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Your Ref:  
Our Ref: DP 439  
Date: 07 April 2004

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Dear Sir

## Milton Keynes Local Plan Inquiry. Interim (Part 1) Report

Further to the agreement with the Council, my Interim (Part 1) Report into objections to the Milton Keynes Local Plan is enclosed. The report includes relevant contributions from the Assistant Inspector, Mr John MacBryde. The Inquiry into matters covered in this Report closed on 26 March 2004. As was discussed with Mr Haynes and Mr Hurwitz, this Interim Report deals with objections relating to strategic matters. An interim report has been produced in order to inform the Panel undertaking the Examination in Public into the Milton Keynes and South Midlands Sub-Regional Spatial Strategy about the conclusions reached regarding the Local Plan strategy. It is also hoped that the Report may help to avoid repetition of detailed matters already dealt with at the Local Plan Inquiry. As agreed, if the sub-regional context changes to a material extent as a result of the Examination in Public, this Interim Report will be reviewed in the light of the revised situation.

The Report contains two sections. The first provides a broad assessment of the soundness of the strategic approach in the Milton Keynes Local Plan and the implications, in terms of land allocations, of the conclusions reached. The second deals with objections made to the first three chapters of the Plan. These are included because Chapter 1 deals with the way the Plan relates to the sub-regional situation, Chapter 2 contains the strategic vision and aims and Chapter 3 contains the strategic policies.

As agreed copies of this interim report have been sent to the Examination in Public Panel, GOSE and ODPM.

Yours faithfully

Keith Holland  
Inspector





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## **1 Introduction**

- 1.1 Section 1 of this Interim (Part 1) Report provides a general commentary on the broad strategy of the Plan. It does not specifically aim to address individual objections although inevitably the essence of many objections will be covered. Section 2 deals with objections lodged to the first three chapters of the Plan. The logic of this approach is that these are the chapters that explain the overall strategy of the Plan. The remaining chapters 4 – 15 will be dealt with in the Final (Part 2) Report that will be available at a later date.
- 1.2 The aim of the Interim (Part 1) Report is to test the soundness of the strategy that underpins the Plan and to provide early guidance to assist the Council with its forward planning. In addition it is hoped that the report may prove useful in the consideration of the role that Milton Keynes is to play at the sub-regional level. The Council has agreed to publish this interim report in the interests of seeking to be helpful to the Milton Keynes & South Midlands Sub-Regional Spatial Strategy Examination in Public Panel and to assist in avoiding repetition of matters already dealt with at the local plan inquiry. If the sub-regional context changes materially before the Final (Part 2) Report is completed, this Part 1 report will be revised accordingly. To that extent Part 1 should be regarded as an interim report.

## **2 Sub Regional Strategy**

- 2.1 The majority of objections to Chapter 1 cover the question of how the plan relates to the Regional Planning Guidance for the South East (RPG9). This situation is clearly complicated by the review that is currently taking place into the amount of growth that is to be allocated to the Milton Keynes & South Midlands Sub-Region. A further complication is the uncertainty about the timing of the growth proposals for the area. Pre Inquiry Change 1 (PIC 1) updates the situation in that it refers to the publication of the sub-regional study in September 2002 and makes it clear that the Council favours the approach of taking the emerging sub-regional situation into account at the next review of this local plan.
- 2.2 In relation to this matter there are two distinct camps. On the one hand the Council, whose supporters include Buckinghamshire County Council (BCC), Aylesbury Vale District Council (AVDC) and the Government Office South East (GOSE) who accept that the regional situation is uncertain but believe there is an urgent need for an adopted plan based on the Buckinghamshire Structure Plan (BSP) and the March 2001 RPG9. On the other hand a number of objectors argue that while the regional/sub-regional situation is not yet finalised, it is overwhelmingly clear that Milton Keynes is going to be required to accommodate far more growth than is allowed for in either the adopted BSP or in the 2001 RPG9. These objectors contend that the BSP and RPG9 have been overtaken by events and if Milton Keynes is to make an appropriate contribution to a higher level of growth in the South East of England, house-building rates have to be boosted sooner rather than later.

Their contention is that in comparison with the adopted BSP, there needs to be an accelerated rate of housing growth during the lifetime of the Plan and continued significant growth thereafter.

- 2.3 The essential background facts are as follows. For Milton Keynes the BSP contains a dwelling figure of 36,700 dwellings 1991 – 2011. Between 1991 and 2001, 16,743 dwellings were provided leaving a balance of 19,957 for the period 2001 to 2011. Completion rates in Milton Keynes have been lower than envisaged in the structure plan and the consequence is that to meet the structure plan figure, the rate of growth will need to increase significantly in comparison with recent years. In 2001/2 completions totalled 1,234 and in 2002/3, 1,188. To make up the shortfall and to achieve the BSP figure will require an annual completion rate of around 2,200 dwellings in the eight years from 2003 to 2011.
- 2.4 As regards existing regional guidance for Buckinghamshire, RPG9 (policy H2) envisages an annual average of 3,210 housing completions in the county for the period to 2006 and beyond until such time as the regional guidance is reviewed. The figures in the RPG are slightly higher than the county figures in the BSP and the implication is that additional land needs to be found in Buckinghamshire for some 1,900 dwellings in the period 2001-2011.
- 2.5 In relation to the review of the regional guidance, in July 2003 the consultation draft of the Milton Keynes and South Midlands Sub-Regional Strategy (SRS) was published. This performs the role of proposed alterations to RPG9 and will be subject to an examination in 2004. The strategy builds on the findings of the Milton Keynes South Midlands Study published in September 2002 and it envisages a step-change in the levels of growth over the next 30 years. In the strategy Milton Keynes and Aylesbury are seen as locations for significant growth in the period 2001 – 2016. Up to 33,900 additional homes are envisaged in Milton Keynes urban area in the period to 2016 with a further 1,200 additional homes in the Milton Keynes rural area. The strategy envisages 19,300 of the additional City dwellings being provided by selective urban intensification and the remaining 14,600 through sustainable extensions to the west, south-west and east of the City. In the period to 2011 within Milton Keynes Unitary Authority Area the housing provision total is 24,100 with 1,200 of these being in the rural part of Milton Keynes. The strategy notes that housing completions have fallen in Milton Keynes over recent years due in large part to a significant decline in the provision of affordable housing. Thus the strategy concludes that quickening the pace of delivery will be a key objective if the growth targets are to be met. For the 24,100 dwellings as detailed in the consultation draft to be provided in the local plan period, an annual average of 2,700 dwellings will need to be built in Milton Keynes between 2003 and 2011.
- 2.6 The approach taken by the Council is to accept the overall SRS figures but to challenge the phasing. The Council argues that it is unlikely to be feasible for completions to reach an annual average of 2,700 over the next eight years. Completions over the short term are reasonably predictable and the strategy suggested by the Council is based on some 1,500 completions in 2003/4, 1,800 in 2004/5 and 2,700 from 2005 onwards. In the light of the problem of making up for the relatively low completion rates in recent years and the

difficulty of suddenly boosting the rate, an approach that “back loads” the system is favoured by the Council. Under this approach the aim is to achieve an annual average of 2,200 completions between 2003 and 2011 with an increase to 3,000 in the years from 2011 to 2016. Hence the BSP figure of 20,000 dwellings would be met to 2011 and, although the proposed sub-regional strategy figure of 24,100 to 2011 would not be achieved, the high growth rate post 2011 would allow the 2001 to 2016 sub-regional figure to be met. Having said that, the Council acknowledges that there have been recent changes in circumstances and the latest (December 2003) forecast from the Council is that some 22,000 dwellings may be built in Milton Keynes between 2001 and 2011. If this is correct, dwelling completions in the period to 2011 would fall roughly half way between the structure plan figure and the sub-regional guidance figure. The changed circumstances include higher densities on some committed sites and the possibility of housing on sites not previously identified for residential purposes, such as the former Gyosei School and Newton Leys Brickworks.

- 2.7 I can see some logic in the view that the amount and timing of growth that Milton Keynes is going to be required to accommodate is not yet confirmed and hence the question should be addressed at the review stage of this plan. However, there is very little doubt that Milton Keynes will be required to plan for substantially more growth than is provided for in the adopted BSP even though it is not possible, at this stage, to know for certain how much additional growth will be allocated to Milton Keynes. In these circumstances I concur with the argument that planning for a step-change in growth needs to begin as soon as possible if such a change is to be achieved in the period to 2016. In any event it appears that current trends may already have overtaken the BSP approach given that the latest forecasts from the Council show the possible completion of some 2,000 more dwellings between 2001 and 2011 than are required by the BSP. Further, I believe that the credibility of the planning system would not be served by basing this Plan on growth figures that are likely to change in the near future. The questions are therefore how much growth should be planned for and what the timing should be for the provision of additional growth over and above that detailed in the BSP.
- 2.8 A supplementary question is whether the plan period should, as is suggested by some objectors, be extended to 2016. The 17 July 2003 statement by Mr K Hill the Minister of State for Housing and Planning, is directly relevant to this question. Mr Hill, referring to PPG3, stated that plans should make provision for housing for at least 10 years from the anticipated adoption date, which in the case of Milton Keynes is 2005.
- 2.9 Dealing with the plan period first, I understand the concern that the Council has that to alter the plan period at this late stage could open up the possibility of having to carry out a revised consultation exercise and re-open the inquiry into the Plan. Such a delay would be extremely unsatisfactory. Furthermore, the Plan includes large housing allocations that are unlikely to be complete by 2011 and hence the position beyond 2011 is to an extent known. Also a large area of strategic reserve land has been identified and the Council is committed to an early review of the Plan in the light of the final SRS. Taking all these into account I do not consider that it would be advisable to extend the plan period at this late stage.

- 2.10 Turning to the amount and timing of growth, I consider that the Plan should contain land allocations that would be sufficient for the level of growth proposed in the draft SRS for the period to 2011. I appreciate that this level of growth is exceptionally high and has only rarely been achieved in the past in Milton Keynes. I also acknowledge that there are factors, such as the availability of funding for necessary infrastructure and capacity in the construction industry that may make this level of growth unrealistic. However it is clear that the government’s very firm intention is that there should be a step-change in the delivery of housing in this and other areas. Whatever factors may inhibit the provision of housing, the amount of land allocated for residential development in the Plan should not be one of them. Further, to go some way to meeting the point about providing for 10 years housing supply from the anticipated date of adoption, the Plan should give a clear indication of the anticipated directions for growth in the post-2011 period. This would allow for a degree of certainty and facilitate at least some medium/long-term comprehensive planning. Taking the approach used in the Plan, I conclude that a Strategic Reserve Area (SRA), or areas, should be allocated that should be the prime candidate/s for growth once the existing land allocated is used up. It should also be the first area/s of search for additional land within the plan period should unforeseen complications arise on allocated sites. As with the period up to 2011, the amount of land allocated as a strategic reserve should be informed by the SRS.
- 2.11 In reaching these conclusions I have taken into account that the sub-regional work is not yet finalised. However if, as the Council wishes, the approach is taken that the needs identified in the SRS should wait for a review of the Plan, valuable time would be lost. Thus the aim of achieving a step-change in housing provision would be much more difficult to realise within the time scale envisaged by the government. My recommendation is that the Plan should at this stage take the draft SRS figures into account and that, if necessary, adjustments can be made at the review stage. While I appreciate that this is not ideal I consider that it is the most sensible approach in circumstances where there is a need to promote higher housing growth rates in both the short and medium terms.

**The next part of this report deals with the broad strategy that underlies the Plan, the major areas allocated for development and the larger sites proposed by objectors that would, if allocated, have strategic implications.**

### **3. The Local Plan Strategy**

- 3.1 Sustainability considerations lie at the heart of the Plan. Development is overwhelmingly to be concentrated in Milton Keynes City. An attempt will be made to maintain the existing balance between homes and jobs. Priority is given to promoting public transport and the Plan seeks to reduce the need for, and length of, car journeys. I endorse this general approach which is in line with current government thinking.
- 3.2 In order to promote public transport the approach is to concentrate most development in three areas-the Western Expansion Area (WEA), the Eastern Expansion Area (EEA) and Central Milton Keynes (CMK)-and to link these areas by mass transit corridors. Within the expansion areas the aim is to adopt new approaches to layout, density, design and mix of uses in order to encourage greater use of public transport, cycling and walking. In and around the City centre changes are proposed that favour public transport over the car and much more intensive residential development is promoted. There is broad support for this approach from most respondents although some objectors consider that rather more growth should be concentrated on the eastern side of the City with less or no growth in the west. I do not agree with those objectors who believe that all the growth should be to the east of the City. There are substantial areas to the west that are already committed for development within the original designated area and the notion of a WEA complements that committed development. Expansion to the west is also an important component of the overall public transport strategy that depends to a large extent on substantial and concentrated development at both ends of the proposed east-west mass transit corridor. Furthermore, there are facilities in the west such as the Westcroft District Centre, that are available to serve further development to the west. For these reasons I support the strategy of having large expansion areas to the west and east of the City. The balance of development between the two areas is a matter that is dealt with in detail below.
- 3.3 There is also a much smaller Northern Expansion Area (NEA). Although this is at odds with the essential east/west growth approach, I accept that adequate justification for the allocation is provided by the brown field status of large parts of the site.
- 3.4 Some respondents argue that far more of development could be accommodated within the existing built-up parts of the City. I do not accept this contention as I am satisfied that a thorough urban capacity study has been carried out and that substantial green field areas need to be allocated for development.
- 3.5 There is broad support from a number of respondents to the intensification of development in CMK although the rate and scale of change is subject to some objection. The Green Party objects to Milton Keynes being seen as a regional centre. The reality of the situation is that Milton Keynes is effectively already a regional centre and this role is logically intended to continue. Making

optimum use of land by increasing densities and promoting mixed developments is in line with government policy and I endorse this strategy. CMK is also intended to be at the centre of the public transport network within Milton Keynes. This network is based on the logical concept of a series of radiating routes.

- 3.6 In relation to employment, the strategy is to maintain Milton Keynes as one of the main sources of jobs in the sub-region. Given its role as a sub-regional employment centre, the intention to have slightly more jobs than the resident labour force is supported. I accept that the available evidence suggests a requirement for an area to be allocated for “large footprint” employment. The suggested location close to the M1 motorway is logical in the light of the need for most “large footprint” activities to be readily accessible by road.
- 3.7 A large number of the objections to the strategy for Bletchley are related to matters of detail particularly the road proposals and the bridge over the railway. These detailed matters will be dealt with in the Final (Part 2) Report. Overall the strategy of promoting the re-generation of Bletchley is supported by most of those making representations, as is the intention to make Bletchley a secondary focus (after CMK) for commercial and cultural development in the City. I support this approach as it reflects the reality of the existing hierarchy of centres in the area. I do not support the view that Bletchley is being promoted at the expense of Wolverton. Both these centres are defined District Centres in policy S2 of the BSP and although the Plan does not contain a strategic policy for Wolverton, the Town Centres and Shopping chapter contains a range of policies that reflect the district centre role of Wolverton.
- 3.8 Newport Pagnell, Woburn Sands, Olney and Hanslope are identified as Key Settlements where development outside the City should be concentrated. The basis for the identification is access to public transport and facilities and it is therefore rooted in sustainability considerations. While I generally support the identification on sustainability grounds, I agree with Hanslope Parish Council that Hanslope would better be regarded as a “Selected Village” than as a “Key Settlement”. Although Hanslope does contain a range of facilities including a school and some employment and has a bus service, it seems to me to be a large village rather than a small town and thus different from the other Key Settlements. Given the size of Hanslope I consider that modest growth of around 40 dwellings would be reasonable rather than the 125 contemplated in the Plan.
- 3.9 Turning to the strategy for other rural settlements, the Council has used an approach that allows for limited housing development where this would support and improve local facilities and, critically, where there is support for this from the parish council. Some objectors clearly feel strongly that this reliance on the view of the parish council is flawed because it gives too much credence to “nimby” opinions and not enough weight to “proper planning”. While I can understand the argument, it seems to me that it is reasonable and logical for the Council to regard the view of the parish council as representative of local opinion.

- 3.10 Clearly there is some weight to the general point that additional housing in a village should help to keep shops open and other facilities viable. However the difficulty is that given the extent to which people are now mobile and are prepared to travel and the attractiveness of shops such as large supermarkets, the situation is seldom as clear as the proponents of this argument make out. It is often difficult to know how much housing would make a material difference. Furthermore, additional housing may harm the character of the settlement and there must be a strong possibility that it would lead to increased use of the car for commuting and for a variety of educational, shopping, social and recreational purposes. The overall impact is thus likely to conflict with sustainability considerations and the emphasis now given to reducing travel by car.
- 3.11 The Council, generally supported by the parish councils, holds the view that the villages in the District are for the most part relatively prosperous and do not require development to retain their vitality. My many site inspections tended to confirm this view. Also the Council told the Inquiry that it is now very firmly committed to supporting village schools on the basis of performance and that school size is not an overriding consideration. Overall therefore I consider that the dangers of village decline, eloquently and passionately put by some objectors, are overstated and I broadly support the approach used by the Council. In reaching this conclusion I have also taken into account policy H6 which allows for affordable housing to meet local rural needs on exception sites.
- 3.12 As far as the countryside is concerned the Plan follows the conventional approach of seeking to strongly restrain development other than that which is for agricultural and forestry purposes. Clearly this is a logical approach that underpins notions of sustainable development and protecting the character and appearance of the open countryside. Having said that, I do think that the Plan at policy S10 could usefully make reference to other uses that can for practical reasons only be located within the countryside.

**From the above it is clear that in terms of the overall strategy the major matter that requires further consideration is the question of the land that should be allocated for housing. I therefore turn now to consider the delivery of housing and to review, in the light of my conclusions on the delivery of housing, the major site allocations and the larger sites put forward by objectors as possible strategic housing sites.**

#### **4. Delivery of Housing**

- 4.1 On the general question of delivering housing a number of objectors make the point that there is a need for a wider variety of small/medium size sites to boost completion rates. The argument is based on the contention that large sites are vulnerable to procedural and infrastructure delays and scepticism about the prospects of quickly selling a large number of dwellings on single sites. Although I do not under-estimate the difficulties of co-ordinating matters such as the provision of services and infrastructure, I agree with the approach of the Council that is based on the notion of focussing attention and resources in a limited number of areas. Arguably such a focus would enable resources to be brought to bear and would concentrate minds on resolving difficulties in an effective manner. If a number of smaller sites are added this focus could be diluted. On the marketing point the expansion areas are extensive areas and it is likely that development would occur at more than one location within the expansion area at the same time. Hence the expansion areas should not be regarded as single uniform sites and the marketing concerns may be over-stated. An important additional consideration is that the mass transit corridor strategy is heavily dependent on concentrating new development in a limited number of areas.
- 4.2 There are several further reasons why I support the Council on the question of the need for a greater variety of sites. In the recent past English Partnerships, who control large areas of land in the area, has, possibly for financial reasons, not always given priority to the early release of land to the development industry. There is now a firm commitment from English Partnerships to bring forward land for development as quickly as possible. Related to this is the creation of an Urban Development Area (UDA) for Milton Keynes which should speed up the delivery of new housing. Further there is evidently an awareness on the part of the Government of the need to provide adequate funding for the necessary infrastructure. Finally, there are in any event a number of medium-size sites outside the expansion areas that are potential housing sites within the plan period. These include the Nampak site, Newton Leys Brickworks and the former Gyosei School. I therefore reject the general proposition that additional small/medium sites should be allocated for housing.
- 4.3 I note that the Council believes that the best estimate for completions up to 2011 is 22,000. Many objectors regard this figure as too high on the grounds that the major expansion areas and CMK will not deliver the numbers predicted by the Council. This argument is the basis for the request for additional small/medium sites to be allocated that I have dealt with in general terms above. Nevertheless as the NEA, WEA, EEA and CMK are critical elements in the housing supply/demand balance I turn now to consider in specific terms the likely contribution from each of these. Any change in one or more of these elements is likely to have significant consequences for the omission sites and the SRA.

