

LOCAL DEVELOPMENT FRAMEWORK ADVISORY GROUP

17 NOVEMBER 2008

ADDITIONAL PAPERS

ITEM 5

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY: CORE STRATEGY

Annex A – Covering letter from Andrew Thomas (**Page 2**) for the comments from Milton Keynes Forum on the Core Strategy (**Pages 3 to 6**).

Annex B – Danesborough Scrutiny Group comments on the Core Strategy, forwarded by Councillor Hopkins (**Pages 7 to 8**)

Annex C – Officer responses to comments from Milton Keynes Forum and Danesborough Scrutiny Group (**Pages 9 to 10**)

ANNEX A

Zammit, John

From: Andrew Thomas [andrewthomas@homecall.co.uk]
Sent: 13 November 2009 14:33
To: Galloway, Mike
Cc: Ferrans, Jenni; Hopkins, David; Morris, Andrew; Potts, Sam; White, Brian; Miles, Norman; Wilson, Bob; Fenwick, Nick; Constantinides, Alex; Lane, Gavin; Mike LeRoy
Subject: LDF Core Strategy (Submission draft) - Observations from MK Forum to the LDFAG
Importance: High
Attachments: mkf.mk.cs.fag171109.at.mlr [final].pdf

Dear Councillor Galloway

The MK Forum Committee welcomes the opportunity to make a few brief, but important comments on the latest draft of the Core Strategy, prior to consideration by the LDFAG at its forthcoming meeting on 17 November. We realize that the Council has a very tight timetable to meet. We submit these comments to the Advisory Group in the spirit of a 'critical friend', following a similar approach to that of POS Enterprises, which we trust will facilitate their incorporation into the Core Strategy without being too much of a further burden on Bob and his team.

MK Forum submitted a comprehensive response at the Core Strategy Preferred Options stage and we are pleased to see from this latest draft, that careful consideration was given to many of our observations. The issues we raise on transport have only become clearly apparent late in the Core Strategy preparation process. They arise from the Cabinet's consideration of the outcomes of the mammoth autumn transport and related strategies public consultation exercise, in December 2008. One of the Council documents, forming part of those consultations was the Transport Strategy Review. It is from this most detailed of documents, that we derived the data of the longer term implications for access and movement in MK.

Throughout the preparation of the Core Strategy, MK Forum has enjoyed a warm and friendly relationship with Bob Wilson and his colleagues in the Development Plans team. Their application to the task in hand has been truly amazing. On behalf of MK Forum, Mike LeRoy and I would like to record our appreciation of the professionalism, dedication and particularly the helpfulness of the team. We trust that our sentiments will be echoed by Cabinet and Full Council when they come to sign off the Core Strategy Submission.

We commend our observations to the Advisory Group, set out in the letter attached.

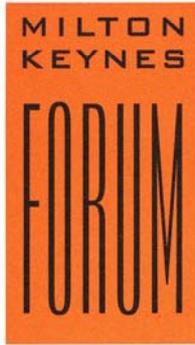
Kind regards,

Andy

Andrew Thomas
Secretary MK Forum

PS Councillor Norman Miles - Norman, Roger remains not directly contactable by email. Would you kindly forward a copy of this email and attachment to him.

Many thanks



Educate Investigate and Enable

To the Chair and Members of the LDF Advisory Group
Milton Keynes Council

13 November 2009

Dear Councillors

**LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY
(draft version for LDF Advisory Group, 17 November 2009)**

The MK Forum Committee welcomes the opportunity to comment on the latest Draft Submission Core Strategy, as modified in response to comments from members at the last meeting of the Advisory Group, and advice received from POS Enterprises.

MK Forum supports many aspects of the Core Strategy, but we are particularly concerned about some issues, especially those relating to ease of movement.

1. Transport

The pace of growth planned for Milton Keynes is unprecedented, but the impact this will have on the city's transport infrastructure and the scale of the transformation this will require to the way people will move around MK in 2026, is substantially understated in the Core Strategy. By 2026, 80% of the presently planned growth will be complete. The greater proportion of the new jobs is to be provided in CMK, bringing the total number of jobs in CMK to around 45,000 by 2026. Analysis of the grid road network and parking policies in the CS indicates that some 25,000 of these workers will need to arrive by public transport, compared to the present number of around 2,500; a tenfold increase. This will require an innovative public transport system that is fundamentally more attractive, convenient, frequent, reliable, speedy and efficient. Indeed, nothing less will be sufficient to achieve the sort of seismic shift in modal choice implicit in the Core Strategy. This needs to be stated specifically in the Core Strategy, as failure to achieve this scale of change would lead to either a slowing of the city's growth, or gridlock in the city centre and considerable damage to some of the most positive aspects of the city's reputation. Neither would the target of 1.5 jobs per household and 45,000 jobs in CMK by 2026, be achieved.

