter for the subsequent Development Management or Site Allocations DPD.</p>
<p>32. Table 5.3 the designation is used twice! pg 39 and pg 30!</p>	<p><b>Agree, the table numbering will be revised, so the strategy table will become 5.6.</b></p>
<p>33. The list of areas for development -pg 39 The sums of jobs are not clear - it's not always clear which are overall figures and</p>	<p>All of the figures are to illustrate the component parts for an overall area. To assist, a total can be added for the larger</p>

<p>which are the component part figures. Occasionally similarly housing figures. And floorspace for retail and leisure. Can we have a separate row at the bottom of each area giving the total housing and employment figures and retail floorspace described in each column for that development?</p> <p>34. The Government said that we should cover employment for the wider area, didn't it? Are we supposed to be covering jobs in the external parts of the SE SDA and SW SDA or just our own? And which is listed here? The jobs figure doesn't seem enough for the whole area in the SE SDA.</p>	<p>areas. <b>Agree, add totals to larger areas of development in this table.</b></p> <p>Agree with statement about South East Plan. Table 5.4 assumes maximum job capacity of <u>all</u> of SDAs at around 6800 jobs. The number of jobs in the South East SDA will depend upon the implementation of more detailed planning through the Development Framework DPD. We need to ensure there is no double counting and will argue that the job numbers in Aylesbury and Central Beds should include their share of the SDA growth in their area.</p>
<p>35. Can someone tell me how much floorspace Tescos in Bletchley has please, re the argument about provision in the SDAs last week.</p>	<p>Tesco at Bletchley has a floorspace (including mezzanine floor) of 6085 sq metres (gross). The proposed food stores in the SDA's are 3500 sq metres (gross).</p>
<p>36. No new houses in the Ouse Valley villages</p>	<p>The CS aims to meet the South East Plan requirement for the rural area by new allocations in the most sustainable settlements, effectively carrying forward the Local Plan strategy. This continues with the key settlements which include Olney. For the villages only Sherington is identified as a key settlement as a result of the Parish Council's request. Others will be limited to small scale infill (normally no more than 1 or 2 dwellings or a change of use). This Local Plan policy has been 'saved' and will remain until it is replaced in the Development Management DPD as explained in the Appendix C.</p>
<p>37. Policy S10 to be kept</p>	<p>This may refer to the previous Local Plan (1995). That has been</p>
<p>38. Policy DE12 (was unsure of the exact policy reference) to</p>	<p></p>

<p>be kept, it was apparently brought up at last DC by Cllr Bristow and refers to not building in rural villages if the houses etc can be built elsewhere.</p>	<p>replaced by the 2005 Plan. Provided the South East Plan's separate requirements for the rural and city areas are satisfied, there is no argument to find additional land.</p>
<p>39. Protect areas of landscape and areas of natural beauty, this would include no gravel extraction in the Ouse valley villages</p>	<p>The policy CS 20 on page 95 of the agenda for the LDFAG meeting on 3<sup>rd</sup> September, addresses the protection of different landscapes in the Borough as identified in the Landscape Character Assessment. There are no Areas of Outstanding Natural Beauty in MK Borough. The issue of gravel extraction will be addressed in the Minerals DPDs.</p>
<p><b>40. Choice</b> This seems to be an ongoing theme and cause for concern for some members of and visitors to the Meetings of the Group. It needs to be clear which recommendations and comments are based on (for example) the contents of the South East Plan or other (external) documents and which are unique to MK and therefore 'optional' or in line with other MK based 'strategies'. Options, where appropriate, should be spelt out in detail for consideration</p>	<p>The covering report for the LDFAG meeting explains how choices were made earlier in the process. In this paper the officer response explains where the South East Plan or other documents limit choice and where changes can be made, as suggested.</p>
<p><b>41. Definitions</b> It might be worth revisiting the 'brainstorming' which identified the key themes that 'make a great, world class city', themes listed for example (but not definitive)</p>	<p>This may be more appropriate for the marketing work mentioned in the covering LDFAG report under the heading 'Background'.</p>
<p><b>42. issues for clarification</b></p> <ul style="list-style-type: none"> <li>- *Housing number (page 24) item 2 – the figure is 7,390 (not 8,500)</li> <li>- The impact and outcomes from the SHLAA research should receive more coverage and explanation within the Core Strategy (e.g. P63 Future Development sites)</li> </ul>	<p><b>Agree, this will be corrected together with other inconsistencies.</b> <b>Agree, this can be added as the footnote suggested.</b> <b>Confirm that the SHLAA will be added with an explanation about this process.</b></p>
<p><b>43. CS1</b> – is I believe misleading as it fudges the definitions of urban, older towns and villages and open countryside. The</p>	<p><b>Agree; this policy will be re-worded to tie the settlement hierarchy in Table 3.1 into the policy. Also add 'and</b></p>

