

Objection by Newton Longville Parish Council

Application: 15/00314/AOP “Salden Chase”

For: Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

At: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

(Note: The description above is as quoted by Buckinghamshire Council in their consultation letter to NLPC and site notices. It is not accurate, see 19 below.)

1. For the reasons detailed below, we respectfully request Buckinghamshire Council:

Reject the application now in accordance with the decision of the AVDC Strategic Development Management Committee on 7th June 2017 that:

*“That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer’s report and subject to conditions as considered appropriate by officers. **If this cannot be achieved, then the application will be refused for reasons as considered appropriate by officers.**”*

Amongst other things it is clear there is no executed, or even agreed, section 106 agreement. Surely three years is more than enough time for a Section 106 agreement to be completed.

2. Failing that, then Buckinghamshire Council should undertake a far more comprehensive and legally compliant meaningful and effective public consultation exercise which should be ongoing for as long as the applicants keep submitting changes in what they propose. Newton Longville Parish Council is more than happy to work with Buckinghamshire Council to ensure the appropriate consultation is carried out on this (as it has on planning application 20/03539/APP <https://bit.ly/GasTankerBletchleyRoad> which has attracted over 1,100 objections in less than a month due to efforts of NLPC and others).
3. The fundamental objections to this application and how it has been incorrectly handled by Aylesbury Vale District Council, is well documented and reproduced as an Appendix to this objection.

4. The application is a cross-boundary application. How a cross boundary application should be dealt with is detailed in our letter of 6th June 2016. It is not two different applications, but identical applications submitted to each planning authority each of which must be made considered holistically, not for each planning authority to act as if in a silo without any regard for the application site as a whole.
5. The consultation letter sent to Newton Longville Parish Council by Buckinghamshire Council required comments by 20th November, however it is clear, that far from adequate consultation has been undertaken by Buckinghamshire so far, as is demonstrated by the very low number of public comments as a result of the re-consultation on the amended proposals.
6. It is clear, from what has said by the QC representing Buckinghamshire Council as a Rule 6 party in the Appeal against the refusal of the application by Milton Keynes Council, that the applicants have been asked by Buckinghamshire Council to provide further information which is to be submitted by the applicants in December. This will inevitably mean further consultation is needed.
7. Under the temporary publicity requirements due to Coronavirus (as explained at <https://bit.ly/335K3Q9>) it is clear that Buckinghamshire Council should have done much more than the minimal efforts made so far to consult on the very significant, and ongoing, material changes made to this application since it was submitted over five years ago, but still not determined.
8. Given the size of this proposed development and particularly that it is subject to an Environmental Impact Assessment, Buckinghamshire Council is under an obligation to take reasonable steps to inform any persons who are likely to have an interest in a planning application.
9. The temporary changes allow local planning authorities to take a flexible and pragmatic approach according to their local circumstances. This means that Buckinghamshire Council are required to publicise an application “**in a manner which is proportionate to the scale and impact of the development**” but so far have not done so. Flimsy notices on generally inaccessible lamp columns are of little use when they are nowhere near people affected, particularly when people are subject to lockdown, nor is an advert in a newspaper which is not generally in circulation in the area.
10. Site notices were erected dated 14th August 2020 at various locations requiring comments by 13th September (Annex 1). Further site notices were erected dated 30th October requiring comments by 29th November (Annex 2). The Town and Country Planning (Development Management Procedure) (England) Order 2015 gives interpretation of “by site display” as “the posting of the notice by firm fixture to some object, **sited and displayed in such a way as to be easily visible and legible by members of the public**”.
11. Given the current closures of most rights of way around the site, due to works being carried out by East West Rail, there is even less chance of site notices being seen. Similarly, displaying notices on such as on Whaddon Road and

Standing Way in isolated locations subject to National Speed Limits are not “sited and displayed in such a way as to be easily visible and legible by members of the public”.

12. The detail within the site notices and press advert(s) do not comply with the requirements the Town and Country Planning (Development Management Procedure) (England) Order 2015.
13. Schedule 3 to the order contains the appropriate form for the notices to be published in the local press and posted on site, which subject to the temporary Coronavirus regulations, must (inter alia):
 - state that a copy of the Environmental Statement is included in the documents which will be open to inspection by the public and give the address where the documents can be inspected free of charge
 - state the latest date by which any written representations about the application should be made to the local planning authority (being a date not less than 30 days later than the date on which the notice is published).
14. The most recent press advert in the Milton Keynes Citizen, for which a copy is on the planning register, was on 16th July 2020 (Annex 3). Yet it was not until 29th September, over two months later that a copy of the advert was uploaded to the planning register. It appears a further advert was placed on 29th October but not copy is on the planning register. Advertising in Milton Keynes Citizen is not an appropriate way to make residents of Newton Longville and nearby villages in Buckinghamshire aware of a planning application.
15. The Environmental Statement must be placed on Part I of the planning register ... **as soon as possible** after publication, but this was not done.
16. An Environmental Statement should be in an easily accessible form, but it has been uploaded to the Buckinghamshire Council website in a haphazard way, making navigating through it a “paper chase” contrary to the principles laid down by Lord Hoffman in Berkeley v SSETR [2000].