## **5. Northern Expansion Area**

- 5.1 The Council expects the NEA to contribute some 380 dwellings within the plan period. Although there are objections to the use of this site for housing I consider that the approach followed by the Council is in line with government policy relating to previously developed land. I appreciate that not all the site is previously developed but, as the Council point out, the defined boundaries are logical having regard to the disposition of the three previously developed parts of the site. Hence the inclusion of small areas of green field land are acceptable. Although the Bedford Group of Drainage Boards is concerned about the western boundary where it adjoins the floodplain I note that the EA has not commented on this matter. I consider that for the purposes of this Interim Report it can be assumed that the Council’s view about the housing capacity of the site is reasonable and acceptable. The use of the eastern part of the site for employment purposes is largely uncontentious.

## **6. Western Expansion Area**

- 6.1 The question of the extent of development within the Western Expansion Area (WEA) is one of the most controversial matters in the Plan. In general terms most objectors are in broad agreement that part of the WEA is suitable for development. The area is sub-divided into four parts described as 10.1 to 10.4 in the documentation relating to the WEA. This terminology appears to derive from work done by Llewelyn-Davies in the 1992 Milton Keynes Expansion Study which identified parts of the current WEA as suitable as an expansion area for Milton Keynes. Area 10.4 was not identified as suitable for development in the Llewelyn-Davies work and it is this area that is the subject of the vast majority of objections to the WEA.
- 6.2 Area 10.4 is part of an area designated as area D in the 1992 study. The following reasons were given by Llewelyn-Davies for rejecting area D as suitable for development. Oakhill Wood forms a strong visual boundary. The area to the west is a distinctive “natural area” with strong landscape features and attractive views. It is part of the Whaddon/Whaddon Chase ambience. There is an ancient monument at Snelshall Priory and finally, the area forms a separate drainage catchment area draining north west. The study explained that the western boundary was determined in a way that respected “the landform, landscape, views and villages which exist in that area. Any development further west would encroach into very high quality landscape with extensive and attractive views”.
- 6.3 In 1996 Llewelyn-Davies updated the 1992 work and reinforced the conclusions of the earlier work by stating that this part of the City is a sensitive topographical location where a permanent and defensible city edge must be created and the visual impact from the countryside protected. In 1998 another study was done by Llewelyn-Davies at the request of SERPLAN to consider opportunities for further significant growth beyond that already committed or planned. Looking at constraints the study noted that to the west of the City there is a ridge (Shenley Ridge) that forms a division between what

is called the urbanity of the new city and the rolling Buckinghamshire countryside. The study repeated the earlier recommendations that development be kept to the east of the ridge. The Llewelyn-Davies views reflect the substance of much of the argument put by many objectors including Whaddon and Nash Residents Association, Genesis Group, JJ Gallagher Ltd, Aylesbury Vale District Council and Buckinghamshire County Council.

- 6.4 A contrary view emerges from the work done by Roger Tym and Partners in relation to sub-regional growth (Milton Keynes and South Midlands Study 2002) and the contribution that Milton Keynes and Aylesbury might make (Milton Keynes and Aylesbury Growth Area Studies 2003). This work favours westerly and south-westerly growth of Milton Keynes in preference to major continuous easterly expansion over the M1 motorway. It appears that this view was influenced by the defined expansion areas in the local plan and the absence of land with any nationally recognised landscape protection designation in the area to the west of Milton Keynes. The consultation draft of the Milton Keynes & South Midlands Sub-Regional Strategy (SRS) follows the Tym approach by showing, on the suggested spatial strategy diagram, the allocated WEA and land for development to the west of the City south of Stony Stratford and in the south west in the area south of the Tattenhoe Park grid square. From my reading of the documents it appears that Roger Tym and Partners have given less weight to detailed landscape considerations in the area to the west of the City than did Llewelyn-Davies.
- 6.5 I appreciate the point made by the Council that the Whaddon area is going to be affected by development on land already committed for development within the designated area of Milton Keynes. This is development that is now proceeding in the grid squares to the east/south-east of Whaddon. Because of the elevated position of Whaddon and the building that is to occur on slopes facing the village, the view towards the City from Whaddon will change significantly in the near future. However I do not regard this as necessarily a good reason for allowing further development on area 10.4 which lies on the slopes facing the Whaddon Valley to the north of the village. My judgement is reinforced by the fact that area 10.4 is visually separated from the SE corner of the designated area by the landform and the screening effect of Oakhill Wood.
- 6.6 If development were to occur on area 10.4 it would be visible from large parts of the Whaddon Valley. The Shenley Ridge is a significant feature in the landscape and I agree with the Llewelyn-Davies assessment that it is a feature that would form a logical and obvious boundary to development. Somewhat surprisingly to my mind Llewelyn-Davies do not rule out development over the ridge in the longer term despite noting that the area to the east of Milton Keynes provides opportunities for short, medium and long-term growth. I agree that the land to the east of Milton Keynes is suitable for long-term development as I consider that this area is much less sensitive in landscape terms than the Whaddon Valley. While I am not here considering the long term, I do not see the logic of regarding the Whaddon Valley as a possible long-term development area. To do so disregards the qualities of the valley landscape and the merits of the Shenley Ridge as a logical and clear long-term boundary.

- 6.7 In reaching this conclusion I appreciate that the assessment by Landscape Design Associates ruled out the designation of the Whaddon Valley as an AAL. However I note that the assessment concluded that Oakhill Wood and the fields to the south were regarded as of higher quality than the wider area but “not quite” able to reach the criteria for Area of Attractive Landscape (AAL) status. In my view the combination of the character of the landscape and the distinctiveness of the ridge dictate that development should not “spill over” the ridge. In any event government policy is moving away from a hierarchical approach to landscape and countryside protection and also away from local designations. For this reason little weight should be given to the conclusion by Landscape Design Associates that the area is not worthy of AAL status.
- 6.8 I am aware that the present view of the Milton Keynes Council is that the M1 should be seen as the long-term eastern boundary for the City. If this view is taken it is probably inevitable that in the medium to long term development will have to sweep over the Shenley Ridge. My view is that the M1 should not be seen as a long-term barrier to development. It is certainly not unusual to have motorways running through cities. Clearly there is some scope for development to the south of Milton Keynes in the medium term. This includes land identified in the SRS and at Eaton Leys (see below) although the sensitive landscape around the Brickhills and the need to consider coalescence limits the amount of growth that would be acceptable to the south of the City. To the north the Ouse flood plain is a major inhibiting factor. Of the remaining options of the west and the east, for the reasons detailed above, I clearly favour the eastern option as the logical direction for large-scale expansion of the City in the long term.
- 6.9 For the Council Mr Cooper contends that in landscape terms it would be possible to mitigate potentially harmful visual impacts arising from development on 10.4. As an example Mr Cooper points to views of the City from the north in the vicinity of Haversham. Whether or not this is the case, I agree with the contention made by Genesis Group and JJ Gallagher that it is generally preferable to avoid harmful impacts altogether rather than use mitigation measures. This requires a comparative exercise to be undertaken so that it can be established whether or not alternatives exist. Given the timing of his instructions Mr Cooper did not have the opportunity to carry out such an exercise. At the Inquiry he confirmed that his work had throughout been to look at mitigation possibilities and not to consider whether better alternative sites existed. The Inquiry has had such an opportunity through the consideration of omission sites suggested by various objectors. I am satisfied that in terms of impact on the landscape better alternatives exist.
- 6.10 At the Inquiry the Council stressed the importance of development on 10.4 to the long-term public transport vision. I have no doubt that the more concentrated development there is in the WEA the easier it would be to implement a mass transit system serving the area. However for several reasons I do not believe that the case has been made that the elimination of 10.4 as a development option would jeopardise the Council’s long-term vision. First the vision is at this stage far from clear. There is no reference to a mass transit system in the Plan. The notion of a mass transit corridor (MTC) is shown in the consultation draft of the SRS but only in diagrammatic form. A

slightly different diagrammatic route for a MTC is shown in the Faber Maunsell study (June 2003) entitled “Public Transport Long Term Vision” (PTLTV). The vision is that public transport must play a much greater role in the overall transport mix than at present. I acknowledge that to achieve this it is critical that, in the words of the PTLTV, “in the long term proposals are feasible only if pursued in conjunction with high levels of development growth located and designed specifically to support a high intensity public transport corridor(s)”. However the study also notes “it is evident that the precise location and form of the development area on the western flank of Milton Keynes will require substantial further work before robust proposals can emerge”.

- 6.11 There is further uncertainty about the form that any system will finally take and the timing of implementation. All parties are agreed that the system will need to evolve from what it is hoped will start as a high-quality bus-based system. The PTLTV is based on 8 diagonal bus routes that are intended to “form the backbone of the overall public transport system with the east-west route and the north-south route expecting to be converted to the higher level of public transport system as the developments take shape and further demand is generated along these corridors. In particular the broad alignment of the east-west route has been developed on the basis of the development that is planned both as a part of the current local plan for the medium term and the growth studies for the longer term”. I accept the point made by the Council that it is important to encourage a public transport mentality by having the routes planned and integrated with development at the earliest possible stage. Given that at this stage this integration is still being planned it seems to me that it should be possible to devise a route that would be entirely satisfactory to serve a WEA that does not include area 10.4. The suggestion for an evolving route made by Mr Eves on behalf of Genesis Group is one illustration of how such a system might be devised. Moreover, I can see no reason why a route serving areas 10.1, 10.2 and 10.3 could not be devised in such a way that it could, in the longer term, be extended into 10.4 if this proved to be essential.
- 6.12 On the question of viability the Council advanced the argument that reducing the scale of development in the WEA reduces the potential demand for public transport and that, given fragile profitability margins, such a reduction could be fatal. The Council also produced a variety of calculations relating to viability. I attach relatively little weight to these calculations as they are based on many assumptions and it is not known what system might finally be adopted. For example, one possibility considered by the Council is that a quality bus system might evolve into a guided light transit system (GLT). This system would be based on high-capacity vehicles on rubber wheels with at least a part of the route being “guided” on tracks. The difficulty is that this sort of system is not yet technically advanced and it is impossible to know if the notion will ultimately prove to be practical or realistic. At this stage Faber Maunsell has concluded that a GLT system (or a tram/light rail system) does not come anywhere close to offering sufficient benefits to justify the high capital costs. Both these options have a cost-benefit ratio of less than one. Faber Maunsell point out that this means that there is no chance of receiving any funding from central government or attracting investment from the private sector. Another problem with the viability calculations is the difficulty of

assessing how much park and ride schemes and any new rail stations to the south of the City might contribute to overall viability. The arguments and calculations also did not take into account the impact of compensatory development, either on the western or eastern side of Milton Keynes, in the event of 10.4 being excluded. Overall therefore I do not accept that it is reasonable to argue at this stage that eliminating development on 10.4 would inevitably significantly harm the Council’s long-term vision for public transport.

- 6.13 The Council suggests a variety of other benefits that would flow from allocating area 10.4 for development. These include providing energy-efficient housing, resolving flooding problems at Upper Wield, supporting the Westcroft District Centre, creating a linear park along the Whaddon Brook and new pedestrian and cycle links from Whaddon to the WEA and the wider City. I do not consider that any of these, or indeed a combination of them, would outweigh the harm done by breaching the Shenley Ridge. The solar energy gain from building on the Whaddon Valley slopes would be very modest. There are alternative ways of dealing with the flooding situation and the Westcroft Centre has a substantial catchment area that is presently being strongly reinforced by the development occurring in the grid squares in the south-west corner of the designated area. Neither the suggested Whaddon Brook linear park nor a Whaddon country park is part of the deposited version of the Plan. I believe that a linear park would be a much weaker development boundary than the Shenley Ridge. The brook is a less significant feature of the landscape and, even if enhanced by parkland, it would still not represent the sort of clear and obvious boundary that the ridge does. In relation to the suggested country park, the area involved is presently fairly attractive and seems to me to be a natural and integral part of the rural landscape. I agree with Mr Denney, the landscape architect acting for Genesis Group, that an intact landscape is preferable to a country park if the price to pay for having the park is development on area 10.4.
- 6.14 Another argument advanced by the Council is that including area 10.4 allows for a high delivery rate of housing completions. From what I have heard, read and seen I do not think that area 10.4 offers any particular advantage in this respect when compared with possible alternatives that do not have the landscape disadvantages of 10.4.
- 6.15 A large number of objectors to area 10.4 argued that the allocation of this area would result in traffic using unsuitable roads and country lanes to the west of Milton Keynes. Clearly there is a danger of this with development within the WEA generally and on area 10.4 in particular because of the way area 10.4 is more closely related to the open countryside than areas 10.1 to 10.3. Traffic generation from the WEA as a whole needs to be resolved as far as possible through the design of the access arrangements. I am satisfied that the Council is alert to the situation and do not regard this factor as a decisive consideration in relation to either the WEA or area 10.4 only.
- 6.16 Some objectors argue that there is no need for the WEA to be allocated at all because of the possibility of using land within the designated area and or density increases in the existing built-up parts of the City. Given the nature of

development in Milton Keynes, opportunities for density increases are limited and the loss of open spaces within the City would be harmful because the City has been comprehensively planned with open areas carefully integrated with the road and development pattern. I am satisfied that the Council has explored the realistic sources of land supply and has reasonably concluded that there is a need for the allocation of major new areas of land for development in the plan period. This conclusion is reinforced by the clear guidance from the government that Milton Keynes is seen as a key area for accommodating growth in the South East of England. I do not agree with objectors who argue that the City should expand to the east only. In my judgement development to the west up to the Shenley Ridge would relate well to the form of the existing built up area and would not harm the overall character of the western side of the City.

- 6.17 Some objections relate to detailed matters such as the location of facilities and the road links. These are matters of detail that should be worked out in the development briefs that I expect to be produced for the WEA. Hence they do not constitute reasons for removing the WEA from the Plan.
- 6.18 The number of dwellings that could be accommodated on area 10.4 depends on detailed planning but is likely to be in the order of 1,600 to 2,000 dwellings. For the purposes of housing estimates I shall assume that the removal of area 10.4 from the defined WEA would result in the loss of some 1,600 dwellings from the supply side of the housing equation.

## **7 Eastern Expansion Area**

- 7.1 The EEA involves land allocated for housing as well as land allocated for “large footprint” commercial development and a Strategic Reserve Area (SRA). Taking the commercial area first, there are some objections to the allocation of the land for this type of employment use. The decision to allocate an area for large footprint buildings (buildings of at least 9240 sq.m on sites of a least 2 hectares) is based on information provided by the development industry and discussions with MK Economic Partnership, the Chamber of Commerce and English Partnerships. There is general agreement by these parties about the need for this type of allocation and I have not seen any convincing evidence to the contrary. The siting of this allocation close to the M1 makes sense bearing in mind the likely traffic generation particularly involving heavy goods vehicles.
- 7.2 The objections to the EEA by Gazeley Properties Ltd, Land Securities Properties Ltd and Wilson Connelly Homes Ltd have largely been resolved by small-scale amendments suggested by the Council. Most of these changes are detailed in Appendix C of the proof submitted by the Council under reference PEO19. Save for the change suggested to paragraph 11.46, I agree with the amendments suggested by the Council as they clarify the position regarding the use of the site and the anticipated highways improvements. In relation to paragraph 11.46 the objectors pointed out that there may be a problem if a firm in Use Class 3b or 3c wished to occupy a large building on this land. At the Inquiry the Council’s officers accepted this point but considered that this

matter would need to be referred back to members. I have not yet been informed of the final Council position.

- 7.3 In addition the Council is content to see paragraph 11.48 excluded as the position regarding a rail link has been resolved. This change is clearly sensible in the light of the study into this matter. Also at the Inquiry the Council suggested the deletion of the words “including the new motorway junction” in (ii) of policy E14. I support this change in the interests of consistency. The detail relating to the large footprint employment area, including the revised wording that I agree with, will be dealt with in the Final (Part 2) Report under policies E12 and E13.
- 7.4 On the question of housing in the EEA, the use of Broughton Manor Farm for housing is generally not contentious. The major concerns relate to the timing of development and the relationship with the SRA. These matters are dealt with below.

## **8 Central Milton Keynes**

- 8.1 Appendix C of the Council’s RTS statement on Housing Deliverability shows just under 4,000 dwelling completions in CMK, with 2,300 of these anticipated between now and 2011. The first completions are forecast for 2005/6. I agree with objectors who consider that this forecast may be optimistic. Although the Council has some market research information, this is of necessity tentative because the market being researched is a new one. Thus the size and strength of the market for high-density, high-rise housing is unproven in Milton Keynes and it may take some time for demand for this type of housing to build up. In addition the phased delivery of this type of housing is likely to be more difficult than with conventional housing estates because of the need to complete blocks before units can be sold. For these reasons I consider that the delivery of dwellings in CMK may be slower than forecast by the Council. I believe that it would be prudent to reduce the contribution expected from CMK in the period to 2011 by about 400 dwellings.
- 8.2 On the other hand there is the prospect of additional housing in CMK on land currently used for parking on the periphery of the city centre. This peripheral land could have the capacity to accommodate as many as 3000 extra dwellings assuming a density of 500 habitable rooms per hectare. This land would become available for housing in the event of the park and ride schemes (see policy T7) being implemented and the Council taking a decision to reduce the amount of parking available in the City centre. At this stage the timing for the park and ride schemes is uncertain and no provision has been made in the LTP for park and ride. Accordingly I do not consider that it would be prudent to assume that housing on the peripheral land could make a contribution to the housing supply within the plan period. On the other hand the implementation of the park and ride proposals and the provision of additional housing in the city centre rather than on green field land on the periphery would be highly desirable from a sustainability point of view. Assuming that the Council is

able and willing to progress the implementation of the park-and-ride proposals in the reasonably short term, it would be advisable for the Council to regard the peripheral city centre land as one of the priority locations for housing in the post-2011 period.

## **9 Housing Demand/Supply Equation**

- 9.1 On the demand side I have recommended that the Plan should aim to meet the SRS figure of 24,100 and to give a clear indication of the directions for growth in the post-2011 period. The Council’s best estimate for completions to 2011 is 22,000. In the light of my conclusions about the WEA and CMK this should be reduced by 2,000 (1,600 WEA and 400 CMK) bringing the supply side down to 20,000. These are broad figures based on general assumptions. Clearly they will need to be carefully monitored and adjusted in the light of what actually happens on the ground.
- 9.2 The important questions are how best to make up this predicted shortfall of 4,100 dwellings and where should the post 2011 growth be directed to. The options are increased delivery rates from the expansion areas and CMK, the use of the SRA and a variety of large/medium sites put forward for consideration by objectors.

## **10 Higher Delivery Rates**

- 10.1 Although I have supported the Council’s anticipated completion rates for the expansion areas, there is no evidence that significantly higher rates may be achievable. As regards CMK I have concluded that the Council’s estimates may be optimistic. Overall therefore I do not believe that it would be prudent to rely on increased completions to any material extent. The consequence is that additional land needs to be allocated for housing.

## **11 The SRA and Broughton Manor Farm**

- 11.1 The view of the Council is that the first area of search for meeting unforeseen needs should be the Strategic Reserve Area (SRA) identified within the EEA. The SRA extends to some 136 ha. The Council considers that at this time the uses to which this land should be put are uncertain and hence it should be held back for future consideration, possibly for growth in the period 2011 – 2016. The landowners and developers with an interest in the land argue that the SRA should be included within the EEA as an area for mixed uses. While I accept that it is difficult at this stage to decide what uses should be allowed on the whole of the SRA, I believe that part of it should be used to help to make up the shortfall of housing land discussed above.
- 11.2 There are three main reasons why I agree with the Council that the SRA should be the first area of search. First, the SRA is very closely related to the EEA and incorporating an additional housing allocation in the SRA would allow comprehensive and co-ordinated planning to occur. Second, development in the vicinity of the EEA would reinforce the public transport/mass transit corridor concept. Third, additional housing closely

related to the EEA should assist the case for improved access to the M1 motorway. I note that in January 2002, when reporting on a review of major green field housing allocations in the local plan, the officers recommended a limited expansion of the EEA into the SRA area. I believe that there is a strong logic behind this recommendation. My recommendation is that land within the SRA for around 2,000 dwellings should be allocated for development. The precise area involved is a matter for the Council to resolve in the light of environmental/infrastructure considerations and the relationship of the land to present and likely future adjoining land uses. The most logical area is clearly the originally designated SRA with the DV2 additional SRA being allocated for mixed development. This would accord with the master planning work currently being done and would help to offset any loss of employment land that would flow from the a decision to use the Newton Leys employment site for housing.

