

Key Decision	Yes
Listed on Forward Plan	Yes
Within Policy	Yes
Policy Document	Milton Keynes Local Plan Deposit Version
Overview Committee	Environment, Transport and Localities (ETL)

EASTERN EXPANSION AREA DEVELOPMENT FRAMEWORK

Accountable Cabinet Member: Councillor McCall

Contact Officer: Martin Davies, Senior Planning Officer - 252614

1. Purpose

- 1.1 To advise the Cabinet of the results of public consultation on this document and to recommend its adoption as Supplementary Planning Guidance.

2. Recommendations

- 2.1 That the suggested changes to the Eastern Expansion Area Development Framework be approved.
- 2.2 That the Development Framework is adopted as Supplementary Planning Guidance.

3. Issues and Choices

Public Consultation

- 3.1 The Draft EEA Development Framework was issued on 27 Sept 2004, with a consultation period of 6 weeks. Copies were available for inspection at all MKC libraries and for viewing or downloading on the internet. A copy of the framework was sent to about 80 consultees. Public exhibitions were held on 4 days at Broughton, Wavendon and CMK. Leaflets were delivered to 250 houses in the locality. 53 written representations were received by the closing date. 20 late representations arrived in the following week. These have all been summarised in the table in the **Annex** (Set out in separate volume) . The table also contains the officer level responses together with recommended changes to the framework, shown in bold text.

- 3.2 The recommended changes are mainly of low significance and have been discussed and provisionally agreed with English Partnerships, who jointly commissioned the framework. A number of other very minor text and graphic corrections will also be made to the framework. The more significant changes are discussed below.

Status of the Development Framework

- 3.3 This framework is being prepared as Supplementary Planning Guidance (SPG) in accordance with the requirements of PPG12 para's 3.15-3.18. One of these requirements is that it is consistent with the policies in the adopted development plan. In this case the SPG needs also to be consistent with the policies of the emerging local plan that now have considerable weight following the recent inspectors report. Clearly the relevant policies are not yet adopted but are likely to be included in the local plan when adopted. The part 1 inspectors report has already been considered by the Cabinet and largely accepted. Cabinet will consider the part 2 report in Feb or March 2005. It is considered that this proposed framework is in accordance with the relevant policies of the emerging local plan.

Key Changes

Proposed Bedford to MK Canal

- 3.4 This issue generated the largest number of responses, mainly in support of the canal. The inspectors report has recommended that a route for the canal is not safeguarded in the Local Plan because this would be contrary to advice in PPG12. The report adds that MKC may wish to consider the feasibility of safeguarding a route in supplementary guidance such as the EEA development framework. However, legal advice has been obtained on the latter point, which concludes that it would not be correct for the SPG to endeavour to safeguard the canal because this would not be consistent with the emerging local plan. Apart from the possible question of legal challenge from objectors to the canal, it is also likely that to do so would result in the weight to be attached to the framework being significantly reduced. The above advice applies equally to the two route options suggested in the draft framework.
- 3.5 British Waterways has been given another opportunity to provide further information on feasibility to justify safeguarding. It provided preliminary reports on costs and benefits and water resources on the 7th December, too late for assessing in this report. The proposed meeting which the B&MK Trust was organising with developers has had to be postponed and may now take place early in the new year. It may be possible to provide a verbal update at the Cabinet meeting.
- 3.6 There are several potential benefits from including the canal, as listed in BW's comments attached. These include: uplift in property values, use for water supply and drainage, wildlife habitat, leisure facility, and a more varied and attractive urban environment. However there are also potential risks, including: delay to housing delivery, legal challenges, property blight, increased development costs leading to reduced S106 contributions elsewhere, uncertain feasibility of the wider canal project.

- 3.7 In conclusion, it is considered that, given the lack of adequate evidence from British Waterways, and the inspectors recommendation, the potential safeguarded corridors for the canal be deleted from the framework. It should refer to the Inspector's suggestions concerning a review at a later stage and explain that this is likely to be considered as part of the next review of the local plan.

Transport Issues

- 3.8 Many comments were received about a wide variety of transport concerns. Initial traffic modelling work has shown that the development of the EEA will significantly increase peak hour queues and delays at a number of off-site junctions between the EEA and CMK. This analysis, and similar work associated with other major developments in the City, has identified the overall scale of works that might be necessary, including indicative junction improvements and route strategies. Transport assessments accompanying planning applications, will need to confirm the impact of individual developments in the EEA, as well as the scale and details of improvements that are considered necessary. In doing so, it will be necessary to distinguish improvements that are specifically required to facilitate development in the EEA from those that are the result of general traffic growth or other developments elsewhere in the City. To ensure compatibility of assumptions and methodologies, use should be made of the Milton Keynes multi-modal transport model to undertake these assessments, wherever possible.
- 3.9 Infrastructure improvements will also be required along the H5 and H6 corridors to ensure that public transport can reach CMK efficiently. Initially, these will take the form of on-street bus priority measures but, at a later date, these may be upgraded to provide a segregated public transport system. Developers of the EEA will be required to contribute to the costs of such infrastructure. Support funding of initial public transport services to the EEA, which are not commercially viable, will also be required for a period of 5 years. Consideration should also be given to innovative ways in which the use of public transport can be promoted (eg by issuing new household discount tickets).
- 3.10 It is currently envisaged that developers' financial contributions towards transport infrastructure up to 2016 will be included in the overall tariff system being developed for the remaining developments on the East and West Flanks. This will require a contribution based on the number of dwelling units involved in each development, and a separate contribution for each employment site calculated on the basis of floor area. The tariff amounts will be based on a proportional contribution to both local (community) and strategic infrastructure requirements. The above clarification of these issues should be added to the framework text.

Housing Density & Capacity

- 3.11 The overall average density of residential development proposed in the EEA (39 dwelling per ha) is not considered to be 'high' in comparative terms (i.e compared to the 30 dws/ha minimum set out in Government guidance). The proposed density is slightly higher than the policy H8 guidance for most of MK, reflecting that part of the EEA lies within the higher density zone 2 of the policy and the relatively late addition to the EEA of the major east-west PT route and

its higher density implications. It is suggested that the wording is changed to ensure that density doesn't exceed the proposed average of 39 dws/ha and also to insert a table of parcel areas and dwelling numbers to help ensure planning applications comply with the framework.

- 3.12 The earlier EEA housing total of 3,150 dws came from the local plan capacity figure of 1,150 for the Broughton Gate site plus the inspector's recommended "around 2,000 dws" for the rest of the EEA. These 2 estimates were deliberately cautious, made before the possibility of this more detailed planning study. The currently proposed total of 4,000 dws is therefore due to the framework study identifying a higher capacity in the EEA than the previous estimates. It makes sense to comprehensively plan as much of the EEA as possible now but not all the 4,000 dws will be built before the plan end date of 2011.

4. Implications

Policy

- 4.1 The framework proposals seek to create a high quality built environment based on sustainable development principles, in accordance with the Deposit Local Plan.

Resources

- 4.2 The funding for the consultants work has come from ODPM money allocated to EP. As with any large development there will be significant indirect implications such as adoption of new streets and open spaces, increased refuse collection service and provision of new schools but normal funding requirements from developers (Section 106 agreements), government and council tax will apply. The framework sets out the detailed financial requirements in chapter 7.

Legal

- 4.3 The revised framework will have the status of supplementary planning guidance in accordance with the requirements of PPG12 para's 3.15-3.18. It will be a material consideration in determining planning applications and may come under scrutiny if applications are refused and taken to appeal. The legal implications regarding a possible canal have been considered in the above report.

Annex – Statement of Consultation, representations and response.

Background Papers:

Representations resulting from the consultation on the Draft Development Framework.