“It may consist of one or more documents, but it must constitute a single and accessible compilation of the relevant environmental information and the summary in non-technical language”
17. As the government guidance on the temporary regulations makes clear “**Greater and more frequent publicity** would be appropriate where the **potential impact** of the planning application is **expected to generate a large volume of representations**. This may be the case, for example, **for large scale applications** ... or where there has been a **previous application which has attracted interest**.”
18. As has already been made clear in earlier correspondence (See Appendix) the Environmental Statement for this application was already an inappropriate “paper chase” by 2016. Then as part of their appeal an “updated” Environmental Statement was produced in May 2020 and submitted to

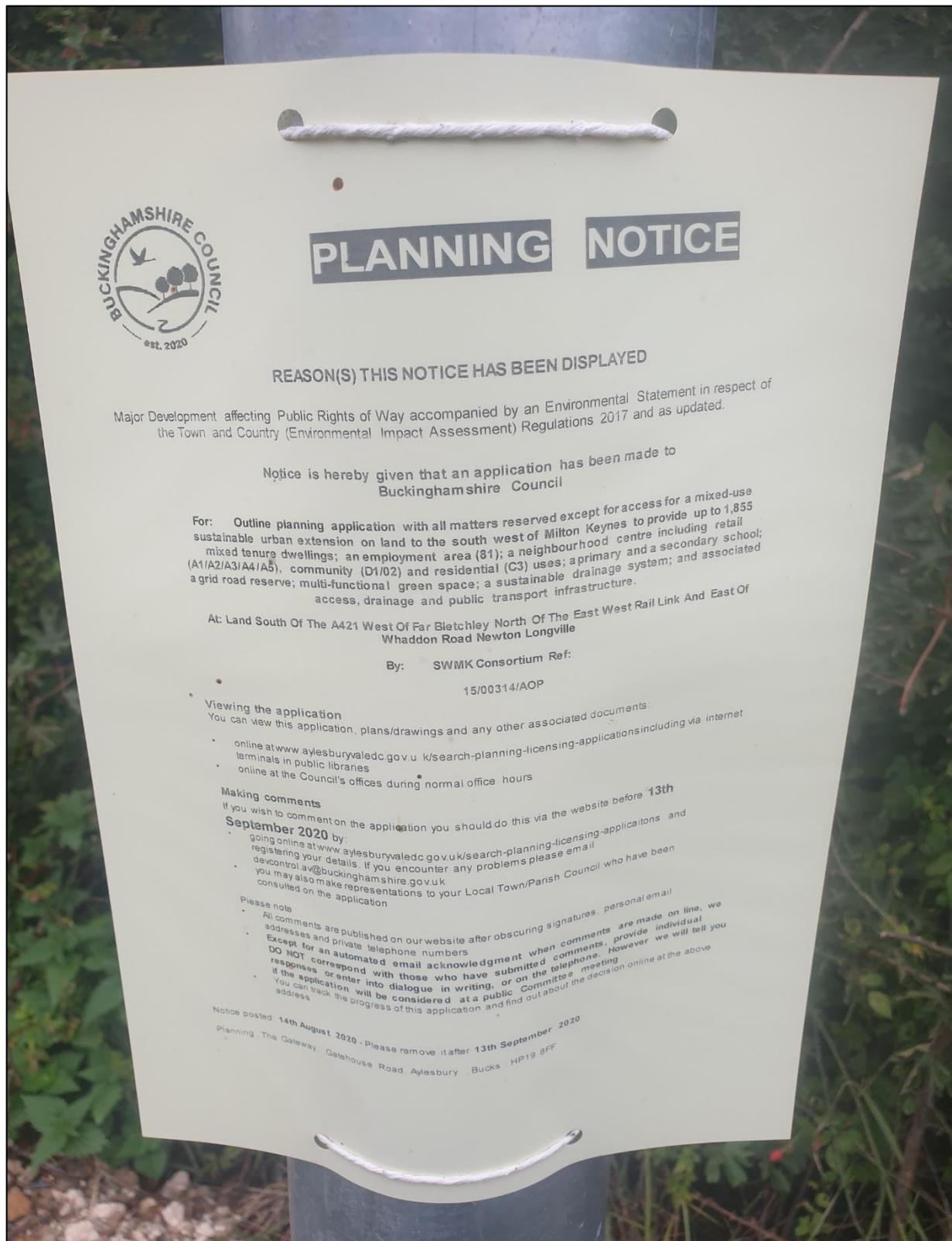
Buckinghamshire Council by email on 19th June. This included yet another new TA with much changed or remodelled, but fundamental errors still there.

