



Green Party

for the common good

MILTON KEYNES CITY PLAN Comments from MK Green Party

Prepared by Alan Francis on behalf of MK Green Party.

9.10.24

Introduction

Needs to go further and faster to tackle climate change

Needs more on adaptation to impacts of climate change

Needs more on Movement and access. Transport sector is largest emitter of CO2.
Needs whole section, not just a single policy.

The only supporting paper on transport is the SOBC for MRT. There should be at least a background paper and/or LTP5.

A full set of Policies maps should be produced, similar to those produced for previous Local Plans.

Strategy for homes

Our ambition and objectives for growth

Objectives

It is difficult to imagine anyone wanting to disagree with these objectives 1-14, as they are all very much 'motherhood and apple pie'. However some of them don't go far enough. For example, "Objective 8 Ensure that communities and nature can cope with and bounce back from negative climate impacts and environmental change." This should be addressing adaptation and resilience to climate change rather than merely talking about "bounce back".

We question whether MKCC's aspiration for 'ambitious growth' ('Our Ambition', p.1) can be described as 'Well-planned'. We will criticise the inflated 'Local Housing Need' figure in our answer to GS1 (below). We would also instance the way developers have already started to contravene some of the basic stipulations of the SEMK SPD (e.g., need for coherent application and west-to-east development) – a cavalier way of operating by developers that we have also seen repeated locally with some smaller-scale developments. At times, MKCC Development Control seems almost supine before the demands of developers, for fear of losing appeals against refusal of their applications. A 'Well-planned' Local Plan ought surely to be so robust as to be unassailable, even by the sliest developers' barristers: so far, it seems ours is not.

Moreover, laudable though the objectives of the Climate and Environmental Action Theme are – and we certainly do endorse them – some aspects of the transport plan, for example, which can only result in yet more polluting road transport hardly seem designed to help achieve them. As in the fable of the Emperor with no clothes, MKCC should beware of its Green ambitions revealing themselves to be so much 'Greenwash'.

Our growth strategy

GS1 Our spatial strategy

The New City Plan should try to minimise the amount of greenfield land outside the existing urban areas that is taken for development. This to protect the green spaces and habitats and prevent unsustainable urban sprawl.

Housing growth & regeneration

We have two major concerns about the 'Local Housing Need' being raised to '1,902 – 2,250 homes per annum', between 53,245 and 63,000 new homes over the period 2022-2050 across Milton Keynes, from the lower level cited in Plan:MK.

First, we believe this new number to be unrealistically high. If the 15.3% decadal increase in population from around 248,800 in 2011 to 287,000 in 2021 (Scoping Report, Appendix 2, A2.1, p. 38) were to be sustained for the next 30 years, the predicted population level in 2051 would be 439,916 (above the 410,000 within MKCC to reach the 'half a million residents by 2050' in Greater MK cited as the 'strategic ambition' in the Milton Keynes 2050 Growth Study: Demographic Modelling Analysis Technical Summary January 2020).

Given that the national average increase in population over the same period of only 6.6% (ONS Census 2021 data), the exceptionally high rate for MK over the last

decade must have relied largely upon immigration from other areas, outweighing intrinsic increase. The probability of immigration to MK from other areas remaining at such a high level for the next three decades is questionable.

Even if we were to take the highest regional rate of population increase in England and Wales (8.3% for the East of England; ONS 2021 Census data) as a guide, the projected population of MK in 2051 would be just 364,559, yielding a net increase from 2021 of only 77,559 – for which the current rate of housing supply, if continued, would clearly be excessive (yielding an average of just 1.5 people per household). Maintaining an ambition for such an unrealistically high ‘Local Housing Need’ figure, with the consequent release of ever more land for development, risks playing into the hands of speculative developers who would cherry pick the most profitable (especially open countryside) sites for building out, at the expense of supplying the affordable housing where and when it is really needed – alongside their habitual over-charging for new homes (see < <https://theconversation.com/builders-are-making-thumping-profits-by-over-charging-for-new-homes-new-findings-200750> >).

Secondly, the previous Conservative Government’s decision to reform planning rules, following Michael Gove’s climb-down on housing targets in December, has recently caused Central Bedfordshire council, for example – like several other LAs –, to put a promised review of its nearly 2,000 homes-a-year local plan indefinitely on hold. However the new Labour government’s imposition of housing targets specifies a minimum of circa 1750 dw pa for MK. We think this also is too high.

We think that the proposed number of new houses, 1,902 – 2,250 homes per annum over the plan period, is too high. The number should be reduced to around 1400 dw pa, as per the baseline in the HEDNA report without the uplifts.

This would be sufficient to satisfy indigenous demand and still provide for some growth from outside MK. The existing infrastructure, roads, hospital, etc would not be able to cope with the higher number. It would also require a lot of greenfield land outside the existing urban area of MK to be developed, an undesirable outcome.

If the target is reduced to 1400 pa then the about 35000 is required during the plan period. MK already has unbuilt planning permissions for about 20,000 dwellings. That just leaves sites for another 15000 to be allocated. That can be accommodated by the 11000 planned in CMK and development on some other undeveloped small sites and densification around transport hubs. Therefore no new major expansion areas on greenfield sites would be required.

MKC made a rod for its own back by setting a figure of 1750 dw pa in the Core Strategy. It hasn't achieved that level, typically 1300 dw pa has been delivered, but because of NPPF and the 5 year land supply criteria developers have been given permission for many inappropriate developments, eg Eaton Leys. If the Core Strategy target had been 1250 dw pa, as we advocated at the time, then the 5 year land supply criteria would have been much lower and would have been met and so MKCC would not have had to grant permission for Eaton Leys, etc. MKCC seems set upon repeating this mistake and giving developers free reign again by adopting unachievable and undesirable housing target of 1,902 – 2,250 homes per annum.

We support some densification of development within the existing urban area, because this would help with the viability of public transport and local shops, especially near to locations well served by public transport. However this should only happen with the consent of residents of the affected areas.

We are pleased that the site North of Haversham is not in the consultation draft. We would oppose its introduction. The River Great Ouse forms a natural boundary which should be respected by the plan.

Sites outside MKCC area

There needs to be closer co-operation between MKCC and neighbouring local authorities where sites within neighbouring local authorities, but abutting the urban part of Milton Keynes, are being developed for housing or employment. This should lead to such sites becoming part of MKCC area.

The residents of such developments will look to MKCC for many of their services and so they should be part of the MKCC area and pay council tax to MKCC.

“Any land within neighbouring local authorities, but abutting the urban part of Milton Keynes, that is developed for housing or employment should be transferred to Milton Keynes City Council through boundary changes. This should be a condition of planning permission.”

