

# New City Plan - Ambitions and Objectives & Sustainability Appraisal Scoping Report Feedback

## New City Plan - Ambitions and Objectives

The questions in this section relate specifically to the New City Plan Ambitions and Objectives paper, which is available to view here: <https://bit.ly/3RnuOKj>

### 1. **Do you have any comments on the big issues set out in the consultation document?**

- Movement
- Housing growth and regeneration
- Economic growth
- Central Milton Keynes (CMK)
- Infrastructure
- Green city
- Beautiful city
- National planning reform

#### **Movement**

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

While we also support MKCC's 'greater focus on walking/cycling through our Local Cycling and Walking Infrastructure Plans', we are disappointed to note that although the final LCWIP (January 2023, p. 15) 'acknowledges that Woburn Sands is a key and important centre of activity in Milton Keynes, however, it was not part of this geographical scoping exercise'. Why not? The much needed upgrading of its arterial Newport Road Redway (ID 57) has thus been effectively kicked into the long grass as a 'long' term project.

## Housing growth & regeneration

We have two major concerns about the ‘Local Housing Need’ being raised to ‘1,900 dwellings per annum’, from the lower level cited in Plan:MK.

First, we believe this new number to be unrealistically high. If the 15.3% decadal increase in population from around 248,800 in 2011 to 287,000 in 2021 (Scoping Report, Appendix 2, A2.1, p. 38) were to be sustained for the next 30 years, the predicted population level in 2051 would be 439,916 (still well below the ‘half a million residents by 2050’ cited as the ‘strategic ambition’ in the *Milton Keynes 2050 Growth Study: Demographic Modelling Analysis Technical Summary January 2020*). Given the national average increase in population over the same period of only 6.6% (ONS Census 2021 data), the exceptionally high rate for MK over the last decade must have relied largely upon immigration from other areas, outweighing intrinsic increase. The probability of immigration to MK from other areas remaining at such a high level for the next three decades is questionable. Even if we were to take the highest *regional* rate of population increase in England and Wales (8.3% for the East of England; *ONS 2021 Census data*) as a guide, the projected population of MK in 2051 would be just 364,559, yielding a *net* increase from 2021 of only 77,559 – for which the current rate of housing supply, if continued, would clearly be excessive (yielding an average of just 1.5 people per household). Maintaining an *ambition* for such an unrealistically high ‘Local Housing Need’ figure, with the consequent release of ever more land for development, risks playing into the hands of speculative developers who would cherry pick the most profitable (especially open countryside) sites for building out, at the expense of supplying the affordable housing where and when it is really needed – alongside their habitual over-charging for new homes (see < <https://theconversation.com/builders-are-making-thumping-profits-by-over-charging-for-new-homes-new-findings-200750> >).

Secondly, the Government’s decision to reform planning rules, following Michael Gove’s climb-down on housing targets in December, has recently caused Central Bedfordshire council, for example – like several other LAs –, to put a promised review of its nearly 2,000 homes-a-year local plan indefinitely on hold. We urge that MKCC would be wise to similarly put its own ambition for expansion on hold.

## Economic growth

Yet more demand for warehousing ‘that could create a need for more development sites in the future that are well connected to our strategic road (and rail) networks’ conflicts glaringly with MKCC’s ‘Green City’ ambition: ever more polluting road transport is hardly going to help ‘reduce carbon emissions in MK to net zero by 2030’. The interests of consumerist ‘Enterprise Partnerships’ should not be considered paramount and need to be fairly balanced against those of local communities where they conflict.

## Infrastructure

We wholeheartedly agree with MKCC’s “I before E” philosophy and look forward to the results of MKCC’s ‘very significant study’. We fervently hope that that new policies emerging from it will have rather more success than has been achieved so far in holding back the

onslaught of developers' applications for "E" in SEMK (one already at reserve matters stage) before any significant coherence of their contributions to "I" has been achieved.

### **Green City**

In January 2020, our Town Council supported MKC's Declaration of a Climate Emergency and since then has developed a wide range of proposals for reducing our carbon footprint and promoting a healthier local environment, both for people and for wildlife. The majority of these received strong support in a survey of the local community held in January 2021, which can be seen here <

[http://www.woburnsands.org.uk/WSTC\\_Climate\\_Change\\_Group\\_Community\\_Survey\\_42660.aspx](http://www.woburnsands.org.uk/WSTC_Climate_Change_Group_Community_Survey_42660.aspx) >, and we have already started to implement some of them. Hence we naturally

endorse MKCC's 'Green City' aspirations. However, from our rather modest success so far in eliciting support from the Highways Department for our traffic-related proposals aimed at reducing C-emissions, we feel that a bit more work may be needed in getting some officers on board.

