



Guidance Note and Response Form

VALP Further Main Modifications Consultation

15 December 2020 – 9 February 2021

Please read these guidance notes before completing your response

Introduction

Following the Main Modifications consultation in late 2019 and the Council's consideration of those responses, the plan has reached the next key stage in the process. The Council has prepared further modifications to the VALP in response to representations and based on other updated information. The Inspector has considered the Council's proposed further Modifications and determined that some of these are main modifications and require further consultation in order to make the VALP a 'sound' plan. The Proposed Further Main Modifications document is accompanied by a Sustainability Appraisal Addendum and an updated Habitats Regulations Assessment as well other supporting documents. The Proposed Further Main Modifications will be subject to an eight week public consultation period from **9am Tuesday 15 December 2020 until 5.15pm Tuesday 9 February 2021.**

The consultation material can now all be viewed on our website: <https://www.aylesburyvaledc.gov.uk/section/valp-examination> .

Due to the COVID-19 pandemic, there are currently Government regulations in place which remove the requirement for the Council to display hard copies of consultation material in its main offices at the Gateway in Aylesbury and deposit point locations around the area. These regulations are due to expire on 31 December 2020 and so the Council will make hard copies available after this date. Further information can be found in the Statement of Availability, which can be found on the Council's website through the link above.

We would encourage consultees to make their representations via our online consultation platform, found at: <https://aylesburyvaledc.oc2.uk/> . This will enable the Council to deal with your representations in a more efficient way. This will assist the examination process by allowing the comments to be sent to the Inspector and publicised in a more timely manner after the consultation.

Responses should be limited to the Proposed Further Main Modifications, the Sustainability Appraisal Addendum and the updated Habitats Regulations Assessment. If you have a comment on the additional evidence produced to support this stage of the plan it should be made against the further main modification it relates to. You should not repeat or re-submit your previous representations or raise new issues on parts of the plan that haven't changed. Following completion of the consultation period the Council will prepare a response to the representations for the Inspector. The Inspector will then consider the representations and the Council's response and decide whether any further hearings are necessary or

any issues need to be revisited. At the end of the examination process the Inspector will present his final conclusions in a final, binding report. If the plan is found legally compliant and 'sound' with any necessary modifications, it will then be adopted by the Council.

If you require a hard copy version of the response form, need assistance in completing your representation, or have any other questions then please contact the Planning Policy Team by email at localplanconsult.av@buckinghamshire.gov.uk or by phone on 01296 585308.

Part A: Personal Details

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website and sent to the Inspector but address and contact details will be removed from published responses.

By making a representation you are agreeing to your name and comments being published.

The Council reserves the right not to publish or take into account any representations which it considers offensive or defamatory. The Council will be publishing representations after the consultation closes. Where possible, please supply an email address when submitting responses as this will allow us to contact you electronically. Everyone who submits a representation will be added to the relevant consultation database (if not already included) so that we can keep you up to date with the Plan. If you do **not** wish to be contacted in this way, please state this clearly on the form or email us at localplanconsult.av@buckinghamshire.gov.uk.

If an agent or consultant has been engaged to act on your behalf, please fill in both sets of details in full when registering online or on your form. Correspondence will be sent to the agent.

Part B: Representation

The Council is inviting comments on whether the Further Main Modifications are legally compliant and sound. Comments should only be made on the Proposed Further Main Modifications published for comment or the accompanying Sustainability Appraisal Addendum and/ or Habitats Regulations Assessment. Please give details to explain why you support or object to the wording of the Further Main Modification or part of the accompanying a Sustainability Appraisal Addendum and/ or Habitats Regulations Assessment. The Inspector is not inviting further comments on issues not covered by the Proposed Further Main Modifications, Sustainability Appraisal addendum or Habitat Regulations Addendum.

The online portal has recently been upgraded in order to improve the consultation process. Consultees who have used the portal for previous consultations will notice the look of the website has changed, however the process for making and viewing representations is still very similar. If you intend to submit a representation on the portal, there is an updated help page available with instructions on how to register, log in, make comments and view representations.

In addition to the proposed Further Main Modifications the Council has identified further minor amendments it considers necessary to improve the clarity of the Plan. These amendments are known as Further Additional Modifications and they include the correction of typos and updates to factual information. These Further Additional Modifications are not considered to affect the soundness of the Plan and **do not form part of this consultation**. Any representations made about the Further Additional Further Modifications will not be considered by the Council as 'duly made' as part of this consultation.