GS2: Strategy for homes

Green Belt

There should be a Green Belt around MK to prevent it sprawling out over the surrounding countryside. Major metropolitan areas such as London, Birmingham and Manchester have green belts. But so too do smaller cities such as Oxford, Cambridge and York. MK is significantly larger, about twice the population and growing rapidly, than any of those and so it too should have a Green Belt. If its good enough for Oxford, Cambridge and York then its good enough for MK.

Consequently we oppose most of the Extension sites shown in the Key diagram (see more detailed comments on GS14-19)

The Green Belt would be around the urban part of MK and be several miles wide, typically about 5 miles. It would include land in MKCC, Central Beds, Bucks and W Northants council areas and would need the consent of those LAs. Near Bow Brickhill and Woburn Sands it would overlap with the London Green Belt.

Green Belt benefits

Green Belts prevent urban sprawl. There are many benefits of Green Belts, including health and wellbeing, food and farming, climate change and wildlife. More detail on these benefits can be found in:

<https://www.cpre.org.uk/explainer/all-you-need-to-know-about-the-green-belt/>

If a Green belt had been in place over recent years it would probably have prevented developments such as Salden Chase, that is now under construction, and Whaddon (misleadingly called Shenley Park by the developers), Aspley Triangle and Old Stratford that are in neighbouring council's Local Plans.

As John Prescott, Deputy PM, memorably said, "The Green Belt is a Labour achievement and we intend to build on it (1998)"

The Local Plan should priorities building on brownfield and and densification first before building on green field sites.

Some large car parking areas at Local and District Centres could be used for housing. If half of the car park at, say Westcroft, was decked over the same number of parking spaces could be provided and the other half used for housing. Alternatively there could be parking on the ground floor with grousing above. This would contribute to densification near transport hubs.

Simply allocating more land for housing will not necessarily increase building rates. Major private housing developers will only build sufficient housing to maximise their profits, not to reduce homelessness or property prices.

There should be a policy to provide some land for self-build housing, as in previous versions of the Local Plan.

Build to Let is a major issue in CMK. This needs a policy.

There should also be more emphasis on facilities such as schools, health centres, shops, etc being provided locally so that people are more likely to walk or cycle to them rather than travelling the longer distances to more centralised facilities by car. The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

Residential developments near public transport hubs should have the option for reduced or zero amounts of car parking. Covenants could be used to enforce this.

The social rent proportion of the total development should be more than 5%, say at least 10%. There is huge unmet demand for social rent housing already. So any developments should make a contribution to meeting this existing unmet demand from existing residents as well as meeting the demand for newcomers.

There should also be a section about encouraging housing cooperatives and Community Land Trusts. These are ways of building sustainable communities.

Need more social housing and affordable (genuinely affordable, not the government definition of 80% market rent) housing.

GS3 Strategy for prosperity

Economic growth

Yet more demand for warehousing 'that could create a need for more development sites in the future that are well connected to our strategic road (and rail) networks' conflicts glaringly with MKCC's 'Green City' ambition: ever more polluting road transport is hardly going to help 'reduce carbon emissions in MK to

net zero by 2030'. The interests of consumerist 'Enterprise Partnerships' should not be considered paramount and need to be fairly balanced against those of local communities where they conflict.

GS4 Strategy for People Friendly and Healthy Places

Beautiful City

We would welcome any measures that would strengthen the ability of the town and parish councils in the rural towns of MK to protect their designated Conservation Areas – including, for example, Article 4 Directions like that established for CMK.

Table 3

Community amenity (majority of new homes)	Catchment distance from amenity for
Bus stop, and active travel stands	400m

Catchment distance should be specified as the *walking distance* from a facility, not the crow-flies distance. DfT, for example recommends that housing should be with *walking distance* from the nearest bus stop.

This should apply to bus stops that actually have a bus service. There are many houses that are within 400m of a bus stop but that stop has no service, so residents are not within 400m of a place where they can catch a bus. Bus services in new areas need to be guaranteed to continue running after the initial Tariff/CIL/S106 payments have finished.

GS5 Our Retail Hierarchy

It is not clear where developments such as MK1 and ASDA/Ikea near Stadium:mk fit into the retail hierarchy.

GS6 Open Countryside

P28 Strategy for renewable and low carbon energy generation

“With respect to wind turbines specifically, we have excluded areas within buffer zones around existing residential dwellings due to the likely amenity impacts of wind turbines.”

How big are buffer zones? If large they will still effectively ban wind turbines.

GS7 Wind Turbine and Solar PV Spatial Strategy

Include solar panels on warehouses and over car parks.

Include policy for battery storage sites, possibly co-located with Wind Turbine and Solar PV.

GS8 Hanslope Park

Any further development should only be permitted if public transport between Hanslope Park and Wolverton and CMK is provided. No more car parking should be allowed.

GS9 Supporting Growth with Infrastructure

There should be denser development around transport hubs, especially around the three rail stations on the WCML at Wolverton, MK Central and Bletchley and around District Centres including Kingston and Westcroft. Also around Local Centres and main public transport corridors, especially MRT corridors.

Key infrastructure that will be used by sustainable travel modes, such as Redways for cyclists and spine roads for buses and MRT should be built at the beginning of the development, say, before 100th occupation, not at the end as has often been the case in recent developments. For example, EEA and Glebe Farm/Eagle Farm where the spine roads, used by bus services, did not open until the developments were almost complete and most residents had already moved in before any bus services could start operating.

GS10 Movement and access

Movement and access should be a whole section of the Local Plan, not just a single policy. So much of planning depends upon transport networks and how people move around.

The only supporting paper on transport is the SOBC for MRT. There should be at least a background paper and/or LTP5.

Movement

The way that we move around MK will change considerably over the plan period. Movement as a Service (MaaS) is likely to lead to different transport requirements. The plan should include flexibility to incorporate new transport modes. These might include fixed systems such as light rail and flexible systems such as demand responsive transport. All new buses should be required to be powered by sources that are not fossil fuels. This might be electric buses, hydrogen or other non-fossil fuels which have zero carbon emissions.

We support the aspiration for a 'Mass Rapid Transit' network, but note that a 'Plan B' is needed in case of significant delay in construction, or should funding for it not materialise: what alternative measures will be implemented meanwhile to 'allow residents and visitors to move quickly and easily around the city without needing to drive their own car', given the currently limited provision of a regular bus service in some areas? DRT (MK Connect) is not an adequately reliable alternative for certain journeys, such as travelling to work, school and hospital appointments.

We also support MKCC's 'greater focus on walking/cycling through our Local Cycling and Walking Infrastructure Plans', We welcome the publication of the LCWIP report. We support the focus on the old towns because they are the places most in need of improved cycling and walking facilities.

