

Response to Milton Keynes East (MKE) Strategic Urban Expansion (SUE) Supplementary Planning Document (SPD)

It is clear that MKC planners clearly do not have the expertise or a team big enough for the planning process demonstrated by the fact that MKC appear to rely heavily on the engagement of external consultants. It is reasonable to assume that few, if not none, of these consultants know or live in the borough or how much Moulsoe and the surrounding area/communities are currently at risk from permanent damage as a result of unnecessary and opportunistic development in the area.

The site boundary has moved further East from the earlier drafts of the document. Why is this? This would be contrary to the opinions expressed by residents of Moulsoe in previous responses. Also, we have heard it said several times that the MKE SUE is a "done deal". Milton Keynes Forum (MKF) representatives have said the same. It is clear from these facts that this so-called "public consultation" process is a sham and the MKC planners never intended to listen to the residents of the local communities. It is also clear from the recent MKF meeting that the planners are being bullied by the developers/landowners and have no real control over the process.

One of the most basic tenets of effective development is embedded within the concept of place-making. The unhealthy interest and interference of developers in the area has replaced place-making with profit-making. None of the residential developments can really be recognised or labelled as affordable or addresses MKC's need for much-needed social housing the bulk of which should really be focussed towards the central part of MKC simply because that is where the transport is, where the employment is and where access to East-West corridor is.

1.2 HIF-bid money would be better spent further south for a crossing more aligned to the Oxford-Milton Keynes-Cambridge (OMC) arc infrastructure. Piggybacking on the OMC arc gives an apparent "weight" to the MKE SUE but is not relevant because of the geography. This plan is not part of the OMC arc initiative in any sense so to include reference to it in this SPD is disingenuous and misleading.

There is a statement in the SPD in policy SD12 that states the development will not proceed without a new M1 crossing. So, is it safe to assume that without HIF there will be no new crossing and no SUE? What if there is a reduced HIF award will MKC walk away or will the tax-payer be the press-ganged into funding the short-fall?

It is accepted that the £90m application will simply not be enough to satisfy all the infrastructure needs of the area and it is naïve to even believe that a spend-overrun will not happen. No infrastructure project of this size has ever been completed to budget – there are too many to mention but HS2 springs to mind.

1.2.4 states *-Whilst East West Rail and the Expressway will not unlock development at MKE, the site is well placed within the Oxford-Cambridge Arc to deliver transformational growth around Milton Keynes.*

But the position of the SUE being as remote as it is from both the Expressway and East-West rail and separated from MK by the M1 cannot, as a development, be used to justify eastern expansion. Development should focus around the path of the arc – easier access to homes, to employments and transport links. No bridges to negotiate, no bottlenecks, no requirement to funnel into grid roads.

Providing a possible second access across the M1 does not guarantee people will use it – habit forces them to use the known and shorter route. If the grid roads on the south-side are not modified then forcing additional traffic across the M1 will simply bring the northern grid-roads to a standstill. There is no plan to widen these or to redevelop J14 even though eastern expansion will result in more commuter traffic going to and coming from the development. J14 is currently at capacity.

1.4.2/1.4.3 Heavy bias during the process of engagement towards the views of the developers/landowners at the expense of the residents of the local communities. Both are included in the stakeholder group referred to in the SPD, but the needs of developers are, in general, at odds with that of the residents. There is no collective agreement in

this stakeholder group as far as we can see and the MKC have never sought it. The use of the stakeholder group in this way is, in our opinion, is another example of the public consultation process being a sham. It is implied throughout the SPD that the stakeholder group in its entirety is in tacit agreement with the MKE SUE plan in general.

The Local Stakeholder Group was and is made up of a majority of members absolutely against development in the East for a myriad of reasons discussed at the meetings and workshops.

To quote attendance at vision workshops does not do justice to the reason as why we were there, it implies support and a general contribution to an exercise that could be viewed as an event to provide the foundations of place-making. This certainly was not the case since the contributions were made to ensure that many ideas were not simply rail-roped into place and to make sure that many of the assessments regarding a variety of criteria were challenged for being inadequate, misleading, inaccurate and in many cases just plain unrealistic in their aspirations.