Transport affects almost everything people do. Recognising the importance of transport policy in achieving the delivery of the Core Strategy requires an additional key issue to be added to the list in paragraph 1.2:

“Transformation of the public transport system to provide attractive, fast, frequent, convenient and efficient movement throughout the city.”

The disadvantages of the design of residential grid squares for buses are overstated and tend towards speculation rather than objective evidence. If Para 2.10 were to remain as it is, it would cast considerable doubt over the achievability of much of the Core Strategy. Fortunately, this over-pessimistic explanation is not borne out by the facts. Since 2004, bus patronage has increased by 30% without any significant changes to the structure of the road system across the city. There are some disadvantages to the design and density of residential areas of the city, but these are not insuperable. The Core Strategy should make this clear.

National policy requires an integrated approach to transport, emphasising the need to integrate spatial planning and transport in growth areas to achieve sustainable development. A reference of the need to achieve integration requires greater emphasis, particularly in the principles of the development of the SDAs, but also in the continuing policies relating to the completion of development in the former designated area.

Other necessary, more detailed, amendments to the transport statements and policies, are contained in the Transport appendix.

2. Balancing housing and employment growth

It is critical to the development of the city that growth of employment should be kept in close relationship with growth in housing. To do otherwise would make the city vulnerable to creating disadvantaged new communities for the long-term. This objective is not well-reflected at Paragraph 5.18. In effect, this says that housing growth levels will be maintained even when they run ahead of job growth, but that the solution will be more job growth! This is a perverse proposal. If housing provision runs ahead of employment, despite an active economic development programme, it will be necessary to slow housing completions to avoid the city suffering the long-term ill effects of attracting people for whom there is no work. The most disadvantaged existing housing areas are a warning of what could happen.

3. Employment

The text (para 2.17) refers to 30% inward commuting, but makes no reference to the skills lost by outward commuting, such as the considerable number who work in London daily. This workforce is also an unrecognised strength as it offers potential to employers who will need these skills in Milton Keynes.

Insufficient recognition is given to the city's need to develop visitor attractions and services, such as the considerable potential of Bletchley Park, and the multiplier effect this could have on the local economy, irrespective of whether it achieves World Heritage status.

4. Shopping

The substantial, but apparently incomplete development of retail at Denbigh North does not appear to be recognised anywhere within the Core Strategy.

5. Potential future crossings of the M1

The M1 is a formidable barrier for movement across MK. There is the long standing issue of motorway bound traffic and urban MK bound traffic being all mixed up, particularly along the A509 corridor, creating extreme pressure along that corridor and especially at J14. The increased capacity of the recently introduced improvements at J14 will be quickly eroded. This slows buses and coaches as well as private vehicles.

Para 6.7 refers to safeguarding of land for any future crossing of, or junction with the M1 motorway, for potential growth after 2026. This seems to imply a need for only one further crossing. If growth beyond 2026 were to require development in this area, it would need to be well-connected with the rest of Milton Keynes, for public as well as private transport. Future development east of the M1 would need to make good connections with areas west of the motorway without adding local traffic pressures to Junction 14 or to any additional junction with the motorway.

Each of these issues suggests that land should be safeguarded for more than one further future crossing of the M1.

Please do come back to us should you require any clarification, or wish to discuss our observations further.

Yours sincerely,

Andrew Thomas
Secretary MK Forum

To Councillors Galloway (Chair), Bristow, Ferrans, Hopkins, A Morris, Potts and White.

CC
Bob Wilson, Development Plans Manager
Nick Fenwick, Assistant Director Planning
Alex Constantinides, Assistant Director Transport
Gavin Lane, Senior Committee Manager
MK Forum Committee

Transport Appendix

Our further and more detailed comments are listed below.