<p>expansion is virtually all on land that would otherwise be defined as open countryside, in older parishes and as expansion to and linked to key settlements such as Woburn Sands. If you read this cold you would think this was a natural expansion within the previously defined (DA) expansion area of Milton Keynes.</p>	<p><b>adjacent to’ after ‘will be focussed’ in the sentence beginning with ‘New homes..’</b></p>
<p>44. <b>CS2</b> – second sentence should read <i>This core strategy allocates the SE SDA as a mixed use strategic allocation containing up to a maximum of 7,300 homes within the current boundaries of the Borough of Milton Keynes</i>  Third sentence should include the additional wording ....in accordance with policy CS1.  Final sentence contains the acronym SEP – which I assume is South East Plan but either use South East Plan in full or put in brackets (SEP) in sentence one if you intend to acronym further down.</p>	<p><b>Agree, with revised wording of second sentence.</b></p> <p><b>Agree with addition to third sentence.</b></p> <p><b>Agree, add ‘(SEP)’ to first line of policy.</b></p>
<p>45. <b>CS3</b> – I am not convinced this is nimble/flexible enough to meet future employment trends. Employment units built in the 70’s are often now ‘unfit for purpose’, many being designed as small manufacturing units when manufacturing demand has declined. We need to be able to shift areas from employment to housing, especially if they are close to CMK, and to concentrate on satisfying the demand for start up / innovation units. We do not know today what the demand will be in five years time, for solutions to problems we do not yet know exist and to satisfy ICT trends that we are yet comprehend. Emphasis on our ability to meet future, as yet unknown need and demand quickly and flexibly, with all the public sector support mechanism designed to support that demand.</p>	<p>The sub paragraph III) refers to the need for a variety of sites for differing requirements of a wide range of uses. By providing enough such land the council will offer flexibility and the Annual Monitoring Report together with the Development Management DPD provide opportunity to review sites no longer needed. They will also help to identify whether a partial review of the Core Strategy is necessary.  <b>Add ‘Should the employment needs of the Borough change dramatically and undermine the assumptions behind the Core Strategy, then a partial review could be considered’ and add this to the Appendix D Risks and Contingencies under point 3.</b></p>
<p>46. <b>CS4</b> – District Centres – It is wrong in policy terms to link on block Bletchley and Wolverton (with specific old town</p>	<p>These centres are linked together because they comply with the definition of district centres in Government Guidance (PPS6)</p>