Legal Compliance

The Inspector has assessed whether the Plan meets the legal requirements under section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended), which includes whether the Council has complied with the Duty to Co-operate when preparing the VALP. In relation to the current consultation, comments regarding legal compliance should only be submitted where they relate to the Proposed Further Main Modifications.

You should consider the following before making a representation on legal compliance:

- The Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed.
- The process of community involvement should be in general accordance with the Statement of Community Involvement (SCI).
- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (as Amended) (the Regulations).
- The local planning authority must provide a Sustainability Appraisal Report and a report assessing if there would be any impact of the plan in combination with other plans and projects on species covered by EU Directive (a Habitat Regulations Assessment). This should identify the process by which it has been carried out, baseline information used to inform the process and the outcomes of that process.

Soundness

Local Plans are required to be assessed against the tests of Soundness. The appointed Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended). If you are objecting to a Proposed Further Main Modification, the response forms asks you to identify which of the below tests of the soundness you consider the modifications fails to address, which will aid the Inspector when considering your comments. Soundness is explained in National Planning Policy Framework (NPPF 2012) paragraph 182.

Positively prepared

This means that the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

The Plan should be the most appropriate strategy when considered against reasonable alternatives, based on a proportionate, robust and credible evidence base.

Effective

The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities, sound infrastructure delivery planning, and should not infringe on regulatory or national planning barriers. It should be flexible to changing circumstances.

Consistent with national policy

The Plan should be consistent with national policy. Any departure from this must be clearly justified.

General Guidance

Where there are groups who share a common view on how they wish to see the Plan modified, it would be very helpful for that group to send a **single** representation which represents the view. In such cases the group should indicate how many people it is representing.

Please remember that where a representation is **over 100 words** you are required to include a **summary in fewer than 100 words** of its main points in the box provided, which will be published alongside your full representation. Where a summary has not been provided by a respondent, one will be produced by a planning officer to outline the key representation issues as a point of reference for the Inspector and any other interested parties.

Care will be taken to ensure the summaries reflect the representations and it is important to note that the full text of all representations and any attachments will still be sent verbatim to the Inspector. The summary will therefore not impact on how the Inspector views your representation.

Representations can be made:

- via the Council's online consultation portal: <https://aylesburyvaledc.oc2.uk/>
- via the representation form which can be downloaded from the website and returned:
 - via email to: localplanconsult.av@buckinghamshire.gov.uk
 - or by post to: Planning Policy, Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF



VALP Proposed Further Main Modifications Consultation Response Form

Responses are encouraged via the Council's online consultation system available at <https://aylesburyvaledc.oc2.uk/>.

However, this form can be returned via email to localplanconsult.av@buckinghamshire.gov.uk or via post to:

Planning Policy, Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 9am Tuesday 15 December until 5.15pm Tuesday 9 February 2021.

This form has two parts - Part A: Contact Details and Part B: Representation Form

Part A: Contact Details

| Personal details | Personal details | Agent's Details (if applicable) | Agent's Details (if applicable) |
|------------------|--|---------------------------------|---------------------------------|
| Title | Mr | Title | |
| First Name | Andrew | First Name | |
| Last Name | Turner | Last Name | |
| Organisation | Milton Keynes Council | Organisation | |
| Address Line 1 | Civic | Address Line 1 | |
| Address Line 2 | 1 Saxon Gate East | Address Line 2 | |
| Address Line 3 | Central Milton Keynes | Address Line 3 | |
| Post Code | MK9 3EJ | Post Code | |
| E-mail Address | Andrew.Turner@milton-keynes.gov.uk | E-mail Address | |
| Telephone Number | 01908 254892 | Telephone Number | |

Part B: Representation Form

Please Note: You do not need to return this form if you have made the same comments via the Council's online system for this consultation. Duplicates will not be considered.

- Please specify which Proposed Further Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment addendum your comments relate to.
- Any representations on the content of the new evidence published alongside the Proposed Further Main Modifications must also relate to a specified Further Main Modification to the VALP or they will not be accepted.
- If you wish to comment on more than one Modification please use a separate form for each.