Milton Keynes EEA Development Framework (draft – 2004)

Milton Keynes Deposit Local Plan (2002)

Adopted Borough of Milton Keynes Local Plan (1995)

STATEMENT OF CONSULTATION UNDERTAKEN

- The Draft EEA Development Framework was issued on 27 Sept 2004, with a consultation period of 6 weeks.
- Copies were available for inspection at all MKC libraries and the Civic Offices.
- The framework was available for viewing or downloading on the internet.
- Public exhibitions were held on 4 days at Broughton, Wavendon and CMK.
- Leaflets were delivered to houses in the locality.
- A copy of the framework was sent to the following consultees:

MILTON KEYNES COUNCILLORS

Sam Crooks (Middleton)

Derek Eastman (Middleton)

David Hopkins (Danesborough)

Douglas McCall

Graham Mabbutt

Pat Seymour (Sherington)

Clive Carruthers (Walton Park)

Jaime Tamagnini-Barbosa (Walton Park)

Pat Wicker (Walton Ward)

PARISH/NEIGHBOURHOOD/TOWN COUNCILS

Aspley Guise Parish Council

Broughton and Milton Keynes Parish Council

Hulcote and Salford Parish Council

Mid Beds Parish Councils Planning Consortium

Monkston and Kents Hill Parish Council

Moulsoe Parish Council

Wavendon Parish Council

Woburn Sands Town Council

MPs Brian White MP

OTHER ORGANISATIONS

Anglian Water Services Ltd

Barwood Developments

BBOWT

Bedford Borough Council

Bedford Group of Drainage Boards

Bedfordshire County Council

Bedfordshire CPRE

Benson Trust

British Gas Southern

British Pipeline Agency

British Waterways

Broughton Manor Business Park

Broughton Villagers Residents Association

BT

Bucks Fire and Rescue

Carrington Estate

City Discovery Centre

East Midlands Electricity

English Nature

Environment Agency

Gallagher Estates Ltd

Garwood Developments

Gazeley Properties Ltd

GOSE

Green King Pub Company
Hallam Land Management
Health and Safety Executive
Highways Agency
Interfaith MK
Mid Bedfordshire District Council
Milton Keynes Green Party
MK Chamber of Commerce
MK Community Health Council
MK Community Foundation
MK Council for Voluntary Organisations
MK Cycle Users Group
MK Economy & Learning Partnership
MK Energy Agency
MK Forum
MK General NHS Trust
MK Metro
MK Parks Trust
MK Partnerships

MK Racial Equality Council
MK TAG
MK Transport 2000
Mr & Mrs Diamond
Mr C Benson
Mr R J Powell
Mr Williams
Powergen Distribution HQ
National Power
Primary Care Trust
Real Land Group
REASON
South East Milton Keynes Consortium
Sport England
Taylor Woodrow Development Ltd
Thames Valley Police
Transco (Southern, Eastern, and East Midlands)
William Davis Ltd

SUMMARY OF REPRESENTATIONS RECEIVED AND COUNCIL RESPONSE

RESPONDENT	REPRESENTATIONS	COUNCIL RESPONSE
ORGANISATIONS		Proposed changes to the framework shown below in bold
Association of Pleasure Craft Operators	Support the canal; to link the Fenland Waterways via Bedford with the popular canal system; to provide a sustainable transport link; to diversify land uses; to provide jobs and tourism, and to provide a green corridor. Support the route option through the Brooklands development as this would have the widest benefit to the development.	See response to British Waterways
Bedford Borough Council	No comments	Noted
Bedford & MK Waterway Trust	Support the canal route option through the Brooklands development, as this would have the widest benefits. Lists a number of possible benefits. Seeks to address 3 key developer concerns i.e. delay, cost and viability of the waterway.	See response to British Waterways
Boyd & Evans	Opportunity to create a large scale, prominent, landmark work of public art close to the M1 that signals MK to the passing traveller or makes a gateway for visitors. Would need most or all of the various developer contributions to be gathered into one large pot.	The framework (sect 5.11) should add this opportunity as a good way of incorporating public art but this would need further detailed discussion because it may divert the available funds away from smaller scale works within the new development.
British Pipeline Agency	Proposal will not affect pipeline responsibilities	Noted

British Waterways	Support the safeguarding of a route for the canal and prefer the route through the housing area	<p>The inspectors report has recommended that a route for the canal is not safeguarded in the Local Plan because this would be contrary to advice in PPG12. The report adds that MKC may wish to consider the feasibility of safeguarding a route in supplementary guidance such as the EEA development framework. However, legal advice has been obtained on the latter point, which concludes that it would not be correct for the SPG to endeavour to safeguard the canal because this would not be consistent with the emerging local plan. Apart from the possible question of legal challenge from objectors to the canal, it is also likely that to do so would result in the weight to be attached to the framework being significantly reduced.</p> <p>In conclusion, it is considered that, given the lack of adequate evidence from British Waterways, and the inspectors recommendation, the potential safeguarded corridors for the canal be deleted from the framework. It should refer to the Inspector's suggestions concerning a review at a later stage and explain that this is likely to be considered as part of the next review of the local plan. (para 3.7.34).</p>
	Consider the potential to use surplus water from the Grand Union Canal via the proposed B&MK Waterway to meet drinking water demand and to take treated foul water. Technical note from Halcrow submitted with some further information.	Anglian Water have been consulted on the Local Plan allocation and the draft DF and have not raised any objections to the principle of development. AW have a legal obligation to provide a water supply and foul water drainage to new development.
	Where are the results of an ecological audit?	This has been done as part of environmental impact assessments.

	<p>Considers that the Grand Union Canal should be acknowledged in para 3.6.1, alongside the river valleys. The opportunities presented by a new waterway in creating a linear park and balancing lake opportunities should be referred to in 3.6.3. The B&MK Waterway fits the 'string and beads' principle.</p>	<p>The linear parks are based principally on the river valleys, although other features have been incorporated into them. The integration of the Grand Union Canal is already mentioned in para 3.6.3.</p>
	<p>Wishes to confirm that canals can be included within open space calculations.</p>	<p>The open space calculations are taken from Appendix L1 in the Local Plan, which does not include an allowance for canals or canal related development specifically. However it is considered that the gross area of a facility such as a district park could include land taken up by a canal and associated infrastructure.</p>
	<p>Questions whether the edge of the M1 is the most appropriate location for landscape provision. Increasing density either side of the waterway might reduce land take and release more suitable locations for landscaping.</p>	<p>Some strategic landscaping is required alongside the M1 as part of the means to mitigate from noise.</p>
	<p>Questions whether the potential road corridor conflicts with both the route for the canal and the landscaped area.</p>	<p>Further work has now confirmed that this will not be needed; potential road corridor to be deleted. (para 3.7.19, and Figs 3.9 and 3.11).</p>
	<p>The wording at para 3.7.31 is out of date. BW has provided the Council with technical information regarding the preferred detailed route, funding options and blight implications. BW are currently completing a new Business and Masterplan.</p>	<p>BW has provided some information but not sufficient to justify safeguarding the route in the LP.</p>

	<p>Inadequate service provision from Pineham Sewage Treatment Works could seriously affect the development costs of the site. This issue should be investigated further. Reference to further details from Watergrid to be supplied on this issue.</p>	<p>See response above in respect of the legal responsibilities of Anglian Water.</p>
	<p>Questions whether the Pell Frishmann report on a surface water drainage strategy is publicly available.</p>	<p>This is not a public document.</p>
	<p>Welcomes the strategic approach to flood mitigation and states that the Internal Drainage Board support in principle the approach taken by B&MK (linking balancing lakes to create sections of the navigable waterway). Inclusion of the Waterway to act as part of the strategic surface water drainage system may allow phasing of the development to be altered.</p>	<p>It is accepted that the proposed waterway may be able to be part of a future surface water drainage system but it is not essential.</p>
	<p>Note the requirement for 3-6 storey development. Quotes letter from Gallaghers to BW stating that there is unlikely to be a demand for such a volume of high density, flatted accommodation in this location.</p>	<p>This comment conflicts with other comments from BW that a new waterway would help to achieve densities higher than those set out in the DF. As a point of clarification the overall average density of residential development proposed in the EEA (39 dwelling per ha net) is not considered to be 'high' in comparative terms (i.e. it is only 9 dwellings per ha higher than the minimum set out in Government guidance). High density development does not necessarily mean a high proportion of flats either.</p>
	<p>Questions why the support from Broughton Villagers for the B&MK Waterway is not mentioned.</p>	<p>There are many supporters of the principle of the proposed B&MK Waterway, including Milton Keynes Council, whose support is specifically mentioned in para 3.7.31.</p>