<p>characteristics, traffic constraints etc with Kingston and Westcroft which are purpose designed and built for modern living – they should be treated separately.</p> <p>The policy should include the plan to include either a second District Centre on the SE Expansion area or the intent to expand the Centre by incorporating neighbouring manufacturing areas for additional retail footage and car parking and should differentiate between Kingston District Centre and Westcroft which have different catchment and access characteristics (Kingston attracting from a far greater geographic hinterland than Westcroft and with soon to be enhanced (A421) access benefits.</p>	<p>and in terms of the amount of floorspace in each centre; they have more in common with each other. The consultants who have reviewed this issue have concluded things should stay as they are and recommended no change. These are centres where the Council is encouraging growth. Just because they appear together does not mean that the approach of the Council in each centre is the same. See response to point 30 above.</p> <p>Previous attempts to split these centres up and elevate one centre above another have not been supported by the Planning Inspectorate. These attempts generate significant objections from interests in those centres that perceive themselves as being slighted and downgraded relative to the ‘promoted’ centre. The status of any centre in the SE SDA is a matter to be resolved in a subsequent DPD and will depend on the details of the scheme. As proposed this centre would be a smaller centre catering for the development around it rather than drawing from a wider catchment area, as do the District Centres.</p>
<p><b>47. CS5 – South East SDA</b></p> <p>2. add the line – <i>including the character and integrity of the hamlets of Cross End and Lower End in the Parish of Wavendon</i></p> <p>6. Specifically quote J13A – recognisable to all as that in council policy.</p> <p>7. Apply, as a <i>minimum</i>, the highest....</p> <p>8. Provide <i>businesses and residents</i> ....</p> <p>11. ...<i>and in line with policies contained within the published Mid Bedfordshire District Council Core Strategy</i></p> <p>15. If we are to specify financial contributions to east/West rail then we should also specify ...</p> <p><i>Contribute financially to the provision of education, health,</i></p>	<p><b>Agree, add ‘and the hamlets of Cross End and Lower End’ to the end of point 2 in the policy.</b></p> <p>The actual numbering of junctions is unclear at the moment. It is better to retain flexibility until further discussions with the HA have taken place. <b>Agree to add ‘as a minimum’</b>. <b>Also add ‘Council’ before ‘standards’</b>. <b>Agree add ‘businesses’</b>.</p> <p>We are waiting for the Central Beds Core Strategy Inspector’s report. Subject to that we may then be able to revise point 11 of policy CS5.</p> <p>Financial contributions are covered in the previous point (14) under the updated tariff agreement.</p>

<p>emergency service and new and existing community facilities such as community centres and playing and recreation fields And then...final section</p> <ul style="list-style-type: none"> <li>- a maximum of 7,300 homes....</li> <li>- Transport infrastructure (replace) a new park and ride site and a lorry park linked to the M1 and A421 with</li> </ul> <p><i>A multi modal transport hub offering connections to park and ride (bus and/or train), cycle links, pedestrian links (connected to the Bedford/MK waterway) and with the potential to access rail services direct to and from London, Bedford and the Midlands. * why does this policy not include the sentence The provision of a strategic and integrated approach to flood and water management?...as included in the SW SDA</i></p> <p><i>An extensive lorry parking facility, taking advantage of the close proximity to the M1 and A421 (East / west link)</i></p> <p>Acronyms unexplained in CS5 include SUDS and SPD</p>	<p><b>Agree to add ‘a maximum’ for consistency with point 44 above.</b></p> <p><b>Agree to replace ‘a new park and ride site’ with italic text as suggested.</b></p> <p><b>Agree add flood and water management as policy CS 6.</b></p>
<p>48. <b>Page 56</b> – we need to change i. Residential to now read <b>A maximum</b> of 9,300 across the whole of the SDA ....</p>	<p>Keep existing text as this covers the same point. <b>Agree, add footnotes to define acronyms</b></p> <p>See note on point 47 about the Central Beds Core Strategy The South East Plan requirement is for the SE SDA as a whole to achieve 10,400 homes in total, subject to the review of the East of England Plan. It is not appropriate at present therefore to specify a maximum for the whole SDA, although as noted in Point 47 above, we can specify a maximum number of homes for the Milton Keynes element.</p>
<p>49. <b>CS 6</b> – should include a specific intent to extend the Grid Road system to incorporate access to and from this area and, in my opinion, should include the intent to incorporate the area, via a boundary review, into the Borough of Milton Keynes. As this is a CS Policy should point 5 actually read <i>Technical work will be undertaken to assess the traffic impact of the SDA</i></p>	<p><b>Agree; add reference to first point in CS 6 to the first principle in CS 5.</b> The boundary review is not a planning policy consideration.</p> <p><b>Agree to revise point 5 of policy as suggested.</b></p>