19. There had been an ongoing issue of AVDC, and now Buckinghamshire Council, failing to put documents on the public planning file in good time, if at all. For example, the letter from the agent (Annex 4) sent by email on 19th June was not uploaded until 19th August, two months later. The letter sent by email on 8th October 2020 (Annex 5) was not uploaded until 19th and 23rd October 2020. Despite several requires for an explanation for these and other delays no explanation has been provided by Buckinghamshire Council.
20. Since then there have been even more changes submitted applicants/appellants in September and October purporting to amend the Environmental Statement submitted in May 2020. Overall, this amounts to an even bigger paper chase than before.
21. The description used for the application has not been amended to include the addition a 60 bed care home as detailed in the letter from the applicant's agent on 8th June 2020, nor does it include any mention of provision for a 6 GP surgery. The letter gives the description as:

“Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.”
22. The applicants and their highways consultants have had over five years to get this right, but it seems they are either unable or unable to defend the “data” submitted which led to the refusal by MKC. So, what should have been a new application for a fundamentally scheme was submitted, but which is still not correct. As a result, every week or so it seems another change is submitted.
23. As soon as a change is submitted, it does not take long for those very competent highways experts supporting and advising NLPC/WBC and MKC as well as Buckinghamshire Council Highways to find and point out the latest errors and/or omissions. So, there is yet another change and so the circle goes on. This is an abuse of process that should be stopped now.
24. How many attempts does it take to sort this out?
25. Within the Appeal Case Management Conference Call on 20th November it became clear that there has been multiple correspondence between Buckinghamshire Council and the applicants/appellants or their consultants which has not as yet all been made available on the public register. That these may have been Highways matters is no justification for not placing them on the planning register as required by law. The planning system is meant to be open and transparent.

Example of site notice dated 14th August 2020

Requiring comments by 13th September (30 days)



PLANNING NOTICE

REASON(S) THIS NOTICE HAS BEEN DISPLAYED

Major Development affecting Public Rights of Way accompanied by an Environmental Statement in respect of the Town and Country (Environmental Impact Assessment) Regulations 2017 and as updated.

Notice is hereby given that an application has been made to Buckinghamshire Council

For: Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/02) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

At: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

By: SWMK Consortium Ref: 15/00314/AOP

- Viewing the application**
You can view this application, plans/drawings and any other associated documents:
- online at www.aylesburyvaldc.gov.uk/search-planning-licensing-applications including via internet terminals in public libraries
 - online at the Council's offices during normal office hours