1.6.5 Why build so many houses in this space? The proposed urban area will much bigger than the surrounding urban areas of Newport Pagnell and Willen. The necessary infrastructure will be not in place before the site is deliverable. The HIF bid is small fraction of the cost of the infrastructure needed. We don't accept the argument of economies of scale since this benefits the developers only. The cost of building will be reduced but the price of the houses will be determined by the market. Thus, the economies of scales allow increased profits for the developers. These large-scale developments provide no benefits to the existing residents of the surrounding communities. Existing residents have chosen to live in a rural location, with this development it will cease to be a rural location.

1.6.9/1.7.1/1.8.1 This fast mass transit (FMT) solution should be looked at in the context of Milton Keynes as a whole, not just for MKE SUE. The FMT system is fundamental to the SPD designs for MKE and yet here is no funding for this. The HIF bid alone will not solve the transportation problems created by the SPD but somehow the success of the HIF bid is the starting gun for detailed planning process. It is quite clear that the SPD does not intend to solve this problem. These sections of the SPD refer to using alternatives to private car usage to get about. We don't see a suitable alternative that will work. For sure the solution will involve the use of buses on roads shared with other traffic.

It is clear that in order to remain "on-point" the SPD has been liberally peppered with references to the FMT but this appears to have been used with no real thought as to realistic delivery. When questioned as to what the FMT actually meant MKC simply responded – bus. A bus or bus system (especially that used in MK currently) can in no way by any sense of the imagination be considered to be an FMT. Anything that relies on using the road system and mixing it with privately run vehicles is subject to the vagaries of delays and disruption all of which we see on a daily basis. To be seen as innovative and progressive we must have thoughts and offerings of a mix of dedicated transport solutions whether rail (aka DLR), shuttle, monorail, tram, autonomous pods - so these draw the public to use them since they run independently of the roads. Such projects also attract the world to come here to see how technology is being used to provide a vision of the future. To develop a potential 5000 home site and quote FMT and then say bus is not just laughable it is a dereliction of planning process. The concept of an FMT was never really talked about during the Stakeholder sessions rather public transport, it appears that FMT has been thrown into the mix as an after-thought merely an aspiration when it should be one of the foundations of place-making.

It is not surprising that little thought has been put into how an FMT integrates into the area, how it will be funded, how it connects to primary connections e.g. rail, main buses. It simply cannot be added as an afterthought at a later date. So, if not done at inception it will simply never be done.

2.12.1 Edge Conditions - Boundary on the south side of Moulsoe does not respect the character of the village. We don't see a green buffer around Moulsoe (too close). The proximity of site boundary to Moulsoe (especially on South side) indicates the expected likelihood of further development very close to Moulsoe on all sides leading to boundary creep. Makes case stronger for a bigger buffer at the village boundary. We don't agree that a school playing field is a

green buffer since there is a recent history of publicly funded schools having to sell this land to developers for housebuilding.

We understand the desire for a “green buffer” but there is a practical question about how this will both be achieved and managed. Who will own it, for example and how wide will it be? Such buffers can be seen as isolating features and were not used for the villages incorporated into MK. What would happen to the area between the village and the buffer as currently drawn?

2.12.1 *Heritage - Development should not adversely affect the setting of the heritage assets within or on the edge of the site, particularly the hotel within the site and the grade 1 listed Church of St Mary in Moulsoe. • Master planning of the site should protect the integrity and character of Moulsoe village,*

If this is the case then why does the development include land so close to the village? it would be better to shift the suggested boundary to line of the bridle path running south of Newport Road. Moulsoe and not go onto the field to the East of the bridle path. An officer was quoted as saying this follows an ownership boundary rather than a field boundary – is this a prime example of tail wagging the dog?

4. Pedestrians & cyclists should be largely separated as in housing developments in Holland. vegetation should be well managed to allow good visibility for all & reduce any personal safety anxieties that are associated with dense, *dark vegetation close to paths*

4.3.2. *The movement network must be designed to discourage car travel, so it should provide short direct pedestrian routes to key generators of movement such as bus stops, shops, schools, and other facilities.*

There is no mention of the FMT here. The need to get to the M1, across the M1 and MK will promote car use not diminish it. To think otherwise is foolish.