	<p>Provision of walking, cycling and open space infrastructure, and public art could be linked to the B&MK Waterway and therefore would contribute towards the cost of construction. Angling could also make a financial contribution to the local community.</p>	<p>It is not clear how the provision of these facilities would directly help to fund the proposed waterway, unless a proportion of the cost of these works went towards the funding of the canal. This would mean levying an additional cost on these works to ring fence for the canal.</p>
	<p>Lists other potential benefits of developing the B&MK Waterway in the EEA, including:</p>	
	<ul style="list-style-type: none"> • development of a high quality urban environment of a new pattern and unique character; 	<p>Noted.</p>
	<ul style="list-style-type: none"> • an attractive first impression to visitors; 	<p>It is not clear why the canal would act as a first impression, unless arriving by canal boat from outside of the City.</p>
	<ul style="list-style-type: none"> • traffic free route for walkers and cyclists along the towpath; 	<p>This will be achieved along the City Street and within the linear park.</p>
	<ul style="list-style-type: none"> • creation of an attractive landscape and feature in a relatively flat and featureless area; 	<p>Noted.</p>
	<ul style="list-style-type: none"> • provision of additional wildlife corridor; 	<p>Noted.</p>
	<ul style="list-style-type: none"> • provision of public transport corridor on opposite bank to the towpath; 	<p>This will be achieved along the proposed City Street.</p>
	<ul style="list-style-type: none"> • provision of excavation material to create earth bunding (for noise mitigation); 	<p>Noted, although there is also likely to be material excavated from the proposed balancing lakes.</p>
	<ul style="list-style-type: none"> • opportunity to develop higher density residential development than that proposed; 	<p>See comments above in respect of density.</p>
	<ul style="list-style-type: none"> • an excellent interim use for a mixed use gateway. 	<p>This comment is somewhat confusing – it is not understood why this use would only be ‘interim’.</p>

Broughton & MK Parish Council	Concern about high density	Proposed density is in line with national planning guidance (PPG3) but is slightly higher than the policy H8 guidance for most of MK, because part of the EEA lies within zone 2 of the policy and the relatively late addition to the EEA of the major east-west PT route and its higher density implications. Agree change to ensure that density doesn't exceed the proposed average of 39 dws/ha. (para 3.3.1).
	Should provide some retirement homes or sheltered housing	The existing housing policies should enable such provision where a need is identified.
	Concern that proposed live work units and retail units may be unsuccessful as has occurred at Broughton	Such uses are likely to be more viable and in demand in the larger EEA than experienced in Broughton.
	Concern about "city streets" being proposed instead of conventional grid roads	The city street concept is a fundamental part of this framework, as it enables a major shift towards sustainable transport by encouraging walking, cycling and public transport. The key east-west route of the long term PT vision would not be feasible if it was based solely on conventional grid roads. The grid roads surrounding the EEA e.g. V11, will remain for use by through traffic.
	Give more consideration to a new J13a	Although MKC supports this, the Highways Agency responsible for the M1 have no current plans to provide it. However, a Joint Transport Team (including MKC and HA) has recently been set up to look at M1 issues including a possible J13a.

Is opposed to the proposed high street; won't work in MK	This innovative approach is being proposed because the conventional MK local centre approach has been generally unsuccessful in commercial and design terms, and it is more compatible with the city street concept.
Need to improve pedestrian/cycle access across the M1 and to the Coachway	2 links across the M1 exist and this is considered adequate; add text to make clear that improvements to the Coachway should include improved pedestrian/cycle access. (section 3.5).
Not aware of proposed facilities in Broughton	Some facilities referred to as proposed are in fact existing; this to be corrected in para 2.2.2 and fig 3.8. Recreation facilities in Tanfield Lane are proposed in the MKC Playing Pitch Strategy 2003.
Supports the canal and prefers the route through the development rather than adjoining the M1	See response to British Waterways
Concerns about surface water and foul drainage	Surface water drainage has been studied in detail and solutions are being prepared in conjunction with current major planning applications that satisfy the relevant drainage bodies and comply with MKC flooding SPG. Foul drainage mentioned in para 3.13.6 but will add more details to this para.
Concern about reserve sites	Land is to be reserved for unforeseen needs as currently occurs in MK; the amount reserved is not as high as previously, reflecting the fact that so much of the original reserve sites remain unused.
Proposed potential road corridor would compromise the noise mitigation measures	Further work has now confirmed that this will not be needed; potential road corridor to be deleted. (para 3.7.19, and Figs 3.9 and 3.11).

	Concern that allotments should not be located within 80m of the M1 due to air pollution	Fig 3.11 and the text (3.6.16) should be changed to make clear that this is not proposed
Broughton Villagers	Concern regarding worsening of traffic problems around J14 and V11	These issues are being dealt with by the Transport Assessment as part of the current outline planning applications, and will include agreeing highway improvements with MKC and the Highways Agency. Any identified problems will need to be resolved by developer-funded mitigation.
	Doubtful about feasibility of mass transit and conventional bus routes will not be a viable alternative to the car	What is proposed as part of the long term PT vision for MK is a form of bus service but which would be higher quality and higher capacity than conventional services.
	Not enough green areas	Only the larger green spaces are shown e.g. linear parks, playing fields, local parks; other smaller spaces including play areas will also be provided within housing areas
	Supports the canal and prefers the route through the development rather than adjoining the M1	See response to British Waterways
Mrs A Cramplin (Bedfordshire CPRE)	Hope that due regard is given to noise and pollution abatement measures in the Brooklands area.	The DF proposes a set back of 150 metres from the M1, which satisfies any environmental health considerations in respect of noise and pollution. Section 3.12 sets out what is required in respect of mitigation measures.

	Object strongly to the grey arrow from the A421 pointing south. It is unnecessary, prejudices many future issues and has longer term implications for Bedfordshire.	This DF is concerned principally with the EEA but it is good planning practice not to preclude future development options. The grey arrow is indicative and acknowledges that the land south of the A421 is recommended by the Local Plan Inspector to have Strategic Reserve status (also supported by MKC's Cabinet) and therefore will be a first area of search in meeting future development needs.
	Concern about the strategic reserve areas south of the A421 recommended by the Local Plan Inspector.	This is not a matter that can be addressed in this report. It is a comment that the CPRE will need to raise if the recommendation is published as a Proposed Modification to the Local Plan.
	Consider that the proposed location for the crematorium is bleak, desolate and squeezed between noisy roads.	It is considered to have potential to be a satisfactory location with suitable landscaping etc, but the preferred option is to expand capacity at the existing site.
Cllr Sam Crooks	Concerned about delays in key transport infrastructure projects (i.e. J13a, A421 widening, J14 improvements). Development should proceed no further than Stage 1 without commitment to an imminent start on one of these projects, and no further than Stage 2 without a start on building.	The Highways Agency have issued an Article 14 direction on both the Broughton Gate and Nova MK planning applications, which means that MKPC cannot determine the applications until this is lifted. It will not be lifted unless and until the HA is satisfied that the strategic highways infrastructure can accommodate new development. In terms of the Broughton Gate application and 'interim' solution is being worked out to accommodate 1,400 new dwellings. Some of the EEA is likely to be constrained though until the completion of a scheme at Junction 13 (scheduled to be completed in 2011) and any other necessary works to J14 (yet to be identified).