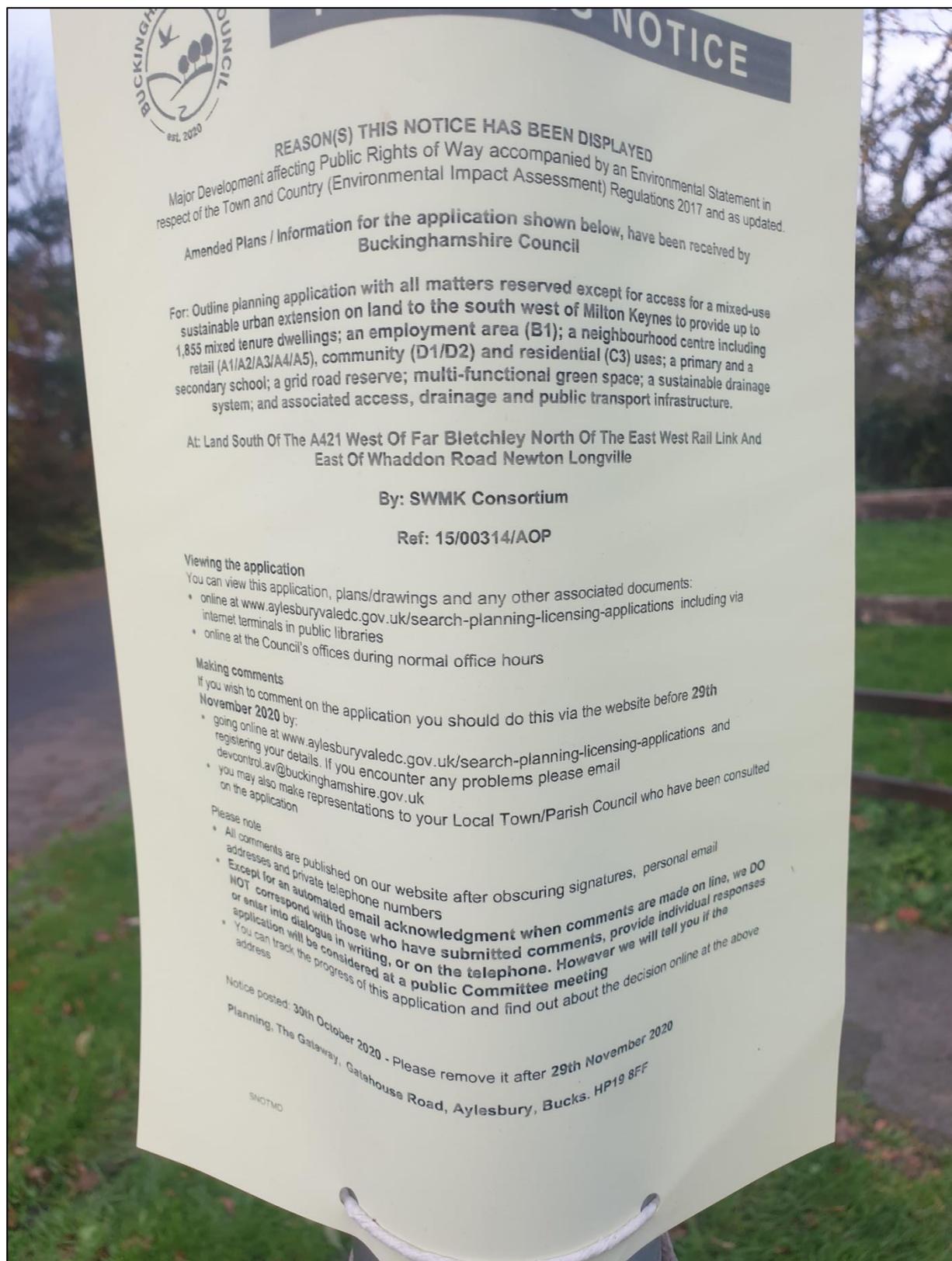
- Making comments**
If you wish to comment on the application you should do this via the website before **13th September 2020** by:
- going online at www.aylesburyvaldc.gov.uk/search-planning-licensing-applications and registering your details. If you encounter any problems please email devcontrol.av@buckinghamshire.gov.uk
 - you may also make representations to your Local Town/Parish Council who have been consulted on the application

- Please note**
- All comments are published on our website after obscuring signatures, personal email addresses and private telephone numbers
 - Except for an automated email acknowledgment when comments are made on line, we DO NOT correspond with those who have submitted comments. However we will tell you responses or enter into dialogue in writing, or on the telephone.
 - If the application will be considered at a public Committee meeting
 - You can track the progress of this application and find out about the decision online at the above address

Notice posted 14th August 2020 - Please remove it after 13th September 2020
Planning, The Gateway, Gatehouse Road, Aylesbury, Bucks HP19 8FF

Example of site notice dated 30th October 2020

Requiring comments by 29th November (30 days)



Press advert in Milton Keynes Citizen on Thursday 16th July 2020

Thursday, July 16, 2020

PUBLIC NOTICES

PUBLIC NOTICES

Buckinghamshire Council

has received the following applications, which can be viewed via the internet or online at our offices during normal office hours. Comments can be made online at www.buckinghamshire.gov.uk within 21 days. We publish every comment we receive on our website.



Within the Conservation Area - 20/02185/APP - METHODIST CHURCH NEWTON ROAD STOKE HAMMOND - Two-storey rear extension, internal alterations and permitted change of use to D1 Nursery.

Buckinghamshire Council has received the following application for which amended plans have been received. These can be viewed via the internet or online at our offices during normal office hours. Comments can be made online at www.buckinghamshire.gov.uk within 30 days. We publish every comment we receive on our website.

Major affecting PRW accompanied by EIA (Environmental Impact Assessment) Regulations 2017 and receipt of an Environmental Statement - 15/00314/AOP - LAND SOUTH OF THE A421 WEST OF FAR BLETCHLEY NORTH OF THE EAST WEST RAIL LINK AND EAST OF WHADDON ROAD NEWTON LONGVILLE - Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

Letter from Applicant's Agent by email on 19th June 2020 (page 1)

Carter Jonas

One Station Square
Cambridge
CB1 2GA

T: [REDACTED]
F: [REDACTED]

Your ref:
Our ref: 5738688v1

Claire Bayley
Associate Planner
Planning, Growth & Sustainability Directorate
Buckinghamshire Council
The Gatehouse
Gatehouse Road
Aylesbury
HP19 8FF

BY EMAIL

19th June 2020

Dear Ms Bayley,

SOUTH WEST MILTON KEYNES (15/00314/AOP)

I write further to our meeting on the 12th June 2020 at which we discussed a revision to the extant planning application for the proposed SWMK development.