<p>on Bletchley town centre, including the impact on town centre car parking. Point 6 is woolly</p>	<p><b>Agree, replace point 6 with copy of point 9 of CS 5.</b></p>
<p>50. <b>CS7</b> – Point 4 should amend to read ... <i>Recognise the influence of the car in the design and layout of the area</i> ... And point 5 is again so vague and should include some examples of how that integration will occur</p>	<p>The point 4 carries forward the principles of Local Plan policy S5. This policy will be re-written to add detail from the preceding paragraphs as suggested by the Inspector.</p>
<p>51. <b>CS8</b> – Does not seem to be written as a policy. In particular the final paragraph which is a statement of fact at a specific point in time and I'd rather see a policy statement as to how those areas identified, and future areas not yet identified, as to be addressed – the mechanisms, the criteria, the options available etc</p>	<p>This policy will be reviewed. Comments have been received from the Government Office about the need to make this more 'place shaping'. There will be reference to addressing additional areas in the future as agreed under point 18. The specific mechanisms are identified in the Regeneration Strategy. They can be linked with a footnote.</p>
<p>52. <b>CS9</b> – First sentence should include ...to be provided in the rural area <i>in line with policy CS1</i> Flexibility needs to be included to allow other villages to be included as selected villages (if they so choose) during the life of the core strategy A sentence encouraging villages to produce individual Village Plan's as part of the Strategy for the Rural Area and another sentence referencing the policy and the annual review of the SHLA process also needs to be included Final sentence on employment needs clearer definition – what constitutes rural employment in the terms referred to – example or clearer definition needed here. A more general point is the need for a clear definition of the status of Wavendon and Woburn Sands which achieves a hybrid status which is never clearly defined. The expansion areas are areas of open countryside and the existing developed areas of the villages are 'village enveloped defined' residential areas. Housing numbers for the parishes are met by the expansion and yet are double counted by the SHLA process?</p>	<p><b>Agree to add reference to policy CS1.</b></p> <p>The need to review rural housing is included under point 1 in the Appendix D Risks Actions and Contingencies. This could lead to a review or partial review of the Core Strategy.</p> <p><b>Agree to add these references in the supporting text with mention of periodic reviews of the CS before 2026</b></p> <p><b>Agree, add footnote with definition.</b></p> <p>The housing in Wavendon and Woburn Sands will be counted as rural growth; they are not double counted in Expansion areas. It is possible that any completions in these settlements will change from rural when the SDA is built, but that could well be after the current CS time period. This will be reviewed in the LDF.</p>



<p>53. <b>CS10</b> – First sentence, could this amend to ...<i>and the needs of ethnic minority and/or religious groups where it is...</i> Do we (third sentence) have to refer to HiMO's or can we refer to policies on key sector housing (for low paid, key social sector housing need etc)? Again is this a choice of phrasing – HiMO has many negative conversations related to inappropriate conversions rather than purpose built, demand led solutions?</p> <p>The final sentence relating to travellers – is this a 'no choice' sentence or could it be removed if we so choose?</p> <p>Could we include a sentence on the support for home working, people running one man businesses from home and the like considering the trend towards such working patterns in recent years – encourage the removal of local government bureaucracy and planning constraints that constrain such enterprise?</p>	<p><b>Agree; add reference to religious groups to first sentence.</b> This part of the policy is aimed at providing a “hook” for future policies in a HiMO SPD. Accept that “HiMO” can have negative implications but “HiMO” or “HMO” is a commonly used term. “HiMO” was also used in the Preferred Option document. Other housing for low paid, key workers etc would be covered by the first part of CS10 and would not necessarily address the same specific issues as HiMOs.</p> <p>Effectively for the Core Strategy it is a “no choice”. We must meet the requirements set out in the South East Plan Partial Review. The partial review has undergone two previous stages of consultation and the proposed new policy now reflects the recommendations made by MKC at previous stages. As with HiMO's it provides a “hook” for the site allocations document and was included in the Preferred Options document.</p> <p>Home working is reflected in the vision, a well connected Milton Keynes and Delivering Economic Prosperity. Agree that it should be included in actual policy wording but consider CS16 to be most suitable location. <b>Add home working to Policy CS</b></p> <p><b>16</b></p>
<p>54. <b>CS11</b> – general – A Well Connected MK should surely refer to both internal and external connections so should there be policy references here to air, road and rail links regionally, nationally and even internationally?  First sentence – rather than better can be try <i>safe and enhanced facilities for cycling...</i>  Point 2 - sentence should read <i>by walking or cycling</i>  Point 3 needs clarification and example(s) to demonstrate the point being made and</p>	<p>The wider transport connections are described in the supporting text.</p> <p>The word 'better' has been chosen to include scope for improving our existing redways as well as for new routes and provision. Point 2 – <b>Agree but use 'and' rather than 'or'</b>.  <b>Agree –add footnote to give examples of demand management.</b></p>