Speed limits

Grid road speed limits should be reduced from 60/70 mph to 40/50 mph or all 50mph to improve safety and reduce pollution and CO2 emissions and improve bus punctuality. Most estates and residential areas should have 20mph speed limits to improve safety. As well as improving road safety and reducing CO2 emissions it would encourage more journeys by walking and cycling.

Reducing grid road speed limits would also reduce grid road traffic noise, mostly from tyres on tarmac, in neighbouring residential areas. This has an impact on

planning. Higher speeds means more noise, which means wider grid road corridors, which means less land available for housing.

15 minute neighbourhoods

This principle of 15 minute neighbourhoods should be included in the New City Plan. This ensures that most local facilities such as shops, schools, health centres, play and sports facilities, open spaces, etc are within a 15 minute walk of all houses. This cuts down on car use and makes places more liveable.

Car parking

Car parking in residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. If MK is to achieve the council's goal of carbon neutrality by 2030 and becoming the Greenest city in the world then its citizens will travel very differently to the way that people have travelled since the inception of the new town in 1967. People will own far fewer cars and so less space will be required to park them in, both "at home" and at work, shops, etc. The surplus car parking spaces should be designed so that they are capable of being turned into cycle storage, gardens, allotments, small parks or play areas or having more housing built on them.

Car parking in non-residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. This might be more employment buildings or leisure facilities.

Consideration should be given to introducing a Work Place Parking Levy in CMK and some other areas of MK. This would both act as a deterrent to car use and provide funds to implement more sustainable alternatives.

MRT and Buses

MRT routes in Reg18 Fig 1 are slightly different to those in SOBC. Need to clarify which is proposed.

MRT seems to have been reduced to fancy buses with a few bus lanes on some grid roads. This is disappointing but not surprising.

MRT has 5 arms. For efficient operation should go edge-CMK-opposite edge. That requires an even number of arms. Biggest omission is

Kingston/Woburn Sands/SEMK corridor so that should probably be a 6th arm.

Also needs another arm to serve WEA and Stony Stratford or extend Wolverton arm to Stony Stratford (as in SOBC but not in Fig 1).

MRT is shown as running through middle of Midsummer Place. We welcome that. There is a legal agreement that electric vehicles (actually anything not powered by an ICE, so horse-drawn coach and bicycle rickshaw allowed too) can pass through Midsummer Place but no-one has tried to use it yet.

There seems to be some confusion about where MRT lanes will be on grid roads outside CMK. Some reports seem to imply that one side of dual carriageway will be used for MRT, one lane in each direction, and the other side for general traffic, one lane in each direction. However other reports imply that each side of dual carriageway will have an MRT lane and a general traffic lane in the same direction. This needs to be clarified.

MRT shown as crossing M1 on a continuation of H4 Danstead Way. This is what we advocated when it was being planned several years ago. However what was approved and appears to be under construction is a skew bridge about 600m to the south. If that is indeed the case then Fig 1 should be changed to reflect that.

Buses should stay on Midsummer Blvd between Saxon gate and Grafton Gate, not be shifted onto Silbury and Avebury Blvd. Instead in order to reduce walking distances to bus stops consider relocating bus stops on Midsummer Blvd between Saxon gate and Grafton Gate so that there are 4 sets of stops instead of 2. (see CMK1)

Carbon

This section fails to take into account the changes necessary to reduce CO2 emissions in order to avoid catastrophic climate change. It is largely 'business as usual' rather than tackling the changes that are necessary.

There is little attempt to tackle road transport's increasing contribution towards climate change. A previous government chief scientist has described climate change as the biggest threat to our society. The Climate Change Act requires a reduction of CO2 emissions of 80% by 2050. To achieve that a reduction of about 50% will be required by 2031. The transport section of the plan should have policies to reduce CO2 emissions from the transport sector by 50% over the plan period.

The Centre for Cities report, Cities Outlook 2011, ranked MK poorly, 53rd out of 64 cities, where the lowest was number 1 when comparing CO2 emissions per capita. The Campaign for Better Transport in its 2014 Car Dependency Scorecard ranked MK as the 27th most car dependent city out of the 29 cities it considered. If MK is to be a genuinely Sustainable Community, where all citizens have good access to facilities, the economy is not damaged by traffic congestion and the Global environment is not damaged by climate change and pollution, then we will need a much larger shift to sustainable transport modes.

There should also be more emphasis on facilities such as schools, health centres, shops, etc being provided locally so that people are more likely to walk or cycle to them rather than travelling the longer distances to more centralised facilities by car.

The design of housing estates should be more permeable for active travel modes with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly to neighbouring streets, shops, schools, bus stops, etc without having to make large detours from the "crow-flies" route.

There needs to be more emphasis in the plan on modal shift, both for existing residents and those in new developments. The report rightly notes that MK has a large amount of low cost car parking, compared to other towns and that bus use in MK is lower than in comparable towns. What the report does not make clear is which is the cause and which the effect. We believe that the large amount of low cost car parking causes the low bus use. A previous consultant supported that view.

More than a decade ago in LTPTV1 Faber Maunsell said:

“Without measures to discourage car use, the public transport system would have to be of fantastic quality to persuade car users to leave their car at home.”

“Restraint on parking and other measures can bring the quality requirement to within more reasonable limits.”

There should be more incentives for car sharing in order to reduce the number of cars being driven in the peaks which causes congestion on the grid roads and high demand for car park spaces in MK.

A car occupancy of just 1.1 (Transport Strategy Review, MKC, 2008) is an appalling waste of the scarce resources of both parking spaces and highway capacity. One bus can carry 44 passengers and requires 12m of

lane space with a similar amount between vehicles. With an occupancy of just 1.1 44 people require 40 cars, each requires 5m of lane space with 10m between vehicles, requiring a total of 600m. So the bus needs just 24m of lane space but the cars to carry the same number of people need 600m of lane space, ie 600m of single carriageway or 300m of dual carriageway, 25 times as much as the bus. The bus does not require any parking space in CMK because it either passes through or waits just a few minutes before returning to its point of origin.

Bus use in MK has been declining slightly over recent years (this was evident even before Covid pandemic). It starts from a low base, typically a third of comparable cities. Bus use in MK needs to be at least doubled as a proportion of journeys.

Road congestion within MK has got much worse over the last decade. This is not just on the roads around CMK, there are many other locations with considerable congestion, around M1 J14, along and across both A421 and A422. This is leading to buses being delayed because they are stuck in the congestion.

Poor punctuality is cited by passengers as the worst aspect of the bus services in MK. Buses need to be given priority at junctions where they are currently delayed. This would make the bus services more reliable which would attract more passengers to use them. This might take the form of bus lanes, HOV lanes, bus gates, smart traffic lights triggered by buses, etc.