The revision has been prepared to address a number of minor amendments that have been made to the proposed development and to address changes in regulation, policy and guidance since the original application was submitted. The amendments to the proposed development have arisen for the following reasons:

- The alignment of the oil pipeline crossing the application site was not identified correctly in the original application drawings and as a result needs to be amended to show the correct alignment. It should be noted that the oil pipeline continues to be located within an area identified as a green infrastructure corridor in the proposed development;
- The standards required for climate change mitigation have been enhanced since the planning application was submitted. As a result, larger surface water attenuation ponds need to be included, which has required minor changes in the size and disposition of the proposed development parcels;
- The housing needs of older people is identified as a specific issue in the emerging Vale of Aylesbury Local Plan and this type of housing is supported by policy (Policy H6b as modified) on those sites identified as suitable in the Housing and Economic Land Availability Assessment. The application site is identified as a suitable housing site and is a draft housing allocation. As a result, the applicant has decided that an element of elderly persons' accommodation (within use class C3) should be included in the proposed development within the total quantum of housing.

Letter from Applicant's Agent by email on 19th June 2020 (page 2)**Carter Jonas**

These changes are not substantial. The oil pipeline remains in an area identified for a green infrastructure corridor within the proposed development. The surface water attenuation ponds have increased in size but are located within similar areas of the proposed development. The proposed extra care housing will be within use class C3 and is located within an area previously identified as a residential development parcel. However, in light of these minor amendments, certain revisions need to be made to the extant planning application, including the consequential amendment of the description of development and the submitted plans and drawings.

The following amendment to the description of development is proposed:-

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

The only change to the description of development is the reference to the 60 extra care units.

There have also been a number of changes in regulation, policy and guidance that have a bearing on the proposed amendments and which will need to be considered in determining the planning application. These updated requirements include the Town and Country Planning (Environmental Impact Assessment) Regulations which were revised in 2017. There have also been changes to relevant adopted and emerging development plan documents and policies since the planning application was submitted; Plan:MK was adopted in 2019 and the emerging Vale of Aylesbury Local Plan (VALP) was prepared and submitted for examination in 2017. The Government published a revised version of the National Planning Policy Framework in 2019, which updated national guidance from 2012 that was originally referred to in the planning application.

The updated documentation and drawings (listed on the accompanying enclosure) include an Environmental Statement reflecting the requirements of the 2017 Regulations and address the up-to-date policy and regulatory framework. It should be noted at the outset that the likely significant impacts of the proposed development, as identified and assessed in the updated Environmental Statement, are not materially different from the previous findings in the 2015 Environmental Statement and its 2016 update.

I should be grateful for early confirmation that the Council is willing to accept the updated documentation and to determine the extant planning application as proposed to be amended. In the meantime, should you have any queries, then please do not hesitate to contact me.

Letter from Applicant's Agent by email on 8th October 2020 (page 1)**Carter Jonas**

Claire Bayley
Associate Planner
Planning, Growth & Sustainability Directorate
Buckinghamshire Council
The Gatehouse
Gatehouse Road
Aylesbury
HP19 8FF

One Station Square
Cambridge
CB1 2GA

T: 01223 368771

F: 01223 346627

Your ref:

Our ref: 5738688v1

BY EMAIL

08 October 2020

Dear Ms Bayley,

SOUTH WEST MILTON KEYNES (15/00314/AOP & APP/Y0435/W/20/3252528)

I write further to our telephone conversation of the 2nd October 2020.

Firstly, thank you for confirming safe receipt of TRN1 prepared by WSP. This, as you know, has been prepared in order to provide a response to matters raised by your colleagues upon the updated Transport Assessment (May 2020) dated 29th July 2020.

In preparing TRN1 and addressing queries raised by your colleagues in relation to the proposed crossing arrangement of the Old Buckingham Road, our attention was drawn to a drafting error in the suite of drawings that accompanied the update of the planning application submitted in June 2020 and which incorrectly illustrated the alignment of the 'left in' access from the A421 Standing Way. This has been corrected in the accompanying suite of drawings with consequential minor amendments to the disposition of the attenuation feature, housing development parcel and the alignment of the primary route corridor immediately adjacent to the access. For clarity, the table below sets out the drawings that are now superceded by the accompanying drawings.