4.3.17. Why should the eastern boundary not be sealed to protect open countryside. On what basis should the city be allowed to expand further

4.3.21 Providing welcome packs is infantile. The important thing is good design of active travel & public transport routes to make them attractive to use

4.4 The placing of a school on the edge of Moulsoe seems like an afterthought. It was never discussed or proposed at the Stakeholder meetings. It does not optimise accessibility by walking/cycling in the southern part nor does the placing of playing fields (section 4.2) in the SE corner. All this does is promote the use of the car to access these facilities. What about connections from Moulsoe into the new area so that residents can use its facilities - not just roads but footpaths and Redways too. Access to the secondary school also appears to have been omitted.

Schools and their playing fields should gravitate to the centre of the development, in order to be within 5 minutes walking distance as document suggests. This is not apparent from the plans which look like they had to be catered for so had to be put somewhere.

4.4.6 It is not realistic to assume that all employment will be satisfied from within. It is clear that people will and have to travel for work since it is impossible for the full work requirement profile to be satisfied locally

Home working is a not a significant proportion of the jobs market, the majority of jobs have to be satisfied at a formal place of work, in the community or at site. Its relevance in the case of SUE is small.

4.4.18 states - *Sites should be provided for two 3FE and two 2FE primary schools. There should be a primary school within 400m (5 minutes walking distance) of most of the houses and they should be located on a primary residential*

street. A minimum of 3 ha of land should be provided for each 3FE primary school, and 2.1 ha for each 2FE primary school

4.6.7/8 The MKE SUE will not reduce flooding risk: it can only increase it – we doubt residents in Newport Pagnell have been made aware that their current flood risk will be exasperated by development in the eastern area.

There is no indication of how effective policy FR2 is and whether integrated SUDS & careful development planning will work, nor is the flooding risk of other continuing developments in MK mentioned. There is a cumulative effect to flood risk which are difficult to predict or model but common sense would indicate if somewhere is prone to flooding and land nearby is effectively “paved over” what is the potential for the problem to get worse.

4.6.15 comments briefly about IT connectivity and open market solutions – well this has not been the model deployed in MK to date with numerous projects across the city awarded to private non open-market suppliers leading to a lack of competition and dissatisfied end-users having no alternatives to consider. What assurances do we have that MKC will not simply award the communications project to the highest bidder?

5.2.3 Perhaps S106 tariffs could be increased in order to fully implement the FMT system. The plan does not work without it.

It is surprising that there is no mention in the SPD about the imminent 900 house development at Tickford Fields – was this omission by design or just an oversight?

Figure 2.7 does not show all the existing hedges within the area. This underestimates the existing wildlife corridors and habitat. This could affect the conclusions in section 2.12 where it says all existing hedgerows should be retained wherever possible.

As a result of this error Fig. 2.15 suggests conserving only a small amount of existing hedgerow which results in a contradiction.

There appears to be no tangible proposition for healthcare facilities or hospital provision – unless you think MK Hospital has capacity for an additional 10000 people – in which case you need take a seat in Accident and Emergency any day of the week.

Reliance, in any shape of form, on facilities located on the south side of the M1 is not just a foolish error it demonstrates a level of idiocy that questions the credibility of the SPD.

Infrastructure of local centre & other facilities should be established by the time half the total number of houses are built and should be accessible from surrounding houses, unlike the current situation at Brooklands.

6.5.2 The Eastern perimeter road should be delivered by the end of phase 2 to avoid the risk of planning creep.

There is no mention or contingency for a Moulsoe by-pass to access Cranfield – this was specifically discussed at the Stakeholder sessions but for some reason has been omitted leaving Moulsoe village exposed as a rat-run.

The SPD has been put together in haste to try to meet a deadline culminating in the possible award of the HIF. There is little in the way of innovative thinking or planning much of which should really be applied to central MK to increase its attractiveness as a potential technology and education hub – live, work, learn, collaborate – these should be the aspirations of MK and were developed within the MK Futures 2050 report. Development in the East does not come close to making a great city even greater it simply serves to squeeze the city into a thinner and wider landscape that does not support people, travel, work or leisure or reducing the reliance on private transport and promoting greener faster mass transport.

The development will successfully destroy a large amount of rural land and the associated farming community in the area along with green belt and the natural green spaces we all come to expect around busy growing towns and cities.