<p>Point 4 likewise – rather than use the work specifically, change to ... <i>for example the dualling of the A421...</i> and reference again the eastern flank transport hub opportunity.</p>	<p><b>Agree replace ‘specifically’ in point 4 with ‘for example’ and add the Multi Modal Transport Hub.</b></p>
<p>55. <b>CS12</b> – People aspire to homes with a garden and that aspiration should be supported by a core policy commitment. It is all very well and commendable producing communal open space but private outdoor space should and must be a core objective of this strategy  Maintain the grid road separation of residential and employment zones – I have ward experience of the one occasion where this was abandoned as a policy and it simply does not work (Tilbrook industrial was to have been in two phases, phase 2 became Browns Wood and years of Environmental challenges and costly remedial works etc followed as people and businesses attempted to live side by side)</p>	<p><b>Agree; see response to comment 8 above. Add ‘and add private amenity space for houses’ at the end of point 3.</b></p> <p><b>Agree, add ‘but maintain satisfactory separation between employment uses and housing to prevent any environmental conflict between the two uses’ at the end of point 2.</b></p>
<p>We need to understand what makes ‘a community’ – how to approach to increase levels of wellness and quality of life, show vision, leadership and collaboration to deliver positive local outcomes from our strategy commitments. This CS should help developing and existing communities imagine their futures and articulate a vision that inspires commitment to a future MK – not sure it achieves that yet?</p>	<p>This can be developed through The LSP Sustainable Community Strategy review.</p>
<p>56. <b>CS13</b> – Point 8 needs rewriting as currently it indicates the Councils car park will extend across MK! Suggest - <i>Effectively integrate the Council’s minimum car parking standards into the layout of new developments recognising the uniqueness of Milton Keynes in supporting private car ownership and the unique selling point in attracting new and enhanced investment into MK through the support of private car ownership and</i></p>	<p><b>Agree with first part of amendment; ‘Effectively integrate the Council’s minimum car parking standards into the layout of new developments’, to point 8 of policy CS13.</b>  Remaining statement can be added to the supporting text, but should reflect the statements made in the Vision about ‘getting around MK’.</p>

<p><i>business, retail and commercial car parking facilities.</i></p> <p>Well designed places also have to work well so we must fall for political correctness and theory in what might look good (in some people's eyes – cutting edge design today can be tomorrows regeneration priority!). We need here also to aspire perhaps to outstanding public art and some memorable city landmark(s) that mark entry to and from the Borough boundary – The Angel of the North type of creation?</p>	<p>Agree; the reference to land marks is partly addressed in point 6 of the policy although that is in the context of helping people find their way round the city.</p>
<p>57. <b>CS14 &amp; 15</b> I take at face value but wonder if community recycling, energy from waste schemes and the like have a part to play here</p> <p>58. <b>CS16</b> – Delivering economic prosperity – there needs to be here an agreed measurement tool, a KPI perhaps, against which this can be set and measured annually for the life of the Core Strategy. There seems to be no analysis of what makes a business (or an individual resident for that matter) decide to invest in, and stay in MK and without such core knowledge. The assumption appears to be education and IT are the core enablers for prosperity, and whilst not diminishing their importance, lets not forget location, transport links, hinterland, the role of the public sector in supporting local investments (outstanding local council = outstanding local area in which to invest). No mention of marketing and promotion of MK and its surrounds, of partnership working, tackling social inequalities.</p> <p>59. <b>CS17 – Small Business</b> Should the 'strategy not start with' <i>We shall build an enterprise culture in MK by...</i> <i>We shall encourage a dynamic start-up market by...</i> <i>We shall build on the capability of small businesses to grow by .</i> <i>We shall consider ways to encourage access to finance for</i></p>	<p>These are addressed in the Waste Development Plan Document. The review of that DPD will provide opportunities to update.</p> <p>Thirteen measures are used to monitor policy CS16 as well as other similar policies. These are listed in the table in the Monitoring and Managing Chapter</p> <p>The important contribution other elements to prosperity is evidenced throughout the document e.g. the SWOT table. The evidence base supplies much of this level of detail. The CS does refer to the MK Economic Vision and the <b>supporting architecture diagram will be reproduced in the CS.</b> Support for IMK marketing could be added to the delivery section. Tackling health and social inequalities are dealt with in CS19 and elsewhere in the document.</p> <p>These changes are getting into a level of detail, which is inappropriate for a spatial plan. Access to finance, encouraging trading with local government are important and very worthy, but the CS cannot be expected to cover all non-spatial aspects such as these and the question arises how can these be delivered through the Core Strategy? If the Council wishes to</p>