- 11.3 A Development Framework for the EEA was prepared for consultation purposes by David Lock Associates in March 2003. This did not allocate uses to the SRA. Currently further work is being done by Halcrow Fox into the framework for the area. The intention is apparently that this work will define possible uses for the SRA and the Council intends to adopt this framework as Supplementary Planning Guidance (SPG). At the Inquiry the owners of the Broughton Manor Farm land argued that this could potentially create significant problems as such an approach would be vulnerable to a legal challenge on the grounds that the land uses should be determined in the local plan, not in SPG. Broughton Manor Farm is one of the Priority Housing Sites defined in the Plan and the expectation is that some 400 dwellings should be built on Broughton Manor Farm by 2006 and a further 750 dwellings after 2006. The Plan explains that Priority Housing Sites will need to be carefully monitored and that the Council may need to take special action to bring forward these sites in order to achieve the overall strategy of the Plan.
- 11.4 Clearly it would be harmful to the aims of the Council and the need to achieve a step change in the delivery of housing if the complications of a legal challenge were to arise. It would also be a problem if, by allocating land uses to the SRA now in accordance with my recommendations, development on Broughton Manor Farm were to be delayed because of a need to undertake substantial additional work on the development framework. As regards the former, the problem should not arise in the event of the uses in the SRA being specified in the Plan in accordance with my recommendation. In relation to the latter the Council told the Inquiry that because the work currently being done includes consideration of uses in the SRA no serious delay should occur. Hopefully this may prove to be correct but, in case it is not, I believe that the explanatory text should be amended to make it clear that the development of Broughton Manor Farm should not be unduly delayed. I consider that Broughton Manor Farm can be singled out for this purpose because the Development Framework work done by David Lock Associates shows that the development of Broughton Manor Farm can be planned and undertaken as a first phase of a comprehensive development without adversely affecting the development of the whole area.

## 12 Area 11

- 12.1 Area 11 lies immediately to the north of the WEA (Area 10) and south of Stony Stratford. It is one of the areas identified for “additional development to 2016” in suggested spatial strategy in the SRS. The western boundary is Watling Street, which in this vicinity marks the western edge of the existing urban area. The omission site extends to some 125 ha of which just under 60 ha is envisaged by Genesis Holdings as being available for housing development. The area is sub-divided into two with Area 11.1 in the north having an estimated capacity for around 480 dwellings and Area 11.2 around 1370. These figures are based on a master plan for the area prepared by the Objector. A framework for the development of Area 11 and Area 10 is currently being prepared by Halcrow on the instructions of the Council and EP. This framework was not made available to the Inquiry as it is still in the course of preparation but it is understood that the housing numbers on the framework document are slightly higher. The framework document is being prepared for both Area 10 and Area 11 because the Council accepts the principle of development on Area 11. The Council’s position in relation to this local plan is that the development of Area 11 should not occur until after 2011.
- 12.2 Area 11 has consistently been identified as suitable for development over a number of years. The 1992 Milton Keynes Expansion Study by Llewelyn-Davies identified Area 11 as a logical extension to the urban area. The 1996 update by the same firm confirmed this view. The 1998 study into the development potential of Milton Keynes by Llewelyn-Davies was undertaken on the assumption that Milton Keynes would play a reduced role in accommodating growth in the South East after 2006. This study linked Areas 10 and 11 into a single strategic site. The northern part of this area was identified for development in the longer term and the southern for development in the short term. The 2002 MKSM Study by Roger Tym and Partners identified the western side of the City, including Area 11, as suitable for expansion. The 2003 follow up work by this firm into the MK and Aylesbury expansion options concluded that development on Area 11 would naturally round off the north-western edge of the City. These assessments clearly show the logic of developing Area 11. Moreover the allocation of Area 11 for housing would reinforce the east/west expansion strategy that underlies the Plan. Hence I endorse the approach being taken by the Council of accepting the principle of development on Area 11.
- 12.3 In reaching this view account has been taken of the strong opposition to development on Area 11 particularly from many residents in Calverton, the Weald villages and Stony Stratford. Understandably these respondents are concerned about a number of matters including visual impact, loss of agricultural land, coalescence, availability of infrastructure/facilities, traffic generation and flooding. From what I have heard and seen I am confident that the Council are alert to these concerns and that they have been, or are being, taken into account in the work that is going on to prepare a framework for the development of Areas 10 and 11. In particular the Master Plan prepared for Genesis Holdings demonstrates how Area 11 can be developed in such a way

that a fixed long-term western boundary can be established between the villages to the west of Area 11 and the City. Using the approach adopted in the Master Plan development on Area 11 can be well screened and kept at sufficient distance from the small settlements to prevent coalescence or undue visual harm. The comprehensive planning for the areas and the policy requirements address the question of co-ordinating development with infrastructure and facilities. Adequate flooding protection measures that satisfy the Council can be provided in Area 11 and the small loss of farmland is outweighed by the benefits of providing suitable land for housing.

- 12.4 In relation to transport the development of Area 11 would have the significant advantage of facilitating one of the main diameter public transport routes (line 7) recommended in the study undertaken for the Council by Faber Maunsell. Not only would this route serve Area 11, it would also improve public transport between Stony Stratford and CMK and would serve part of Area 10 that is more than 400 metres from the proposed mass transit corridor through Area 10. The Council wishes to have the route in place before any development on Area 11 is occupied. The Objector is agreeable to this although their professional advisers consider that initially the area could be served from Watling Street. Given the critical importance of strongly promoting public transport in Milton Keynes, the approach favoured by the Council is supported.
- 12.5 In the light of my agreement with the Council that Area 11 is suitable for development the critical question is one of timing. Previously in this Report it has been recommended that Area 10.4 should be deleted from the Plan. Given the proximity and similarities between Area 11 and Areas 10.1 – 10.3 as evidenced by the integrated master planning work being done, Area 11 should, as the Objector argues, be substituted for Area 10.4 and effectively become part of the WEA. Using the Master Plan prepared for Genesis Holdings the capacity of the two areas is broadly similar and this reinforces the logic of substituting the one for the other. Whether this substitution changes the amount of housing that may be built in the WEA within the plan period is a moot point. The Council’s best estimate is that some 5,600 dwellings can be accommodated in the WEA with about 4,100 of these being provided within the plan period. A number of objectors contend that this is too high given the size of the area and the potential for problems to arise on large sites. For reasons that I explain elsewhere I support the Council in this regard. Although Genesis Holdings argue that it would be possible to bring forward housing on Area 11 at an early stage I do not consider that it would be prudent to assume that this means that completions in the WEA would be materially higher than 4,100. Development of Area 11 should, as the parties agreed at the Inquiry, be co-ordinated with what occurs on Area 10. Further I am supporting the Council in relation to the provision of a segregated core diameter transport route prior to occupation. These considerations lead to the conclusion that the substitution of Area 11 for Area 10.4 should not alter the assumption that not all of the WEA development will be completed by 2011 and that around 1,500 dwellings in the WEA are likely to be built after 2011.

12.6 I do not accept the argument advanced by the Council that recommending the allocation of Area 11 would be premature and/or cause unacceptable delay. In relation to prematurity the SRS accepts as a given the local plan housing allocations and I cannot see how a recommendation to substitute one local plan designation with an alternative site would be premature or prejudice the SRS. One strand of the Council’s prematurity argument is that the emerging SRS refers to the new development plan system and not to local plans. I do not find it surprising that the SRS consultation document refers to the new style of development plans rather than local plans. However, it is clear that the local plan for Milton Keynes will have a critical part to play in enabling housing to be delivered and it would not be sensible to wait for the new system to come into force before seeking to address matters raised in the emerging SRS. The allocation of Area 11 in accordance with my recommendation would require modifications to be published but it is by no means certain that this would inevitably lead to the delay inherent in the calling of a modifications inquiry. This will be a matter for the Council to make a decision about in the light of any new substantial planning issue that may be raised.

### **13 Stantonbury Park Farm**

13.1 The Stantonbury Park Farm omission site promoted by the Genesis Group comprises two areas of land – an area of land north of Wolverton Road and a smaller area of land known as Stonepit Field to the south of the road. Stonepit Field is currently managed by the Milton Keynes Parks Trust. Much of the land in this locality is not suitable for development because of the River Ouse flood plain but the objection site is on relatively high ground and is not affected by flooding considerations. One point raised by the Council against the site is the fact that land to the north of Milton Keynes was not considered to have potential for growth in the work done by Roger Tym and Partners. Further, the land to the north of the city is not identified in the SRS as suitable for development in the post-2011 period. On this score I accept the contention by Genesis Group that the Roger Tym work was looking at the area in broad terms. On this basis large-scale development across extensive areas of land to the north of the City was ruled out largely on flooding grounds and this is one reason why the area is not suggested for growth in the SRS. I agree with the objector that this is a reasonable interpretation of how the background material influenced the SRS. The flooding argument should not automatically rule out relatively small areas that are not vulnerable to flooding.

13.2 An argument against the allocation of the land is that it does not complement the east/west growth strategy. This is undoubtedly a consideration that weighs against this site. However, balanced against this there are several factors that favour the allocation of the site. First, the site is readily accessible from two of the bus routes suggested by Faber Maunsell as part of the recommended rationalisation of the internal bus network for Milton Keynes. This is more than is the case with some of the allocated sites and it means that allocating the site would help to implement the broader bus strategy. I regard this as a significant factor in favour of allocating the site. Second, based on the Council’s own analysis, in broader sustainability terms, the site does not

perform materially worse than several allocated sites. Third, the Objector is prepared to make some 60 ha of land available to extend the adjacent county park and hence improve overall public access to the countryside. I agree with the objector that an extended parkland area would form a very clear long-term strategic open space boundary to the north of the City. In addition the allocation of the land for housing would enable the footpath network to be rationalised. At present the footpath route in this area is partly within the urban area but the objectors proposal would enable a re-routing that would provide a link with the Great Ouse walk between Bradwell and the Stantonbury Park site. Fourth, medical facilities in the area need up-grading and the Objector has had discussions with the Area Health Authority that offer a strong prospect of improved facilities being provided that would serve the development and have the added peripheral benefit of upgrading facilities in the area. Finally the objector has demonstrated to my satisfaction that a scheme could be devised that would not harm the character and appearance of this part of the City.

- 13.3 At the Inquiry the Council accepted that in landscape terms the main objection to the allocation of the objection site relates to the Stonepit Field element of the land. This area has a capacity to accommodate about 100 dwellings. The Master Plan prepared by the objectors shows a total capacity for both areas of around 600 dwellings. At the Inquiry the Objector confirmed that the exclusion of Stonepit Field from any allocation would not make any difference to the offers made in relation to the country park, the footpath network and the health facilities.
- 13.4 The provision of secondary school places is an issue in relation to this site. Stantonbury Campus which would be expected to accommodate pupils from a development on this omission site is at capacity in terms of existing pupil numbers and the situation may get worse with the planned change in the age of transfer. As I understand it an agreed position has been reached. The provision of secondary school places to serve this site and the area in general is likely to occur as a result of a longer-term review of secondary school places in the Borough. Such a review is likely to occur in the period 2007-2009 for implementation from 2009 onwards. Assuming that this is correct it is clearly likely that should this site be developed it would only be acceptable for that to occur late in the plan period. Be that as it may, having regard to the advantages that would flow from allocating Stantonbury Park Farm detailed in paragraph 13.2 part of the omission site should be allocated for housing. I judge that the advantages outweigh the disadvantage of deviating from the east-west expansion area approach. My recommendation excludes Stonepit Field as this is an integral part of an existing open space corridor that is both accessible and well used. I consider that using part of this land for development would harm its present role. On this basis this land would contribute some 500 dwellings to the supply side of the housing land equation albeit likely that the site could not come forward until late in the plan period once the education issue has been resolved.

## **14 Glebe Farm & Eagle Farm**

- 14.1 The Council accepts that Glebe Farm is suitable for development in principle post-2011. In this respect the site is regarded as directly comparable to Area 11. In the sustainability appraisal undertaken by the Council the site scored very well. Glebe Farm was identified as suitable for housing in the 1992 expansion study undertaken by Llewelyn-Davies, although with a cautionary note regarding the need to consider carefully the relationship with Wavendon village. This view was endorsed in the Llewelyn-Davies 1996 update. The site is within the general area identified for growth up to 2016 in the work done by Roger Tym and Partners, within the SRS and it lies within the proposed Urban Development Area.
- 14.2 Eagle Farm lies on both sides of the A421 immediately west of the M1. Eagle Farm was not identified as suitable for development in the expansion study work done by Llewelyn-Davies in 1992 and 1996 although these studies did introduce the notion of a gateway into Milton Keynes on the A421. The 1998 work by Llewelyn-Davies identified the part of Eagle Farm north of the A421 as having potential for employment use in the short term and the area south of the A421 having medium term employment use potential. Eagle Farm north is mostly within the SRA and my conclusions in relation to the SRA thus apply to Eagle Farm north. Gallagher Estates Ltd wishes to see both Eagle Farm south and north allocated for mixed use development or, at least, have Eagle Farm south included within the SRA. Gallagher Estates Ltd and Taylor Woodrow Developments argue that Glebe Farm should be allocated for residential development as an alternative to area 10.4 or at least given SRA status. Eagle Farm south is not identified in the 2003 MK and Aylesbury Growth Area Study as suitable for development in the period to 2016. The study does say that provided the issue of motorway noise can be resolved the general area within which Eagle Farm south is located has many attractions for urban growth. The objectors are preparing a mixed-use scheme for Eagle Farm based on the concept of “gateway” development including business use, housing, residential, a hotel and a park and ride facility.
- 14.3 I concur with the view that Glebe Farm is suitable in principle for residential development. I also consider that Eagle Farm south has development potential. Both sites should be seen as one cohesive medium-term development area lying to the north of Lower End Road. Seen in this linked way the area could be developed in a logical and comprehensive fashion taking into account inter-related questions of gateway development, highway improvements, the optimum location for a park-and-ride facility and the need to prevent coalescence. I regard Lower End Road as important because I agree with Mrs Hankinson, the landscape architect appearing for Gallagher Estates and Taylor Woodrow Developments, that what she calls the “Wavendon Settled Ridge” is a containing feature that has a different character to her “Broughton Urban-Edge Plain”. Restricting the SRA in this vicinity to the land north of Lower End Lane would have the benefit of helping to eliminate the problem of coalescence in relation to settlements such as Wavendon, Woburn Sands and Aspley Guise.

14.4 I do not accept that these sites (other than Eagle Farm north see above) should be allocated for development in this Plan. Rather they should be given SRA status to reflect their potential. Given the need to achieve a step change in the delivery of housing it is important that allocated sites are capable of development within the short term. Notwithstanding the optimism expressed by consultants working for the objectors, I am not convinced that Glebe Farm/Eagle Farm are as likely to deliver significant numbers of dwellings in the plan period as is Area 11. Master planning integrating Area 11 with Areas 10.1 to 10.3 is already underway and the link between these areas is readily appreciated on the ground. With Glebe Farm/Eagle Farm south there are potentially complicating factors that could cause delivery problems. These include the need to consider traffic on the A421 and the proposed duelling of the A421 from Junction 13 on the M1 to the A5130, alterations to the M1 and M1 junctions and the best location for a park and ride facility in the area. In relation to a park and ride scheme, the suggested location in the SRS is different to that favoured by the objectors. There is also the question of how development south of the A421 in this locality should deal with the issue of coalescence. A SRA embracing Glebe Farm and Eagle Farm south would probably have a housing capacity of around 2150 dwellings.

## **15 Church Farm Wavendon**

- 15.1 I do not accept the argument from Connolly Homes that the land should be allocated at this stage because the Council has over-estimated the amount of land available for housing. The latest information indicates that, if anything, the Council’s original estimates were too low. The supply side of the equation is being increased through density increases and extra land coming forward (see 4 above).
- 15.2 For reasons that I have explained elsewhere in this report I also do not agree with the contention that a range of smaller housing sites should be included in case there are problems with the major expansion areas. On the other hand I have also concluded that the existing SRA should be allocated for mixed development at this stage and that alternative strategic reserve areas should be included in the Plan.
- 15.3 The site is largely contained within area 4 (Wavendon) identified in the 1992 Llewelyn-Davies study into the expansion of Milton Keynes. That work concluded that the area around Wavendon is “one of the better sites for development”. This view is reinforced in the 1996 update that repeats the point made in the 1992 study that the major constraint is the relationship of the area to Wavendon village. In the Llewelyn-Davies final report area 4 is seen as suitable for development in the short/medium term. These conclusions were incorporated into the Milton Keynes & Aylesbury Growth Area Studies undertaken by Roger Tym & Partners. On the Preferred Spatial Strategy (Figure MK4) the area is shown as suitable for additional development to 2016 and the consultation SRS document (CD7.6) adopts the same view.

- 15.4 All these assessments clearly identify the land as suitable for development at some stage and this conclusion was accepted by the Council at the Inquiry. I agree with this position, especially given the way the site relates well to the existing urban form of the City and the generally positive score achieved by the area in the sustainability appraisal carried out by the Council as part of the local plan preparation process. On the other hand I do not think that the site should be allocated for development within the plan period as it is somewhat removed from the EEA. An allocation at this time would not complement the fundamental east/west expansion strategy. As I have indicated elsewhere in this report I believe that the Plan should give a clear indication of the direction of growth for the post-2011 period. This indication should take the form of an allocation of strategic reserve land that could be considered as one of the options for development if unforeseen problems arise with the allocated land or in the post 2011 period once the three identified expansion areas have been substantially completed. My conclusion is that the land at Church Farm that has a capacity for accommodating some 300 dwellings should be included as a SRA in the Plan. This site, together with Eagle Farm and Glebe Farm which are also recommended as strategic reserve sites, should be considered in a comprehensive way in relation to the need to take into account coalescence issues within the Wavendon/Woburn Sands area.

## **16 Eaton Leys**

- 16.1 For the avoidance of doubt the land referred to in this part of the report is the land contained by the A4146 (Fenny Stratford Bypass) and Watling Street. The land is shown on Plan 1 as Area 5B in the Council’s proof of evidence in relation to OM20(part). Area 5B is sub-divided on Plan 1. The northern part is within MK District and the southern part within the AVDC area. All the 5B land is under the control of the JJ Gallagher Ltd and the Objector favours the comprehensive allocation of the whole site as land to be developed in the period 2011 to 2016. Clearly the MK plan cannot specify a designation for land within the AVDC area and hence the Objector is seeking to have that part of Eaton Leys that falls within the MK area designated as a SRA
- 16.2 In the Plan the MK part of 5B is shown as part of a proposed extension to the adjoining linear park and is covered by the general countryside designation. The part within AVDC is covered by an Area of Attractive Landscape designation in the AVDC local plan. The Council does not advance an objection to the allocation of the site as a strategic reserve site on landscape or visual impact grounds. This is understandable given the distance between the site and the Brickhills that have a different, higher quality landscape character. The question of the principle of the retention of AALs is dealt with in Section 2 of this Interim Report.
- 16.3 In the Milton Keynes Expansion Study 1996 Update undertaken by Llewelyn-Davies the land is shown as area 5b. The study noted that the part of the site within AVDC is constrained by a local landscape designation (Area of Attractive Landscape) while the MK part of the site contains a Scheduled Ancient Monument (SAM). Taking these factors into account and noting that the development of the land would add to traffic pressures on the A4146 and

the A5 roundabout, the Study concluded that the site does not have the strongest case for expansion. However the study acknowledged that the land is adjacent to existing roads and would have low servicing costs. The conclusion reached was that the possibility of developing the site (along with an area to the north across the A5) should be investigated further.

