

MOULSOE PARISH COUNCIL

The Parish Clerk | The Old Rectory | Moulsoe | MK16 0HL

Milton Keynes Council
Development Plans
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

By hand and
By email PlanMK@milton-keynes.gov.uk

8 June 2017

Dear Sir/Madam

Public Consultation on Draft Plan:MK (March 2017)

I wish to make the following comments on the Draft Plan:MK Consultation (March 2017) ("the Plan") on behalf Moulsoe Parish Council and the residents of Moulsoe.

We broadly support the Plan and appreciate that Milton Keynes Council (MKC) has noted earlier representations from the local ward, parish councillors and the community and concerns over the Northern Expansion Area, satellite settlements and the original suggested wave of development to the rural area East of the M1.

General Comments

Notwithstanding the above, we maintain the whole consultation is meaningless without a proper projection of how the population will grow. Whether and where houses are built, in practice, depends on how many of them are necessary to meet population demand. No evidence-based housing demand exists beyond 2031 and there has not been any MKC debate or decision in this respect. Half of new UK housing demand originates from immigration forecasts, but, whatever government is in office, it is highly likely that levels of immigration will be reduced, with a consequent reduction in housing demand.

A doubling of the size of Milton Keynes (MK) is contrary to current central government plans to re-balance population and economy between the north and the south. South-East of England is already the most densely populated territory in Europe, with exception of Malta, and our infrastructure is struggling to cope even with the current population levels remains in the EU, it is highly likely that levels of immigration will be reduced, with a consequent reduction in housing demand.

We consider the aspiration of an ultimate population of 400,000 in the MKC area is optimistic and runs the risk of degrading the living experience for residents of MK in the process

From a purely financial perspective, the head of finance at MKC has said that for every 1,750 houses built (the current housing target), MKC faces a net increase in cost of £1 million. While there will be offsetting economic benefits, this will be outside the MKC budget i.e. in the private sector or in public services not administered by MKC such as the NHS. This begs the question of how the increase in population can be financed

Situating new housing in the urban area would have many advantages both in social integration and in public transport infrastructure. MK is just too spread out and loses coherence. A tighter centre would give greater opportunity for an integrated transport system. We maintain that this should be the preferred option, because it will enhance the borough, whereas most other options detract from it.

"26,500 new homes will be provided over the next 15 years – almost 20,000 have planning permission, with 7,600 earmarked for development". Our research indicates that MKC currently has actual current approved planning applications indicating 31,000 potential dwellings in the "pipeline", which effectively satisfies the requirement for 26,500 homes until 2031.

Due to the duty to cooperate and cross boundary developments, we suggest that all new housing built within approximately eight miles of CMK, should be considered to be part of the population of MK, regardless of which local authority it is in. This is because new residents will rely largely on the facilities of the MKC area, so, for example, residents of any development near Aspley Guise or Newton Longville area will naturally look to MK for health, social & leisure facilities.

We are concerned that the Plan does not appear to make sufficient provision for hospital/healthcare improvements given the current demand and annually increasing head of population in addition to any new residents

Currently, MK offers both a city location for young people (which needs investment to make it more vibrant), and beautiful villages to attract families who do not want to be part of a city environment, but want access to city facilities nearby – the latter would disappear with the expansion engulfing these villages, even if they were protected by a buffer zone.

Flood Plains in the Ouse Valley

We are concerned about issues arising from flooding along the river which is becoming a more regular event. Increased density of housing/ employment opportunities in this area would only exacerbate this issue where development would add to increased surface water run-off

The M1 - A Natural Barrier

The M1 motorway should formally be stated within the Plan as a natural barrier to development east of the M1 as identified in the original “New Plan for Milton Keynes 2005” as a “major inhibiting factor” to development. Much of the area east of the M1 is good agricultural land and the food it produces will be increasingly important to help feed Britain.