<p><i>small business by (advisory service or by an Essex CC 'bank' type of initiative)</i>  <i>We shall encourage enterprise in disadvantaged communities and 'under-represented' groups by...</i>  <i>We shall improve small business experience in dealing with and trading with local government and other aspects of the public service in MK by ....</i>          And then set out the existing text plus references to Oxford/Cambridge ARC / Cranfield Uni / Innovation Centre developments</p>	<p>implement these measures there are other mechanisms open to the Council. Some of these aspects are dealt with in the MK Economic Vision and similar related documents to which the CS refers.</p> <p>Oxford –Cambridge arc, innovation centre is mentioned earlier in document no need for further duplication.</p>
<p>60. <b>CS18</b> – mention the role of local authority in setting an example in new ways of working          No mention of access for the disabled etc          Also, no mention of service information on line (MK web and its successors) and via emerging technologies enabled through wireless and fixed line fibre based technology network across MK. Use of information and knowledge to enable access to services and local business etc</p>	<p><b>Agree to add reference to MKC's good practice in electronic service delivery and the need for access for disabled.</b></p>
<p>61. <b>CS19</b> – Healthier and Safer Communities          - arguably could mention flood prevention measures (planning measures) and other emergency planning assurances as our commitment to safer communities?          Links with our leisure strategy          Links with the PCT and preventative advise strategies etc          Focus on the emerging needs of an aging population demographic          Support for and encouragement of community developed strategies</p>	<p><b>Agree, add reference to emergency planning measures in policy and refer to Leisure, PCT and other strategies in supporting text. Add reference in policy to ageing population at end of first sentence.</b></p> <p><b>Agree; add cross reference in text to Regeneration Strategy.</b></p>
<p>62. <b>CS20</b> – Historic and Natural Environment          - perhaps a policy to support the extension and review of</p>	<p>There is a statutory duty to undertake this work: Planning (Listed Buildings and Conservation Areas) Act 1990 section 69,</p>

<p>conservation areas as and when local demand exists  Extension of the Linear Parks into Bedfordshire in line with the Mid Beds DC adopted Core Strategy  Specific section on Bletchley Park is required  More on specific climate change mitigation methods</p>	<p>so there is no need for a policy.  Extension of the linear parks into Central Beds is covered in point 47 above.  Footnote identifies Bletchley Park at beginning of Part F.</p>
<p>63. <b>CS21</b> – Minerals – requires a key principal namely: <i>Development proposals for mineral extraction in the borough of Milton Keynes will be judged primarily on the basis of policies in the development plan for the area- in effect consuming locally what is produced locally for expansion purposes .. and no more</i>  And then detail as the existing policy</p>	<p>Determining applications in accordance with the development plan is fundamental to the plan-led approach.</p> <p>The second point relates to self-sufficiency in our minerals production and use. This is not a sustainable approach. As the background text states that as a rough guide, the construction of each house uses between 50 and 60 tonnes of aggregate, and when we consider all the associated infrastructure, roads, etc that need to go along with it, that figure is about 400 tonnes. If we are building around 2,000 homes each year, this would put our aggregates demand at around 0.8 million tonnes per annum (mtpa).</p> <p>The sub-regional apportionment (following the review of the South East Plan) will be somewhere between 0.12 and 0.22 mtpa. We will rely on recycled aggregates for some of the remainder, plus imports from other areas and regions (mostly by rail) and marine-dredged sand and gravel. It is not feasible, sustainable or desirable to meet demand from within the area.</p> <p>Further, these principals should be debated through the Minerals Core Strategy. To pre-empt the policies in that document without proper consultation etc is unsound.</p>
<p>64. <b>CS22</b> – Infrastructure  Core policy – <i>MK adheres to the key principle of I before E (Infrastructure before Expansion) in all its commitments</i></p>	<p>This is expressed albeit in a different way, in the opening sentence of chapter 9.</p>