Drawing	Drawing Reference	Superceded by
Development Framework Plan	CSA/4857/100 Rev K	CSA/4857/100 Rev L
Open Space Plan	CSA/4857/113 Rev C	CSA/4857/113 Rev D
Illustrative Masterplan	CSA/4857/112 Rev E	CSA/4857/112 Rev G
Residential Density	CSA/4857/119 Rev C	CSA/4857/119 Rev D
Public Transport	CSA/4858/117 Rev C	CSA/4857/117 Rev D
Building Heights	CSA/4857/114 Rev C	CSA/4857/114 Rev D

Letter from Applicant's Agent by email on 8th October 2020 (page 2)

Carter Jonas

Key Structural Elements	CSA/4857/120 Rev F	CSA/4857/120 Rev G
Landscape Character Areas	CSA/4857/121 Rev E	CSA/4857/121 Rev F

We have been monitoring the consultation responses that have been made upon the updated documentation that was submitted in June 2020. We have prepared documentation to respond to issues raised in relation to ecology and surface water drainage.

Ecology

Please find accompanying this letter the following documentation:-

- Addendum to Chapter 7 Ecology of the updated Environmental Statement (May 2020)
- Appendices to Addendum
- Response Note (October 2020)

The addendum to Chapter 7 Ecology of the Environmental Statement sets out the findings of confirmatory ecological survey work conducted between April and August 2020. The addendum supports the assessments made of the likely significant effects of the proposed development in terms of Ecology and Nature Conservation within Chapter 7 of the updated ES.

The Response Note has been prepared to address comments received from the Council's Ecologist (19th August 2020) and the BBOWT (27th July 2020) and should be read in conjunction with the ES addendum.

Surface Water Drainage

The Council's Sustainable Drainage Team provided comments on the updated Flood Risk Assessment and Surface Water Drainage Strategy (May 2020) on the 21st July 2020, additional information was also requested in relation to greenfield run-off rates.

The attached Technical Note dated 1st October 202 has been prepared by WSP to respond to the comments made and provide the additional information requested. The Indicative Surface Water Drainage Strategy drawing in Appendix A of the FRA & SWDS (May 2020) reference 1442-D-003 Rev P17 is superseded by the updated drawing contained in the Technical Note reference 1442-D-003 Rev P19. The revision reflects the corrected access arrangement noted above.

I trust that this is all clear. As ever, should you have any further queries, please do not hesitate to contact me.

Appendix 1

Rather than repeat what has been said before, appended to this objection are:

- Letter on 26th September 2016 to AVDC (and MKC)
- Letter on 5th June 2017 to AVDC with extracts of minutes of MKC meetings
- Letter on 6th June 2017 to AVDC Strategic Development Management Committee
- Letter on 30th May 2017 to AVDC Corporate Planner

NEWTON LONGVILLE PARISH COUNCIL

Tel: 01908-367799
Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall
Whaddon Road
Newton Longville
Buckinghamshire
MK17 0AT

Office Hours: Mon, Wed & Fri 9:30 am – 3:30 pm

26th September 2016

By email to:

Claire Bayley, Aylesbury Vale District Council
Sarah Hine, Milton Keynes Council

Dear Claire and Sarah

AVDC Planning Application: 15/00314/AOP
MKC Planning Application: 15/00619/FUL

In my email to you on 7th September I forwarded on to you an email I had sent to the SWMK Consortium. The response from the applicants is attached to this letter.

This is therefore a formal submission to both planning authorities seeking action on what we believe are primarily procedural matters as detailed below. I stress that the parish council is not being critical of the planning authorities in the handling of this. For the avoidance of doubt this letter is not intended for the planning file unless you wish add it.

1. Environmental Statement - Compliance with Environmental Impact Regulations – Avoidance of a “Paper Chase”

- 1.1. We believe that what has currently been produced is not compliant with the Environmental Impact Regulations and amounts to a “Paper Chase”. We ask that both planning authorities issue Regulation 22 notices requiring revised documents to be submitted which completely replace those documents which currently require a reader to jump to and fro between two versions.
- 1.2. What we now have is effectively little different to a new application. It has significantly changed proposals and plans. A revised Environmental Statement (ES) has been submitted, however it has only been replaced in parts and to read through the ES means jumping from old to new.
- 1.3. Replacement of the odd page or part of a page may be acceptable in isolation, but if the documents are fundamentally changed as here then the relevant sections of the ES should be produced as a new document.
- 1.4. The updated Design and Access Statement is a short but complex example of the need to navigate two different documents together. The Transport Assessment is far worse.