- 16.4 In the MK & AV Growth Area Studies undertaken by Roger Tym & Partners, Eaton Leys was dealt with in association with other nearby sites on the southern side of the City. That work concluded that the major strength of these sites is their proximity to the rest of the City and employment sites, while a drawback may be the difficulty of providing public transport. Thus the Tym and Partners view is that Eaton Leys should be an area considered for growth in the post-2016 period. In the SRS the land to the south of the City, including Eaton Leys, is not shown as a location for growth in the period to 2016.
- 16.5 Having regard to Table B2 of the SRS, I note the point made by the Objector that Eaton Leys is unique in providing an alternative option for accommodating additional growth in the AVDC area if the area near Newton Longville fails to deliver. However, I agree with the Council that the starting point is not that 2,500 dwellings in the MK Implementation Area must be within AVDC. In the event that the Newton Longville area cannot deliver, I see no reason why an alternative site could not be wholly within MK if that is where the most appropriate site is. Thus I do not accept the view that Eaton Leys has a unique advantage.
- 16.6 Elsewhere in this report I have concluded that the existing SRA should be allocated for mixed development in the Plan. I do not agree with the view expressed by the Council at the Inquiry that in this event it would not be necessary to allocate an alternative SRA. I appreciate that additional unexpected land is coming forward for housing development and that this suggests that a SRA may not be needed. On the other hand the need for additional growth in MK is becoming ever clearer and there could easily be unexpected complications with some of the land identified for development or now coming forward unexpectedly. Thus I regard it as prudent to retain the concept of strategic reserve land to meet unforeseen needs and to indicate areas of search for development post 2011.
- 16.7 Given that I do not consider that it is essential that any fall-back site for Newton Longville must include land within the AVDC area, I consider that Eaton Leys is not the most appropriate location for an alternative SRA. Eaton Leys could well be an appropriate site for housing in the longer term but at present it would be preferable to have strategic reserve areas that better complement the focussed east – west strategy in the Plan. .
- 16.8 My view also has the advantage of essentially reinforcing the conclusion of the MK & Aylesbury Growth Area Studies that the Eaton Leys area should be seen as an option for the period beyond 2016. It also complements the emerging SRS that does not envisage development in the Eaton Leys area in the period up to 2016. Further, it is consistent with the public transit strategy

that depends on a concentration of development along the mass transit corridors. The east-west corridor in particular relies on development in the west and eastern expansion areas and this is a significant consideration in my judgement that strategic reserve areas should be located in reasonably close proximity to the expansion areas.

## **17 Land North of Little Linford Lane.**

- 17.1 The Objector, Mr Keswani, wants to have this site added to the NEA and is content to see the site allocated as a mixed-use site or as a housing site with the whole site being available for affordable housing (including key worker housing). As a “fall back” position the objector would wish the site to be given Strategic Reserve status.
- 17.2 At the inquiry it was accepted by all parties that landscape considerations are critically important. The planning history of the site shows that this factor has been decisive in the past. At a “call in” inquiry in 1992 where the possibility of 300 houses being built on the site was being considered, the Inspector judged that the proposed development would seriously detract from the rural character and appearance of the open countryside on the urban fringe of Newport Pagnell. He felt that development on the scale proposed would have a devastating and widely apparent effect on the character and appearance of attractive countryside. The Inspector who reported on the 1992 local plan inquiry stated that the site is closely related to the Ouse floodplain and that it was appropriate to include the land as part of a linear park. Since that time a Landscape Character Study has concluded that the site should be included in the Ouse Valley AAL. In the Plan the site is now shown as within the Linford Lakes area, within a linear park and within the Ouse Valley AAL. A small part of the objection site is also shown as liable to flooding. Irrespective of my recommendation regarding AALs, these factors count against the allocation of the site for development.
- 17.3 On the other hand the allocation of the NEA, the development that has occurred across the motorway at Portfields Farm and the permission granted for a replacement hotel at the motorway service area are new considerations that could impact on the way the site is seen in the wider landscape. I agree with the Council that the impact of the Portlands Farm development has little impact as it is clearly separated from the objection site by the motorway and is not visually prominent from the Linford Lakes area. Development on the NEA would make some difference but here also I agree with the Council that in visual terms Little Linford Lane, the motorway and the service area provide logical defining limits to development in this area. Development on the appeal site would clearly extend development into an area that is likely to be perceived as part of an attractive area of open countryside. Development on the site would thus harm the character and appearance of the Linford Lakes Linear Park. I do not consider that the linear park suggested by the objector for the western and northern part of the site would compensate for the serious harm caused. In relation to the hotel I believe that the proposed building would be seen as part of the existing service area and would thus not

materially change the impression given by the objection site as part of the rural landscape. Overall therefore I judge that the considerations that previously led two Inspectors to recommend against development on the objection site still apply.

- 17.4 At the inquiry matters of noise and traffic were raised but as I regard the landscape consideration as the most critical factor I do not regard these matters as decisive. On the question of the need for additional housing and the possibility of making the whole site available for affordable housing, I concur with the Council’s view that it would be wrong to allocate this inherently unsuitable site for development even with the prospect of affordable housing on all the site on offer. Also, I consider that there are other options available to meet these requirements elsewhere in Milton Keynes. These would not have the harmful impact on the landscape that the use of the objection site would have. I also accept the point made by the Council that it wishes to see affordable housing integrated with conventional housing. For all these reasons I conclude that the site should not be added to the NEA or given Reserve Land status.

## **18 Land West of Newport Road Woburn Sands**

- 18.1 This site, promoted by Swan Hill Homes Ltd, which could accommodate around 165 dwellings adjoins the settlement boundary for Woburn Sands. In this vicinity to the east of the appeal site the settlement boundary follows the Newport Road while the bulk of the settlement lies to the south beyond the railway line. Woburn Sands is identified as a Key Settlement in the plan. Within Woburn Sands there is one main housing site known as the Nampak site. This is a previously developed site and the current proposal is for a mixed-use development with an estimated housing capacity of 270 dwellings. This level of growth is the highest allocated to any of the Key Settlements but is, correctly in my view, seen by the Council as acceptable because of the brown field status of the Nampak site and its relatively sustainable location.
- 18.2 At the 1992 local plan inquiry the site was considered but not recommended for housing by the Inspector who regarded the visual character of the site as rural. I accept that the policy context has now changed because of the Key Settlement status of Woburn Sands. However I consider that the allocation of the Nampak site provides for an adequate amount of housing in the context of the Key Settlement status of the Woburn Sands and having regard to its present size and character. I agree with the Council that the settlement boundary as proposed to the west of the settlement and north of the railway line is defensible. The character of the site is rural and it provides an open and attractive entrance to the settlement and the site is visually well related to the adjoining countryside to the west. Housing on this site would undermine its role as an open, attractive feature at the entrance to the settlement and be intrusive in the countryside to the west of the village. For these reasons at this time I do not consider that the site should be allocated for housing or that the settlement boundary should be amended.

## **19 Tickford Fields Farm**

- 19.1 The aim of a number of related objections related to this land is to get the re-instatement of site NP3 as an allocated site, to link it with omission site OM136 to the north and to allocate the two parcels of land for a mixed development involving some 12 ha of land for housing and 6.2 ha for class B1 employment purposes. In addition the objection site includes land to the east of NP3 which the objector suggests could be used for a local centre and a safeguarded area for a re-located Ousedale School/dual use sports facilities and strategic open space.
- 19.2 The Council originally allocated site NP3 for around 200 dwellings on the basis that this level of housing would help to achieve improvements to the facilities and services of Newport Pagnell. Because of objections to the allocation and the results of the Urban Capacity Study (UCS) the Council decided, at DV2 stage, to delete the NP3 allocation.
- 19.3 My views regarding the overall housing situation and the deliverability of the BSP housing requirement are relevant to these objections. Since the Plan was prepared the Council has revised its view about the housing supply situation, largely because of density increases on allocated sites and the unexpected availability of sites within the City area for housing. The current view is that the structure plan figures are likely to be exceeded within the plan period. The question is whether this site should be re-instated in order to meet the additional housing requirement set out in the SRS.
- 19.4 I have accepted the Council’s view that the first area of search for additional land should be the SRA in the EEA. I have also identified other sites within the City that can accommodate housing in the plan period in a way that would complement and support the essential east/west strategy and the associated public transport enhancement programme better than would this objection site. In these circumstances I do not believe that this land should be allocated for development within this plan period. Looking to the longer term, in the Council’s response to the SRS consultation it states that it wishes to allow for some housing growth outside the City area in the period 2011 to 2016. Bearing in mind the point about having a housing supply for 10 years from adoption, I have indicated that I believe that the Plan should contain an indication of the directions for further growth post 2011. I consider that site NP3 and the omission site to the north (hereafter called the reserve land to distinguish it from the whole of the objection site that includes the land to the east of NP3) is a suitable area for consideration in the post-2011 period. I have not included the land to the east because the need for a school re-location site is uncertain and may well no longer exist because of alternative plans made by the education authority.
- 19.5 In reaching my conclusion I have taken into account the strong opposition to the allocation of NP3 at DV1 stage and the AAL designation of the site. In relation to the former it is not unusual to have strong opposition to a development plan allocation. However, I consider that the reserve land would

be a reasonable expansion area for the town in the longer term as the site could be developed in a way that would relate in an acceptable way to the existing urban area. Further, Newport Pagnell and Milton Keynes are geographically closely related and there are opportunities for extending public transport facilities in association with development on the land. For these reasons I consider that housing on the reserve land could reasonably be regarded as sustainable in the context of some growth in the rural area after 2011. I do not regard the AAL designation as decisive as I do not support the retention of local landscape designations in the Plan (see Section 2 of this report)

- 19.6 In relation to flooding I agree with the objector that the reserve land offers the prospect of practical drainage measures to be introduced that would avoid the problem of development on the site adding to the risk of flooding. Although part of the site is in the Ouse floodplain I note that the EA do not have an objection in principle to development on the land. Only part of the site is within the flood plain and it is likely that housing can be restricted to parts of the site that are not subject to flooding. Thus policy S13 could reasonably be applied and clearly the allocation of the site as a SRA would not eliminate the need for a Flood Risk Assessment.
- 19.7 If my recommendation is accepted the Council will need to consider whether or not part of the land should be used for employment purposes in the light of circumstances post 2011.

## **20 Conclusions**

- 20.1 The broad strategy of the Plan, which involves focussing most of the growth in the City, is soundly based on sustainability considerations.
- 20.2 The level of growth to be planned for should take into account the emerging sub-regional strategy at this stage rather than when the Plan is reviewed. The plan period should not be extended to 2016 but the Plan should contain an indication of the directions for growth beyond 2011.
- 20.3 The defined expansion areas, with an emphasis on concentrated east/west growth, support the overall sustainability approach and provide a sound basis for the Council’s public transport initiatives
- 20.4 The City Centre proposals complement the overall strategy
- 20.5 An allocation for “large footprint” employment use is justified and the proposed location is logical.
- 20.6 The hierarchy of settlements for the rural area is soundly based. Hanslope should be re-classified as a Selected Village rather than a Key Settlement
- 20.7 Save for the policy relating to Areas of Attractive Landscape, appropriate policies to protect the open countryside are included. Adequate justification for the Areas of Attractive Landscape policy has not been provided.
- 20.8 The latest available estimate by the Council suggests that the structure plan housing growth figure for the period to 2011 could be exceeded by some 2,000 dwellings. This estimate should be reduced by 400 dwellings to take into account the possibly over-optimistic view of completions in the plan period in CMK. On this basis there is a need to allocate additional land for some 2,500 dwellings if the SRS figures are to be achieved.
- 20.9 The boundary of the Western Expansion Area should be revised to exclude Area 10.4 but to include Area 11 with no net impact on the overall housing figures.
- 20.10 Land use allocations should be made in the Strategic Reserve Area. The SRA should be included as an integral part of the EEA for development in the plan period. The allocations should include housing for some 2000 dwellings and mixed-use development. The Plan should make it clear that development of the Broughton Manor Farm site should not be unduly delayed by master planning for the EEA.
- 20.11 Stantonbury Park Farm (excluding Stonepit Field) should be allocated for a development of some 500 dwellings
- 20.12 Taking into account the suggested spatial strategy for Milton Keynes in the SRS, Glebe Farm, Eagle Farm and Church Farm, Wavendon should be identified as Strategic Reserve Areas for growth beyond 2011. In order to meet the Council’s aim of having some growth in the rural area post 2011

Tickford Fields Farm should also be given strategic reserve status. The extent to which any strategic reserve land might be needed for development after 2011 would depend on how much land remained available for housing at that time in the WEA, the EEA, CMK and on any other allocated housing sites. Clearly this is an area where the plan, monitor and manage approach will be critical.

**Housing Demand – Supply Equation arising from these conclusions**

|  | <b>Supply</b> | <b>Demand</b> |
|--|---------------|---------------|
| Demand based on emerging Sub-Regional Strategy |               | <b>24,100</b> |
| Estimated completions-Council December 2003    | 22,000        |               |
| Less 400 over-estimate for CMK completions     | -400          |               |
|  | 21,600        |               |
| Effect of substituting Area 11 for Area 10.4   | Nil           |               |
|  | 21,600        |               |
| Allocation in Strategic Reserve Area           | 2,000         |               |
|  | 23,600        |               |
| Allocation of Stantonbury Park Farm            | 500           |               |
|  | <b>24,100</b> |               |



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## 1. CHAPTER 1 – INTRODUCTION

### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                           |
|---------------------------|---|
| INT/5/2                   | Stillman S                                  |
| INT/78/22                 | English Nature                              |
| INT/98/1                  | Chicheley Estate                            |
| INT/719/1                 | Milton Keynes Parks Trust Ltd               |
| INT/1016/1                | Council for the Protection of Rural England |
| INT/1043/5                | Great Linford Manor                         |
| INT/1226/3                | Genesis Group                               |
| INT/1226/4                | Genesis Group                               |
| INT/1226/5                | Genesis Group                               |
| INT/1226/6                | Genesis Group                               |

### Objections (2<sup>nd</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                          |
|---------------------------|--|
| DV2/INT/312/8             | Whaddon Parish Council                     |
| DV2/INT/402/2             | Corran (Wakefield) Ltd                     |
| DV2/INT/719/1             | Milton Keynes Parks Trust Ltd              |
| DV2/INT/889/3             | Northamptonshire County Council            |
| DV2/INT/1082/3            | South East Milton Keynes Consortium        |
| DV2/INT/1118/1            | Hallam Land Management                     |
| DV2/INT/1155/1            | Williams Davis Ltd                         |
| DV2/INT/1187/111          | Gallagher Estates Ltd                      |
| DV2/INT/1214/112          | Wilson Connolly Homes Ltd                  |
| DV2/INT/1218/1            | Gazeley Properties                         |
| DV2/INT/1220/1            | Land Securities Properties Ltd             |
| DV2/INT/1221/1            | Wilson Connolly Homes Ltd                  |
| DV2/INT/1226/1            | Genesis Group                              |
| DV2/INT/1226/2            | Genesis Group                              |
| DV2/INT/1569/112          | Gallagher Estates Ltd and Wilcon Homes Ltd |
| DV2/INT/1719/2            | Westbury Homes (Holdings) Ltd              |

### Objections to Proposed Changes

| <b>Representation No.</b> | <b>Respondent</b>                                   |
|---------------------------|---|
| PIC/INT/PR/82/1           | Gallagher Estates Ltd                               |
| PIC/INT/PR/83/1           | Wilson Connolly Ltd                                 |
| PIC/INT/PR/84/1           | Gallagher Estates Ltd and Wilson Connolly Homes Ltd |

### Issues

- a. Response to the emerging sub-regional strategy.
- b. Guidance in relation to local centres
- c. Environmental implications of the policies and extent of wildlife corridors

### 1 Inspector's Reasoning and Conclusions

1.1 A number of the issues raised are effectively dealt with in Section 1 of this Interim Report. The explanatory text in for example paragraph 1.28, will need to be comprehensively reviewed in the light of the response of the Council to the recommendations. Although Pre-Inquiry Change (PIC) 1 aims to up-date the position regarding the sub-regional study, this matter has moved on and thus the text should be revised further. The objection by English Nature is somewhat general but I do not accept that the Plan fails to give adequate emphasis to

the environment. The concern that the Council has for the environment is reflected in the development brief work being undertaken and in the policies in Chapter 6 which I regard as reasonable and adequate. The wildlife corridors are based on comprehensive research (CD13.1) and the Objector has not produced any evidence to counter this material.

1.2 I do not understand how parts of the objection from Mr Stillman relate to Chapter 1. On the matter of the clarity of the presentation I consider that the DV2 document is an improvement on DV1 and is a reasonably clear document. The inclusion of an index of policies has made the Plan more user-friendly. I note that the Council states that it will seek to make further improvements to the layout and style of the Plan at the adopted stage. I agree with the objection from Milton Keynes Parks Trust Ltd that the guidance in 1.33 is potentially misleading in relation to local centres. The objection by Mr Winkelman is met in DV2.

### RECOMMENDATIONS

- **Amend text to reflect the up-to-date sub-regional situation and decisions taken by the Council in relation to the recommendation that the Plan should be based on the emerging sub-regional growth figures. (It follows from this that Pre Inquiry Change (PIC) 1 is not supported)**
- **Revise guidance for local centres to read “suitable for improved retail provision and wider range of uses, including employment, community and residential”**

## 2. CHAPTER 2 – VISION & AIMS

### 2.1 LOCAL PLAN AIMS

#### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent   |
|--------------------|--|
| VIS/910/2          | Hermes Prudential                                  |
| VIS/989/4          | MK & North Bucks Chamber of Commerce               |
| VIS/580/3          | Milton Keynes Christian Council                    |
| VIS/1022/2         | Woodward K   |
| VIS/1226/8         | Genesis Group                                      |
| VIS/1154/19        | Swan Hill Homes Ltd                                |
| VIS/999/1          | Mayne C  |
| VIS/1221/9         | Wilcon Homes Ltd                                   |
| VIS/1218/25        | Gazeley Properties                                 |
| VIS/1220/25        | Land Securities Properties Ltd                     |
| VIS/987/4          | British Astronomical Assoc Campaign for Dark Skies |
| VIS/78/17          | English Nature                                     |
| VIS/989/5          | MK & North Bucks Chamber of Commerce               |
| VIS/633/1          | Hope-Lang P K                                      |
| VIS/769/14         | Milton Keynes Forum                                |
| VIS/741/2          | Thames Valley Police                               |
| VIS/769/16         | Milton Keynes Forum                                |
| VIS/1205/38        | Bellway Estates                                    |
| VIS/989/2          | MK & North Bucks Chamber of Commerce               |
| VIS/24/1           | Dimarco A  |
| VIS/719/2          | Milton Keynes Parks Trust Ltd                      |
| VIS/402/1          | Corran (Wakefield) Ltd                             |
| VIS/719/4          | Milton Keynes Parks Trust Ltd                      |
| VIS/1204/17        | McCann Homes                                       |
| VIS/1206/14        | Beazer Strategic Land                              |
| VIS/1210/6         | Other Clients (Agent, DLP)                         |
| VIS/1218/27        | Gazeley Properties                                 |
| VIS/78/18          | English Nature                                     |
| VIS/1221/11        | Wilcon Homes Ltd                                   |
| VIS/1220/27        | Land Securities Properties Ltd                     |
| VIS/1226/7         | Genesis Group                                      |
| VIS/1224/1         | English Partnerships                               |
| VIS/1224/2         | English Partnerships                               |

#### Issues

- a. Detailed wording and content of the aims.

#### Inspector's Reasoning and Conclusions

2.1.1 In general terms the aims are supported by respondents and the objections are largely to matters of detail. Some objectors consider that the aims should include reference to the regional role to be played by Milton Keynes. This matter is adequately covered as one of the “visions” makes reference to the role of the Milton Keynes as a regional centre. Both local needs and the regional role are covered and these are not mutually exclusive (for a detailed consideration of the sub-regional role of Milton Keynes see Section 1 of this Interim Report). Another general objection is that the Plan does not adequately reflect the importance of the car to the prosperity

of the area. While I understand the thrust of the argument, the role of the car is exceptionally well catered for in the City and there is no realistic prospect of its role being undermined. To give a more significant role to public transport will require the sort of action being suggested by the Council and the promotion of an integrated public transport system is necessary and reasonable. I do not agree with Mr Woodward that the Plan does not give adequate emphasis to services and amenities. Read as a whole the Plan places emphasis on the quality of the environment in general and the need to provide a high quality living environment in particular. The Milton Keynes Christian Council wants to see an additional aim that promotes the positive benefits of living in a multi-cultural city. This Plan is a land use plan and bearing in mind the limitations of what it can realistically influence, I can see no justification for the inclusion of such an aim, however worthy it may be. The objection by Mrs Mayne relates to the overall strategy of the Plan and the emphasis in the Plan on focussing most development in the City. It seems to me that the aims would remain much as they are, even if there was more emphasis on development in the rural parts of the district.