<p>Bullet 2 - ...at the right time <i>to the required minimum high standards demanded by this council and its partners</i></p> <p>A paragraph here as well on a core strategy principle regarding infrastructure adoptions</p>	<p><b>Agree, add phrase as suggested at end of second bullet point in policy CS 22.</b></p> <p><b>Agree, add supporting text to explain adoption processes for highways and open space as examples.</b></p>
<p><b>65. Housing Needs of the existing population</b></p> <p>The housing need for Milton Keynes covers the needs of those people already living here, and the needs of those MK wishes will move here.</p>	<p>It is more straightforward to consider all need together, when for example affordable housing policies will show the total need (30% at the moment). They do not show what proportion of this is for existing residents or for new residents. <b>Agree; add a reference to the fact that housing should meet the requirements of both existing and new residents.</b></p>
<p>66. The national household trends (of negligible organic population growth and a continuing reduction in average household size) are completely outweighed by factors arising from the massive influx of households into MK since its inception as a New Town some 40 years ago. The people who chose to move here were predominantly young adults and young families. So there is a continuing pressure for “first homes” for the next generation of young adults (to build the sense of community), and larger homes for growing families, without any of the constant availability that would happen through natural mortality of a more typical population age distribution. And MK is just about to face a massive increase in its numbers of elderly residents, for the first time in its history.</p>	<p>The SHMA shows mostly 1 and 2 bedroom properties are required not larger family homes. Forecasts in changes to the population structure will be monitored in the Population Bulletin.</p>
<p>67. Data shows that the existing population currently needs about 1000 additional dwellings per year (although the figure is around 800 net, taking into account the release of existing properties as occupants move to more suitable accommodation). The proportion of affordable homes should reflect the needs of the existing population.</p>	<p>The 2008 SHMA shows that the existing population currently requires a net additional 1348 homes a year.</p> <p>The CS does not set a proportion for affordable housing. This will be set out in the Development Management DPD.</p>

<p><b>68. Housing Needs of future residents</b>  MK is aiming to grow in population by attracting people to the jobs, the homes, and the lifestyle that the area offers. Within CMK, the proposition is “City Living” – high-rise, high-density apartments and associated lifestyle. Elsewhere in the conurbation, the proposition is a high quality suburban lifestyle: predominantly houses with gardens for families, and trees in sight of every home, across a range of styles, densities and costs.</p>	<p>The phrase “a tree in sight of every home” could not be enforced and is not appropriate for inclusion in the Core Strategy. <b>Agree with the general point though in describing the type of places we want. This will be strengthened in the supporting text in the area based policies to emphasise the differing roles of CMK and the rest of the borough.</b></p>
<p>69. The number and mix of homes built for new residents must support the Council’s strategy for further development of the skill &amp; industry mix within the local economy; the continued development of MK as a regional hub for business, leisure, retail, entertainment and culture; and as a city of national and international significance. To fulfil these goals, MK must also attract top entrepreneurs, sports stars, entertainers and other public figures to come and live here by providing the right homes and quality of life. Recent research by HCA shows that MK has failed to attract some major employers because of a lack of suitable homes for directors and other high-income employees.</p>	<p>This point is made in the second paragraph of the pre-ambles to CS10 with reference to “executive homes” needed to meet the objective of economic prosperity. <b>Agree, that this be added to with reference to specifically support the knowledge based economy, but not specifically stating sports stars etc.</b></p>
<p>70. The new town has a proud history of housing innovation, and it is intended that future housing continues to be at the leading edge of energy efficiency<sup>1</sup>, renewable energy generation, design, practicality, flexibility and attractiveness: “Smart Growth<sup>2</sup>”. This will include a deliberate range of</p>	<p>All of this is covered elsewhere in the document or within CS10. There is no need to repeat energy efficiency targets here.   Reference to Council tax is not necessary, different types, sizes and tenures would achieve this anyway.</p>