NEWTON LONGVILLE PARISH COUNCIL

- 1.5. Planning Policy Guidance Paragraph: 035 Reference ID: 4-035-20140306
"What information should the Environmental Statement contain?" states:

"It may consist of one or more documents, but it must constitute a "single and accessible compilation of the relevant environmental information and the summary in non-technical language" (Berkeley v SSETR [2000] 3 All ER 897, 908)."

- 1.6. A quotation from Lord Hoffman in the above case is included in Query 9 in the attached as put to the applicants.
- 1.7. A later part of the same PPG paragraph on outlining alternatives has not been done, even though by virtue of the changes now proposed alternatives have been considered. In general, the rationale for the changes is not explained in either the main ES or the Non-technical summary.

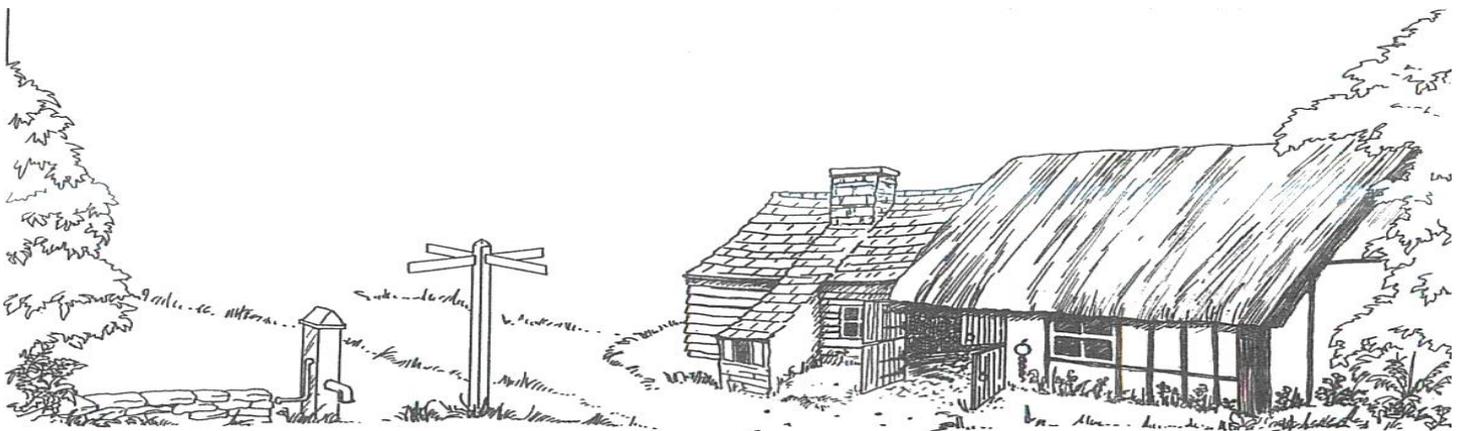
"Where alternative approaches to development have been considered, the Environmental Statement should include an outline of the main alternatives studied and the main reasons for the choice made, taking into account the environmental effects."

2. Missing Data

- 2.1. See details in Queries 1 to 3 in the attached. In brief the Transport Assessment does not contain the raw data of Automatic Traffic Counts and Manual Classified Counts. There does not appear to be any justification for this.
- 2.2. Please require this data to be required to be produced.

3. Details of matters agreed with highways authorities and other consultees.

- 3.1. The applicants have made various claims about matters having been "agreed" with AVDC/BCC/MKC. This is both within the Environmental Statement (ES) and within presentations made at recent meetings at West Bletchley and Newton Longville Parish Council.
- 3.2. They have referred to matters having been specified by AVDC/MKC/BCC consultees but no details of this is included in the ES or planning files.
- 3.3. We understand that this may in part be because the highways authorities and other consultees have had direct contact with the applicants without details being provided to the planning authorities.
- 3.4. Full details of discussions with the highways authorities and other consultees should be on planning files. In particular it should be clear what has and has not been "agreed".
- 3.5. Please ensure all the consultees that have been involved in direct contact with the applicants provide full details to the planning authorities and details of all exchanges are added to the planning files.



4. Other issues with Environmental Statement

- 4.1. There are two other related matters detailed in 5 and 6 below, which are also more of a procedural nature and we ask that these are both also addressed now and where considered appropriate further information be required from the applicants.