2.1.2 Moving to more detailed objections, the Genesis Group has objections to a number of the aims. In relation to the transport aims, I agree with the objector that many trips are beyond the scope of the local plan's influence. However the general thrust of the Plan is in line with government policy and the alternative wording suggested does not make the position any more precise or amenable to monitoring. I agree with the objector that the third aim could be more clearly worded and I endorse the wording suggested by the objector. In relation to energy I do not see how the suggested wording on behalf of the Genesis Group improves the Plan but I do agree with the British Astrological Association that reference could also usefully be made to reducing energy use both inside and outside buildings.

2.1.3 In relation to wildlife habitats Genesis Group favour an approach that relates the degree of protection to the relative importance of the designation while English Nature are seeking to have all wildlife habitats protected and reference to woodland to improve carbon fixing included. I do not agree with Genesis that the aim should be qualified by "where opportunities arise" as this would weaken the aim too much. It would be unrealistic to aim to protect all wildlife habitats and the emphasis on important habitats is less confusing than the complicated matter of having an aim that brings in the question of relative designation importance. The aims are of necessity broad brush and in this context the wording in the Plan is clear and appropriate. The reference to tree cover is adequate and there is no need for reference to "woodland"

2.1.4 The alternative wording suggested by Genesis Group for air/water pollution, land contamination and waste recycling do not improve the aims or make the areas where the Council can have an influence any clearer. The conservation of water may be achievable in a variety of situations and I do not think that the aim should be as limited as suggested by Genesis Group. As regards the aim of minimising the use of green field land for development, I agree with the Council that in the light of the thrust of government policy this is appropriate as an overall aim. I do not feel that the fears of the Chamber of Commerce that this aim would conflict with the growth role of Milton Keynes are justified. This is because the aim does not rule out green field development where essential. I agree with Genesis Group that the aim of improving human well-being is too vague and broad to be useful. The same applies to the suggestion from the Milton Keynes Forum in relation to this matter. This aim should be amended and in this respect I agree with the point about the public realm made by Milton Keynes Parks Trust Ltd. I note that in Deposit Version 2 (DV2) the Council has largely taken on board the objection from Thames Valley Police. The reference to the orientation of buildings proposed by the Milton Keynes Forum is too detailed for this part of the Plan. The wording suggested by the Forum for the design and culture elements are not significantly better than the wording suggested by the Council.

2.1.5 In relation to housing I do not see how the wording suggested by Genesis Group would improve the Plan and as a general aim the approach favoured by the Council is clear. As regards employment I accept the objection made on behalf of several objectors that it is difficult to identify employment needs and training requirements. Replacing “identified” with “likely” would resolve this problem. The alternative wording suggested by Genesis Group does not have any material advantage over the wording proposed by the Council.

2.1.6 The CLA is concerned that the vision does not address the needs of the rural areas. My reading of this chapter as a whole does not support this view. Much of the vision is expressed in general terms and could apply to both the rural and the urban area. Similarly, read as a whole the chapter gives adequate emphasis to the quality of the environment and the revised wording suggested by English Nature would not materially improve the Plan. Nor do I support the view of Milton Keynes Parks Trust Ltd that replacing “enjoys” with “manages” would improve the Plan. “Enjoys” relates more logically to the preamble “We want a Milton Keynes that ...”

2.1.7 The additional material suggested by English Partnerships for paragraph 2.1 would add unnecessary length to the plan without adding anything of substance to the vision. English Partnerships also suggests changes to the wording of the aims. These seem to me to be alternatives that would also make the plan longer without bringing any substantial benefits.

2.1.8 I agree with the view of the Milton Keynes Parks Trust Ltd that part of the seventh aim is confusing. The revised wording suggested would make the position clearer and I do not agree with the Council that it would represent an inappropriate level of detail.

## RECOMMENDATIONS

### I recommend that:

- **the third aim under Transport be amended to read “New development will be allocated at locations that are easily accessible by sustainable transport modes or are capable of being well served by such modes through transport enhancements”**
- **the words “and the external environment” be added to the first Energy aim**
- **in the Health and Safety section amend the first bullet point to read “Improve community safety, recreation and the management of the public realm”**
- **under Employment replace “identified” with “likely”**
- **in the seventh aim replace “protect local mineral deposits” with “safeguard viable mineral deposits from sterilisation by development”**

## 2.2 LOCAL PLAN TARGETS

### Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent                    |
|--------------------|-------------------------------|
| DV2/VIS/407/1      | Fairfield Partnership, The    |
| DV2/VIS/1226/4     | Genesis Group                 |
| DV2/VIS/1719/1     | Westbury Homes (Holdings) Ltd |

### Issue

- a) Appropriateness of requirements in relation to buses

### Inspector's Reasoning and Conclusions

2.2.1 Given the way the bus system is organised with buses stopping on request in residential areas rather than at formal stops, I agree with objectors who prefer the original reference to routes rather than stops. The use of routes also seems more sensible in relation to considerations of viability and giving the operators adequate flexibility. Given the critical importance of enhancing the use of public transport in the City, I do not however agree with Genesis Group that the standard of 3 buses per hour is too prescriptive.

### RECOMMENDATION

- Replace “bus stop” with “bus route” under “Targets and Indicators” in the Equality section.

## 2.3 TABLE VA1

### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent                                  |
|--------------------|---|
| VIS/407/2          | Fairfield Partnership, The                  |
| VIS/398/2          | Country Landowners and Business Association |
| VIS/78/16          | English Nature                              |
| VIS/402/2          | Corran (Wakefield) Ltd                      |
| VIS/719/7          | Milton Keynes Parks Trust Ltd               |
| VIS/741/1          | Thames Valley Police                        |
| VIS/886/2          | English Heritage                            |
| VIS/989/6          | MK & North Bucks Chamber of Commerce        |
| VIS/1022/1         | Woodward K                                  |
| VIS/1226/9         | Genesis Group                               |
| VIS/1080/21        | Galloway M                                  |
| VIS/1085/5         | Scott-Garrett P                             |
| VIS/1154/18        | Swan Hill Homes Ltd                         |
| VIS/1186/2         | Muston D                                    |
| VIS/1218/29        | Gazeley Properties                          |
| VIS/1220/29        | Land Securities Properties Ltd              |
| VIS/1221/8         | Wilcon Homes Ltd                            |
| VIS/1001/1         | Broughton and Milton Keynes Parish Council  |

### Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent                      |
|--------------------|---------------------------------|
| DV2/VIS/407/2      | Fairfield Partnership, The      |
| DV2/VIS/580/3      | Milton Keynes Christian Council |
| DV2/VIS/1164/4     | J J Gallagher                   |
| DV2/VIS/1218/2     | Gazeley Properties              |
| DV2/VIS/1220/2     | Land Securities Properties Ltd  |
| DV2/VIS/1221/2     | Wilcon Homes Ltd                |
| DV2/VIS/1719/3     | Westbury Homes (Holdings) Ltd   |
| DV2/VIS/1719/4     | Westbury Homes (Holdings) Ltd   |
| DV2/VIS/1719/5     | Westbury Homes (Holdings) Ltd   |

### Objections (Not Duly made but accepted at 1<sup>st</sup> Deposit)

| Representation No. | Respondent         |
|--------------------|--------------------|
| NDM6/VIS/5         | Environment Agency |

### Issues

- a) Detail and content of performance indicators in table VA1

### **Inspector's Reasoning and Conclusions**

2.3.1 In relation to transport several objectors feel that the reduction in car use sought should be matched by a target for an increase in public transport. In response the Council points out that the Plan is following the approved Local Transport Plan and that the achievement of the targets will necessitate increased use of public transport. I can see no reason why the target for bus journeys should be restricted to new allocations as some objectors suggest. It is important for the use of public transport to be encouraged throughout the plan area.

2.3.2 The brown field target of 20% is much less than the general figure favoured by the government. However, Milton Keynes is an exceptional urban area where the vast majority of development is recent and where opportunities for brown field development are likely to be very limited. The Milton Keynes Housing Capacity Study concluded that the planned nature of the City severely limits the scope for the re-use of previously developed land. Thus the low figure is justified although this is a matter that the Council will need to monitor and adjust if necessary.

2.3.3 Several objectors argue that the percentage of energy being sought from renewable sources is unrealistic. The Council point out that the target has had regard to the government target of 10% of energy from renewable sources. On this basis I support the target.

2.3.4 I agree with objectors to the wildlife indicator that the percentage of land covered by nature conservation designations is not an appropriate performance indicator, as the percentage depends essentially on where conservation interests exist. The Council argues that the figure is based on knowledge of sites held by conservation organisations but does not substantiate this claim. As I understand it a survey was carried out in the mid-1990's which resulted in the designation of areas where nature conservation interests are important. If the Council wishes to include an indicator related to this matter it should be on the basis of seeking to have no land of nature conservation interest adversely affected by development. The point made by Mr Woodward that the preservation of wildlife is always important is not directly relevant to the definition of performance indicators.

2.3.5 Turning to air quality limits I do not see why the Genesis Group are concerned about this indicator or why it should only be applied at the proposed allocations. There is no reason why applications within the existing built up area should not be assessed with air quality in mind. While I agree that the target for water conservation measures is ambitious, as they only apply to new houses I cannot see why it should not be achievable.

2.3.6 In relation to recreation space I note the point made by Milton Keynes Parks Trust Ltd and others who see no justification for reducing the standard for the provision of recreation space. The Council's explanation is that linear parks will not be increased in proportion to population growth. I accept that in order to make efficient use of land in the interests of containing the spread of the City into the open countryside, it may be necessary to slightly revise previously generous standards.

2.3.7 I do not think that it is unreasonable for the Council to aim at prohibiting new development in floodplains. Although mitigation measures are a consideration, as is the need for the development, PPG25 makes the point that built development in functional floodplains should be wholly exceptional. Given the scope in the area for development on land that is not subject to flooding the indicator is acceptable.

2.3.8 The affordable housing target is based on extensive survey work undertaken by the Council. A 30% target is accepted by most of the interested parties as reasonable taking into account historic trends, identified needs and the economics of housing provision and procurement.

2.3.9 English Heritage wants additional cultural indicators added. However the suggestions

generally involve action initiated by owners and others rather than by the Council. For example, the reuse of listed buildings will in many instances be dependent on the commercial decisions of the owners/occupiers. For this reason these are not appropriate performance indicators. The same applies to the indicators suggested by CMK Partnership which involve decisions that are outside the scope of land use planning, for example the number of cultural organisations

2.3.10 The Thames Valley Police want a target added that relates to the percentage of applications meeting a safety by design standard. The Chamber of Commerce wants a target for public safety. I accept the Council's response that community safety is difficult to monitor using an indicator/target approach. Policy D2A includes reference to surveillance as a design consideration. The Secure by Design standards go beyond what is appropriate for planning control.

2.3.11 Under the heading Minerals and Waste the target refers to the use of recycled materials. An additional explanatory point has been added to paragraph 2.8 which addresses the point made by the Genesis Group. Having regard to the objection from the Chamber of Commerce I find it difficult to know whether the target is justified. Clearly in general the higher the proportion of new development that includes recycled material the better. For this reason I support the ambitious approach followed by the Council although the matter may need to be revised in the light of monitoring if it proves to be an unrealistic target.

2.3.12 I agree that it is not clear how or why retail floorspace relates to equality. This should be clarified in the explanatory text.

2.3.13 As regards employment Genesis Group want this more closely related to the new employment areas that are allocated. The Council does not appear to have specifically responded to this point but it seems to me that what is important is the overall balance. In supporting the Council I am assuming that the point of the indicator is to give a guide as to the need for employment generating allocations as part of the plan, monitor and manage approach.

2.3.14 Westbury Homes objects to the density target of 35 dwellings per hectare and want the range detailed in PPG3 substituted. The figure is based on detailed local survey work and I can see no reason why local circumstances should not be used to inform the Plan.

## **RECOMMENDATIONS**

- **Exclude the wildlife performance indicator**
- **Add explanatory text to paragraph 2.8 dealing with the reason why retail floorspace is in the table under "Equality"**

### 3. CHAPTER 3 – STRATEGIC POLICIES

#### 3.1 S1 - GENERAL PRINCIPLES

##### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                                |
|---------------------------|--|
| STR/59/1                  | Railtrack Property, Railtrack Plc                |
| STR/78/15                 | English Nature                                   |
| STR/220/7                 | Aspley Guise Parish Council                      |
| STR/357/1                 | Bedfordshire CPRE                                |
| STR/367/1                 | Marshall S                                       |
| STR/396/1                 | Clarke B & A                                     |
| STR/397/1                 | Clarke P & P                                     |
| STR/433/14                | Castlethorpe Village Residents Association       |
| STR/520/1                 | REASON   |
| STR/719/8                 | Milton Keynes Parks Trust Ltd                    |
| STR/863/1                 | Haversham & Little Linford Residents Association |
| STR/910/7                 | Hermes Prudential                                |
| STR/911/30                | Old Road Securities                              |
| STR/928/14                | Milton Keynes Cycle Users Group                  |
| STR/989/7                 | MK & North Bucks Chamber of Commerce             |
| STR/1058/8                | Woburn Sands and District Society                |
| STR/1077/3                | Boyd M   |
| STR/1080/19               | Galloway M                                       |
| STR/11 18/6               | Hallam Land Management                           |
| STR/1138/3                | Aylesbury Vale District Council                  |
| STR/1154/15               | Swan Hill Homes Ltd                              |
| STR/1155/9                | Williams Davis Ltd                               |
| STR/1170/32               | Parry J  |
| STR/1187/1                | Gallagher Estates Ltd                            |
| STR/1202/15               | Charles Wells Ltd                                |
| STR/1203/15               | Northern Family, The                             |
| STR/1204/8                | McCann Homes                                     |
| STR/1204/18               | McCann Homes                                     |
| STR/1205/23               | Bellway Estates                                  |
| STR/1205/39               | Bellway Estates                                  |
| STR/1206/10               | Beazer Strategic Land                            |
| STR/1206/15               | Beazer Strategic Land                            |
| STR/1210/7                | Other Clients (Agent, DLP)                       |
| STR/1214/1                | Wilcon Homes Ltd                                 |
| STR/1223/16               | Old Road Securities                              |
| STR/1224/3                | English Partnerships                             |
| STR/1226/10               | Genesis Group                                    |

## Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent                                 |
|--------------------|--|
| DV2/STR/78/2       | English Nature                             |
| DV2/STR/124/1      | Bedfordshire County Council                |
| DV2/STR/719/3      | Milton Keynes Parks Trust Ltd              |
| DV2/STR/719/4      | Milton Keynes Parks Trust Ltd              |
| DV2/STR/1187/1     | Gallagher Estates Ltd                      |
| DV2/STR/1214/1     | Wilcon Homes Ltd                           |
| DV2/STR/1226/6     | Genesis Group                              |
| DV2/STR/1569/1     | Gallagher Estates Ltd and Wilcon Homes Ltd |
| DV2/STR/1593/1     | Preserve Bow Brickhill (PBB)               |

## Issues

- a. Sub-regional role for Milton Keynes and implications for scale and direction of growth.
- b. Clarity of policy particularly in relation to relationship to transport, sustainable development, policy constraints and the environment.

## Inspector's Reasoning and Conclusions

3.1.1 PIC 2, which attracted two further objections from Gallagher Estates and Wilson Connelly Ltd, updated the Plan to reflect the sub-regional situation. The Council accepts that this will need further updating as the sub-regional strategy develops. A number of the objections relate to the role of Milton Keynes in the sub-region, the implications for the boundaries of the City and the impact on surrounding towns and villages. These matters are dealt with in Section 1 of this Interim Report.

3.1.2 Many of the objections are adequately addressed in changes made to DV! including the clarification of sustainability, what is meant by existing centres and removal of the potential confusion regarding ribbon development.

3.1.3 I do not understand the point made by the Haversham & Little Linford Residents Association that S1 is inconsistent with several other policies in the Plan. The relevant policies seem to me to be complementary.

3.1.4 The change suggested on behalf of Hermes Property Asset Management Ltd and Prudential Assurance Company Ltd would not reflect the role that the City plays in the sub-regional as a growth point. Similarly the point made by the Chamber of Commerce does not acknowledge that a small excess of jobs is implicit in the sub-regional the role of the City.

3.1.5 Mr Boyd and the Cycle Users Group's suggested re-wording in paragraph 3.16 is supported as it would improve the grammar. In relation to Mr Galloway's objection I believe that reading the explanatory text in conjunction with the policy adequately addresses the point and I do not see a conflict between (ii) and (vi) of the policy.

3.1.6 Genesis Group objects to parts of the policy. These objections seem to me to be seeking to have rather too much detail within the policy itself. I consider that policy S1 is broadly acceptable as an explanation of key principles in a chapter that deals with strategic matters. However I do agree with several objectors, including Bedfordshire County Council, who feel that the reference to environmental constraints should be re-instated. An explanation of what is meant by these constraints could usefully be added to the explanatory text.

## RECOMMENDATIONS

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- Replace the words “bike” and “on foot” in paragraph 3.16 with “cycle” and “walking”.
- Re-instate (vii) and add explanatory text to make it clear that the key environmental constraints include landscape features, high quality agricultural land and floodplains.
- Review PIC 2 to reflect the up-to-date sub-regional situation

## 3.2 S2 - MILTON KEYNES CITY

### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent                     |
|--------------------|--------------------------------|
| STR/88/4           | British Waterways              |
| STR/261/10         | West S                         |
| STR/403/11         | Buckinghamshire County Council |
| STR/749/1          | House Builders Federation, The |
| STR/1187/2         | Gallagher Estates Ltd          |
| STR/1214/2         | Wilcon Homes Ltd               |
| STR/1226/11        | Genesis Group                  |

### Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent                   |
|--------------------|------------------------------|
| DV2/STR/1593/2     | Preserve Bow Brickhill (PBB) |

### Issues

- a. Detail within the Plan

### Inspector's Reasoning and Conclusions

3.2.1 DV2 no longer contains policy S2. I concur with the Council’s opinion that this matter is more appropriately dealt with by means of a reference to the Proposals Map in policy S1. Questions relating to the position of the boundary will be dealt with in the Final (Part2) Report.

### RECOMMENDATION

- No change to the Plan

## 3.3 S3 - CITY EXPANSION AREAS

### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent                                |
|--------------------|---|
| STR/244/2          | Gorman J                                  |
| STR/341/1          | South Northamptonshire Council            |
| STR/403/12         | Buckinghamshire County Council            |
| STR/433/13         | Castletorpe Village Residents Association |
| STR/520/3          | REASON                                    |
| STR/531/3          | Shenley Brook End Parish Council          |
| STR/752/1          | Drake L S                                 |
| STR/864/1          | Foster P                                  |
| STR/907/7          | Wolverton Business Association            |

|             |   |
|-------------|---|
| STR/915/3   | Newton Longville Parish Council               |
| STR/917/2   | Aylesbury Vale District Council               |
| STR/1098/1  | Stagecoach United Counties                    |
| STR/1118/3  | Hallam Land Management                        |
| STR/1138/6  | Aylesbury Vale District Council               |
| STR/1155/10 | Williams Davis Ltd                            |
| STR/1164/1  | J J Gallagher                                 |
| STR/1165/1  | Trustees of Lord Carrington's 1963 Settlement |
| STR/1179/1  | Milton Keynes Green Party                     |
| STR/1202/9  | Charles Wells Ltd                             |
| STR/1203/9  | Northern Family, The                          |
| STR/1204/11 | McCann Homes                                  |
| STR/1205/34 | Bellway Estates                               |
| STR/1211/4  | Sawbridge C                                   |
| STR/1222/1  | Bellow Hill Farm and Wadleys Farm Consortium  |
| STR/1226/12 | Genesis Group                                 |
| STR/1226/13 | Genesis Group                                 |
| STR/1569/1  | Gallagher Estates Ltd and Wilcon Homes Ltd    |

### **Objections (2<sup>nd</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b> |
|---------------------------|-------------------|
| DV2/STR/1226/8            | Genesis Group     |

### **Issues**

- a) Extent and location of expansion areas.
- b) Balance of City/rural area growth.