The speed limit on grid roads should be reduced to 50 mph. As well as improving road safety and reducing CO2 emissions it would make it easier for buses to pull out of bus stop lay-bys - much easier for a bus to join a stream of traffic travelling at 50mph than one travelling at 70mph - and easier for buses to cross traffic when turning into or out of estates.

MK is not a 9 to 5 city. Buses also need to operate longer hours to suit the varied work and leisure times of residents.

Key locations in MK should have high quality bus interchanges. Currently only Station Square, Coachway and Bletchley satisfy this criteria. The following key locations should be upgraded to high quality bus interchanges: The Point/CMK, Hospital, Westcroft, Kingston, Wolverton, Stadium:mk/MK1, Newport Pagnell. This may require more land being made available for the bus interchanges.

Add "ensure provision of public transport services to the sites throughout their period of use, ie not just while being developed."

Add "However the high speed grid roads encourage car use and increase emissions. The high speeds make it difficult and dangerous for vehicles turning into and out of estate roads. The high speeds also make it difficult for buses to exit the bus stop lay-bys because they have to join a 70mph stream of traffic from a standing start. To improve road safety and public transport grids road speed limits should be reduced to 50 mph."

Add "there should be more priority for buses and multiple occupant cars on the grid road network by creating more bus/MOV lanes"

There should be policies for E-bikes, e-scooters, hired/private, robot delivery vehicles (Starship).

Basically Encourage, but with Facilities for parking these out of way of pedestrians

Home Deliveries for food and smaller packages should be encouraged to be made by Starship robots/ Cargo bikes, etc rather than diesel vans.

Shift to EVs should be encouraged Charging points in new developments.

Consolidation depots near CMK and other centres for local delivery by Cargo bikes, electric vans, Starship robots, etc

Unload small parcels at MKC or Bletchley stations for local deliveries to shops, offices, homes, etc.

East West Rail

We fully support the re-instatement of the rail line between Cambridge and Oxford via MK (EWRL).

The two largest towns in the corridor are MK and Luton, both considerably larger than Cambridge and Oxford. These are the two intermediate towns where most of the housing growth and jobs growth will be in the future. Consequently the rail line should serve those two intermediate towns as well as link Cambridge and Oxford.

We are concerned about the delays to EWRL. The western section, Oxford to MKC, was scheduled to be completed and operational in December 2017. This has slipped considerably and is now scheduled to be open sometime before June 2025. The Central section, MK to Cambridge, was scheduled to be complete in CP6 (2019-2024) but the latest forecasts are

for some unspecified time after that. We hope that the NIC will propose bringing these completion dates forward.

Trains from the Cambridge direction should be able to reach MK Central station. Currently this can only be done by a reversal at Bletchley platform 5. The new high level platforms should also have the ability to reverse trains so that they can travel between MK Central and Bedford/Cambridge. This should also be possible by a reversal at Bletchley platform 6. This only requires a few extra points and signals.

In the longer term there should be a direct route that does not involve trains reversing. This might be by constructing a North facing chord from Fenny Stratford to the flyover line. This would involve the demolition of some industrial units on James Way.

Network Rail (NR) published its West Coast South Strategic Advice (WCSSA) report last year. This calls for extra infrastructure between Bletchley and Milton Keynes Central (MKC) to enable more East West Rail (EWR) services, from both Oxford and Cambridge, to reach MKC. The report looks at how to make use of capacity on the West Coast Main Line (WCML) released when some fast trains between London and Birmingham and Manchester transfer to HS2.

The key part of the proposal is extending some EWR services from Cambridge, Bedford and some Marston Vale stations to MK Central. This could be via reversal in Bletchley station or a new east to north chord at Bletchley. The Local plan should allocate land that may be required for an extra 2 tracks on the East side of WCML from Denbigh Hall South Jn (where the Flyover lines join the Slow lines just before crossing over Watling St) to MKC station, about 3 km, and 2 extra platforms at MKC with connection to the slow lines at the north end of the station and a east to north chord at Bletchley, as recommended in WCSSA report.

Active Travel

There should be more commitment to Active Travel and provision for it. Active Travel England in its Local Authority Active Travel Capability Ratings 2024 recently ranked councils on their commitment to Active Travel. With rankings from level 0, no commitment, to level 4, excellent provision. MKCC is ranked “Level 1: Some local leadership and support with developing plans and isolated interventions.” This needs to be improved and requires more commitment to Active Travel facilities in the Local Plan. <https://assets.publishing.service.gov.uk/media/66d959112bc43c72b08264a0/local-authority-active-travel-capability-ratings-2024.pdf>

We also support MKCC's 'greater focus on walking/cycling through our Local Cycling and Walking Infrastructure Plans', We welcome the publication of the LCWIP report. We support the focus on the old towns because they are the places most in need of improved cycling and walking facilities.

However, where we do take issue is with the delivery and funding. There is a long list of 300 schemes of which the top 100 are shown in table 5.2 of LCWIP. this is whittled down to a short list of 28 in Table 7.1. but of those just one scheme is to be delivered in the first year and just 4 in the following 2 years. At that rate it would take 150 years to deliver all 300 schemes. Years 4-10 have another 23 schemes - at that delivery rate it would still take 100 years to deliver them all.

So the council really needs to speed up the delivery rate. It should be doing at least 5 schemes per year but preferably 10.

There should be grade separated Redway crossings every 500m or less on grid roads and other major roads.

Permeability

More journeys must be made by walking and cycling. This should be encouraged by providing better facilities for those modes.

There must be permeability for pedestrians and cyclists. It was there many decades ago in the design of, for example, West Bletchley and Lakes Estate, but not in more recent developments of last 30 years, eg Monkston and Middleton.

The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

There should also be frequent pedestrian/cycle links from the streets within a grid square to the Redways alongside the surrounding grid roads and the bus stops on the grid roads.

GS11 Principles for Extensions to the City

Any land within neighbouring local authorities, but abutting the urban part of Milton Keynes, that is developed for housing or employment should be

transferred to Milton Keynes City Council. This should be a condition of planning permission.

The residents of such developments will look to MKCC for many of their services and so they should be part of the MKCC area and pay council tax to MKCC.

See GS2 Green Belt above

GS12 Redevelopment of Wolverton Railway Works

Add:

- i. Include a frontage to the canal and a footbridge across the canal to the towpath and Old Wolverton.

GS13 Redevelopment of Walton Campus

If this site is vacated by the Open University, which seems to be in doubt, then most of the site should be retained for employment re-using many of the existing buildings.

Add:

C 10. Retain as many of the existing buildings as possible in order to not waste the embedded carbon in them.

GS14 Eastern Strategic City Extension

Remove this site, retain as countryside and farmland.