Appropriate Rural Development

There is scope for modest growth (around 10%) in towns and villages, which will preserve their character and continue to provide a genuine rural and village choice for families

We would like to see MKC accept development of 1,000 houses across rural areas in line with neighbourhood plans. This approach will ensure that the development is of an appropriate scale and location and encourages and enables the rural communities of the borough to ensure the sustainable growth of their towns and villages.

Further, we urge MKC to resist pressure for expansion to the east of the M1 from landowners and developers when it can be demonstrated, for the time-being, estimated housing needs can be satisfied from other identified potential development areas described elsewhere in the Plan.

Future Expansion alongside Infrastructure

The Plan’s direction of expansion should work in concert with the proposed infrastructure development of East-West Rail and the Oxford to Cambridge Expressway. This will be a positive step to promote economic growth along the increasingly important “Oxford - Cambridge corridor” and also aligns the Plan to the findings of the MK Futures 2050 Commission, something that MKC has stated it supports unequivocally. The improved public and private transport possibilities promised by the East-West railway and the Oxford to Cambridge Expressway make development in the southern parts of MK much more sensible than building east of the M1.

Development to the south and west also has a number of benefits, mainly because Aylesbury Vale Council also wishes to develop on adjacent land. The benefits of scale from the two authorities working together in terms of road infrastructure (e.g. link dualling the A421) would be significant, although, again, protection should be offered to existing villages such as Whaddon, Nash, and Beachampton by a green belt.

Future development of the city towards the suggested “400,000” by the MK Futures 2050 Commission must be supported by appropriate infrastructure including communications and healthcare.

Urban Regeneration

We support the regeneration in Bletchley and older city grid squares to improve the housing stock within these urban areas.

MK must strive to develop and refresh itself to create a buzz and atmosphere as a city for people and serving people whether they live, work or simply just visit. Creating an inviting atmosphere, pedestrian friendly with ability to move not just between other cities, business centres and retail/leisure activities but also for city-dwellers to move between MK-based leisure and retail centres and of equal importance, the urban and rural environments

Currently MK appears tired, none of the areas of interest link together particularly well – the railway station, The Hub, intu, Theatre District. Stadium MK has leisure and retail attractions and Kingston Centre has a range of shops and restaurants, but none are linked particularly well. CMK is not as thriving as one would expect given the investment in the area since many commute out after work rather than living locally and have easy access to residential areas. Having a better designed station with a rapid transit system connecting all points of the compass would incentivise people to venture into MK perhaps as they pass through MK rather than just heading home to the outskirts.

Organic growth starts with urban regeneration first and should not be an afterthought when there are no other options and the current fabric of central MK has declined to make redevelopment uneconomic.

Linking regeneration to existing and active development activity such as towards the south-west must be able to capitalise on existing economies of scale – grid road extension, infrastructure extensions, transit systems, cooperation with neighbouring authorities.

Developing large remote and decentralised locations would not encourage people to use the facilities of CMK. The consequence would be that MK becomes a “need to location” rather than a desirable place to visit.

In summary, we are in favour of the other development intensification and redevelopment in the urban areas because:

- CMK is losing its identity as a city because of its sprawl – greater density and city centre identity connected to MKC railway station is desperately needed to satisfy the need of the commuter both to and from MK.
- People want good commercial office accommodation, with adjacent retail and leisure facilities all within walking distance from their home – this can only be achieved by redeveloping the centre of MK around the railway station to deliver 21st century needs to the growing population of MK.
- Regeneration and invigoration of MK will attract young professionals to live and work in MK, which will have a positive effect on the local economy.
- The needs of the young commuter are best served by affordable residential accommodation within walking distance of the railway station, with the option of high-quality build to rent development.
- Keeping homes, work and leisure together with an efficient and modern transit system allows access to (i) surrounding areas outside of CMK; (ii) neighbouring retail and leisure hubs e.g. Stadium MK.
- It reduces the amount of potential Greenfield development.
- Developing under-used and run-down urban areas improves environment, attractiveness and appearance.
- Urban regeneration supports more sustainable communities and associated benefits such as public transport, green transport initiatives and lowers car use especially single occupancy vehicle movements.
- Such developments are usually quicker to complete and commission than for Greenfield sites.
- Renewal of poor quality housing estates is aligned with government policies.