### **Inspector's Reasoning and Conclusions**

3.3.1 The substance of most of these objections has been dealt with in Section 1 of this Interim Report. The logic of having three expansion areas is supported and the proposed concentration of development is soundly based on the need for sustainable development that can facilitate the provision of a mass transport system. In relation to the scale of development the plan has to have regard to the sub-regional strategy. In terms of the need for expansion areas the Council has adequately researched the options for accommodating development within existing built-up areas and has reasonably concluded that expansion areas on green field sites are required. The only change that is recommended relates to the detail of the description of the expansion areas in the light of the recommendations in Section 1 of this report.

### **RECOMMENDATION**

- **Revise the descriptions of the expansion areas in the light of the recommendations in Section 1 of this Interim Report.**

### 3.4 S4 - PHASING OF THE CITY EXPANSION AREAS

#### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                                |
|---------------------------|--|
| STR/82/6                  | Menday P   |
| STR/531/5                 | Shenley Brook End Parish Council                 |
| STR/749/2                 | House Builders Federation, The                   |
| STR/863/2                 | Haversham & Little Linford Residents Association |
| STR/863/3                 | Haversham & Little Linford Residents Association |
| STR/926/6                 | Gladedale Homes                                  |
| STR/1080/20               | Galloway M                                       |
| STR/1118/7                | Hallam Land Management                           |
| STR/1155/11               | Williams Davis Ltd                               |
| STR/1196/1                | Williams T A                                     |
| STR/1204/5                | McCann Homes                                     |
| STR/1204/12               | McCann Homes                                     |
| STR/1205/4                | Bellway Estates                                  |
| STR/1205/32               | Bellway Estates                                  |
| STR/1206/5                | Beazer Strategic Land                            |
| STR/1206/13               | Beazer Strategic Land                            |
| STR/1209/5                | Bellway Homes                                    |
| STR/1218/16               | Gazeley Properties                               |
| STR/1220/16               | Land Securities Properties Ltd                   |
| STR/1224/5                | English Partnerships                             |
| STR/1226/14               | Genesis Group                                    |
| STR/1569/2                | Gallagher Estates Ltd and Wilcon Homes Ltd       |

#### Objections (2<sup>nd</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                          |
|---------------------------|--|
| DV2/STR/88/2              | British Waterways                          |
| DV2/STR/402/8             | Corran (Wakefield) Ltd                     |
| DV2/STR/402/9             | Corran (Wakefield) Ltd                     |
| DV2/STR/910/7             | Hermes Prudential                          |
| DV2/STR/1118/3            | Hallam Land Management                     |
| DV2/STR/1118/5            | Hallam Land Management                     |
| DV2/STR/1155/3            | Williams Davis Ltd                         |
| DV2/STR/1155/5            | Williams Davis Ltd                         |
| DV2/STR/1164/2            | J J Gallagher                              |
| DV2/STR/1187/2            | Gallagher Estates Ltd                      |
| DV2/STR/1214/2            | Wilcon Homes Ltd                           |
| DV2/STR/1226/10           | Genesis Group                              |
| DV2/STR/1569/2            | Gallagher Estates Ltd and Wilcon Homes Ltd |
| DV2/STR/1662/1            | J S Bloor (Northampton) Ltd                |

#### Issues

- a. How can delivery of housing be promoted.
- b. Relationship between development and infrastructure

### **Inspector's Reasoning and Conclusions**

3.4.1 The phasing provisions in the DV 1 version of the plan have been revised in the interests of delivering the required housing. This addresses the objections from a number of the respondents. I am satisfied that co-ordinated development should be achievable through a combination of the application of this policy and the development briefs that are being prepared for the major housing areas. The Council also agreed at the Inquiry to further strengthen the approach to improving the delivery of housing by adding a reference to expediting applications to paragraph 3.29. I support this change. Given the importance of facilitating the delivery of housing I do not agree with the Genesis Group that priority sites should not be identified. I do however support the view that reference to the whole of the WEA not being required by 2011 should be deleted in the interests of increasing flexibility and to avoid putting unnecessary policy obstacles in the way of housing delivery.

3.4.2 In relation to infrastructure the policy follows an acceptable and pragmatic approach. Although I appreciate the concerns that some objectors have in this regard the Council is alert to the need to match development with infrastructure. It would not be reasonable to require all infrastructure to be in place before development commences or to require new development to make up existing deficiencies as well as provide for the additional needs that flow directly from the development.

3.4.3 Even though the NEA is a much smaller area than the other expansion areas, I agree with Corran (Wakefield) Ltd that there is no good reason for excluding the NEA from the provisions of policy S4. On the other hand I do not believe that the change to the wording of (iii) suggested by this Objector improves the policy.

3.4.4 Given the uncertainty about the provision of additional waterways, including reference to navigable waterways with other public transport services could have the undesirable effect of delaying development. As regards the wording of (iv) I note that Genesis Group consider that the implications are unclear. Bearing in mind the wide variety of infrastructure involved I cannot see how more precision can sensibly be introduced.

3.4.5 The question of the treatment of the EEA in comparison to the WEA raised by Hallam Land and others is dealt with in Section 1 of this Interim Report.

### **RECOMMENDATIONS**

- **Add a final sentence to paragraph 3.29 to read “To achieve the policy aim MKC will seek to ensure that applications for these sites are dealt with expeditiously, taking into account all material planning considerations”**
- **Add Northern Expansion Area in the first sentence in the policy.**
- **Exclude the first sentence of paragraph 3.29a**

### 3.5 S5 – CENTRAL MILTON KEYNES

#### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                    |
|---------------------------|--------------------------------------|
| STR/78/14                 | English Nature                       |
| STR/719/10                | Milton Keynes Parks Trust Ltd        |
| STR/910/11                | Hermes Prudential                    |
| STR/910/13                | Hermes Prudential                    |
| STR/989/8                 | MK & North Bucks Chamber of Commerce |
| STR/989/10                | MK & North Bucks Chamber of Commerce |
| STR/1000/1                | Ray Merrington Chartered Architect   |
| STR/1043/6                | Great Linford Manor                  |
| STR/1080/23               | Galloway M                           |
| STR/1085/3                | Scott-Garrett P                      |
| STR/1138/7                | Aylesbury Vale District Council      |
| STR/1179/3                | Milton Keynes Green Party            |
| STR/1212/8                | Client (Agent, DLP)                  |
| STR/1224/15               | English Partnerships                 |
| STR/1226/15               | Genesis Group                        |

#### Objections (2<sup>nd</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                          |
|---------------------------|--|
| DV2/STR/407/3             | Fairfield Partnership, The                 |
| DV2/STR/749/3             | House Builders Federation, The             |
| DV2/STR/769/3             | Milton Keynes Forum                        |
| DV2/STR/910/9             | Hermes Prudential                          |
| DV2/STR/1187/3            | Gallagher Estates Ltd                      |
| DV2/STR/1214/4            | Wilcon Homes Ltd                           |
| DV2/STR/1224/2            | English Partnerships                       |
| DV2/STR/1226/12           | Genesis Group                              |
| DV2/STR/1226/13           | Genesis Group                              |
| DV2/STR/1569/4            | Gallagher Estates Ltd and Wilcon Homes Ltd |
| DV2/STR/1656/3            | O'Sullivan M                               |
| DV2/STR/1719/6            | Westbury Homes (Holdings) Ltd              |

#### Issues

- a. Relationship to development framework for CMK.
- b. Role of CMK within the region
- c. Content of the policy.

#### Inspector's Reasoning and Conclusions

3.5.1 The effect of PC/027/STR, which I fully endorse, is to make extensive reference to the CMK Development Framework in paragraphs 3.36 and 3.36a. Policy S5, like many of the detailed Chapter 12 policies encapsulates the detailed studies carried out in formulating the 2001 EDAW Development Framework. The long gestation period of the latter document and the incorporation of very many of its provisions in DV2, can scarcely be regarded as, in any sense, either premature or precipitate.

3.5.2 Policy S5(ii-iii) aims to achieve a broader mix of land use and generally higher densities

of development. To my mind, these are perfectly consistent with CMK's role as an emergent regional centre. Indeed, without generally higher plot ratios and the development of central area sites (including large tracts of open car parking), it is difficult to see how this regional role might realistically be achieved or enhanced. The central feature of the above SPG is a very detailed (fig 5.1 @ 1:5000 scale) layout of building blocks, albeit indicative at this stage. This helpful study is in many ways analogous to a Supplementary Town Map or Town Centre Map, commonly urged but infrequently prepared under the original 1947 Town and Country Planning Act framework. It also envisages a longer time horizon (2001-2020) than the Local Plan itself.

3.5.3 The component parts of Policy S5(ii-vi) include criteria concerning land use diversity, design standards, development patterns, segregation of vehicular and pedestrian traffic, enhancement of public transport access and circulation and the integration of various component parts of the central area. These are all time-honoured aspects of the "*use of land and buildings*" and the regulation of physical development. If the relevant objections are directed against the greater integration of land use and transport planning, I can only comment that such views are directly contrary to the thrust of national policy advice, spanning the 30 years between the publication of the original Buchanan Report ("Traffic in Towns") and PPG13 (Transport), to say nothing of later publications and relevant advice.

3.5.4 As this policy is a strategic one it would not be appropriate for it to go into detail regarding matters such as parking policy and targets as sought by some objectors. Also there is no need for this strategic policy to go beyond the general point about a broader mix of uses as the question of the importance of, for example, additional residential development and cultural facilities is dealt with in detail in chapter 12. Read as a whole the Plan makes clear the status of CMK and its importance in the region.

3.5.5 Several objectors raise the matter of planning obligations discussed in paragraph 3.33. The Council agrees that this matter needs revising and has suggested a re-wording of the last sentence of the paragraph. In relation to PPG13 advice, it is relevant to comment that the suggested revised wording in Core Document (CD)1.8 (paragraph 8.3) seems perfectly consistent with it (see PPG13 paragraph 74). Accordingly, I approve the wording now suggested by the LPA which adds "*in accordance with the tests set out in Circular 1/97, or its successor(s), and the Council's adopted SPG on Planning Obligations for CMK*". This seems to me to be an especially critical addition to the supporting text of Policy S5, having regard to the concerns of other objectors regarding the claimed possible over-provision of car parking within CMK.

## **RECOMMENDATION**

- **Revise paragraph 3.33 as proposed in CD1.8**

### 3.6 S6 – BLETCHLEY

#### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent                      |
|--------------------|---------------------------------|
| STR/1059/4         | Sellers D J                     |
| STR/1063/1         | B T Property/Pace               |
| STR/1063/3         | B T Property/Pace               |
| STR/1080/24        | Galloway M                      |
| STR/1138/8         | Aylesbury Vale District Council |
| STR/1179/19        | Milton Keynes Green Party       |
| STR/1224/35        | English Partnerships            |

#### Issues

- a) Role of Bletchley in the hierarchy of centres
- b) Emphasis given to public transport

#### Inspector's Reasoning and Conclusions

3.6.1 A large number of the objections in relation to Bletchley are matters of detail that will be dealt with in the parts of the Final Report that cover the Transport and the Town Centres and Shopping chapters.

3.6.2 Both Policy S6 and the inset diagrammatic Plan S1 give due emphasis to the nodality and good accessibility by public transport enjoyed by Bletchley. Indeed, of all the designated District Centres in the Local Plan. Only Wolverton and Bletchley enjoy full multi-modal access by road and rail-based public transport. It is clearly the intention of the Local Plan to capitalise on this distinctive advantage. Like CMK there is an unfortunate lack of easy interchange between the respective rail stations and the core of the shopping areas. In the case of Bletchley, improvement is dependent on station redevelopment and, by implication, upon the early planned upgrading of the Bedford-Bletchley-Oxford link to provide enhanced east-west movement by rail. Station redevelopment would also have the distinct collateral advantage of improving bus-rail interchange; at present the many CMK Metro bus services terminate on the very fringe of the shopping precinct.

3.6.3 The planned regeneration of the retail function of Bletchley will clearly “*support and be supported by high quality public transport*” (cf Policy S5(iii)). Given that both Wolverton and Bletchley are conspicuously nodal points in the MK Metro network, it is clearly appropriate to accord them a status second only to CMK with respect to comparison retailing and floorspace expansion (see paragraph 3.40 as amended by PC/029/STR). Indeed, as I later conclude, it is possible that they, like the Policy DC2-3 District Centres, might very well have their multi-modal access characteristics further emphasised and much strengthened by forming cardinal points within a potential park and ride (P+R) system. This functionality might be based on their wide availability of car parking provision and their enhanced future bus terminal provision.

3.6.4 There appears to be no inconsistency in an equality of hierarchical status between Wolverton and Bletchley. They are both very clearly regarded as prime candidates for regeneration, as distinct from the controlled expansion and diversification which are (or should be) the policy aims for both Westcroft and Kingston District Centres. A major concern, based on inspection, is the relatively poor degree of segregation between pedestrians and vehicles in both Wolverton and Bletchley. This is unfortunate, given the commendable degree of

pedestrian amenity and freedom of circulation enjoyed by both CMK and the two consciously planned Eastern and Western District Centres. In my view, pedestrian priority in Bletchley ought to be embodied in Policy S6 in precisely the same terms as employed in Policy S5(v).

3.6.5 I agree with the objections on behalf of BT Property/PACE that the wording of the first sentence could be improved. I do not agree that Bletchley should be seen as “the” secondary focus bearing in mind that Wolverton is also a secondary focus for development and has the same District Centre status as Bletchley. I do not agree that “maximise” is indistinct in (v) as the position is made clear from the Bletchley Park Area Development Framework document. The question of promoting additional residential development raised by AVDC is covered by policy TC19 and there is no need for duplication.

## RECOMMENDATIONS

- **Amend the first sentence of policy S6 to read “Proposals that help to establish Bletchley as a secondary focus for commercial and cultural development within the City will be encouraged”. Amend the first sentence of paragraph 3.40 by substituting “a” for “the”.**
- **Further Modify Policy S6(ii) to read as follows:“(ii) Improve access by public transport to and within the centre, including better interchange facilities and the segregation of pedestrian and vehicle traffic, and linkages between different areas within and adjoining the town centre.”**
- **Further Modify Policy S6(v) to read as follows:“(v) Maximise the potential of Bletchley Park, Milton Keynes College Campus and adjoining land, leading to a greater intensity of activity, supporting and supported by high quality public transport.”**

## 3.7 S7 - KEY SETTLEMENTS

### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>    |
|---------------------------|----------------------|
| STR/991/2                 | McEvoy W E           |
| STR/992/2                 | Weetman A S          |
| STR/993/2                 | Weetman R            |
| STR/994/1                 | Wheeler D            |
| STR/996/1                 | Eason P J            |
| STR/1080/26               | Galloway M           |
| STR/1089/2                | Freeman A            |
| STR/1154/17               | Swan Hill Homes Ltd  |
| STR/1170/26               | Parry J              |
| STR/1202/1                | Charles Wells Ltd    |
| STR/1202/4                | Charles Wells Ltd    |
| STR/1203/1                | Northern Family, The |
| STR/1203/4                | Northern Family, The |
| STR/1204/1                | McCann Homes         |
| STR/1204/4                | McCann Homes         |
| STR/1223/15               | Old Road Securities  |

## Issues

- a) Concept of Key Settlements
- b) Selection of settlements for inclusion under policy S7

## Inspector's Reasoning and Conclusions

- 3.7.1 A number of the objections recorded against this policy are in fact representations regarding either allocated sites in the key settlements or omission sites. These will be dealt with in the Final (Part 2) Report as this Interim Report is concerned with the strategy of having key settlements rather than with matters of detail.
- 3.7.2 On the grounds of promoting sustainability I support the approach of concentrating the vast majority of development in the City. Having said that as some development is allocated to the rural area, it is logical to identify the settlements outside the City where a modest amount of development can occur. The basis for this selection is accessibility and the availability of services. This is a sensible approach based on sustainability considerations. I do not agree that the hierarchy in the Plan should be complicated by the addition of further levels such as “principle key settlement”. No clear purpose would be served by such a designation and it carries the risk of creating uncertainty and undermining the clear strategy of strongly focussing growth in the City. My conclusions regarding the broad strategy is contained in Section 1 of this report as are the reasons why I consider that Hanslope should be classified as a Selected Village rather than a Key Settlement. If this recommendation is agreed the settlement boundary for Hanslope will need to be revised. I do not have sufficient information to recommend which of the allocated housing sites in Hanslope should be retained. This is a matter for the Council, presumably in consultation with the Parish Council.
- 3.7.3 Some objectors favour the re-allocation of Lavendon as a Key Settlement. In terms of the range of services on offer Lavendon does not compare with Newport Pagnell, Woburn Sands and Olney. Given the limited facilities in, and scale of, Lavendon I do not believe that it has been incorrectly classified in the Plan.
- 3.7.4 Several objectors argue that Olney should not be seen as a Key Settlement because of infrastructure and traffic congestion issues. Given the size of Olney and the facilities in the town it is reasonable for it to be seen as a key settlement. There is a range of policies in the Plan that aim to ensure that development is appropriately linked with infrastructure. The Plan must be realistic and should not include proposals that are unlikely to be implemented within the plan period. However desirable it may, the question of a by-pass for Olney falls into this category and the Plan is obliged to take into account highway priorities set by the Council.

## RECOMMENDATION

- **Reclassify Hanslope as a Selected Village and revise the settlement boundary accordingly**

### 3.8 S8 – SELECTED VILLAGE

#### Objections (1<sup>st</sup> Deposit)

(See appendix 1)

#### Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent                                    |
|--------------------|---|
| DV2/STR/286/1      | Lansing Investments Limited                   |
| DV2/STR/1165/4     | Trustees of Lord Carrington's 1963 Settlement |

#### Issues

- a) Concept of Selected Villages
- b) Choice of villages to be covered by the policy.

#### Inspector's Reasoning and Conclusions

3.8.1 The approach used by the Council for identifying Selected Villages is to base the choice on the views of the relevant Parish Council about the need for limited additional development to support and improve village facilities. This policy is an exception to the general strategy and is designed to allow a degree of flexibility based on the views of rural communities. For the reasons explained in Section 1 of this Interim Report I support the approach favoured by the Council. Not surprisingly some objectors who are seeking to promote omission sites clearly feel that the consultation procedures may not have been adequate and/or appropriate. This is a procedural matter for the relevant councils and I am not in a position to make a judgement on this matter.

3.8.2 Until the Inquiry the only Parish Council that maintained the position that additional development is needed was Bow Brickhill Parish Council and hence this is the only Selected Village in the Plan. At the Inquiry it became clear that Hanslope Parish Council now favours being re-classified as a Selected Village rather than as a Key Settlement. As is explained above I support this change. A number of objectors, most of whom are promoting omission sites, argue that various villages, including Stoke Goldington, Haversham, Sherington, Emberton, Lavendon and Wavendon should be designated as Selected Villages. Given the lack of endorsement for this from the relevant parish councils and my support for the approach adopted by the Milton Keynes Council I do not find in favour of these objections.

3.8.3 In the DV1 version of the Plan Castlethorpe was shown as a selected village with two sites allocated for housing development. Following a substantial level of objection the Council resolved to remove Castlethorpe from the list of selected villages. This has resolved the objections from a very large number of people but has led to counter objections that selected village status should be restored. I do not accept the argument that additional development is needed to “complete” the village. It is not realistic to argue that additional development will allow for a more precise balance of age groups in the local school. This may or may not occur but it is so uncertain that it does not provide an argument for departing from the strategy that the Council favours. In addition, even if it were to occur the benefits would be relatively small and would not outweigh the objections to substantial additional development in the village. From my observations Castlethorpe has a fairly wide range of types of accommodation and existing

housing commitments in the village total some 32 dwellings. The village shop is by common agreement poorly located but, as I understand it, steps are being pursued to remedy this situation. The school is well attended and, despite the fears of Alderman Tapp, there is no evidence that it is likely to be threatened with closure in the foreseeable future, particularly in the light of the fairly extensive development that has occurred in the settlement in recent years.