It won't be sustainable because too far from CMK and severed from CMK by M1. Too far for active travel, eg cycling, and no guarantee that there would be frequent fast public transport.

It would completely surround Moulsoe village. It would almost coalesce Cranfield with MK, just one field separating them.

This site is a long way from CMK and so would be too far for most people to walk or cycle to CMK. Moulsoe currently has just an hourly bus service. While more bus services could be provided there is no guarantee that that would happen. Thus most residents would not be able to use sustainable

modes of transport and so would travel by car, increasing congestion and CO2 emissions.

GS15 East of Wavendon Strategic City Extension

Remove this site, retain as countryside and farmland.

This site is a long way from CMK and so would be too far for most people to walk or cycle to CMK. There is no bus service to this site. While more bus services could be provided there is no guarantee that that would happen. Thus most residents would not be able to use sustainable modes of transport and so would travel by car, increasing congestion and CO2 emissions.

GS16 Wavendon Strategic Buffers

Support

GS17 South of Bow Brickhill Strategic City Extension

Remove this site, retain as countryside and farmland.

This site is a long way from CMK and so would be too far for most people to walk or cycle to CMK. There is no bus service to this site. While more bus services could be provided there is no guarantee that that would happen. Thus most residents would not be able to use sustainable modes of transport and so would travel by car, increasing congestion and CO2 emissions.

GS18 Levante Gate Strategic City Extension

Remove this site, retain as countryside and farmland.

This site is a long way from CMK and so would be too far for most people to walk or cycle to CMK. There is no bus service to this site. While more bus services could be provided there is no guarantee that that would happen. Thus most residents would not be able to use sustainable modes of transport and so would travel by car, increasing congestion and CO2 emissions.

GS19 Shenley Dens Strategic City Extension

Remove this site as housing, retain as countryside and farmland or use for recreation and sports pitches.

It is over the Shenley ridge (roughly followed by North Bucks way) which should be the edge of developed area of MK. In order to prevent MK sprawling over the ridge towards Buckingham.

CMK1 Central Milton Keynes Placemaking Principles

Station Square should prioritise access to the station by sustainable travel modes. It should include dedicated parking areas for hire bikes, e-bikes and e-scooters. MRT and buses must have priority over private cars and not be held up by them.

We support the first part of “D. Manage the level of parking needed to support a vibrant city centre, while maintaining high levels of convenience.” Improved public transport access and a reduction in the number of parking spaces should be part of the “carrot and stick” approach to modal shift from car to sustainable modes.

CMK2/CMK3 Central Milton Keynes Development Framework Area

Support Active travel modes on Midsummer Blvd Northern carriageway and MRT on Midsummer Blvd Southern carriageway. MRT on Southern carriageway should be shared with buses. In the short and medium term, both will be similar technology, rubber tired vehicles running on tarmac. Passive provision should be made for MRT to become tracked vehicles, eg trams.

Buses should continue to run on Midsummer Blvd. They should not be moved to Avebury and Silbury Blvds because those Blvds are too far, in excess of DfT recommended 400m walking distance to a bus stop, from the opposite side of CMK. Midsummer Blvd is central and about 400m from anywhere within CMK.

The Masterplan Framework proposes an interchange of all three MRT Lines at Saxon Gate/Midsummer Boulevard. It also proposes that the public transport strategy maximises accessibility across CMK for all uses, providing interchanges at the most important nodal points - the Station and the retail core. We assume that the ‘retail core’ means Saxon

Gate/Midsummer Boulevard junction. This implies that all buses must run along Saxon Gate either from Avebury Blvd to Silbury Blvd or vice versa.

Thus buses using the north side of Campbell Park, to Gt Linford, Newport Pagnell, etc, from Station must go via Avebury Blvd, Saxon Gate, Silbury Blvd. Similarly buses using the south side of Campbell Park, to Kingston, Bletchley, etc, from Station must go via Silbury Blvd, Saxon Gate, Avebury Blvd.

This means that anyone wishing to travel from the north side of the Business District towards Gt Linford, Newport Pagnell, etc would have to walk to Avebury Blvd, more than 400m, or change buses at the Saxon Gate/Midsummer Boulevard interchange. Similarly, this means that anyone wishing to travel from the south side of the Business District towards Kingston, Bletchley, etc would have to walk to Silbury Blvd, more than 400m, or change buses at the Saxon Gate/Midsummer Boulevard interchange.

Neither of these options is convenient for passengers. Therefore buses should stay on Midsummer Boulevard wherever possible. In order to reduce walking distances to bus stops consider relocating bus stops on Midsummer Blvd between Saxon Gate and Grafton Gate so that there are 4 sets of stops instead of 2.

MRT is proposed to go through Midsummer Place. We support this. While diesel buses are in use they cannot go through Midsummer Place and so would have to dogleg around that, as they have done for the last 25 years. However once all buses are electric, probably within a decade, then they too can go through Midsummer Place.

Consider a hopper bus running along Avebury and Silbury Blvds between Station Square and Marlborough Gate, similar to MyMK BID's previous service for employees, but for anyone to use.

Retain all underpasses in CMK. They provide safe traffic-free routes for pedestrians and cyclists. Some people perceive the underpasses as being unsafe however we have not seen any evidence that they are any less safe than other parts of CMK. Those perceptions need to be tackled by better lighting, more overlooking, education, etc rather than filling them in.

Where the underpasses at Witan/Avebury junction have been filled in pedestrians and cyclists have to wait for the green man at traffic lights, delaying their journeys.

While we want to encourage travel by active travel modes we are concerned about Stopping up both Witan Gate and Saxon Gate at their junctions with Midsummer Boulevard to cars. This would force more traffic on to Grafton Gate and Secklow Gate and cause severance of the northern and southern halves of CMK.

Housing

CMK should have the same proportions of affordable and social housing as the rest of MK.

Skyline Strategy

We do not support buildings up to 30 storeys. They would dominate the skyline, causing shadowing and overlooking and be visible from more than 10 miles away. Most buildings should be no more than 10 storeys. Maximum height should be 15 storeys. Delete the category “up to 30 storeys”.

Station Square

Bus interchange should be kept adjacent to the station entrance. No large buildings in Station Square. We do support development on the surface car parks behind the Old Bus Station, Phoenix House and Elder House.

Campbell Park

While we support the principle of a green bridge over V8 we are concerned about the illustration in the Masterplan Framework. This shows pedestrians and cyclists having to cross traffic on Marlborough Gate.

Currently the underpass provides a traffic free connection for pedestrians and cyclists. In the illustration it is downgraded and has an awkward and inconvenient zig-zag ramp up from the underpass to the green bridge. Pedestrians and cyclists should have convenient, level, direct and traffic-free access to Campbell Park.