	<p>The existing H7 east of the V11 should be duelled and extra lanes should be added where possible to the following roundabouts (or equivalent improvements): H6/A5130, H7/V11, H8/V11, H8/A5130.</p>	<p>The list of off-site transport works required in connection with the EEA will be added. (para 3.7.20).</p>
	<p>Concern about the density ranges in the DF in terms of generating more than 4,000 dwellings if implemented at the higher end of the ranges, and the related impact on transport and health infrastructure, and schools. Also question the appropriateness of high rise development on the edge of the City. The EEA should be limited to a maximum of 4,100 new dwellings.</p>	<p>The overall average density of residential development proposed in the EEA (39 dwelling per ha net) is not considered to be 'high' in comparative terms (i.e. it is only 9 dwellings per ha higher than the minimum set out in Government guidance). Density proposed is slightly higher than the policy H8 guidance for most of MK, reflecting that part of the EEA lies within zone 2 of the policy and the relatively late addition to the EEA of the major east-west PT route and its higher density implications. Agree wording change to ensure that density doesn't exceed the proposed average of 39 dws/ha (para 3.3.1); also insert a table of parcel areas and dwelling numbers to help ensure planning applications comply with the framework (new appendix).</p>

	<p>Concerned that the minimum number of storeys also implies room sizes, road widths, etc that are less than desirable. Residential development should be restricted to 3-4 storeys except for occasional landmark buildings within the High Street and at key corner locations. Road widths should be in keeping with building height.</p>	<p>Agree that there should be some clarity over the issue of building height. State that development will be a maximum of 4 storeys, except on the High Street and at key landmark locations, where it could be 5 or 6 storeys. Agree that road widths should be proportionate to building height. Guidance on this is contained in several design texts – such as the Urban Design Compendium, published by English Partnerships and the Housing Corporation. The issue of room sizes is a detailed matter that cannot be considered in the DF. Reword the text under ‘Building Heights’ in the City Street Environs table. (section 4.2).</p>
	<p>Delete the reference to ‘minimal setbacks from the pavement edge’.</p>	<p>Clarify what is meant by this term in the glossary – i.e. it refers to a gap between the pavement and a building, not the distance between the road edge and a building. Insert a definition of ‘setback’ into Appendix 3, Glossary of Terms. Also Insert minimum setback of 1 m on city street except in high street area (section 4.2).</p>
	<p>Seek clarification on the phrase ‘reducing the width of the City Street’ on pages 46 and 47. Would oppose reduction in carriageway width.</p>	<p>This does not imply a reduction in the carriageway width but refers to being able to bring buildings closer to the carriageway due to parking being accommodated elsewhere.</p>
	<p>Object to focus on trees for street landscaping. Bushes should also be used. Lack of reference to street landscaping in some areas. Insert some type of greenery into median strip in Fig. 5.3.</p>	<p>Agree that bushes should be referred to as well as trees and that Fig 5.3 should be amended. Landscape / planting is referred to in each of the character area tables. In the City Street Environs and Urban Core tables (sections 4.2 and 4.3) refer to bushes in the planting section. Amend Fig. 5.3 to add landscaping.</p>

	<p>Concern about road widths in terms of service vehicle access, accidents and on pavement parking. Roads should be wide enough for two cars to pass at half the maximum speed limit. On street parking should be provided in separate laybys.</p>	<p>Agree that roads should be of sufficient width to accommodate passing vehicles and service vehicles. This is clearly the case with the City Street however on other highways this will need to be considered at a more detailed stage (as noted at the end of para 3.7.15). However a reference to service vehicles could be added in for clarity. Also clarify references to on street parking. Amend para 3.7.15 to refer to access for service and emergency vehicles. Clarify references to on street parking in the character area tables. (sections 4.2 – 4.5).</p>
	<p>Concerned about the lack of play areas close to houses – they should be located within 300m of houses. Include a reference to teen facilities.</p>	<p>Para 3.6.14 clarifies that Local Play Areas are not indicated at the DF scale – this is something that needs to be taken into account at the more detailed planning stage. The Local Plan Leisure and recreation standards include the requirement for teen facilities in neighbourhood play areas.</p>
	<p>The DF should encourage housing designs and management arrangements that facilitate independent adults living in a variety of communal households.</p>	<p>This is an interesting idea but needs to be justified by evidence of need. The MK Housing Need Study did not identify a need for this particular type of accommodation but it may be something that the next HNS could address more specifically. There are also now other means of achieving affordable communal living through more flexible mortgages being provided by lenders.</p>

	Concerned about the pressure on schools, community facilities and healthcare resulting from the initial phases of development in the EEA. Also notes that PS1 (proposed to be developed ahead of PS2) lies close to the existing school at Broughton, and could therefore leave the southern part of the residential area without a school in close proximity until Phase 3. Shift PS2 to Phase 1 and PS1 to Phase 3. Include community and health facilities in Phase 1.	Agree. Amend Figure 6.1 to put PS1 into Phase 3 and PS2 into Phase 1. Add healthcare facilities and community centre/sports pavilion into bulleted list under Phase 1. (para 6.1.5).
DLA (agent for Nova MK clients)	Planning applications and development briefs will be prepared by developers and determined by MKP	The process for approval of development briefs is to be clarified as part of the local plan review process.
	Last sentence of the foreword is an unnecessary duplication of local plan	Important point to retain, about the purpose of the document
	Para 1.3.3 Distinguish between Fen Fm and Eagle Fm	Agree to change. (para 1.3.3 and Fig. 1.2).
	Para 2.1.14 incorrect reference to bund	Agree to change. (para 2.1.14).
	Para 2.4.3 query about 80m distance?	Technical advice has confirmed the validity of this distance.
	Fig 3.1 minor improvements suggested	Not necessary; is only diagrammatic
	Fig 3.3 show all access points; delete references to potential road corridors as they have not been justified and conflict with other aims e.g. canal, wildlife corridor.	Agree to change. (Fig 3.3).
	Add reference to the city street providing varied spaces.	This is done in chapter 4

Para 3.7.11 provision of the frequent bus service in advance of each phase of development is not practicable	It is accepted that a bus service should be provided at beginning of each phase though not necessarily high frequency; change to “It is important that PT provision is made in advance of each phase...”. (para 3.7.11).
Fig 3.6 is overly prescriptive	No change; is only diagrammatic
Para 3.7.17 if offsite highway works are justified they should be detailed in the text	Agree to change. (para 3.7.17).
Para 3.7.18 remove reference to J13a	No change
Para 3.7.19 strong and detailed objection to reference to potential road corridor as they have not been justified and conflict with other aims e.g. canal, wildlife corridor.	Further work has now confirmed that this will not be needed; potential road corridor to be deleted. (para 3.7.19, and Figs 3.9 and 3.11)
Para 3.7.31 delete all references to the canal as it has no local plan status etc	See response to British Waterways
Para 3.8.3 clarification of purpose and location of community recycling centre	Its purpose will be the same as existing sites, also called civic amenity sites; see response to Mathews & Goodman
Para 3.8.19 details of reserve sites should be agreed at reserved matters stage	Change to be part of S106 planning obligation agreements. (para 7.5.2).
Para 3.10 objection to potential second crematorium	Will be needed if ongoing feasibility study concludes it is needed
Details of possible uses at Eagle Fm are premature	Provided for background information
Para 3.5.10 concern about increased drainage infrastructure costs	Concern not justified

Character areas contain too much detail and should guidance for later stages	Level of detail is generally correct and its guidance role is already included in para 4.1.4
Para 4.6 parking detail too prescriptive	Text covers important and necessary issues
Para 4.7 employment area should not limit height to 3 storeys as it adjoins the city street	Change to allow greater height on city street edge as long as compatible with adjoining housing. (section 4.7).
Parking details are impractical	Change to follow similar approach to section 4.6. (section 4.7).
Chap 5 need to avoid monotonous development along city streets	This already addressed e.g. para 5.2.11
Para 5.8.1 should change BREEAM excellent rating to good or very good	Insufficient justification given
Delete references to policy D4	The Inspectors Report has recommended that Policy D4 be retained subject to some rewording; therefore the framework should refer to the policy but not its specific requirements. (para 5.8.3).
Para 5.11.2 types of public art incomplete	Not intended to be exhaustive but see response to Boyd & Evans
Sect 6.1 phases should include relevant dates	Not possible to identify dates in this document due to need for further information
CRC on proposed location is not deliverable in 1 st phase	CRC will be required in 1 st phase so a suitable location/mechanism will need to be agreed; see response to Mathews & Goodman
Para 6.1.3 suggests an extra principle	Not necessary
Phasing table should include all land uses	Only intended to focus on dwellings