What are you commenting on? Please only state a Further Main Modification reference (e.g. FMM001), the Sustainability Appraisal Addendum or the Habitats Regulation Assessment.

FMM058

Do you support or object?

Support

Object

Do you consider the Local Plan to be legally compliant?

Yes

No

Do you consider the Local Plan to be sound?

Yes

No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared

Justified

Effective

Consistent with National Policy

Enter your full representation here:

Please see attached letter

If your representation is more than 100 words, please provide a summary in fewer than 100 words here:

Milton Keynes Council continues to object to the allocation of Shenley Park in the VALP. We welcome the Inspector's decision to hold a hearing session on sites D-WHA001 Shenley Park and D-NLV001 Salden Chase and several changes made to Policy D-WHA001, principally via FMM058.

Our objections relate to Shenley Park becoming a successful part of the city, concerns are raised about the failure to require a grid road and associated grid road corridor incorporating Redways and the provision of a large enough primary school. Concerns are also raised about traffic modelling and the impact on the local highway network.

Please specify the changes you think are needed to be made to the proposed further main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please see attached letter

If the Inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No (written response only)

If 'Yes', please outline why you consider it necessary to speak at any further hearings:

When developed Shenley Park will be a major extension to the city of Milton Keynes. Milton Keynes Council wishes to be represented at any further hearing session on Shenley Park in order to ensure this development becomes a successful part of the city, reflecting its distinctive and high-quality character and to mitigate its impact on local services and facilities.

Do you wish to be notified:

When the Inspector's report is published?

When the Vale of Aylesbury Local Plan is adopted?

Responses should be returned to Buckinghamshire Council by 5.15pm Tuesday 9 February 2021.

Privacy and the Vale of Aylesbury Local Plan (VALP)

This privacy notice explains how the local planning team at Buckinghamshire Council (the data controller) will use the personal information we collect about you when participating in this process.

Information we hold

We can collect the following information about you:

- Name and address
- Contact details
- Job title and organisation (where relevant)
- Your comments/representations

Why we need your information

We are asking for your information so:

- We can support the local planning process and creation of the Vale of Aylesbury Local Plan including within the independent examination process
- We can comply with the law, as a Local Planning Authority, and carry out consultations for this purpose.

We can use your information because we have your consent to do so (Article 6(1)(a)) and we need it to provide a service as a local authority under our legal obligation (Article 6(1)(c)) under planning legislation:

- Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

You may have rights to stop us using your information depending upon the stage of the local plan and the applicable legislation. If you want to discuss this or stop us using your information you should email localplanconsult.av@buckinghamshire.gov.uk and quote 'Vale of Aylesbury Local Plan consultations'.

If you ask us to stop using your information (where possible) your comments or representations may not be taken into account within the local planning process and we will not be able to contact you with any follow up information on the plan's development, including the outcome of the independent examination.

Your information is only used for the reasons above but if we need to use it for any other reason, such as the preparation of Supplementary Planning Documents (SPDs) and future Local Plans, we will normally tell you.

How we share and process your information

We will share your information, if appropriate, with:

- JDi Solutions who operate our online local plan consultation system for us as our data processors.
- Once the consultation closes we are required by Regulations to share all valid and existing comments/representations with the independent Planning Inspector appointed by Government to undertake the examination. If the Inspector wishes to invite you to answer any follow up questions in response to your representations or invite you to attend any further public hearing for the purposes of the examination, we will share your contact information with the Inspector so they can contact you about the Vale of Aylesbury Local Plan.

Please note that your name, organisation, system ID and representations will be made publically available. However your contact information will not be published in the report of representations and will be redacted if it appears in the body of your representation.

We will securely hold your information and it will normally be retained for the length of the plan period or until the plan is no longer in effect. At the end of this period your records will be confidentially disposed of.

Automated decision making

We do not carry out any automated decision making in relation to this information.

Your rights

You have legal rights over your information. For details of those rights, see our corporate Privacy Policy: <https://www.buckinghamshire.gov.uk/your-council/privacy/privacy-policy/>.

Our Data Protection Officer can be contacted at Buckinghamshire Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF, or by email at dataprotection@buckinghamshire.gov.uk.