We support the provision of an outdoor event space somewhere in CMK. The original City Square, now built over by M&S, was a space for large open-air gatherings. The tiny remnant now called City Square, no longer fulfils this requirement.

CB1 Supporting Investment in Central Bletchley

5. Should explicitly include a commitment to improved public transport (bus and MRT) facilities at Bletchley station, including eastern entrance, transport hub.

PFHP1	Delivering Healthier Places
PFHP2	Provision and Protection of Community amenities
PFHP3	New Local Centres
PFHP4	Delivering a healthier food environment
PFHP5	Designing People Friendly Places
PFHP6	Designing Healthy Streets
PFHP7	Well-designed buildings

Healthy Homes

The plan should include all of the 12 policies in TCPA's Healthy Homes Principles

<https://www.tcpa.org.uk/resources/healthy-homes-principles/>

Some of these would be in Healthy Homes section and some in Climate and environmental action section.

HQH1	Healthy Homes
HQH2	Affordable homes
HQH3	Supported and specialist homes
HQH4	Supporting regeneration and renewal
HQH5	Homes for co-living

This should include support for Housing Coops

HQH6	Homes in multiple occupation
HQH7	Pitches for Gypsies and Travellers
HQH8	Accommodation for boat dwellers
HQH9	Exception sites

Climate and environmental action

This covers:

- carbon emission reduction to achieve carbon net-zero
- biodiversity net-gain
- strengthening networks of parks & open spaces, lakes, rivers and canals
- access to attractive open areas.

The New City Plan should include interim carbon reduction targets. These might be annual or bi-annual targets for carbon reduction in each sector so that progress can be monitored.

The target should be to reduce all CO2 emissions from MK to net zero by 2030, not just those from MKCC activities which represent less than 2% of emissions from MK.

Many residents were motivated by the Council's commitment in 2019 to reduction of 'carbon' emissions and were discouraged to find that this did not cover the much wider requirements to reduce emissions from all vehicles in the City and emissions related to the much wider impacts from heating and use of power in all buildings, for which the MK City Plan should be seen as a main driver.

The plan should encourage and support local community energy schemes. This should include criteria to enable siting of energy storage and distribution systems, in parallel with local energy generation schemes.

Although the need to reduce net greenhouse gas emissions is addressed, there is no specific mention in this list of the need to plan for mitigation of the effects of extreme weather events (heat-waves, droughts, storms, heavy rainfalls, etc.) such as are predicted to become increasingly frequent and intense with global climate warming – unless this is covered in the vague reference to 'bounce-back' from environmental challenges' in objective 5.

Decide first what measures are needed to prepare for the environmental challenges that MK communities are likely to face over the next few decades and then procure whatever funding is needed to do the job, by all available means (including progressive 'taxation' via Council charging, as needed), rather than being constrained by an arbitrary priority of 'available funding'. The eventual cost of not acting will far outweigh that of taking appropriate action now.

In 2019 MKCC made a Declaration of a Climate Emergency and since then has developed a wide range of proposals for reducing our carbon footprint and promoting a healthier local environment, both for people and for wildlife. Hence we naturally endorse MKCC's 'Green City' aspirations but they need to go much further.

The plan should include all of the 12 policies in TCPA's Healthy Homes Principles

<https://www.tcpa.org.uk/resources/healthy-homes-principles/>

Some of these would be in Healthy Homes section and some in Climate and environmental action section.

The plan should also incorporate many of the objectives and policies in Bristol City Council's Climate Change Strategy. Although Bristol is not the same as MK it has a population similar to that which MKCC aspires to for Greater MK (ie MKCC area plus the bolt-ons from neighbouring LAs) by 2050.

<https://www.bristol.gov.uk/council/policies-plans-and-strategies/our-action-on-climate-and-ecology/mission-net-zero>

CEA1 Sustainable Buildings

Include support for Air Source Heat Pumps and Ground Source Heat Pumps where the scale of development and space availability makes that possible, to create better energy efficiency.

CEA2 Green Roofs and Walls

We suggest removing all references to Green Walls. They are much less energy efficient than Green Roofs, more expensive to construct, and require frequent and expensive replenishment and maintenance. They reduce energy use far less than green roofs.

A

1 In an era of rising temperatures, prevention of excessive solar gain is an increasing necessity of design to be applied alongside achieving adequate solar gain.

6 Provision of habitats and food sources should be for wild bee species, so they are not competing with 'farmed' honeybees. Bumblebees and solitary bees continue to decline in the UK.

7. Provision should be made for installation of permanent bat and bird boxes as part of the design and construction of properties. This is distinct from fitting limited-life bird boxes.

Taller buildings should provide multiple Swift nest-bricks at height as this species is colonial, feeds on the wing, benefits from nesting at height, and is and is long-lived.

10. Can these irrigation systems meet the water supply regulations that do not permit direct connection to mains systems?

CEA3 Resilient Design

Climate Adaptation

It does not cover the issue of Climate Adaptation. It should do so. And this should cover not just adaptation to the 1.3 deg global temp rise that we have seen so far but should include adaptation to higher temp increases, 2 or 3 deg, which seem likely to occur over the next few decades unless there are major reductions in global CO2 emissions in the immediate future.

This will include, for example, policies for cooling dwellings as well as heating them and infrastructure that can tolerate more extreme weather events of heat, cold, rainfall, drought and storms. The adoption of Passivhaus standards for dwelling would help with this.

Requiring 'external blinds and/or shutters' is a significant and welcome step forward. This will require the City Council to provide specific guidance of what would be effective and acceptable.

CEA4 Retrofitting

Retrofitting should also address the issue of suitable types of energy generation installation on Listed Buildings and scope for these to be installed on roof aspects where they will be most effective to generate electricity.

CEA5 Water Efficiency

There are already water shortages in the SE, with chalk streams drying up, aquifers and reservoirs dangerously low. More large scale development should not go ahead until these issues have been sorted out and any development should ensure that it does not impose increased demands on the very limited water supplies.

Credible and funded means of closing this gap must be in place before large-scale developments proceed, including requirements for much enhanced water conservation measures on all new developments.

CEA6 Low and Zero Carbon Energy Provision

The plan should encourage and support local community energy schemes, including storage.

It should also cover Data centres. The waste heat from these could be used to heat homes, offices, swimming pools, etc.

The City Centre has a seriously neglected combined heat and power (CHP) network which supplies locally generated heat and electricity to significant buildings such as The Quadrant, occupied by Network Rail. This holds a key to local energy generation for CMK. The City Council must avoid this becoming a wasted asset and enable its rejuvenation, by installation of 21st century power sources and a programme of CMK-wide development of this as a rejuvenated heating and cooling network producing locally generated electricity.