	Para 7.2.1 need to be clearer about the partial funding mechanisms by ODPM, EP etc	Agree to change. (para 7.2.1).
	Para 7.2.5 delete reference to SPG for CMK	The guidance for CMK is valid SPG
	Para 7.2.7 refers to other developments that should contribute to infrastructure costs	Text does not attempt to define such developments
	Para 7.5.4. delete reference to equalisation agreement	This is an important and necessary issue
	Para 7.7.3 objects to a proposed MKPC forum to coordinate EEA development	Text refers only to “possibly chaired by MKPC”; MKPC and MKC have statutory planning responsibilities in this area that would be greatly assisted by such a coordination body.
	Appendix 1 delete because inspectors report not yet received	Inspectors report now received
	Appendix 4 delete because duplicates text and is overly prescriptive	Noise is a vital issue that requires detailed guidance
DLA (agent for several landowners & developers in EEA)- Same comments as above except for those shown opposite	Para numbers incorrect page 8	Will correct. (section 1.2).
	Fig 1.1 blue and pink areas should be extended e.g. to include New Covert etc	Figure adequately illustrates the local plan allocations
	Reduce width of M1 wildlife corridor	Agree partial change to follow brook north of New Covert. (Fig 2.3).
	Fig 2.1 delete dotted line along Broughton Tributary	Agree change. (Fig 2.1).

opposite	Table 3.2 Question the need for this amount of allotments and reserve sites	Allotment provision is based on local plan requirements but specific sizes, locations etc may be defined at a later stage; reserve site provision is already lower than the local plan requirement in response to such developer concerns.
	Para 3.3.1 concerns that density is too high	Density proposed is slightly higher than the policy H8 guidance for most of MK, reflecting that part of the EEA lies within zone 2 of the policy and the relatively late addition to the EEA of the major east-west PT route and its higher density implications. Agree change to ensure that density doesn't exceed the proposed average of 39 dws/ha. (para 3.3.1).
	Para 3.3.2 affordable housing requirement may vary over time	If this requirement changes in future then it would be applied to undeveloped parts of the EEA
	Para 3.3.5 Should allow low density homes adjacent to M1eg parcel HL1	The framework does allow this
	Para 3.5.3/4 Should allow wider range of uses at the J14 gateway area, particularly housing	Existing text is sufficiently flexible to allow this
	Table 3.1 is incomplete	The text correctly refers to table 3.1 as a summary of local plan guidance
	Para 3.6.12 Delete size of district park because not included in table 3.2	It is included as part of larger category
	Fig 3.2 delete balancing area adjoining M1; and allotments	These will be subject to agreeing details of size, location etc at later stage

	Fig 3.5 Delete 300m catchment for PT route	This originates from the PT Long Term Vision study and is a recommendation specifically for the east-west, north-south routes, of which this is part; it does not require all development to be within this distance.
	Para 3.8.2 Allow the EEA to include large scale retailing in addition to the Kingston Centre	This would be a major departure from the MK retail hierarchy; significant retail units will be allowed but only serving local needs.
	Fig 3.8 is overly prescriptive about shape and size of schools and reserve sites	Schools are based on current specific MKC requirements but could vary if agreed at a later stage; for reserve sites see para 3.8.19.
	Para 3.8.8 amend to refer to the new Broughton school as also serving early phases of Brooklands	Agree change and also to update because the school is now open. (para 3.8.8).
	Para 3.8.19 objects to the transfer of reserve sites to MKC or another party	Change to be part of S106 planning obligation agreements. (para 7.5.2).
	Para 3.9.3 is overly prescriptive about high street uses; delete ref to size of retail units	Agree change to list of uses being only indicative but should be more precise about maximum size of any retail unit i.e. 1,000 sq m. (para 3.9.3).
	Table 3.2 contains too much detail and some figures are not consistent with elsewhere in the document e.g. mixed use/high street	Level of detail is necessary but changes agreed to ensure consistency with text and fig 3.11 land uses. (Table 3.2).
	Fig 3.11 is overly precise; move dotted line of main street that cuts through HM3/HM4	The text adequately describes it as “illustrating”; it allows for later flexibility over detail. Agree change to dotted line. (Fig 3.11).

	Sec 5.3 implies that the city street would have buildings upto 6 storeys along the entire length	"Up to 6 storeys" does not mean continuously 6 storeys, as described in more detail in sec 4.2. Will add clarification in 4.2 , see response to Cllr Crooks
	5.4 High St should include large "merchants houses"	Present text would allow this but is an unnecessary level of detail
	Para 5.5.1 The modelling of the secondary school on Oxford should be reconsidered	The text is clear that only the integrated urban form of Oxford is aspired to, and this is considered compatible with contemporary design, lifetime learning and community access.
	Para 5.11.2 to 5.12.2 should be deleted because unnecessarily detailed	Agree to delete 5.12 but not 5.11
	Para 7.2.4 objects to 5 year public transport subsidy	This is the preferred provision but which will be subject to detailed discussion and agreement at planning application stage.
	Appendix 4 change requirement for "good" internal noise levels to "reasonable"	Proposed internal noise level based on expert EHO advice and BS8233 code of practice
DPP (agent for Tesco BL Holdings and Tesco Stores Ltd)	Framework is not in accord with the Local Plan in respect of the role of Kingston District Centre serving the needs of the east flank. Regard should also be had to the retail hierarchy and the impact of the High Street on the existing town centres of Newport Pagnell and Woburn Sands.	Noted. It is considered that the DF should be more specific to the role of the Local centre and the scale of retail floorspace that would be acceptable there. Delete reference to 'town centre' in 3.9.1. Add in floorspace figures at 3.9.3

	The new High Street will lie less than 1km away from the existing Kingston Centre and has the potential to duplicate many existing and potential uses. The DF should differentiate between the scale and function of these two areas. It should limit the scale of commercial development in the High Street to that which would serve a strictly local function.	See above.
East Anglian Waterways Association	It is crucial that the proposed canal is included in local development plans as a prelude to the route being protected.	See response to British Waterways
Cllr Derek Eastman	See comments under Cllr Sam Crooks, above.	See comments under Cllr Sam Crooks, above.
English Nature	No comments	Noted
FPDSavills (agent for South East MK Consortium)	Consider more fully the synergy between the EEA and land south of the A421 and north of the Bedford – Bletchley railway, especially in terms of transport infrastructure.	The DF is 'future proofed' as much as is practicable to take into account further expansion of the City. However given the long-term nature of any further expansion, and hence the uncertainty in respect of land uses and development patterns beyond the EEA, the DF must be principally concerned with the development of the EEA itself.
	Welcome the City Street extending south of the A421 but should be further to the east to avoid Wavendon House and be consistent with the Consortium's own master-planning work.	See above. In addition Wavendon House is south of Lower End Road, and therefore some distance from the City Street intersection with the A421. There will be some scope therefore to consider the alignment of a City Street through this area, should it come forward for development.

	The SPG should incorporate more linkages crossing the A421 so as not to compromise public transport connections within this area and CMK.	See above. This needs to be considered as part of any comprehensive planning of land south of the A421 in the longer term. The DF does not preclude additional crossings being implemented.
	The SPG is misleading by saying that MKC support a Junction 13a and is not consistent with wording in the Local Plan (Policy EA3, as suggested to be amended by MKC during the Local Plan Inquiry). All references to J13a should be deleted.	Since the Council appeared on at the Local Plan Inquiry on this matter the Cabinet has expressed explicit support for a Junction 13a through their comments on the draft MK and South Midlands Sub Regional Strategy (16 November 2003 Cabinet – minute C129 refers). This support is ongoing.
	Support references to A421 dualling but the text should refer to Policy T12 in the Local Plan and the LSMMMS. T12 should also be added to Appendix 1.	The reference to Policy T12 is not considered necessary in the main body of the document but should be added to Appendix 1. The reference to the LSMMMS as suggested is also not considered to be necessary – it is not Council policy and it's recommendations have not been formally endorsed by MKC. Add Policy T12 to Appendix 1.
	Obligations to make contributions to infrastructure should be more clearly defined and set out how the phasing of development may relate to the implementation of off-site works.	Agreed. Need to reflect the further work on this. Change as suggested. (Chapter 6).
Faulkners (agent for Mr Powell)	Concerned about the issue of land locking of Mr Powell's land.	Framework shows access off A5130