Mr Paul Clarke,
c/o Planning Policy,
Buckinghamshire Council,
The Gateway,
Gatehouse Road,
Aylesbury,
HP19 8FF



9 February 2021

Dear Mr Clarke,

In our letter of 16 December 2019 on the Main Modifications to the Vale of Aylesbury Local Plan (VALP) Main Modifications, we objected to, and raised significant concerns about, the soundness of the proposed allocation of Shenley Park via Policy D-WHA001. In summary those representations were:

- a) That the conclusions drawn in the updated Housing and Economic Land Availability Assessment relating to Eaton Leys - which is a key piece of evidence underpinning the sustainability appraisal and selection of Shenley Park as a proposed allocation (rather than Salden Chase and/or Bucks part of Eaton Leys) - are not justified.
- b) That the conclusions of the Viability Report published alongside the consultation do not appear to have been considered in the sustainability appraisal or selection of the proposed allocation, indicating that the allocation is not justified nor effective
- c) That the highway modelling evidence does not appear to provide a sufficiently robust assessment of the impacts upon the highway network in Milton Keynes in order to justify the proposed allocation of Shenley Park.
- d) That there is no evidence of a robust, yet proportionate, site selection process underpinning the proposed allocation of Shenley Park and, therefore, that the proposed allocation is not justified.

Although the allocation of Shenley Park was initially proposed at the Regulation 18 stage of the Vale of Aylesbury Local Plan (VALP). The site was removed from the Regulation 19 version of the VALP and not included in the VALP when submitted for examination. The reappearance of Shenley Park via the Examination in Public and the Proposed Main Modifications consultation thus came as a significant surprise to the communities of Tattenhoe, Kingsmead, Oxley Park and Bletchley within Milton Keynes, as well as those in Whaddon and Newton Longville. These communities would not have felt it necessary to engage in the Regulation 19 consultation on the VALP as Shenley Park had been removed as a proposed allocation, and have not had a voice in the examination proceedings to date.

Given this history, we welcome the Inspector's decision in ED265 (Discussion document D8) that he is minded to hold a hearing session on sites D-WHA001 Shenley Park and also D-NLV001 Salden Chase. This will give us, and others, an opportunity to discuss these matters and the significant limitations with the evidence base associated with the inclusion of this allocation.

We welcome several changes that have been made to Policy D-WHA001, principally via FMM058. However, we maintain our strong objection on a number of matters, particularly those which are critical to this extension of Milton Keynes becoming a successful part of the city, reflecting its distinctive and high-quality character. Of concern is the failure to require a grid road and associated grid road corridor incorporating Redways and the provision of a large enough school. These are necessary in order ensure the allocation policy will effectively ensure successful planning of growth on the borders of Milton Keynes. This allocation would have clear cross-boundary impacts in terms of highways and education but also needs to successfully integrate into the city by reflecting key distinctive features such as grid road corridors and redways. Our stated planning policy position on urban extensions to Milton Keynes that reside outside of the Council's boundary is set out within Policy SD15 of Plan:MK. This provides a framework for how such urban extensions should be planned and designed so that they integrate well with the existing city and adopt many of the distinctive principles and features of Milton Keynes. If a Development Framework SPD for Shenley Park is prepared by Buckinghamshire Council, we would like to work with them on its preparation.

Our comments on these and other matters arising from the VALP's Further Main Modifications are set out below:

1. In our representation at Main Modification stage (MM076 refers) we sought a change to policy D-WHA001 criteria c so that 3 forms of entry (FE) were provided at the Shenley Park primary school rather than the 2 FE proposed. This is needed to ensure primary school education needs were fully met on site. Buckinghamshire Council have not amended criteria c. However, we still consider this amendment to be necessary, which is based upon our own experience and evidence¹ of pupil yield from new development in Milton Keynes (which this allocation would effectively be a part of).
2. Regarding policy D-WHA001 criteria p (Ref FMM058), significant differences remain between Buckinghamshire Council and us over the extension of the grid road system through the Shenley Park site. This would require a width of land measuring 60-80m to be reserved for a dual carriageway grid road and associated grid road corridor. We strongly object to Buckinghamshire Council's proposed further changes to criteria p. These fall short of what we see as necessary to enable growth adjoining Milton Keynes to successfully become part of the city. In our representation at Main Modification stage we proposed that criteria p should read as follows.