The capability of this as a CMK-wide energy network service requires a policy to extend the network by protecting its existing and potential routes throughout the CMK underpass system, alongside other measures to enhance at-grade crossings of CMK boulevards and other roads for walkers and riders. The underpass network can enable lower-cost extensions to this CHP network.

CEA7 Mitigating wider environmental pollution

Needs stronger measures on the issue of light pollution, the deleterious effects of which on both people and wildlife have become better understood in recent years (see, for example, < <https://www.darksky.org/light-pollution/wildlife/> >; < <https://www.rhs.org.uk/wildlife/garden-lighting-effects-on-wildlife> >). Recent 'citizen-science' records collated by CPRE (< <https://www.nightblight.cpre.org.uk/> >), for example, show the night sky of MK to be severely light-polluted.

We suggest that the success of MK City Councils' programme of Redway lighting upgrade and use of night-time streetlight dimming needs to be followed by setting criteria-based planning standards to limit glare from outdoor lighting installations.

Milton Keynes lacks the kinds of criteria-based noise policies appropriate for dense urban areas city, which will become increasingly important as more intensive development takes place. We suggest that Westminster City Council's policies can provide a useful basis for some appropriate planning policies for Milton Keynes, as from their Noise Technical Guidance Note 2020:

https://www.westminster.gov.uk/sites/default/files/ev_env_005_v2_noise_technical_standards_wcc_september_2020.pdf

https://eburybridge.org/assets/Documents/Planning-Proposals/Volume-3-E S-/58e5d5f4c3/EBR-13_Appendix-K_Noise.pdf

CEA8 Provision and protecting of accessible open space

We believe that all new open space should be owned and managed by either the Parks Trust of MKCC. We are concerned about the growth of so-called “fleecehold” where such land is transferred to a private management company which leads to both a question of public access rights and the fact that the city gets a two-tier service where such residents are paying, not only for the maintenance of their own land but also land throughout the City (via Council Tax).

Biodiversity Net-Gain’ is not an appropriate term to use in this context of this policy. It is a technical process for calculating types and quantity of habitats present at a development site then, applying this to required actions to ensure that an even larger quantity of useful habitat is retained, created or compensated for as part of a development. It is not an appropriate description of what biodiversity open spaces provide, irrespective of development.

We suggest that the latter part of para 207 should be re-worded to explain that: “Open spaces may provide benefits towards the conservation of significant habitats and species, as well as contributing to protection of landscapes, surface water management, and sequestration of carbon dioxide in trees, permanent pastures and their soil”.

Air quality in terms of open spaces reducing local air pollutants, as required for Local Air Quality Management – such as: PM10, NOx, NO2, PM2.5, Benzene, 1,3-Butadiene, Carbon Monoxide and Lead – is very limited. Some temporary suspension of particulates on leaves of trees may be achieved only when trees are in leaf. Some sequestration from CO2 can be achieved in special habitats such as peatbogs and unimproved permanent pasture or meadows in good condition.

Para 208 is an important statement of intent. The heading above para 207 (“Providing and protecting our valued green spaces”) WHAT DOES THIS MEAN because it implicitly that makes a conditional commitment, depending on whether particular open spaces are “valued” or not. It needs to make clear which open space are valued. If any are not valued, the criteria on which this is based must be made clear.

The paragraph should also make this clearer by referring to open spaces: “As designated on the Policies Plan”.

There is a fundamental problem with understanding types of open spaces across Milton Keynes and where they are located. The draft 'MK City Plan 2050 Policies Map' does not provide comprehensive coverage of all types of open spaces: it lists and shows one type of open space, (Linear Parks) but none of the others.

Although these typologies are reflected in full in Appendix A and Appendix B of the previous 'Plan: MK 2050', they are not shown on the Policies Map for the City Plan, which shows only what it describes as Linear Parks.

The City Plan must also show all other typologies of sites designated as open spaces: to do otherwise would suggest that many existing open spaces have no status at all.

1. Country Parks
2. District Parks
3. Linear Parks
4. 'Other' Natural and Semi-natural greenspace
5. Amenity greenspace
6. Local parks
7. Pocket parks
8. Civic spaces and formal gardens
9. Food growing areas: Allotments, orchards, and community growing areas
10. Cemeteries, churchyards, and other burial grounds
11. Formal outdoor playing fields
12. Green access links
13. Common land and village greens
14. Paddocks.

We also suggest that there should be a new category of City Parks, which we would define as "*Public parkland and facilities for activities and events that have a citywide catchment*".

The range of different types of open space is illustrated in the 'Open Space Assessment Report' which is presented as evidence.

The maps reproduced within that report are so indistinct and fuzzy that they are almost totally unreadable. Nor do these appear to distinguish types of site, because their purpose is to assess for each Parish: indices of various aspects of social and health deprivation; and results of site quality assessments related to: 'Quality' and Accessibility scores.

A new set of MK-wide Parish maps of open spaces is required of at least the standard and breadth of content of the Parish maps that were published with 'Plan: MK' which, in relation to Open Spaces, showed:

- Open Countryside
- Linear Parks
- District & Local Parks
- Recreation and Open Spaces
- Amenity Open Spaces
- Site of Special Scientific Interest
- Historic Park and Garden
- Wildlife Corridor
- Traditional Orchards
- Ancient Woodland
- Priority Habitats
- Local Wildlife Sites
- Local Nature Reserves
- Biological Notification Sites
- Biodiversity Opportunity Areas
- Local Geological Sites.
-

This was an important presentation of significance of different types of open space and should be updated and included in the City Plan.

The distribution of all these types of Open Space should be fully shown on the Policy Map, including the range of types of sites of wildlife, biodiversity and historic importance.

There do not appear to be any policies within the City Plan that achieve what was contained in Policy L2 (Protection of Open Space and Existing Facilities) of 'Plan:MK 2016-2031': "Planning permission will be refused for proposals involving the loss of public open space..." etc. The absence of such a policy in the City Plan would be a serious omission.

As far as the provision of new routes is concerned, the established name for paths through linear parks and many other areas managed by The Parks Trust is "Leisure Path" (and routes were shown thus in the Milton Keynes City Atlas: we suggest that the term should be included here.

Most of these Leisure Paths are recognised by a distinctive sealed golden gravel surface and are usually 1 to 2 metres width, compared to at least 3 metres for Redways. Leisure Paths are for leisure uses and provide for safe movement for families with young children and those with mobility needs as well as those seeking green spaces and wildlife for passive and active enjoyment. Some residents use these for cross-city travel but appreciate that priority is for leisure uses.

Associated with some Leisure Paths are horse-riding trails, mainly on turf surfaces. We suggest that Leisure Paths and Horse-Riding Trails should be referred to in MK City Plan 2050 as an important aspect of leisure uses of open spaces.