<sup>1</sup> Including adopting Zero Carbon at an early stage

<sup>2</sup> The preferred style of expansion described within the South East Plan, where population and prosperity grow but environmental impact is minimised

<p>household sizes styles and price bands (Council Tax bands mirroring the distribution across the South East Region), a mix of tenure types, and a range of residential densities.</p>	
<p>71. In recognition of the lifestyle and community benefits, the overwhelming majority of new homes should be houses with gardens rather than flats (except in and immediately around CMK, where apartment blocks are more appropriate for density, lifestyle and urban design reasons).</p>	<p>Density is covered in CS13 bullet point 7. <b>Agree, add reference to that policy about higher density in CMK , along good public transport routes and lower elsewhere</b></p>
<p>72. To enhance the appearance of new residential neighbourhoods, and to encourage residents to leave their cars behind, new neighbourhoods should have as many parking spaces as will be needed for the projected levels of car ownership for the mix of dwellings (plus spaces for visitors). Attractive alternatives to car travel must be provided in order to reduce the carbon footprint of new estates.</p>	<p>Parking spaces are addressed in the Parking Standards SPG and subsequent review. Alternatives to the car are addressed in A Well Connected Milton Keynes.</p>
<p>73. <b>Policy CS10 Housing Need</b> New housing development should meet the needs and aspirations of the existing population and of the future residents MK chooses to attract. This includes building homes of diverse sizes, values, styles, tenures and densities.</p>	<p><b>Agree, add to chapter distinction between existing and new residents, but not 'future residents MK chooses to attract'.</b> Other points already in policy CS10 or CS13 (density).</p>
<p>74. New housing should always be exemplary in energy efficiency, renewable energy generation, carbon neutrality and safety by design. Where possible, housing should support changing family needs over time (“lifetime living”), and some should support home working in a variety of occupations by its design and provision for colleagues, employees and business visitors. All homes should provide exemplary ICT connectivity for both home working and social inclusion.</p>	<p>Sustainability is covered in Policies CS12, 13, 14 and 15 “Lifetime living” is covered in the existing policy CS10 which requires flexible design. <b>Agree; add reference to home working to policy CS 16.</b> ICT is more suitable in CS16.</p>
<p>75. Except in CMK (where apartment blocks are appropriate for</p>	<p>Density is covered in CS13. See comment above on density.</p>



<p>density, design and lifestyle) the overwhelming majority of dwellings (90%+) should be homes with gardens rather than apartments. In-fill development should respect the local style and scale of buildings, and enhance the mix of dwelling types.</p>	<p>There is no evidence to put a policy requiring over 90% of new dwellings to be homes rather than apartments. We could not enforce this and if we did, it could prevent future delivery as house builders will only build what they believe will sell. Existing policies about creating mixed communities and reflecting existing character should be adequate. If we did want to address this it would be best done in the DM DPD but the same issues would still exist at that stage. Design is covered in CS13</p>
<p>76. Residential neighbourhood design should encourage non-car travel as part of a comprehensive travel choice strategy and social inclusion strategy, by providing sufficient identified parking spaces for projected levels of car ownership (in addition to visitor parking).</p>	<p>Parking spaces are addressed in the Parking Standards SPG and subsequent review. Alternatives to the car are addressed in A Well Connected Milton Keynes.</p>
<p>77. To support the local sense of place and social continuity, priority allocation of social rented accommodation should be given to those with the longest history of living in Milton Keynes. Where possible, residents should have the option of living close to their family home.</p>	<p>This is a Housing function not for the Core Strategy. Priority is already given to those with a local connection.</p>
<p>78. The Council will plan positively for open market properties, affordable and other low-cost properties (including those at and close to Housing Benefit levels of rent), and to meet the needs of all other identifiable groups: the elderly, those needing support or with other special needs, single people, members of ethnic or lifestyle groups having specific requirements, etc. Wherever possible, all alternatives to open market family homes will be distributed in a pepper-pot manner, and be “tenure-blind”.</p>	<p>Tenure blind and pepper potting policies will be included in the Development Management DPD.</p>
<p><b>79. Delivery</b> (to be re-written to reflect the narrative &amp; policy above...)</p>	