1. Para 2.9 needs to say congestion will increase **dramatically** as the city grows. Even without growth, congestion would get **significantly** worse (Source MK Transport Strategy)
2. Para 2.12 - add the need **to achieve a seismic shift in modal choice from car to public transport** in addition to the mention of demand management (Source Local Plan Inspector's Report).
3. Para 11.3 – it's a 'network', not a 'system' - delete 'growth is putting increased pressure etc' and replace with **analysis shows that the Council must introduce change to the way people travel around the city in order to prevent growth putting unbearable pressure on the network.**
4. Para 11.4 needs to refer to the improvements to public transport as a **step change** or a **seismic change**. The paragraph also requires a statement to be included that transport **analysis shows that in the latter part of the strategy leading towards 2026, buses alone will not be able to achieve the modal shift required and measures to begin the introduction of some form of mass transit will be necessary to keep Milton Keynes moving to 2026 and beyond.**
5. Policy CS 11 needs to refer to **step change improvements to public transport**. Also in addition to the delivery of high quality transport interchanges, the policy needs to state '**Planning for the development of the introduction of mass transit, for delivery in the period looking forward to 2026**'.
6. Para 7.5 (CMK section) requires change to '**Significant investment in transport is required to achieve an attractive, distinctive, high quality public transport system to improve.....etc** (Source CMKDF).
7. Para 7.6 needs to commence '**A successful public transport strategy is crucially dependant on the supply and management of parking in CMK**. The total number of spacesetc (Source PTLTV Study).
8. Para 2.13 – rather than 'maximise' which is incorrect, change to '**preserve**' **capacity in the grid road network.**
9. Para 2.14 - delete all but first sentence as this is an LTP issue too detailed for the CS (also with around 550 underpasses and bridges, MK must have a far greater number and a much higher density of grade separated crossings of its high speed roads than anywhere in the country).

ANNEX B

Zammit, John

From: Hopkins, David (Home)
Sent: 13 November 2009 16:01
To: Wilson, Bob; Haynes, Ian; Fenwick, Nick; Galloway, Mike (EXT); Hopkins, David
Subject: Core Strategy - Pre LDF Comments

Bob

The 'Danesborough' scrutiny group has gone through the final document and I list below comments / observations / concerns about the final draft document.

First, overall comment was how much work and quality effort had been put in by officers to turn what was a very inadequate document into what we see now. I have been asked to pass congratulations on to the team, which I am happy to do. One quote from the Danesborough panel being *'I have read the latest version and think it has retained the great advance of the previous one and is beginning to make a lot of sense.....given that we have to find such huge numbers of dwellings over a relatively short time in an already well and intensively developed new town'*.

General point was that perhaps more information at the front of the document setting out the headline vision/strategy/objectives was perhaps inadequate and did not fully relate to the detail contained in the chapters that follow. I know as well there are concerns about the approach to regeneration / deprivation and clustering which should be identified on a street by street basis rather than by grid squares. The concept of super output areas (say 200 'dwellings' at a time) literally homes in on precise areas of deprivation, by street or apartment block.

Other comments:

1. There seems to be an acceptance that residents actually like living here and that there is no need to re-invent the whole concept.
2. There still seems to be an underlying "desire" to impose urban ideas on the rural areas. If there has been identified sufficient land for the urban developments - with space left over - why is there a need to find a further 1200 dwellings in the rural areas. Development in rural areas is more costly and less resource efficient than developing in the urban areas.
3. It is a pity that the East of M1 development has been lost - it made so much sense - while the Aspley Guise/WS development does not because of its impact on the access to MK, as well as the loss of good agricultural and amenity land (in another County!)
4. If there are to be 100,000 new residents up to 2026, there will presumably be at least 33000 new commuters, in and out. Yet nowhere is the impact of current commuting plus the "new" commuters assessed on the road system feeding into the grid system. Woburn Sands and Bow Brickhill already suffer hugely at rush hours due to such commuters avoiding blockages (p.2.8) and rat-running on roads totally unsuitable for such volumes. It is OK it seems to protect new estates from through-traffic but why not "old" villages? paras.2.9 and 2.11 do not address this adequately for now or the future.
5. Para 2.21 encapsulates the "garden" concept which is so important to MK. Para.2.28 is also v.important.
6. The "SWOT" analysis is interesting and the "threats" section needs to be reviewed regularly as development progresses.
7. Para 3.5 recognises that growth could exert pressure on services for existing residents - who wants growth if we can't get to the doctor?
8. The Spatial Vision has lots of good stuff in it but under 7. says it will "deal effectively with through traffic" and "avoid unacceptable congestion on existing roads" but omits to say how! Under 9. the "A421 corridor" is raised but with its 13 roundabouts from M1J13 to bottledump is more like a maze than a corridor! Traffic is thus a major problem which needs solutions at the Core Strategy stage.