Forest of Marston Vale	The DF does not mention the Community Forest or Greensand Ridge, both of which are in close proximity. Development should respect the setting of Aspley and Wavendon Woods Access Area and the Forest of Marston Vale.	Agreed. Paragraph 3.6.6 refers to the potential to develop the forest city concept – reference to the Marston Vale Community Forest should be inserted here. The wider landscape context of Aspley and Wavendon Woods should be referred to under site constraints in paragraph 2.4.6 and again in para 3.6.8 under Landscape Strategy. Add a new bullet point into 2.4.6 to refer to the wider landscape context of Aspley and Wavendon Woods and the Greensand Ridge within the Brickhills AAL. Add text to para 3.6.6 to refer to the ‘community forest’ and links with the neighbouring Marston Vale Community Forest.
	Large scale development should make a financial contribution to the Greensand Trust to help with the running costs of Aspley and Wavendon Woods Access Area.	The EEA has been designed with strategic landscape and open space to meet the needs of the residential community there. The existing facilities within the City are also available for people to use, and arguably may be more accessible than the Aspley and Wavendon Woods Access Area. As a consequence it is not considered appropriate to require a contribution to the Greensand Trust.
	Consideration should be given to the effects of development in the expansion area on the Marston Vale Community Forest and developer contributions to implement the Forest’s objectives.	Agree that it would be consistent with supporting text in the Local Plan to try and extend the forest city approach to help to link with the nearby Marston Vale Community Forest. Contributions to new planting schemes east of the M1 will be sought. Add new bullet point under para 7.5.2 to refer to Community Forest woodland planting
	Support for the canal and the safeguarding of the two possible routes.	See response to British Waterways

	<p>Support the provision of cycle routes; Route 51 of the National Cycle Network passes the southeast corner of the EEA and therefore the DF should consider links to this route and improvements to the route (as supported by Policy T4 in the MK Local Plan).</p>	<p>Route 51 passes from Salford, passed the southeastern most tip of the Eagle Farm (Strategic Reserve) part of the EEA. From there it heads directly south to pick up Lower End Road, some distance away from the EEA. The City Street will already provide a segregated route for cyclists, so the most practical option is to link to Route 51 from this. This should include a route from EEA east along Salford Rd to Salford, south along the A5130 to Wavendon or southwest through Kingston. The provision of this, plus a contribution to any improvements on Route 51 within reasonable cycling distance of the EEA is justified. After para 3.7.26 add a new para to refer to access to Route 51 of the National Cycle Network.</p>
<p>Friends of the Earth</p>	<p>Wildlife should not be restricted to parks, provide more diffuse habitat creation</p>	<p>The framework correctly concentrates on the strategic aspects of biodiversity but it would help to add text to para 3.6.11, requiring planning applications to also include smaller scale measures to enhance biodiversity, as set out in local plan policy NE3.</p>
	<p>The development is in a peripheral greenfield location which will be an accessibility/sustainability problem</p>	<p>Such a strategic issue is not possible to change at this advanced stage; it has been considered at length and agreed by MKC and confirmed by the recent local plan inquiry inspectors report.</p>

	<p>More emphasis needed to effect modal shift away from the car e.g. trips by PT being faster than by car, restriction on workplace parking</p>	<p>This aim is already a fundamental part of the framework; the whole EEA has been designed around new higher quality PT routes that will be easily accessed by all residents and with priority given to walking, cycling and PT. Car parking provision is not a matter for this document but is set by the MKC standards that are currently being reviewed and in draft form.</p>
	<p>Lack of coherent strategy for linking in to the city PT infrastructure</p>	<p>The text is clear that the EEA is a key part of the PT long term vision for MK and its east-west corridor, which will provide a fast service direct to CMK. Some more detailed aspects e.g. exact routing, will be finalised at a later stage.</p>
	<p>Should be specific strategy to encourage cycling</p>	<p>Chapter 3 includes a section on encouraging walking and cycling; cycle parking is a requirement in the draft parking standards; identify in fig 3.3 the proposed walking and cycle routes referred to in 3.7.25/26 and clarify text.</p>
	<p>Suggests a number of measures to improve waste recycling</p>	<p>These are mainly borough-wide issues, not the subject of this document but will be covered by policy D4 mentioned in sec 5.8. The proposed Community Recycling Centre will provide all the services of a civic amenity site.</p>
	<p>Suggests a number of measures to improve energy use</p>	<p>These are mainly borough-wide issues, not the subject of this document but will be covered by policy D4 mentioned in sec 5.8, which does include very high sustainable construction requirements similar to that suggested.</p>
	<p>Other issues e.g. graffiti and litter</p>	<p>These are borough-wide or non-planning issues, not the subject of this document.</p>

Garwood Developments (agent for owner of Brooklands Fm)	Canal appears to lack any strong support and it should not be reliant on developer funding, given the other infrastructure requirements of the EEA. In Brooklands it is estimated that it would reduce housing capacity by 160 units, 48 of which would be affordable. The canal should follow the route along the motorway.	See response to British Waterways
Grand Union South Angling Consultative	All canal users should be given equal consideration including anglers. Anglers help to police waterways and are prepared to make a financial contribution, such as has been done on the Grand Union Canal.	The matter is too detailed for this document.
Hallam Land Management	Own part of the proposed "Parkside" employment site and reserve site; want both replaced with low density residential use, other minor changes to 4.7 e.g. B2 and B8 uses should be located adjoining the M1	Suggested residential use instead of employment is inappropriate due to motorway noise; reserve site should remain because is likely to be used for a residential use; change text regarding B2 and B8 uses adjoining the M1. (section 4.7).
Highways Agency	Suggest additional text to state that the Secretary of State for Transport has ruled out M1 widening north of J13.	Will add that there is no current plan to widen the M1 north of J13 but will be looked at by the Joint Transport Team. (para 3.7.3).
	Given existing congestion issues at J14 and Northfield roundabout it strongly recommended that no new accesses be created on the A509 in the short distance between these roundabouts.	Accepted
	J14 park and ride proposals should not increase total parking stock.	Increased parking at the P&R should have no negative impact on J14
	Strongly recommend further discussions with the HA on the J14 gateway section.	Agreed and underway

	Results of MKC traffic and transport assessments should significantly influence section 3.7.	Agreed; text to be revised. (section 3.7).
	3.7.2. – improvements are essential.	Agreed; text to be revised. (section 3.7).
	3.7.3 – A421 widening is in DfT's Targeted Programme of Improvements. The SoS for Transport does not intend to build a J13a.	Noted. However, a Joint Transport Team (including MKC and HA) has recently been set up to look at M1 issues including a possible J13a.
	The necessary improvements to J13 and J14 should be added to the phasing list. These works should take place at the start of the development.	The Joint Transport Team will look at these details; to be clarified. (Chapter 6).
	SPG requirement to improve J14 / Northfield roundabout should be extended to developments in CMK.	This is correct but not relevant to this document.
Hulcote and Salford Parish Council	Not convinced that stopping up Salford Road will prevent rat running.	In addition to the stopping up, traffic will be managed by use of the signalised junction on city street.
	House building to start in October 2005 – ambitious?	An outline planning application for Broughton Gate is due to be determined by MKPC in January. If more detailed design briefs and planning applications follow on swiftly then it may be possible for construction to start at the end of next year.
	Doubt the feasibility of providing 600 homes pa.	This is based on estimates provided by the developers
	Impractical and naïve to believe that a public transport system, or cycle path will provide a substitute for the car for most residents.	The Local Plan, Local Transport Plan and new development in the Expansion Areas is aimed at achieving a modal shift away from the car in support of the SITS target.