3.8.4 In common with many such villages there may well be “hidden” and potential households who cannot afford to buy properties in the area. However the Plan contains provision for rural exceptions housing to address this matter and thus this consideration is not a justification for departing from the overall strategy of the Plan.

3.8.5 For these reasons I concur with the assessment by the Council that Castlethorpe does not need additional housing land to be allocated to maintain its vitality. I also consider that it is reasonable for the Council to accept the contention by the Parish Council and the Residents Association that there is no general support for the allocation of the village as a selected settlement.

3.8.6 In the light of the decision by the Council to exclude the allocated housing sites the amendments suggested in DV2 for the Castlethorpe settlement boundary are very minor. The change suggested on land adjacent to 22 Bullington End Road is intended to align the boundary with the settlement boundary on the opposite side of the road. Given that there are no physical features on the land adjacent to 22 Bullington End Road that support this adjustment I can see no sound reason why the boundaries on opposite sides of the road should be precisely aligned. However, in November 2003 the Council approved an outline application for 2 dwellings on the site (03/01675/OUT) and in the light of that decision it would be sensible to amend the boundary as proposed in the Plan. In the case of the land adjacent to Hanslope Road, at the Inquiry the Council explained that this change is due to the permission granted for 2 dwellings on the site. The reasons why these dwellings were allowed relate to improved surveillance and tidying up the site. These objectives have been met by the development currently under construction and the Council’s officers are content for the boundary to be left unaltered in this vicinity. This would mean that the land around to the north of these new dwellings would be regarded as countryside for planning purposes. Given the specific reasons for allowing these new dwellings I concur with the logic of not altering the settlement boundary in this part of Castlethorpe in this Plan.

3.8.7 English Nature wants paragraph 3.45 to include reference to access to the countryside as a part of a sustainable quality of life. I do not support this as it seems to me to be a generally applicable point that does not help to explain how the selected villages were chosen.

## **RECOMMENDATIONS**

- **Add Hanslope to the list of Selected Villages**
- **No change to the Plan in relation to the boundary proposed adjacent to 22 Bullington End Road, Castlethorpe**
- **Revise the settlement boundary of Castlethorpe to reflect the existing adopted settlement boundary in relation to land at Hanslope Road.**

### 3.9 S9 – OTHER VILLAGES

#### Objections (1<sup>st</sup> Deposit)

| Representation No. | Respondent                                    |
|--------------------|---|
| STR/96/1           | Slinn J E                                     |
| STR/475/10         | Pollyrock Ltd                                 |
| STR/491/1          | B J Wells and Sons                            |
| STR/588/2          | CW & R C Shrimplin, Architects                |
| STR/656/2          | Crook A J                                     |
| STR/999/3          | Mayne C                                       |
| STR/1019/4         | J W Cook & Son                                |
| STR/1119/2         | Hobbs D                                       |
| STR/1125/4         | Scharff C                                     |
| STR/1165/4         | Trustees of Lord Carrington's 1963 Settlement |
| STR/1172/5         | Wilson C                                      |
| STR/1173/2         | Randall G O                                   |
| STR/1178/4         | Nicholls G                                    |
| STR/1180/10        | W Needham & Sons Ltd                          |
| STR/1190/14        | John Drake & Co                               |
| STR/1197/6         | Savage C                                      |
| STR/1202/3         | Charles Wells Ltd                             |
| STR/1203/3         | Northern Family, The                          |
| STR/1204/3         | McCann Homes                                  |
| STR/1216/16        | David Wilson Estates                          |

#### Objections (2<sup>nd</sup> Deposit)

| Representation No. | Respondent |
|--------------------|------------|
| DV2/STR/1598/1     | Humphrey R |

#### Issues

- a. Is the Plan excessively restrictive and/or unclear
- b. Choice of “Other Villages”

#### Inspector's Reasoning and Conclusions

3.9.1 A number of these objections have been dealt with above in relation to Selected Villages.

3.9.2 The Plan is based on the concept of strongly restricting development in the villages and small settlements. A more extensive hierarchy would be confusing and could undermine this broad strategy which I support for the reasons detailed in Section 1 of this report. The term “infill” is defined in paragraph 3.48 for members of the public who may be unfamiliar with planning jargon. The notion of village boundaries is a valuable planning tool in situations such as this where strong restraint policies apply.

3.9.3 I am satisfied that generally the Plan takes adequate account of the need for rural regeneration and the maintenance of services. A reasonable amount of development is allowed for in Key Settlements and Selected Villages and policy E5 allows for employment generating development in redundant rural buildings. Increased flexibility would not necessarily ensure the retention of village services and would be likely to lead to development that would harm the character and appearance of the countryside adjacent to small settlements and villages. It would also not complement the aim of reducing the need to travel by car.

3.9.4 While I note the PPG7 point raised on behalf of Mr Humphrey, the same paragraph in PPG7 makes it clear that development in the open countryside should be strictly controlled. The policies in the plan conform to the strict control philosophy.

3.9.5 I concur with the view taken by the Council that the size and relatively sporadic form of Moulsoe make it unsuitable for a village boundary and hence for inclusion within S9. Any specific local housing needs within this area would appropriately be dealt with under the rural housing needs policy H6.

### **RECOMMENDATION**

- **No change to the Plan**

## **3.10 S10 – OPEN COUNTRYSIDE**

### **Objections**

| <b>Representation No.</b> | <b>Respondent</b>                             |
|---------------------------|---|
| STR/1019/6                | J W Cook & Son                                |
| STR/1080/27               | Galloway M                                    |
| STR/1164/6                | J J Gallagher                                 |
| STR/1165/5                | Trustees of Lord Carrington's 1963 Settlement |
| STR/1190/1                | John Drake & Co                               |
| STR/1225/1                | Stony Stratford Tree Warden                   |
| STR/1226/17               | Genesis Group                                 |

### **Objections (2<sup>nd</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b> |
|---------------------------|-------------------|
| DV2/STR/88/4              | British Waterways |

### **Issues**

- Uses to be included within the policy
- Definition of open countryside
- Need for a more flexible approach to rural diversification

### **Inspector's Reasoning and Conclusions**

3.10.1 Several of these objections relate to omission sites. As this part of the Plan is concerned with strategic matters these objections will be dealt with in the Final (Part 2) Report where matters of detail will be considered. Several other objections that raise the question of matters excluded from DV1, such as mineral and waste workings, have been addressed in DV2. Further clarification has also been provided in DV2 by the margin notes that draw attention to other policies that apply to the open countryside. Clearly all examples cannot be quoted and thus I agree with John Drake and Co that the policy would be improved by including reference to other development that can only reasonably be accommodated in the open countryside. This should address the objection from British Waterways.

3.10.2 I do not agree with those objectors who want this strategic policy revised to promote rural diversification schemes. The strategic objective of this policy is to protect the open countryside and to concentrate development where possible within and adjoining settlements.

The issue of diversification is appropriately dealt with in other chapters and as the plan is to be read as a whole the absence of specific reference to it here should not create undue problems.

3.10.3 A number of these objections are based on the character of the sites referred to by the objector. I accept the Council's approach that the term open countryside is not simply a descriptive term, it is used as a policy designation for all land outside defined development boundaries. The use of the term in this way is valuable in connection with the implementation of the overall restraint strategy in the rural area. Hence the argument that a site does not have an open countryside character does not provide a basis for amending the policy.

3.10.4 I agree with the Council that the question of tree belts is a matter that is best dealt with in development briefs rather than in this strategic policy. The definition of the settlement boundary north of Wolverton is clear and hence I do not understand the basis for the objection lodged by Mr Galloway. Finally I do not agree with the Genesis Group that the policy objective is unclear. The alternative suggested would introduce uncertainty particularly through the phrase "as appropriate".

### **RECOMMENDATION**

- **Add "or other uses that can only reasonably be accommodated in the open countryside" to the end of policy S10**

## **3.11 S11 – AREAS OF ATTRACTIVE LANDSCAPE**

### **Objections (1<sup>st</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>                   |
|---------------------------|-------------------------------------|
| STR/209/3                 | Parry J                             |
| STR/348/6                 | Lafarge Redland Aggregates          |
| STR/520/4                 | REASON                              |
| STR/769/2                 | Milton Keynes Forum                 |
| STR/1058/7                | Woburn Sands and District Society   |
| STR/1082/3                | South East Milton Keynes Consortium |
| STR/1125/6                | Scharff C                           |
| STR/1164/7                | J J Gallagher                       |
| STR/1170/35               | Parry J                             |
| STR/1202/8                | Charles Wells Ltd                   |
| STR/1203/8                | Northern Family, The                |
| STR/1223/18               | Old Road Securities                 |
| STR/1226/94               | Genesis Group                       |
| STR/1226/18               | Genesis Group                       |

### **Objections (2<sup>nd</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>   |
|---------------------------|---------------------|
| DV2/STR/1164/5            | J J Gallagher       |
| DV2/STR/1164/6            | J J Gallagher       |
| DV2/STR/1223/1            | Old Road Securities |

### **Issues**

- a) Justification for designation

### Inspector's Reasoning and Conclusions

3.11.1 The Council contends that this designation is county-wide and therefore not strictly local. I do not accept that the county-wide nature of this designation takes the matter outside the scope of clear government advice that local designations such as Areas of Attractive Landscape should be rigorously assessed in development plans and, if they are to be included, special justification is needed. In particular local designations should only be maintained where there is good reason to believe that normal planning policies cannot provide the necessary protection. The emerging government advice in the consultation version of PPS7 reinforces the point by stating that “The Government does not believe that local countryside designations are necessary....”. Local authorities are advised to remove existing designations when reviewing their development plans and instead to adopt criteria-based policies.

3.11.2 In Milton Keynes several objectors argue that the Council has not carried out the necessary assessment as part of this plan or provided the special justification required if it is to be retained. The Council points to the landscape assessment done by Landscape Design Associates. I am not convinced that the landscape study undertaken involved the sort of rigorous assessment of the need for the AAL designation that is required. While I acknowledge that the researchers could have challenged the notion of having AALs in the first place, it appears to me that the work primarily involved a comparative study of landscape quality and did not explore the question of whether normal planning policies could provide adequate protection. The study explicitly states that the work involved two main components. First an overview of landscape character and second, an evaluation of landscape quality. To my mind no convincing evidence has been produced to show that the normal countryside protection policies would be inadequate. Hence I consider that the AAL designations should be eliminated from the Plan. Clearly it follows that I do not support objectors who want further designated areas added to the Plan and I do not make any recommendations regarding suggested boundary alterations or changes in the wording of policies.

### RECOMMENDATION

- **Remove the AAL designations from the Plan and delete policy S11**

### 3.12 S12 – LINEAR PARKS

#### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b>                           |
|---------------------------|---|
| STR/78/3                  | English Nature                              |
| STR/88/6                  | British Waterways                           |
| STR/261/8                 | West S                                      |
| STR/531/9                 | Shenley Brook End Parish Council            |
| STR/531/10                | Shenley Brook End Parish Council            |
| STR/531/11                | Shenley Brook End Parish Council            |
| STR/586/1                 | Taywood Homes (Central) Ltd                 |
| STR/649/3                 | Davies Associates                           |
| STR/719/14                | Milton Keynes Parks Trust Ltd               |
| STR/839/5                 | Offord R                                    |
| STR/911/23                | Old Road Securities                         |
| STR/1009/6                | Haversham cum Little Linford Parish Council |

|             |                                       |
|-------------|---------------------------------------|
| STR/1094/8  | Stony Stratford Community Association |
| STR/1117/1  | Rooney A                              |
| STR/1118/8  | Hallam Land Management                |
| STR/1155/12 | Williams Davis Ltd                    |
| STR/1164/8  | J J Gallagher                         |
| STR/1201/2  | Hold A C                              |
| STR/1212/2  | Client (Agent, DLP)                   |
| STR/1223/19 | Old Road Securities                   |
| STR/1226/20 | Genesis Group                         |

### Issues

- a) Definition of linear park boundaries
- b) Wording and application of the policy to various sites

### Inspector's Reasoning and Conclusions

3.12.1 The revised wording suggested by English Nature is expressed in negative rather than positive terms. The Council's approach, which is framed in positive terms and has been well tried by means of the presently adopted plan, is preferable. I do not support the alternative wording for the objective of the policy suggested by Genesis Group because the wording in the Plan is clear and the alternative through the use of "where appropriate" would be less so. I agree with the Council that the wording of the policy and the margin note is adequate and thus I do not support the amendment sought by Shenley Brook End Parish Council. I do not agree with JJ Gallagher Ltd that there is unnecessary duplication as the policy for the linear parks promotes certain forms of development within them rather than in the open countryside which is covered by policy S10. The changes suggested by Milton Keynes Parks Trust do not seem to me to be needed as the existing adopted plan wording has apparently proved successful and the alternatives suggested are less clear. I note the helpful suggestion from the Council to clarify the meaning of "countryside recreation".

3.12.2 The Rocla Pipes site and Stantonbury Park Farm are dealt with in Section 1. The "Mutual Meadows" site is in the floodplain and is thus appropriately included within the linear park designation. The Council accept the logic of the objection from Taywood Homes (Central) Ltd and, in the light of the implementation of the housing permission, I agree with the change suggested by the Council. In relation to the Ouzel Valley linear park extension south of Caldecotte I do not follow why the extension is so extensive. Bearing in mind the objective of the policy I consider that the extension should largely be restricted to the floodplain, particularly as this area is one that may have long-term development potential.

3.12.3 I do not agree with Old Road Securities that site NP5 should be retained as a linear park. This former allotment site is suitable for housing on account of the way it logically relates to the existing urban form of the area. In relation to the land south of Passenham I am satisfied that the Council has designated an appropriate area of land to achieve the objective of this policy and is alert to the need to protect this sensitive area. Manor Farm Old Wolverton is within the Ouse Valley Linear Park and thus I do not follow the point made by Haversham-cum-Little Linford Parish Council. The site at Bradwell Road, Loughton is partly within the floodplain and is within a linear park in the adopted local plan. Given these considerations and the difficulty of accessing part of the land I concur with the view of the Council that the land should remain as linear park.

3.12.4 The precise change to the policy being sought by Hallam Land Management and William Davis Ltd is not clear to me. I cannot see how a change could be made that would not potentially prejudice the overall approach taken by the Council to the provision of open space within new housing development. It seems to me that the Council's approach which allows for

a comprehensive assessment is the only practical way of proceeding. In order to be as comprehensive as possible and to have any chance of achieving the objective of the policy it is not feasible for the linear parks to only include recreational land in public ownership or land that has a special importance in landscape/nature terms.

3.12.5 British Waterways seek a housing allocation on its former dredging tip at Fenny Stratford. At the previous local plan inquiry the same submission was made and, although supported by the Inspector, was rejected by the Council on flooding, access, possible contamination and linear park designation grounds. In the Milton Keynes Infill Study the objection site together with adjacent land was placed in category 2 (some constraints and/or less attractive site conditions). I note that at a Local Plan Sub-Committee meeting in April 2000 the officers recommended that the objection site be allocated for housing and open space. Changed circumstances include resolution of the access situation and exclusion of the site from the floodplain in the latest EA maps. Similar land to the north, that was at one time part of the linear park, has been developed and the site is close to the full range of facilities in Fenny Stratford. BW is prepared to provide part of the site for public open space. Clearly the question of contamination would need to be investigated and resolved if problems are revealed but I agree with the previous Inspector that in principle this is a suitable site for housing/public open space.

## RECOMMENDATIONS

- **Add explanatory text that clarifies the meaning of countryside recreation as set out in 2.1 c of the Council's written response to objections to S12**
- **Delete the second sentence of paragraph 3.63 and the text in the notes column. Amend the Proposals Map accordingly**
- **Revise the Extended Linear Park designation in the area south of Caldecotte and amend the Proposals Map accordingly**
- **Amend the linear park designation to exclude the British Waterways former dredging tip site at Fenny Stratford.**

## 3.13 S13 – AREAS LIABLE TO FLOODING

### Objections

| <b>Representation No.</b> | <b>Respondent</b>                          |
|---------------------------|--|
| STR/15/1                  | Country Gardens                            |
| STR/261/7                 | West S                                     |
| STR/274/2                 | Hanslope Parish Council                    |
| STR/719/15                | Milton Keynes Parks Trust Ltd              |
| STR/893/11                | Bedford Group of Drainage Boards           |
| STR/893/12                | Bedford Group of Drainage Boards           |
| STR/911/21                | Old Road Securities                        |
| STR/1170/1                | Parry J                                    |
| STR/1187/4                | Gallagher Estates Ltd                      |
| STR/1214/4                | Wilcon Homes Ltd                           |
| STR/1223/20               | Old Road Securities                        |
| STR/1226/21               | Genesis Group                              |
| STR/1569/3                | Gallagher Estates Ltd and Wilcon Homes Ltd |

### **Objections to Second Deposit**

| <b>Representation No.</b> | <b>Respondent</b> |
|---------------------------|-------------------|
| DV2/STR/1164/7            | J J Gallagher     |

#### **Issues**

- a. Adequacy of policy and need for a comprehensive approach.

#### **Inspector's Reasoning and Conclusions**

3.13.1 A number of these objections have been addressed by the changes made in DV2. Clarification has been provided regarding the indicative nature of the maps produced by the EA and the need to complement these maps with site specific information when development proposals are considered. In addition the latest version of PPG25 is referred to as is the MK Drainage Study and the Council has produced draft SPG on Development and Flood Risk. Overall it is clear that the Council is well aware of the need to take flooding issues fully into account and to apply risk based assessments where appropriate. I am satisfied that the Plan provides for a comprehensive approach to flooding that includes the question of mitigation measures.

3.13.2 I do not consider that the revised wording for the policy objective is materially better than the simple explanation in the Plan. I note that the policy has been revised in DV2 with the intention of making it clear that the policy is generally applicable and not just relevant to the River Ouse and its tributaries. This clarification is welcomed but I believe that it would be further improved by placing the reference to the River Ouse in the explanatory text rather than in the policy.

#### **RECOMMENDATION**

- **Remove the first sentence from the policy and place it in the explanatory text**

### **3.14 S14 – PROTECTION OF THE BEST AND MOST VERSATILE AGRICULTURAL LAND**

#### **Objections (2<sup>nd</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>                             |
|---------------------------|---|
| DV2/STR/1164/8            | J J Gallagher                                 |
| DV2/STR/1187/4            | Gallagher Estates Ltd                         |
| DV2/STR/1187/5            | Gallagher Estates Ltd                         |
| DV2/STR/1214/5            | Wilson Connolly Ltd                           |
| DV2/STR/1214/6            | Wilson Connolly Ltd                           |
| DV2/STR/1569/5            | Gallagher Estates Ltd and Wilson Connolly Ltd |
| DV2/STR/1569/6            | Gallagher Estates Ltd and Wilson Connolly Ltd |

#### **Issues**

- a. Conformity with PPG7

#### **Inspector's Reasoning and Conclusions**

3.14.1 PIC 3 sensibly introduces a policy objective. No objections were received in relation to the objective.

3.14.2 I do not agree with the objectors that the explanation in the policy of what is meant by poorer quality agricultural land should be deleted. As drafted the policy and explanation is clear and in accordance with the PPG7 and the emerging PPS. Further the policy acknowledges the importance of sustainability considerations and does not conflict with the Plan's vision and aims.