- It is an excellent opportunity to renew current and near future Brownfield sites.
- Infrastructure is already in place, notably, transport, sewerage, utilities, etc.
- The Plan needs to work in concert with the complete range of initiatives for the borough including 2050 Futures, City of Culture applications, competing with cities such as London, Birmingham and Manchester.

Strategic Site Allocations Policy SD14

The New Plan for MK (2005) identified that sustainable development east of the M1 would be a challenge primarily due to cost, hence it could not be considered a long-term sustainable approach – this is in direct conflict with the National Planning Policy Framework.

Additionally, even at that time, it was identified that an improved link over the M1 was a prerequisite since congestion would grow and use of public transport would not increase.

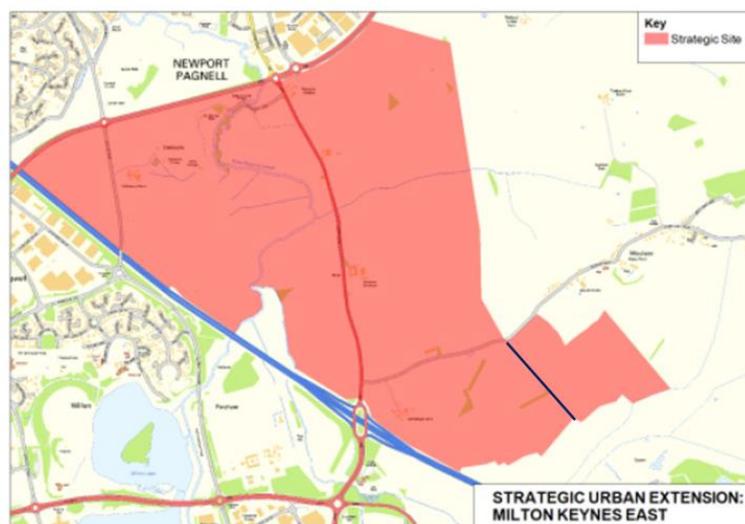
“Land is identified east of the M1 for housing and jobs after 2031. This may come forward earlier once decisions on the new Oxford-Cambridge Expressway are made or should we be struggling to provide enough housing elsewhere in the borough”. It is simply not an equitable situation to expose the eastern area to the potential development due to failings to satisfy estimated demand elsewhere in the borough. Having the opportunity to go east, under certain circumstances, provides no incentive to extract the maximum potential from other, easier to develop, sites in the central MK area.

It seems unfair that there are a number of possible caveats that are yet to be decided after consultation on the Plan has concluded. These are key issues that should be part of a complete and more joined up approach to development in MK – currently it appears rushed, poorly managed and disjointed in its approach to this most important of strategic plans for the area. Any development should be focused on the Expressway in the south and if more housing should be required these should be sourced from various urban regeneration schemes.

Moulsoe – Strategic Site Boundary

If this policy is to remain, then we would like to see the proposed south east boundary of the eastern area in Moulsoe Parish be moved closer to form a straight line, going along the line of the bridle path south of the village, or one field further west, running along the hedge line, southwards from the bend beyond the 30mph sign (as noted on the illustration below). Doing so would protect Moulsoe village to a greater degree and reduce potential flooding risks from extreme weather events that are likely to become more common. This adjustment would not reduce the potential number of houses significantly.

Map 2 Milton Keynes East



Many thanks for your attention.

Yours faithfully

A handwritten signature in blue ink that reads "Elizabeth Taylor". The signature is written in a cursive, flowing style.

Elizabeth Taylor
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