	<p>City Streets will cause major confusion at junctions, have no similar link to the rest of the road network in MK and will use vast swathes of land. 30 and 20 mph speed limits will have to be achieved by using copious speed humps.</p>	<p>The move away from the existing grid system is intended to support a public transport oriented development (which is difficult to support on the existing grid). It will integrate with core bus routes, as identified in the Public Transport Long Term Vision and will be controlled by traffic signals where it meets the existing road network. Traffic calming can be achieved in a number of ways – not just through speed humps.</p> <p>The street width is needed to segregate public transport from other road users, but does not include large landscaped verges – so it uses less land than grid road corridors. However, will revise to ensure that the city street width is kept to the minimum necessary. (section 5.3).</p>
	<p>Park and Ride: figure imply that there are 10,000 commuters a day using J13 / A421 and J14. Imagine that it is more than this.</p>	<p>Ask BM. 1991 census figures implied a net influx of 10,000 commuters into the City (on a City wide basis).</p>
	<p>Imperative that car parking is mentioned. Foolish to suggest that without parking car use will decline.</p>	<p>Parking is mentioned in the Character Area tables. This is related to the character of provision rather than standards, which is covered elsewhere in Council policy.</p>
	<p>No mention of increased capacity in healthcare – hospital already overloaded.</p>	<p>The provision of local healthcare facilities is covered in paras 3.8.12 and 3.8.13. The Secretary of State in his response to the MK and South Midlands Sub Regional Strategy Panel report states that a new hospital should be identified in a future Local Development Document.</p>
Inland Waterways Assoc	<p>Support the canal route option through the Brooklands development, as this would have the</p>	<p>See response to British Waterways</p>

Assoc	widest benefits.	
Jennifer Lampert Assocs (agent for Real Land Investment Co.)	Wish to preserve the existing Broughton Manor business park and allow its expansion to adjoining land; also the subject of an objection to the local plan	The framework shows various existing uses including the business park as remaining, although it is possible that this could be redeveloped in future. The adjoining land however is considered more appropriate for residential use; sites have been identified elsewhere (e.g. the high street and parcel E1) for small-scale employment uses. High street mixed use area to be increased in size from 2 to 3 ha to ensure opportunities for this. (para 3.9.3).
Rev. Susan Jackson Broughton Rectory	What provision has been made for a new worship centre or improvements to existing ones?	Broughton church is the nearest existing facility and is in need of improvements to improve its accessibility and capacity, at a cost of approx £300,000. Reserve sites are included for such uses but the preferred option is financial help for improvement of the existing church. Add to list of S106 obligations. (para 7.5.2).
Cllr Graham Mabbutt	Generally supportive but should be more positive about the possible advantages of the proposed canal e.g. high density, high quality waterside development.	See response to British Waterways

Cllr Douglas McCall	Need explanation of the increased housing total	The earlier housing total of 3,150 dws came from the local plan capacity figure of 1,150 for the Broughton Gate site plus the inspector's recommended "around 2,000 dws" for the rest of the EEA. These 2 estimates were deliberately cautious, made before the possibility of this more detailed planning study. Also the relatively recent addition to the EEA of the major east-west PT route has meant slightly higher density assumptions. The currently proposed total of 4,000 dws is therefore due to the framework study identifying a higher capacity in the EEA than the previous estimates. It makes sense to comprehensively plan as much of the EEA as possible now but not all the 4,000 dws will be built before the plan end date of 2011. Add the above text to section 3.3.
Mathews & Goodman (agent for the Benson Trust)	The proposed location for the Community Recycling Centre is not deliverable before 2011; suggests siting near J14 instead	The CRC is a requirement of policy E13 and the large footprint development will be unlikely to proceed unless the CRC is provided sooner than 2011; the location is only indicative but it needs to serve the whole eastern flank of MK and therefore a site near J14 would not be accessible enough. Move location of CRC to the large footprint development site. (Fig 3.11).
Mid Beds District Council	<p>Pleased that 3.7.31 states that MKC support the canal in principle but disappointed with the reference to the views of the MKSM SRS Panel on this matter.</p> <p>Essential that the preferred route is secured through the development.</p>	<p>7.9 programme and milestones are unachievable due to delay resolving planning obligation issues</p> <p>These will be reviewed and updated if necessary</p> <p>See response to British Waterways</p>

MK Forum	Supports some aspects e.g. higher density, city streets, high street, high quality, attractive environment	Noted
	The development is in the wrong place; its peripheral location will have an accessibility/sustainability problem	Such a strategic issue is not possible to change at this advanced stage; it has been considered at length and agreed by MKC and confirmed by the recent local plan inquiry inspectors report.
	Doubtful about the modal shift effectiveness of proposed bus service frequency; inferior to that currently serving Stony Stratford	Proposed frequency of “at least every 15 mins” is based on the recommendations of the PT Long Term Vision study. Higher frequencies may be possible.
	Should include ZED (zero energy development) construction standards	Sec 5.8 does include very high sustainable construction requirements similar to that suggested
	Should include good standards for internal space in dwellings	This can not be required through the planning system
MK Parks Trust	Generally supportive but the document should identify who is to adopt the landscape and drainage infrastructure	Para 7.8.2 add that MKC is agreeable to MK Parks Trust adopting the linear park, subject to MKC approval of design, and that all other open space be offered to MKC for adoption.
MK Partnership	Request clarification on the feasibility and routing of the proposed canal	See response to British Waterways
	Request clarification on the feasibility of J13a	No decision has yet been made on this issue but central government currently does not support any new junctions on the M1. J13a is not a requirement of development and land in the SRA is not formally safeguarded for this scheme but no development is proposed in the plan period that could prevent it.

MK Primary Care Trust	<p>Propose that primary care provision provided in a 'hub and spoke' format in which local units are supported by a bigger hub, in which, together the hub and spokes make up the organizational unit of health care delivery. Hubs will provide a more extensive range of services than the spokes - and might include minor surgery, and act as a base for a range of community services including social care, district nursing etc. They also provide an opportunity for co-location of a range of other services from fitness centres, to pharmacy, etc.</p> <p>PCT would like to co-locate primary care facilities with schools - especially primary schools, so want a 'spoke' with the primary school PS1 (needing at least 375 sq m), and a 2nd spoke at the primary school PS2 with capacity to expand to become a "hub" in the longer term (needing about 2000sq m). Would want PS2 to move slightly to be adjacent to the mixed use area MC4.</p>	<p>The framework already contains requirements for primary care provision (paras 3.8.12/13) based on earlier PCT advice. The PCT requirement for new provision has now changed to the 'hub and spoke' format. This change can be accommodated with relatively little difficulty. Revise paras 3.8.12/13 and fig 3.11.</p>
Mr & Mrs Diamond (Owners of Broughton Manor and agents to Broughton Manor Prep. School)	<p>The new design places a high density housing area (HH8) immediately adjacent to Broughton Manor. This is unacceptable and either HH8 should become medium density or the main street should abut Broughton Manor.</p>	<p>No convincing reason given for this change; the proposed adjoining uses should not cause any significant problem.</p>
Moulsoe Parish Council	<p>Concerned about the capacity of the existing MK Hospital.</p> <p>Should consider a J13a and / or access close to Cranfield being improved.</p>	<p>This is being resolved at a wider level but funding for this will be sought from the EEA development.</p> <p>Although MKC supports this, the Highways Agency responsible for the M1 have no current plans to provide it. However, a Joint Transport Team (including MKC and HA) has recently been set up to look at M1 issues including a possible J13a.</p>

	Stopping up Salford Road will push more traffic through Moulsoe. Need a main road linking Cranfield with MK.	Traffic passing through Salford will be managed but not stopped completely.
	A509 should be dualled between J14 and Newport roundabout if J14 is to become a major entry point.	This is already an aim of MKC.
	Has a tram system been considered?	This was considered as part of the Public Transport Long Term Vision, but not recommended.
Two Shires Ambulance Patient Public Involvement Forum	Need to include facilities for ambulance 'standby points'	We are seeking further clarification of what this may involve but it is likely that the proposed reserve sites could be suitable locations.
Wavendon Parish Council	It is not accurate to state that the EEA is highly accessible (para 1.1.5) as it does not reflect existing traffic problems in the East Flank	The significant highways issues related to the development of the EEA are acknowledged. The statement in para 1.1.5 is intended to reflect the relative position of the EEA in terms of proximity to the strategic road network in contrast to other development locations (such as the WEA).
	Strongly support a Junction 13a to serve the Nova MK site and Junctions 13 and 14 cannot handle increased traffic flows. Support the development of the potential road corridor adjacent to the M1 to serve Nova MK. It would also provide access to and from a J13a.	Noted.
	Fully support the duelling of the A421 from Kingston to J13. However the A5130 from Kingston south through Wavendon and Woburn Sands should be restricted to passenger traffic and not developed for HGV traffic.	Support noted.