Although some Redways need to cross linear parks and other leisure landscapes, it would be inappropriate to provide fast, active travel routes more widely throughout leisure landscapes as these could conflict with the benefits of open spaces for leisure users, but Redways do need to reach the edges of open spaces and cross main river valleys.

We suggest **“providing active travel networks that connect to open spaces”** rather than “integrating with active travel routes and recreation routes” which suggests that parklands and open spaces should be bisected by more Redways.

We suggest that point 4 should be reworded to be more specific: “How future management and maintenance will be funded and achieved, to what standards, and what body will be responsible”.

Policy F: The policy and the supporting text lack a definition of what designated or ‘undesignated open spaces’ are. This clarification is needed within the text, with an explanation of the significance of ‘undesignated’.

Policy H: This policy should also apply to inappropriate development next to Linear Parks that would have an unacceptable impact on uses of Linear Parks, such as through excessive visual or noise intrusion.

CEA9 Biodiversity and Habitats Network

Biodiversity

Much more is required on Biodiversity. There is more to it than just biodiversity net-gain. We already have a biodiversity crisis, with many species endangered or lost. The New City Plan should address this and include policies to improve biodiversity.

We suggest that *“and nature reserves managed by other bodies”* should be added to the definition of “Local Designations”.

This description of ‘Local designations’ has omitted important types of Local Biodiversity Designation. The main, nationally recognised designation is Local Wildlife Sites (LWS) of which there are over 20 in Milton Keynes. These are

decided through an expert ecology committee set up by the Bucks & MK Natural Environment Partnership through the Bucks & MK Environmental Records Centre, supported by Buckinghamshire Council and MK Council, and using objective ecological data.

The Buckinghamshire Council website says: *“Biological Notification Sites, a previous and similar designation of locally important wildlife sites, are reviewed and assessed by Local Wildlife Site Officers to see if they are of reasonable quality to meet the LWS wildlife site criteria.”* In effect Biological Notification Sites (BNS) are sites awaiting full assessment, in retain the prospect of becoming Local Wildlife Sites with provisional acceptance of that potential future status. This should be made clear in Policy CEA9 and its supporting text.

The term ‘local nature reserve’ lacks a single agreed definition nationally, other than for Local Nature Reserves (LNRs) designated under Section 21 of the National Parks and Access to the Countryside Act 1949, by principal local authorities. The only one in Milton Keynes local authority area is Blue Lagoon. Although no other site in MK has this designation there are other sites known as and managed as nature reserves. Most County Wildlife Trusts and other such bodies such as the RSPB and Plantlife have their own nature reserves. In MK, the BBOWT wildlife trust own and manage Little Linford Wood as a nature reserve, but it is not a designated Local Nature Reserve. The Parks Trust manages six local nature reserves: these are at Elfield Park, Stony Stratford, Floodplain Forest (Old Wolverton), Linford Lakes Nature Reserve, Pineham, and Walton Lake. Some, but not all of these are designated by the Bucks & MK Natural Environment Partnership as Local Wildlife Sites.

There have been two recent examples in Milton Keynes of known Priority Habitat Lowland Meadow sites which have been included in Planning Consents for part of their area to be built on: one at Caldecotte South, another at MK East to the west of the River Ouzel.

These are not habitats that should have been given consent. Biodiversity Net-Gain is unlikely to enable them to be replicated. We therefore suggest that Priority Habitats in Milton Keynes should be shown on the Policies Map to alert developers to so that they avoid including them in any proposals for development.

Footnote 10 refers to “MK Wildlife Sites” which appear to be the same thing as Biological Notification Sites, which are potential Local Wildlife Sites (LWS) awaiting assessment, or that term is being used instead of Local Wildlife Site. We suggest deleting the term ‘MK Wildlife Sites’ and placing Local Wildlife Sites at the head of

the list as this is the term used by the Government, Natural England, other local authorities and other bodies.

CEA10 Protection and enhancement of environmental infrastructure network,

We are concerned about the get-out clauses in B, C and D. We fear they will be seen as an invitation by developers. Either remove them or make them more onerous for developers.

CEA11 Urban greening, trees and woodland

All mature trees should be retained and protected. More trees and woodlands should be planted as part of the development.

Most existing hedges should be retained and joined together with new planting to act as wildlife corridors.

There should be a requirement to plant lots of street trees. These provide shading and cooling in housing areas, increasing comfort and reducing energy consumption.

The Urban Tree Canopy Cover standard also promotes trees for shade, and this term should also be mentioned in this text.

Forest Research's publication about this standard says: "Urban trees provide many benefits to all who live and work in urban areas, providing contact with nature, a backdrop for recreation and wellbeing, cooling and improving the air quality." We suggest that the benefit of urban tree cover for shade and cooling should also be mentioned alongside 'carbon capture' and flood mitigation, because of their urban importance in a changing climate.

<https://www.forestresearch.gov.uk/tools-and-resources/fthr/tree-canopy-cover-leafllet/#:~:text=Background,over%20283%20towns%20and%20cities>.

What is not evident is how this standard will be achieved in higher urban development densities with trees that have significant canopies.

Most private woodlands in the rural Milton Keynes areas do not provide permissive access. This is not reflected in the evidence provided by the MKCC Open Space Assessment Report (January 2023) and its series of maps of access to Forest & Woodlands in MK of 2ha and less and 20ha and less (Maps 26 to 28). This

shows all woodlands and journey distances although most of these are private woodlands without any public access. What would be more appropriate would be maps of woodlands to which public access is permitted, which is far fewer.

CEA12 Conserving and Enhancing Landscape Character/Special Landscape Areas

CEA13 Sustainable drainage systems (SuDS) and integrated flood risk management

We support Policy CEA 13, B 10 and requirements to restore culverted watercourses for the benefits to local communities and biodiversity. This should be applied in particular to Brooks such as the Abbey Hill Brook, Shenley Brook, Kingsmead Brook, Tathall Brook, and Water Eaton Brook.

CEA14 Protecting and enhancing watercourses

CEA15 Managing flood risk

Recent floods have shown that even with SuDS many areas of MK are subject to flooding due to increased rainfall resulting from climate change. This applies to roads, redways, etc as well as houses and other buildings. Action will be required in the existing developed areas, not just in the new developments, to address this.

ECP1 Protecting Employment Land and Buildings

ECP2 Supporting the vitality and viability of centres

ECP3 Sequential and Impact Tests

ECP4 Supporting a Diverse Rural Economy

ECP5 Heritage

Despite the title 'Heritage and cultural prosperity' the policy has nothing about Culture. It should do so.

Enforcement

All of these planning policies are worth very little without proper enforcement. The Planning department and its enforcement team need to be properly resourced and staffed in order to ensure that these policies are adhered to.