New developments must also offer a splendid opportunity for built-in community renewable energy schemes, which would further contribute to the reduction of C-emissions. Yet we do not see these being promoted in SEMK, for example – a terrible lost opportunity.

### **Beautiful City**

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

### **National Planning Reform**

Please note previous comment, under 'Housing Growth & Regeneration' concerning *Local Housing Need*: the Government's decision to reform planning rules, following Michael Gove's climb-down on housing targets in December, has recently caused Central Bedfordshire council, for example – like several other LAs –, to put a promised review of its nearly 2,000 homes-a-year local plan indefinitely on hold. We urge that MKCC should similarly put its own ambition for expansion on hold to avoid putting a potential millstone round its neck.

## **2. Are there any other patterns of growth that you think could be explored?**

There is considerable scope for engagement with the town and parish councils of the rural towns for the integration of their landscape assets with the Green and Blue Infrastructure of the City, so as to provide peripheral open space 'lungs' for the City that can be safeguarded against inappropriate opportunistic development – in the same way that land was originally secured around London by the National Trust, with similar intent.

**3. Do you have any other comments on the ‘what does this mean for you’ section?**

**4. Tell us what you think about our New City Plan Ambition.**

*Please consider if you agree or disagree, if you think it is clear, if you think there is anything missing*

Too much emphasis on the quantity of urban expansion at the expense of planning for quality. MKCC needs to rediscover the genius of the Development Corporation.

We would like to see the New Plan re-affirming the foundational ideology of what MK was about at its inception – its internationally admired brand – that of a forward looking town (now honoured with City status) at the leading edge of design with new technology and sustainability as its base. This means new developments adhering to high quality, holistic design codes that balance residential densities, plot ratios and building footprints with complementary areas of green infrastructure. They need especially to mitigate against the effects of extreme weather events, such as overheating, flooding and storms that are expected from ongoing climate change.

While we recognize that the New City Plan indeed aspires to such design principles in its *vision*, too often in more recent developments they have been overridden in practice by developers’ single-minded aim to squeeze the maximum profit from their sites. This is not sustainable and has to stop: developers must be brought to heel and persuaded to build for the future welfare of the city’s residents, rather than just to fill their own pockets in the short term.

Moreover, with a reduction of the ‘Local Housing Need’ ambition to more realistic levels, as we urge in our response to Q1 (*Housing Growth and Regeneration*), a better balance of housing density and open green space can be more readily achieved. It would certainly make possible more self-sufficiency in new housing projects – going back to the concept of 1km square grids and a maximum of ½ km to local shops, which would reduce car usage and encourage more healthy walking/cycling.

**5. Tell us what you think about the objectives.**

*Please consider if you agree or disagree, if you think they are clear, if you think there is anything missing.*

- Economic and cultural prosperity theme
- High quality homes and neighbourhoods theme
- Healthy places theme
- Climate and environmental action theme

It is difficult to imagine anyone wanting to disagree with these objectives, as they are set out on pp. 12-13 of the *Ambitions and Objectives* document, as they are all very much ‘motherhood and apple pie’. However, what is questionable is whether MKCC’s approach to some of the issues listed in Q1 is best suited to achieving these objectives.

Hence we question whether MKCC’s aspiration for ‘ambitious growth’ (‘Our New City Ambition’, p.11) can be described as ‘Well-planned’. We have already criticized the inflated ‘Local Housing Need’ figure in our answer to Q1 (*Housing and Regeneration*). We would also instance the way developers have already started to contravene some of the basic stipulations of the SEMK SPD (e.g., need for coherent application and west-to-east development) – a cavalier way of operating by developers that we have also seen repeated locally with some smaller-scale developments. At times, MKCC Development Control seems almost supine before the demands of developers, for fear of losing appeals against refusal of their applications. A ‘Well-planned’ Local Plan ought surely to be so robust as to be unassailable, even by the developers’ sliest barristers: so far, it seems ours is not.

Moreover, laudable though the objectives of the *Climate and Environmental Action Theme* are – and we certainly do endorse them – some aspects of the transport plan, for example, which can only result in yet more polluting road transport (see earlier comment in answer to Q1, *Economic Growth*), hardly seem designed to help achieve them. As in the fable of the Emperor with no clothes, MKCC should beware of its Green ambitions revealing themselves to be so much ‘Greenwash’.