	<p>Support the provision of 30% affordable housing and would encourage the 'pepper pot' principle to be adopted. Adequate provision needs to be made for the housing of the elderly within existing villages and towns.</p>	<p>Support noted. The principle of pepper potting is supported in the adopted Affordable Housing SPG, although it states that within flatted developments there may be some merit (in management terms) in having a concentration of affordable housing (but no more than 12 dwellings in a cluster).</p> <p>Affordable housing in other towns and villages is beyond the scope of the EEA DF. Provision is being sought through Local Plan allocated housing sites. In settlements where no additional housing is proposed it is possible to provide affordable housing on 'rural exception sites' on the basis of survey evidence of local need.</p>
	<p>Seek clarification over the two different routes south for the public transport route.</p>	<p>Both routes shown in the Nova MK area have the status of being proposed public transport routes. The spur into the Eagle Farm Strategic Reserve Area would eventually link to the A421, but would be related to the longer term development of this area.</p>
	<p>Has the cost of the highway infrastructure been calculated and will there be sufficient funds from the development of the EEA to provide all the infrastructure required?</p>	<p>Will be more added on funding infrastructure. (Chapter 7).</p>
	<p>Considerable concern is expressed about the provision of primary and secondary healthcare. Pressure must be applied to formulate satisfactory growth plans for medical care in MK.</p>	<p>The health centre requirements in the DF are based on discussions with the MK Primary Care Trust. PCT staff working on the Strategic Service Development Plan for the PCT are also aware of the EEA DF. Hospital expansion is being resolved at a wider level but funding for this will be sought from the EEA development.</p>

Wood Frampton (agent for Gallagher Estates and Taylor Woodrow)	Concern about procedural difficulty of producing SPG in advance of a clear local plan context; creating inconsistency in treatment of parts of the EEA	The need to progress housing delivery has made the procedure necessary; this has been discussed with GOSE and has not had an objection.
	Refer to Broughton Manor Fm site as Priority Housing Site as in local plan	Agree change to text (section 3.3) ; framework does however give substantial priority to this site in terms of phasing.
	Refer to Inspectors Report (IR) recommendation regarding new strategic reserve area south of A421	Concerns land outside the EEA, identified for unspecified development not in the current plan period, but its potential development has been taken into account in producing the framework.
	Inclusion of Pineham/Brook Furlong is inconsistent	This is justified because it is land within the former designated area, allocated for development in the adopted local plan, and with key transport relationships to the EEA.
	Lack of justification for new employment allocation	Because the Newton Leys development has been permitted on land allocated for employment, the inspectors report recommends some compensatory provision of employment in the EEA.
	Lack of justification for non-allocation of mixed uses Eagle Farm north	Para 3.11.4 provides an adequate, 5-point, justification for this decision.
	Lack of justification for phasing and land release policies; would hold back rate of development	The reasons for this are set out in para 6.1.3/4 e.g. to ensure early provision of essential infrastructure, to coordinate housing development with its associated facilities, based on maximum likely level of housing completions.

	Para 5.8.1 Objection to BREEAM excellent rating and compliance with policy D4	Insufficient justification given; the Inspectors Report has recommended that Policy D4 be retained subject to some rewording; therefore the framework should refer to compliance with the policy but not its specific requirements. (para 5.8.3).
	Concern about details (width etc) of the proposed H7 extension	This level of detail is not relevant to this document, can be considered at a later stage.
	Over concentration in phase 1 on high density housing	Phase 1 does include some low density but should add some medium density to provide a more diverse range. (Fig 6.1).
	Objection to para 6.1.7 “developments must be planned comprehensively”, the BMF site is deliverable as it stands	Provision of early essential infrastructure e.g. the city streets, requires development to proceed early on a number of major development sites that are in different ownerships.
	Para 7.5.4 delete reference to equalisation agreement	This is an important and necessary issue
	Specified width of the city street is excessive	It is necessary to provide the desired high quality PT routes
	Para 3.7.31 etc proposed canal has no development plan status and should be deleted	See response to British Waterways
	No need for a new J13a, which could blight Eagle Farm, now that commitments are in place to improve J13 and J14, and the Highways Agency no longer support J13a	Although MKC supports this, the Highways Agency responsible for the M1 have no current plans to provide it. However, a Joint Transport Team (including MKC and HA) has recently been set up to look at M1 issues including a possible J13a.

	Not appropriate to allocate the extra 2000dws recommended by the IR to the Brooklands area without evaluation of the alternatives e.g. land south of A421	The IR clearly recommended that the extra 2000dws be located in the SRA (strategic reserve) part of the EEA i.e. the Brooklands area. Land south of the A421 and EEA is given the status of SRA, but not for development in the current plan period and not to be an extension to the EEA.
	Objects to the principle of reserve sites and their transfer to the council for longer than 5 years.	This is based on a local plan policy but is intended to be applied flexibly and not requiring the possible maximum amount. Will be dealt with by S106 obligations.
	Phase 1 should not include any land at Brooklands or the H7 link	This is justified following the IR recommendation, now accepted by MKC; the H7 link is necessary for early provision to ensure good PT services and access to facilities at Kingston. Will change all of Broughton Gate site to phase 1 and 2. (Fig 6.1).
Wyvern Shipping Company Ltd	Support the canal; to link the Fenland Waterways via Bedford with the popular canal system; to provide a sustainable transport link; to diversify land uses; to provide jobs and tourism, and to provide a green corridor. Support the route option through the Brooklands development as this would have the widest benefit to the development.	See response to British Waterways

SUMMARY OF COMMENTS FROM INDIVIDUALS AND THE EXHIBITIONS (Ordered according to frequency; issues only mentioned once are not included).

NO. OF PEOPLE COMMENTING	NATURE OF COMMENT	COUNCIL RESPONSE
28	Support for proposed new canal	See response to British Waterways
6	Will cause traffic congestion on local roads.	These issues are being dealt with by the Transport Assessment as part of the current outline planning applications. Any identified problems will need to be resolved by developer-funded mitigation.
4	Not enough green areas / recreation space	Only the larger green spaces are shown e.g. linear parks, playing fields, local parks; other smaller spaces including play areas will also be provided within housing areas.
4	Need better leisure facilities (including for teenagers)	The Local Plan Leisure and recreation standards include the requirement for teen facilities in neighbourhood play areas.
3	Need for hospital expansion	See response on the hospital issue raised by Wavendon Parish Council.
3	Improve / redesign the Coachway	This is recognised and is proposed in section 3.5 but should be added to list of funding requirements in section 7.5
3	Need to provide new infrastructure before the housing	Agree that key infrastructure needs to be in place to serve the EEA. This is addressed by the DF by the phasing plan and suggested changes in this Cabinet report (in respect of primary schools, community and healthcare facilities). Para 3.7.11 states that public transport services must be provided in advance of each phase of development.
2	Will cause increased flood risk, flood plain map out of date	Flood risk assessments have been carried out to the satisfaction of the Environment Agency and Internal Drainage Board, will update flood map. (Figs 2.3 and 3.11).
2	Objection to Junction 13A	No decision has yet been made on this issue but central government currently does not support any new junctions on the M1.

2	Concern about high density housing	See response on density raised by Cllr Sam Crooks and British Waterways.
2	Support for proposed vehicle weight restrictions	Noted.
2	Should restrict development until commitment and implementation of highways improvements	See response to highways issues raised by Cllr Sam Crooks.
2	Other suggested highway improvements	List of required improvements to be added. (para 3.7.20).
2	Restrict development to 4,100 dwellings max	See response to the point raised by Cllr Sam Crooks.
2	Restrict residential to 4 storeys unless on the High Street or at key landmark locations	See response to the point raised by Cllr Sam Crooks.
2	Include bushes as well as trees in landscaping	See response to the point raised by Cllr Sam Crooks.
2	Concern about road widths and on street parking	See response to the point raised by Cllr Sam Crooks.
2	Concern about lack of play areas	Para 3.6.14 clarifies that Local Play Areas are not indicated at the DF scale – this is something that needs to be taken into account at the more detailed planning stage.
2	Suggestions for housing designs and management for communal households	See response to the point raised by Cllr Sam Crooks.
2	Change phasing of schools	See response to the point raised by Cllr Sam Crooks.
2	Add phasing of community and health facilities into Phase 1 list.	See response to the point raised by Cllr Sam Crooks.