Policy D-WHA001 criteria p. Provide for a **Grid Road** ~~Link Road~~ connection **for general traffic from the A421** through the site to Grid Road H6 Childs Way and **upgrade the existing H6 Childs Way to accommodate additional traffic movements arising from the new access and link road whilst maintaining safe and suitable access arrangements off the H6 Childs Way for existing communities. The Grid Road connection should be aligned and designed to carry through traffic away from built up areas within the site.**

The proposed changes to criteria p within the Further Main Modifications read as follows:

¹ 'Milton Keynes Pupil Yield Survey, 2017' available at <https://www.milton-keynes.gov.uk/assets/attach/48286/Pupil-Yield-Survey-2017-FINAL.pdf>

“Provide for a Link Road connection through the site to Grid Road H6 Childs Way and or H7 Chaffron Way, **which shall include:**

A Redway providing direct connection through the site to the existing Redway network
A public transport route to incorporate Mass Rapid Transit through the site to Grid Road H6 Childs Way and or H7 Chaffron Way

In its response to our representation at Main Modification stage Buckinghamshire Council have responded (Ref RE001) that the *“Grid roads are not used in the County of Buckinghamshire and no evidence has been provided by MKC to demonstrate the necessity of this requirement.”* The provision of a grid road and corridor is not only a matter of managing traffic in order for the policy to be effective. Grid roads and their landscaped corridors incorporating Redways are distinctive and successful features of Milton Keynes, and their incorporation into urban extensions of Milton Keynes should be enabled when setting policies governing such growth, otherwise those policies are not effective. We wish to further make the case for grid road provision at the Shenley Park during the examination session.

3. In our representation at the Main Modifications stage we proposed an amendment to criteria (q) that:

A new Redway should be provided alongside the grid road link to provide direct connection through the site to the existing Redway network.

Buckinghamshire Council is now proposing to amend criteria p (Ref No FMM058) as follows:

A Redway providing direct connection through the site to the existing Redway network

We welcome the proposed change so that a clear requirement for the provision of a Redway is included in the allocation. However, this should be linked to the provision of a grid road and grid road corridor as noted above in order to effectively plan for growth that has a clear cross-boundary impact. We maintain that the changes proposed by us at the Main Modifications stage should be incorporated into the policy at what is now criteria p.

Redways are defined in our Local Plan, Plan:MK, adopted in March 2019 as a network of over 270 km of safe paths (generally surface with red tarmac) that criss-cross the entire city of Milton Keynes used by cyclists and pedestrians.

4. In our representation at Main Modification stage we proposed the following new criteria be added to policy D-WHA001:

Provide a public transport and Mass Rapid Transit route through the development, from the H7 Chaffron Way to the A421, and where necessary upgrade the existing H7 Chaffron Way/Hayton Avenue to enable acceptable routing of public transport and Mass Rapid Transit services along it. The route should directly serve any local centre

within the site as well as a new Park and Ride site to be located in the southern area of the site. Where appropriate and feasible, the route should be segregated from other traffic and benefit from priority junctions

Buckinghamshire Council is proposing to amend what would be criteria p, to state the following:

A public transport route to incorporate Mass Rapid Transit through the site to Grid Road H6 Childs Way and or H7 Chaffron Way

By way of correction the Council has noticed there is an error in its representation, where Haydon Avenue should be Hayton Way. Whilst we welcome Buckinghamshire Council amending criteria p to enable a public transport route to incorporate a Mass Rapid Transit system through the site, this amendment does not carry forward key elements of the new criteria proposed in our previous representations.

It is critical that a Mass Rapid Transit system is either segregated from, or has priority over, other traffic. Linked to this, the route of the Mass Rapid Transit system should directly serve the local centre and a new Park and Ride facility within the site. Whilst we accept that Milton Keynes is at the early stages of developing further evidence around Mass Rapid Transit to inform our new Local Plan, evidence already exists making the case for a Mass Rapid Transit link to and through this allocation and associated Park and Ride facility².

Based on the evidence cited above, our preference is for the Mass Rapid Transit link to be via H7 Chaffron Way/Hayton Way rather than H6 Childs Way. However, we accept there is scope for this to change as further evidence is prepared, and we therefore accept that the wording as proposed via the Further Main Modification would enable a choice of routes based on the latest evidence at the time.