### **RECOMMENDATION**

- **No change to the Plan.**

### **3.15 OTHER STRATEGIC OBJECTIONS**

#### **Objections (1st Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>                                  |
|---------------------------|--|
| STR/61/1                  | Moutrie M  |
| STR/267/5                 | Wolverton & Greenleys Town Council                 |
| STR/267/3                 | Wolverton & Greenleys Town Council                 |
| STR/348/4                 | Lafarge Redland Aggregates                         |
| STR/352/9                 | Bedford Borough Council                            |
| STR/531/2                 | Shenley Brook End Parish Council                   |
| STR/580/16                | Milton Keynes Christian Council                    |
| STR/672/5                 | Stantonbury Parish Council                         |
| STR/720/12                | Wolverton and District Archaeological Society      |
| STR/863/5                 | Haversham & Little Linford Residents Association   |
| STR/879/2                 | Derek Lovejoy Partnership                          |
| STR/879/8                 | Derek Lovejoy Partnership                          |
| STR/910/4                 | Hermes Prudential                                  |
| STR/910/5                 | Hermes Prudential                                  |
| STR/987/5                 | British Astronomical Assoc Campaign for Dark Skies |
| STR/1009/27               | Haversham cum Little Linford Parish Council        |
| STR/1009/5                | Haversham cum Little Linford Parish Council        |
| STR/1019/5                | J W Cook & Son                                     |
| STR/1049/1                | Howkins A  |
| STR/1080/25               | Galloway M   |
| STR/1080/28               | Galloway M   |
| STR/1080/29               | Galloway M   |
| STR/1134/1                | Shanks Waste Service Ltd                           |
| STR/1187/3                | Gallagher Estates Ltd                              |
| STR/1214/3                | Wilcon Homes Ltd                                   |

#### **Objections (2nd Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>              |
|---------------------------|--------------------------------|
| DV2STR/402/3              | Corran (Wakefield) Ltd         |
| DV2/STR/719/2             | Milton Keynes Parks Trust Ltd  |
| DV2/STR/910/4             | Hermes Prudential              |
| DV2/STR/1097/2            | Tesco Stores Ltd               |
| DV2/STR/1218/4            | Gazeley Properties             |
| DV2/STR/1220/4            | Land Securities Properties Ltd |
| DV2/STR/1221/4            | Wilcon Homes Ltd               |

#### **Objections (to Pre inquiry changes)**

| <b>Representation No.</b> | <b>Respondent</b>     |
|---------------------------|-----------------------|
| PIC/STR/PR/82/2           | Gallagher Estates Ltd |

PIC/STR/PR/83/2 Wilson Connolly Ltd  
PIC/STR/PR/84/2 Gallagher Estates Ltd and Wilcon Homes Ltd

### **Objections (Not Duly made but accepted at 1<sup>st</sup> Deposit)**

| <b>Representation No.</b> | <b>Respondent</b>  |
|---------------------------|--------------------|
| NDM6/STR/1                | Environment Agency |
| NDM6/STR/2                | Environment Agency |
| NDM6/STR/13               | Environment Agency |

### **Issues**

- a) Relationship to sub-regional strategy and housing figures
- b) Need for additional strategic policies
- c) Extent of local landscape designations

### **Inspector's Reasoning and Conclusions**

3.15.1 Objections relating to the sub-regional situation, housing figures, minerals and waste and local landscape designations have been dealt with either in Section 1 or in other parts of Section 2 of this Interim Report. As regards the need for strategic policies for both Wolverton and Bletchley, I accept the contention made by the Council that a specific strategic policy for Bletchley is justified because of possible changes to the rail network. I do not consider that the policies in the Plan would, in the absence of a specific strategic policy for Wolverton, unacceptably hamper the scope for improvements and/or necessary changes to Wolverton. The question of light pollution is addressed in policy D1. I do not consider that specific strategic policies covering sustainability and coalescence are needed. These matters consistently inform a wide range of policies in the Plan and there is no need for duplication.

### **Recommendation**

- **No change to the Plan.**

## APPENDIX 1

### S8 – SELECTED VILLAGES

#### Objections (1<sup>st</sup> Deposit)

| <b>Representation No.</b> | <b>Respondent</b> |
|---------------------------|-------------------|
| STR/810/1                 | Goodger K         |
| STR/912/2                 | Wilson M          |
| STR/914/4                 | Wilson R          |
| STR/1093/4                | Elliott E J       |
| STR/1227/4                | Hollingsworth D A |
| STR/1228/4                | Hollingsworth J   |
| STR/1229/4                | Bradbury S        |
| STR/1230/4                | Rice R            |
| STR/1231/4                | Rice C            |
| STR/1232/4                | Flach T           |
| STR/1233/4                | Flach L           |
| STR/1234/4                | Fisher L          |
| STR/1235/1                | Roe S             |
| STR/1236/4                | Towers A          |
| STR/1237/4                | Knowles L K       |
| STR/1238/4                | Knowles R J D     |
| STR/1239/4                | Birchall C        |
| STR/1240/4                | Birchall N        |
| STR/1241/4                | Bridges A M       |
| STR/1242/4                | Sills W M         |
| STR/1243/4                | Miller H A        |
| STR/1244/4                | Miller K          |
| STR/1245/4                | Massie M          |
| STR/1246/4                | Long JEH          |
| STR/1247/4                | Moorhead B A      |
| STR/1248/4                | Long R W          |
| STR/1249/4                | Boyle E J         |
| STR/1250/4                | Massie P          |
| STR/1251/4                | Boyle V S         |
| STR/1252/4                | Grant B           |
| STR/1253/4                | Tholen J M        |
| STR/1254/4                | Tholen W          |
| STR/1255/4                | Hutton M          |
| STR/1256/4                | Fitzjohn R        |
| STR/1257/4                | Denton C L        |
| STR/1258/4                | Fitzjohn J L      |
| STR/1259/4                | Shakespeare B     |
| STR/1260/4                | Peddel M A        |
| STR/1261/4                | Humphries J       |
| STR/1262/4                | Humphries M E     |
| STR/1263/4                | Thomson A C       |
| STR/1264/4                | McConochie M      |

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|            |                |
|------------|----------------|
| STR/1265/4 | Thomson P S    |
| STR/1266/4 | Green M        |
| STR/1267/4 | Boobier M L    |
| STR/1268/4 | Boobier T      |
| STR/1269/4 | Boobier D A    |
| STR/1270/4 | Bouch M        |
| STR/1271/4 | Bouch E        |
| STR/1272/4 | Wenham M       |
| STR/1273/4 | Sabin R        |
| STR/1274/4 | Wenham E       |
| STR/1275/4 | Sabin L        |
| STR/1276/4 | Jones P C      |
| STR/1277/4 | Graham S       |
| STR/1278/4 | Jones E M      |
| STR/1279/4 | Caldwell P     |
| STR/1280/4 | Steggles J     |
| STR/1282/4 | Summers A M    |
| STR/1283/4 | Adams K        |
| STR/1284/4 | Steggles M     |
| STR/1285/4 | Adams R        |
| STR/1286/4 | Howard E J     |
| STR/1287/4 | Godbold V      |
| STR/1288/4 | While B        |
| STR/1289/4 | Earp G J       |
| STR/1290/4 | Boulton M      |
| STR/1291/4 | Staesby N      |
| STR/1292/4 | Staesby G      |
| STR/1293/4 | Thomas C       |
| STR/1294/4 | Martin A       |
| STR/1295/4 | Kempson A C E  |
| STR/1296/4 | Moss S         |
| STR/1297/4 | Bunce J S      |
| STR/1298/4 | Bull J R       |
| STR/1299/4 | Ray A          |
| STR/1300/4 | Hutchby R      |
| STR/1301/4 | Carpineta B    |
| STR/1302/4 | Forgham S      |
| STR/1303/4 | Bird K         |
| STR/1304/4 | Brooks D A     |
| STR/1305/4 | Steggles I C   |
| STR/1306/4 | Fraser I N     |
| STR/1307/4 | Godbold A      |
| STR/1308/4 | Risbridger D F |
| STR/1309/4 | Risbridger E L |
| STR/1310/4 | Bull C A       |
| STR/1311/4 | Belton M A     |
| STR/1312/4 | Hindmarch A    |
| STR/1313/4 | Belton E       |
| STR/1314/4 | Rogers C L     |
| STR/1315/4 | Homer P        |
| STR/1317/4 | Hindmarch D    |

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|            |              |
|------------|--------------|
| STR/1318/4 | Goodman L    |
| STR/1319/4 | Bunker M     |
| STR/1320/4 | Griggs M A   |
| STR/1321/4 | Griggs J P   |
| STR/1322/4 | Gamble S M   |
| STR/1323/4 | Pease R      |
| STR/1324/4 | Lester D     |
| STR/1325/4 | Newman J     |
| STR/1326/4 | Esplin S     |
| STR/1327/4 | Johnson J    |
| STR/1328/4 | Stannard N   |
| STR/1329/4 | Hamp C       |
| STR/1330/4 | Hamp M       |
| STR/1331/4 | Hutchby E A  |
| STR/1332/4 | Ayles C J    |
| STR/1333/4 | Barrand A L  |
| STR/1334/4 | Ayles P      |
| STR/1335/4 | Browne D E   |
| STR/1336/4 | Norris B     |
| STR/1337/4 | Norris E     |
| STR/1339/4 | Mardell L    |
| STR/1340/4 | Mardell C M  |
| STR/1341/4 | Bendon H J   |
| STR/1342/4 | Lynch A      |
| STR/1343/4 | Cross G C    |
| STR/1344/4 | Duffy P      |
| STR/1345/4 | Duffy A      |
| STR/1346/4 | Tate T J     |
| STR/1347/4 | Tate S E     |
| STR/1348/4 | Runacres D M |
| STR/1349/4 | Shayler B    |
| STR/1350/4 | Caldwell J   |
| STR/1351/4 | Sweetland J  |
| STR/1352/4 | Smith P D    |
| STR/1353/4 | Steele R     |
| STR/1354/4 | Brewer A     |
| STR/1355/4 | Brewer C     |
| STR/1356/4 | Watts T S    |
| STR/1357/4 | Watts T      |
| STR/1358/4 | Wingfield C  |
| STR/1359/4 | Ray R        |
| STR/1360/4 | Ray J        |
| STR/1361/4 | Tompkins A   |
| STR/1362/4 | Andrews S    |
| STR/1363/4 | Harrison C M |
| STR/1364/4 | Chapman C N  |
| STR/1365/4 | Chapman P H  |
| STR/1366/4 | Grant I      |
| STR/1367/4 | Dunwoodie L  |
| STR/1368/4 | Dunwoodie C  |
| STR/1369/4 | Thomas A D   |

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|            |                 |
|------------|-----------------|
| STR/1370/4 | Longworth M     |
| STR/1371/4 | Esplin H S      |
| STR/1372/4 | Bingham M       |
| STR/1373/4 | Whitworth S L   |
| STR/1374/4 | Edwards N       |
| STR/1375/4 | Edwards L E     |
| STR/1376/4 | Webb S          |
| STR/1377/4 | Wykes L         |
| STR/1378/4 | Wykes S         |
| STR/1379/4 | Daniels H M     |
| STR/1380/4 | Daniels G       |
| STR/1381/4 | Chapman L       |
| STR/1382/4 | Harris M M      |
| STR/1383/4 | Welch M         |
| STR/1384/4 | Shipstone H     |
| STR/1385/4 | Pasha Z         |
| STR/1386/4 | Common D        |
| STR/1387/4 | Pasha R         |
| STR/1388/4 | Sawbridge C P   |
| STR/1389/4 | Charlton K      |
| STR/1390/4 | Sawbridge S     |
| STR/1391/4 | Thurley E J     |
| STR/1392/4 | Harrison J      |
| STR/1393/4 | Sawbridge O     |
| STR/1394/4 | Forgham R       |
| STR/1395/4 | Butler S J      |
| STR/1396/4 | Runacres G C    |
| STR/1397/4 | Sawbridge E     |
| STR/1398/4 | Rogers G        |
| STR/1399/4 | Rogers A C      |
| STR/1400/4 | Rogers          |
| STR/1401/4 | Cork B G        |
| STR/1402/4 | Cork T          |
| STR/1403/4 | Bird T H        |
| STR/1404/4 | Thomas S        |
| STR/1405/4 | Bird J W        |
| STR/1406/4 | Wolverson N     |
| STR/1407/4 | Wolverson J     |
| STR/1408/4 | Gawthorn G      |
| STR/1409/4 | Forster J       |
| STR/1410/4 | Gawthorn S      |
| STR/1411/4 | Burton L        |
| STR/1412/4 | Hands E         |
| STR/1413/4 | St John Green S |
| STR/1414/4 | Handyside S A   |
| STR/1415/4 | Bunker K        |
| STR/1416/4 | Billingsley D   |
| STR/1417/4 | Billingsley V H |
| STR/1418/4 | Hunter W N      |
| STR/1419/4 | Clarke V        |
| STR/1420/4 | Woodhouse A L   |

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|            |               |
|------------|---------------|
| STR/1421/4 | Rigby A F     |
| STR/1422/4 | Tipple J      |
| STR/1423/4 | Rigby C       |
| STR/1424/4 | Tipple S      |
| STR/1425/4 | Tipple L      |
| STR/1426/4 | Tipple L      |
| STR/1427/4 | Chapman M     |
| STR/1428/4 | Chapman P G   |
| STR/1429/4 | Stevens I N   |
| STR/1430/4 | Webb T D      |
| STR/1431/4 | Stevens S     |
| STR/1432/4 | Webb C J      |
| STR/1433/4 | Dunwoodie A   |
| STR/1435/4 | Ward E        |
| STR/1436/4 | Cross E       |
| STR/1437/4 | Crompton B    |
| STR/1438/4 | Crompton N    |
| STR/1439/4 | Pearson S     |
| STR/1440/4 | Moore M       |
| STR/1441/4 | Black S       |
| STR/1442/4 | Wilkinson L C |
| STR/1443/4 | Rossiter C J  |
| STR/1444/4 | Paris M R     |
| STR/1445/4 | Paris J B     |
| STR/1446/4 | Foakes A      |
| STR/1447/4 | Foakes J      |
| STR/1448/4 | Sumner P      |
| STR/1449/4 | Sumner M J    |
| STR/1450/4 | Shakespeare L |
| STR/1451/4 | Shakespeare L |
| STR/1452/4 | Shakespeare M |
| STR/1453/4 | King S        |
| STR/1454/4 | King S J E    |
| STR/1455/4 | Filby K M     |
| STR/1456/4 | Smith B D     |
| STR/1457/4 | Smith E       |
| STR/1458/4 | Michael E     |
| STR/1459/4 | Harrison M    |
| STR/1460/4 | Brooks J      |
| STR/1461/4 | Quinn C R     |
| STR/1462/4 | Hudson T A    |
| STR/1463/4 | Hudson K      |
| STR/1464/4 | Tutin E       |
| STR/1465/4 | Barrand C A   |
| STR/1466/4 | Mahood M T    |
| STR/1467/4 | Mahood C      |
| STR/1468/4 | Robson J A    |
| STR/1469/4 | Robson P A    |
| STR/1470/4 | Burton R      |
| STR/1471/4 | Elliott D J R |
| STR/1472/4 | Everest A     |

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|            |                   |
|------------|-------------------|
| STR/1473/4 | Everest P R       |
| STR/1474/4 | Presant-Collins J |
| STR/1475/4 | Presant-Collins J |
| STR/1476/4 | St John Green P   |
| STR/1477/4 | Flagg G           |
| STR/1478/4 | Abbey R           |
| STR/1479/4 | Savage C P        |
| STR/1480/4 | Tutin M           |
| STR/1481/4 | Forman A          |
| STR/1482/4 | Collins S         |
| STR/1483/4 | Le-Grys E         |
| STR/1484/4 | Stubbs G          |
| STR/1485/4 | Ford A            |
| STR/1486/4 | Ford S            |
| STR/1487/2 | Flagg L R         |
| STR/1488/4 | Noon C A          |
| STR/1489/4 | Russo L           |
| STR/1490/4 | Gamble J M        |
| STR/1491/4 | Gamble KJ         |
| STR/1492/4 | Cragg A           |
| STR/1493/4 | Soutar H          |
| STR/1494/4 | Harrison T        |
| STR/1497/4 | Howard L          |
| STR/1498/4 | Loomes I          |
| STR/1499/4 | Loomes S H        |
| STR/1500/4 | Carpineta G       |
| STR/1501/4 | Moore M           |
| STR/1502/4 | Chinnery D        |
| STR/1503/4 | Goodger J F       |
| STR/1504/4 | Skelland C A      |
| STR/1505/4 | Platt I           |
| STR/1506/4 | Beatty D          |
| STR/1507/4 | Beatty L          |
| STR/1508/4 | Turner C          |
| STR/1509/4 | Hands Y           |
| STR/1510/4 | Gamble P J        |
| STR/1511/4 | Dunwoodie S       |
| STR/1512/4 | Tompkins C        |
| STR/1513/4 | Stephenson N      |
| STR/1514/3 | Gommon G          |
| STR/1515/2 | Gommon J          |
| STR/1516/4 | Russo K           |
| STR/1517/2 | Gommon V          |
| STR/1518/4 | Meacham J         |
| STR/1519/4 | Lynch V           |
| STR/1520/4 | Lynch D           |
| STR/1521/4 | Bull J            |
| STR/1522/4 | Eadon M           |
| STR/1523/4 | Sproston H        |
| STR/1524/4 | Davies D          |
| STR/1525/4 | Davies M          |

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|            |  |
|------------|--|
| STR/1526/4 | Goodman I  |
| STR/1527/4 | Smallcombe A                                     |
| STR/1528/4 | Temple B   |
| STR/1529/4 | Scott D J  |
| STR/1530/4 | Morley R W D                                     |
| STR/1531/4 | Morley T J                                       |
| STR/1532/4 | Sweetland G A                                    |
| STR/1534/4 | Webb J   |
| STR/1535/4 | Bird G   |
| STR/1536/4 | Edwards R  |
| STR/1537/4 | Fraser P D                                       |
| STR/1538/4 | Grisley R  |
| STR/1539/4 | Clark J  |
| STR/1540/4 | Patel K  |
| STR/1541/4 | Jones R A  |
| STR/1542/4 | Line J   |
| STR/1543/4 | Line S   |
| STR/1544/4 | Handyside N                                      |
| STR/1545/4 | Nicholls C                                       |
| STR/1546/4 | Nicholls J                                       |
| STR/1547/4 | Bradbury W                                       |
| STR/1548/4 | Black C  |
| STR/1549/4 | Black C  |
| STR/1550/4 | Jones K  |
| STR/1551/4 | Morrish A  |
| STR/1552/4 | Allen L  |
| STR/1553/4 | Grisley C  |
| STR/1554/4 | Millard D  |
| STR/1555/4 | Millard M  |
| STR/1556/4 | Johnson P  |
| STR/1557/4 | Penwell M  |
| STR/1558/4 | Penwell A  |
| STR/1559/4 | Hill L   |
| STR/1560/4 | Hill D H   |
| STR/1561/4 | Chapman J  |
| STR/1562/4 | Hinds R J  |
| STR/1563/4 | Hinds D G  |
| STR/78/13  | English Nature                                   |
| STR/84/2   | Moore J M  |
| STR/85/1   | Lay J  |
| STR/98/2   | Chicheley Estate                                 |
| STR/412/1  | Hayward J  |
| STR/433/1  | Castlethorpe Village Residents Association       |
| STR/475/3  | Pollyrock Ltd                                    |
| STR/506/1  | Cooper P   |
| STR/509/1  | Jones T  |
| STR/570/4  | Client (Agent, Beesons)                          |
| STR/588/1  | CW & R C Shrimplin, Architects                   |
| STR/863/4  | Haversham & Little Linford Residents Association |
| STR/911/29 | Old Road Securities                              |
| STR/1009/3 | Haversham cum Little Linford Parish Council      |

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|             |   |
|-------------|---|
| STR/1019/1  | J W Cook & Son                                |
| STR/1104/5  | Wilcon Homes Ltd                              |
| STR/1125/5  | Scharff C                                     |
| STR/1165/3  | Trustees of Lord Carrington's 1963 Settlement |
| STR/1170/33 | Parry J                                       |
| STR/1172/2  | Wilson C                                      |
| STR/1173/3  | Randall G O                                   |
| STR/1178/1  | Nicholls G                                    |
| STR/1180/6  | W Needham & Sons Ltd                          |
| STR/1185/3  | Franklin M                                    |
| STR/1190/13 | John Drake & Co                               |
| STR/1197/5  | Savage C                                      |
| STR/1202/2  | Charles Wells Ltd                             |
| STR/1202/12 | Charles Wells Ltd                             |
| STR/1203/2  | Northern Family, The                          |
| STR/1203/12 | Northern Family, The                          |
| STR/1204/2  | McCann Homes                                  |
| STR/1223/14 | Old Road Securities                           |