(7)

9. Table 4.1 "Core Strategy Objectives" is pretty clear but point 9. is inadequate and point 13 not compatible, suggestion is, with "reviewing village envelopes"

10. Policy CS1 and the "Settlement Hierarchy" seem satisfactory.

11. Table 5.2 "Strategic Housing Supply" is clear enough but the Danesborough panel still has two concerns about the unallocated sites in the rural area. First, the numbers for the rural areas were arrived at by averaging the numbers in previous years and these were mostly ad hoc developments but since then Nampak and similar WS developments have occurred and it seems that "large" developments have become acceptable in the Rural Area. Secondly, therefore, they are concerned that land surrounding Woburn Sands, especially towards Bow Brickhill, could come forward too to the considerable detriment of BB by way of traffic, access, pressure on services and so on.

12. Policy CS5 (South East SDA) does deal with road access to CMK from the SE SDA by suggesting that it should link to the H10. Seems to one of the 'scrutiny panel' that an H10 extension thru' the SE SDA to the A421 link road would solve many problems of traffic in WS/BB/AG as well as linking the SDA to the main arteries thru' the town and thus to the SW SDA which in turn would also be linked to the M1 J13.

13. Policy CS6 (SW SDA) suggests a link between A421 and A4146 (which becomes the V10 - see above). It also notes the need for dualling existing roads, improving junctions and traffic calming measures (6.21)

14. Para. 9.3 is a very clear commitment in relation to Bow Brickhill.

15. Policy CS11 does not cover the feeder road system into Milton Keynes.....and it should. It cannot just be assumed that existing roads will be adequate; if they are not now, why will they be in the future?

The scrutiny group has read the rest of the paper but nothing much struck them except possibly Policy CS 21 Minerals, where there is a policy to protect sites for storage, handling, processing and bulk transport of primary, recycled/secondary materials.....which the panel do not understand but hope it is not for incinerator produce!

Cllr David Hopkins

Local Development Framework Advisory Group 17 November 2009

Papers received after publication of agenda:

1. MK Forum
2. Danesborough Scrutiny Group

Introduction.

As these responses were made outside of any formal consultation process it is important to recognise they cannot lead to any change to the Core Strategy at this stage, unless it is a minor change. The advice from the Planning Advisory Service for minor post-publication changes (editing) is set out below:

'In some cases, development plan documents may require minor changes. For example, to improve legibility or ensure it is up to date. These are the kind of changes which could be made to a development plan document without consultation. It is envisaged that these minor changes could simply be listed as an attached schedule to accompany the development plan document when it is submitted to the Secretary of State'.

1 MK Forum

The Forum supports many aspects of the Core Strategy, but is concerned about some issues especially ease of movement. A key statement is the Forum claim 25,000 workers will need to arrive in the city centre by public transport by 2026. Upon this assumption the response goes on to discuss the need for an innovative public transport system.

However, the background report for the Transport Strategy Review, at Table 11 sets out the number of trips forecast between various modes of transport and the increase in bus patronage is from 8.75%(2,315) of trips in 2001 to 19.3% (9,671) in 2031, not the 25,000 claimed in the MK Forum response. Other modes of transport will contribute to the move from the car's dominance in 2001, including car share, park and ride and walking. The Council could not sustain the degree of change proposed by the Forum. Furthermore it is based on an invalid forecast.

Balancing housing and employment growth – will be monitored as explained in the Core Strategy, but the approach is to accelerate 'slowing' development rather than hold back development to allow the other to catch up. The emphasis in the Core Strategy is on improving skills of our workforce. Shopping at Denbigh was developed as part of the enabling development for the Stadium MK and this can be added as a minor change. The suggestion that more than one crossing be safeguarded over the motorway is noted, but the work on the future development after 2026 will need to look at all potential locations and the Core Strategy only allocates the South East SDA.

There are two comments which warrant minor changes and these can be addressed in the editing changes described above.

2 'Danesborough' scrutiny group

Some of the comments appear to relate to an earlier version of the Core Strategy and are addressed by the changes to the document for tonight's meeting. Other comments refer to matters that were addressed in the South East Plan, or the Sustainability Appraisal.

Other comments include a reference to traffic on roads outside the city and this can be picked up in an editing change to paragraph 2.9. A suggestion to include 'reviewing village envelopes' in the objectives may not be necessary as explained in policy CS 9. The comment 11 about the rural housing supply relates to windfall sites and these should be seen as a basis for policy making. The issue will be fully addressed in the Allocations and Development Management DPDs.

Policy CS 11 does refer to improvements to the highway network for the whole Borough, which includes feeder roads into Milton Keynes.

Policy CS 21 does not refer to an incinerator.

Conclusion

It is proposed that a response based on the statement above is sent to both parties. In that response both the Forum and Danesborough should be thanked for their contributions and advised that if they continue to have concerns about any aspect of the Submission Core Strategy (once it has been approved by the Council), they can put these concerns in writing for the Inspector to consider at the Public Examination.