5. Policy D-WHA001 criteria o is proposed to be amended (Ref FMM058) as follows:

“More detailed traffic modelling will be required to inform on the extent **and design** of offsite highway works **and** to determine whether the section of A421 between the Bottledump roundabout and the site access roundabout needs to be dualled. **The scope and design of any detailed traffic modelling must be agreed by Buckinghamshire Council as the highway authority, in consultation with the Milton Keynes highways authority.**

We welcome the amendments to criteria o reflecting wording proposed by the Council at Main Modification stage.

² ‘Mobility and Mass Rapid Transit Study, 2019’ and ‘Covid-19 refresh of the Mobility and Mass Rapid Transit Study, 2020’ available at https://ddd3d78e-749e-4b55-9eee-73303fdcb896.filesusr.com/ugd/02d3f7_f30afad72eaf42aa996741eb44542ead.pdf and https://ddd3d78e-749e-4b55-9eee-73303fdcb896.filesusr.com/ugd/02d3f7_2b038066bf644216adcdf2ab63b9575e.pdf

6. Regarding Policy D-WHA001 criteria e and the provision of a health centre at Shenley Park, we raised concerns about the effectiveness of this requirement in delivering suitable provision to accommodate additional demand on health care services in the area. We queried whether the Milton Keynes Clinical Commissioning Group (CCG) and/or Aylesbury Vale CCG had any input into the proposed allocation of Shenley Park and criteria e of Policy D-WHA001. We note no change is proposed to the wording of criteria e in the Further Main Modifications (Ref FMM058). We believe this matter remains to be tested during the examination at the proposed further hearing session into Shenley Park, with the input of the CCGs.
7. We support Further Main Modifications to Policy D-WHA001 criteria f (Ref FMM058) shown below as they include wording previously proposed by ourselves at the Main Modifications stage.

“The site will be designed using a landscape-led **and green infrastructure** approach. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA) **that integrates the site into the landscape and the existing network of green infrastructure within Milton Keynes and Buckinghamshire.** It will provide a long-term defensible boundary to the western boundary of Milton Keynes. This recognises that whilst being located totally within Aylesbury Vale, the development will use some facilities in Milton Keynes, given its proximity, Milton Keynes also provides an access point into the site.”

8. Buckinghamshire Council has proposed further changes to criteria q (Ref No FMM058) shown below.

“Existing public rights of way need to be retained, enhanced and integrated into the development with safe and secure environments as part of a wider network of sustainable routes (utilising amongst others the Redway and Sustrans network), to directly and appropriately link the site with surrounding communities and facilities **including the extension of bridleways into the site (Bridleway WHA12/2 and Shenley Brook End Bridleway 006) to Redway standard.**”

We support existing rights of way being retained, enhanced and integrated into the development. However, we insist on separate provision to keep bridleways separate from Redways. There are rare locations where Redways and bridleways co-exist in Milton Keynes, but this is to be avoided. The wording, as proposed by FMM058, risks merging a new Redway through the site with the retention or diversion of other rights of way which would be highly inappropriate with regard to bridleways.

The Milton Keynes Council Bridleway Design Manual states:

- 6.1 In exceptional circumstances a horse trail may share a surface with a redway. This may occur where a trail is directed along an established route or where a common underpass or bridge is used to cross a city road.

6.2 In these circumstances the minimum width for the shared surface is 5 metres to a construction specification suitable for all users and the route must be designated as a “Bridleway”.

The proposal of modifying bridleways to redways creates several issues. Hard surfaces, as seen on redways, are not ideal for bridleways and are not recommended by horse user groups for various reasons. A potential compromise could be the use of bound rubber crumb surface, such as flexipave or connipave, which is recommended by the British Horse Society and suitable for all users and has various advantages.

Another alternative, would be to provide a bridleway on a grassed surface alongside a redway. However, there are legal implications to this as changing the nature of the Right of Way may require changing part of its legal status from bridleway to cycle track through a public path order. This would be subject to public consultation and could be controversial as the width of available bridleway would be being reduced and could draw objections from user groups.

A diagram from the Milton Keynes Council Bridleway Design Manual showing a redway running alongside a bridleway with the required widths for such a proposal is reproduced in Appendix A to this letter.