## 6. Do you have any comments on our principles for engagement and consultation on the New City Plan?

*Please include any specific suggestions for how we could engage and communicate with you throughout the preparation of the New City Plan*

We acknowledge that statutory limitation of the consultation period – not MKCC’s fault – makes **inclusiveness** little more than a pious hope. Despite everyone’s best efforts to let MK’s residents know about it, we suspect most will remain unaware of it, while among those who have been made aware many will not have had time to study the relevant documents, let alone respond. Sadly, planning seems destined to remain an elite exercise in the present circumstances.

While the language of the *New City Plan Report* has acceptable **simplicity** and **clarity**, there is sometimes a lack of **transparency** in its content. For example, it is not clearly explained that the figure for ‘Local Housing Need’ is just an ‘ambition’ – a politically motivated target for expansion of the City – rather than an evidence-based assessment of actual intrinsic *need*. What there is of the latter is more an issue of affordability than of housing *per se*. Again, the simplistic statement that economic growth ‘benefits our residents and businesses’ might give the rosy impression that it’s good for everyone, whereas such ‘benefits’ in fact become distributed very inequitably and some residents will indeed suffer

from the environmental impact of the enterprises concerned. There is therefore more than a little *legerdemain* in such honeyed promises that sidestep the conflicting interests that a 'Well-planned' Local Plan should address.

## Sustainability Appraisal Scoping Report

The questions in this section relate specifically to the Sustainability Appraisal Scoping Report which is available to read in full here: <https://bit.ly/3HJubHT> or as a non-technical summary

### 7. **Task A1: Review other plans, policies, programmes & SA objectives**

Have all the plans, policies and programmes that are relevant to the production of the MKNCP been considered? Or are there any others that should be added to Plan, Programme and Objective Review?

As a small Town Council, we are not well qualified to respond categorically to the sheer amount of technical and legal documentation covered in this 77 page document in the time available, but as far as we can see the items listed in Table 2.1 (p. 11) covers all the requisite bases – though we are puzzled that there is no mention of East-West Rail in the list for Transport. Although their funding seems to remain 'fluid' and they (still!) have to conduct their statutory consultation, we suppose MKCC might have been granted privileged access to any information directly relevant to the development of SEMK (concerning, for example, their plans for crossings and bridges), beyond that already made public in their 2021 non-statutory consultation.

### 8. **Task A2: Collecting baseline information**

Do you have, or know of, any additional relevant baseline data that is relevant to the MKNCP?

There is no mention in the section on *Water, Pollution and Climate Change* (pp. 18-19) of the issue of **light pollution**, the deleterious effects of which on both people and wildlife have become better understood in recent years (see, for example, < <https://www.darksky.org/light-pollution/wildlife/> >; < <https://www.rhs.org.uk/wildlife/garden-lighting-effects-on-wildlife> >). Recent 'citizen-science' records collated by CPRE (< <https://www.nightblight.cpre.org.uk/> >), for example, show the night sky of MK (and even Woburn Sands) to be severely light-polluted.

9. Are you aware of any inaccuracies in the data presented?

We have not been able to assess this in detail.

10. **Task A3: Identifying sustainability issues**

Do you agree that these are the key sustainability issues for the MKNCP?

Yes

11. Are you aware of any other sustainability issues which, in your opinion, should be added?

Although the need to reduce net greenhouse gas emissions is addressed (objective 5 in Table 5.1, p. 20), there is no specific mention in this list of the need to plan for mitigation of the effects of extreme weather events (heat-waves, droughts, storms, heavy rainfalls, etc.) such as are predicted to become increasingly frequent and intense with global climate warming – unless this is covered in the vague reference to ‘bounce-back’ from environmental challenges’ in objective 5.

12. **Task A4: Developing the Sustainability Appraisal framework**

Are the SA Objectives, Considerations, and Appraisal Criteria suitable?

Yes

13. Should any SA Objectives and/or Appraisal Criteria be added, or should any be removed?

No

14. What assumptions do you think we should consider when finalise the Appraisal Criteria and Assumptions?

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

## Individual or organisation?

15. Are you answering this survey as an individual, or on behalf of a company or organisation? \*

Individual

Company/organisation

## Demographic Monitoring

The questions in this section allow Milton Keynes City Council to investigate trends in responses that may be present amongst respondents with similar demographic criteria. You do not have to answer any of the demographic questions in this section if you would prefer not to and any answers you do provide are held confidentially and securely and are not published with your

(Presume N/A for Town Council)

## Organisation and Contact Information

32. What is the name of the organisation you are submitting this representation on behalf of? \*

Woburn Sands Town Council

33. What is your name? \*

Alison Jordan (Town Clerk)

34. What is your e-mail address? \*

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35. What is your telephone number?

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