Transport evidence

In addition to the Further Main Modifications, we note that further transport evidence has been published, which is partly in response to the concerns we raised in our previous representations at the Main Modifications stage.

Document ED256 is helpful in setting out the WebTAG criteria (some very recent) as it relates to the Countywide Model for Local Plan testing and we accept that this indicates a level of accuracy that is commensurate with this guidance. We acknowledge that impacts will be assessed in detail at planning application stage. The new Phase 4 assessment has also represented the latest housing allocations more accurately and this includes a reduced allocation at Shenley Park of 1,150 homes.

We appreciate that the use of TEMPRO is the usual default position for taking account of external development in strategic modelling. Our concern is that the growth trajectory of Milton Keynes is well-established and that committed employment growth in the Milton Keynes urban area (as distinct from the borough, and without including any Plan:MK additional growth) to 2031 is more concentrated than TEMPRO at some 28k jobs (of which nearly 19k are in CMK) compared with TEMPRO’s 10k. This could lead to a significant underestimate of traffic to and from Milton Keynes, especially if this information then passed to the detailed models to be used in any future planning application. Shenley Park is located at one of the key entry points to the city for commuters and, therefore, this remains of concern. As the Shenley Park site would be principally residential, the acknowledged wider imbalance of housing compared with TEMPRO is unlikely to offset this outcome. This matter should be resolved by sensitivity testing at the plan-making stage in the process.

Whilst we have stated that the Milton Keynes Multi-Modal Model (MKMMM) should be used to inform any Transport Assessments for development at Shenley Park, there should be traffic impact analysis across both authorities. This hasn't happened and each authority uses a different traffic modelling technique which show some different results.

In relation to traffic impacts, our main concern is the conclusion in ED256 from the Stage 3 work. This identifies significant travel time increases in all three scenarios on the A421 and adjoining minor roads. Neither mitigation scenario adequately mitigates the impact of the additional local plan development. This is because neither mitigation scenario includes both the Bletchley Bypass and the dualling of the A421. (ED256, Table 28: Phase 3 Impact Summary Table). The Phase 4 work comparing the new allocation (including 1,150 homes at Shenley Park) showed the impact on Milton Keynes and the A421 as 'moderate' in terms of increased travel times with traffic to and from Milton Keynes increasing by up to approximately 10%. Firstly, we raise concerns over the reliance on a Bletchley Bypass to mitigate impacts from the site. Secondly, while the MKMMM is also essentially strategic, it includes more of the minor roads in the Shenley Park area and in Milton Keynes, with more local trips represented. It should therefore represent the likely draw of employment towards Milton Keynes more accurately and has been used already to carry out initial tests in relation to a planning application. As such we would be reassured about understanding the impacts of Shenley Park better if it were used to assess this scenario.

The Phase 3 modelling tested five DS scenarios and, while three of these represented the sites under consideration in isolation (Shenley Park DS, Eaton Leys South DS4 and Salden Chase Extension DS5), there appeared to be no direct comparison of these to inform the selection process. However, comparisons of the sites in combination (DS2 vs DS4, DS3 vs DS, and DS4 vs DS3) have been carried out, which we felt made this assessment less clear. Phase 4 modelling, as reported in Section 12 of ED256, includes the reduced number of homes planned for Shenley Park (1,150 as opposed to 1,600 in Phase 3) which is nearer to the quanta tested for Eaton Leys South and Salden Chase Extension. However, it only compared the new Aylesbury Vale (as was) housing allocations with the proposed Phase 3 mitigation.

I trust the comments will be considered seriously and I hope they prove helpful, alongside our previous representations on the Main Modifications, in addressing points of soundness within the VALP and the Proposed Further Main Modifications. The proposed development of Shenley Park would, to all intents and purposes, be part of the city of Milton Keynes and it is therefore our strongly held view that the process of allocating such growth on the borders of Milton Keynes is robust and sound. Any final planning policy governing the delivery of such growth needs to ensure the necessary mitigation of impacts upon Milton Keynes and the successful integration of new communities with the city.

Yours sincerely,

Cllr Pete Marland
Leader of the Council

Appendix A: Diagram from the Milton Keynes Bridleway Design Manual showing a Redway running alongside a Bridleway with the required widths for such a proposal.