Validation of traffic models

- 4.2. Google Maps traffic layer has been used to validate the traffic modelling.
- 4.3. We do not believe use of Google Maps traffic layer is appropriate to validate models. The traffic layer does not show queue lengths at all, but is an approximation of the traffic flow and should not be used to validate models. The applicants have stated (at our public meeting) that it was Buckinghamshire County Council that instructed that Google Maps traffic layer be used.
- 4.4. Even if use of Google Maps traffic layer to validate models was acceptable (which we do not accept), the quality of the screenshots in Appendix P is far too poor. If such screenshots are to be used then they should be much larger.
- 4.5. The tables in Appendix P appear to use data which purports to be derived from Google Maps. However the traffic layer cannot be used to measure queue lengths. The traffic layer colour coding is only an indication and not actual data.
- 4.6. Whilst the issue with use of Google Maps traffic layer primarily relates to roads within Buckinghamshire, it has also been used for Milton Keynes as well, see for example paragraphs 9.88 and 9.91 in the TA addendum. Note that for this, though a larger screenshot has been included and use made of Google typical rather than live traffic.

“9.88 The queue lengths recorded for the PM peak were compared to Google Traffic ‘typical’ conditions for validation purposes. The recorded queue length compares well to the Google typical traffic screen shot.”

5. Stage 1 Safety Audit

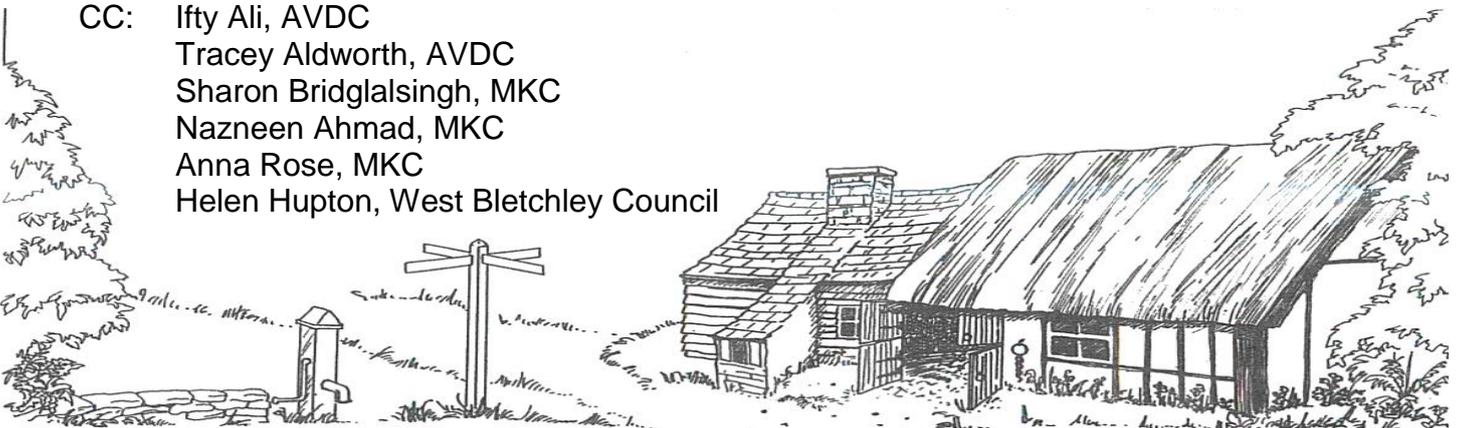
- 5.1. A Stage 1 Safety Audit was carried out on junctions in the original proposals but has not been done on the revised proposals. In addition, not all the junctions where changes are proposed have been subject to a Stage 1 Safety Audit at all. Of particular interest to Newton Longville is the proposed traffic calming within the village.

Yours sincerely



Mike Galloway
Clerk to the Council

CC: Ifty Ali, AVDC
Tracey Aldworth, AVDC
Sharon Bridglalsingh, MKC
Nazneen Ahmad, MKC
Anna Rose, MKC
Helen Hupton, West Bletchley Council



NEWTON LONGVILLE PARISH COUNCIL

Tel: 01908-367799
Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall
Whaddon Road
Newton Longville
Buckinghamshire
MK17 0AT

Office Hours: Mon, Wed & Fri 9:30 am – 3:30 pm

5th June 2017

By email to:
Claire Bayley, Aylesbury Vale District Council

Dear Claire

AVDC Planning Application: 15/00314/AOP
MKC Planning Application: 15/00619/FUL

Attached to this letter is an extract of the minutes of the three meetings of the Milton Keynes Council Development Control Committee meetings held to consider the application. As you will see each time it was deferred for various matters to be resolved including but not limited to highways matters. The matters remain unresolved.

There has been one meeting with the MKC Highways officer, their Highways consultant and the then case officer. Their consultant acknowledged he had information including data which had been provided by Mouchel but which had not all been passed to the case officer. He undertook to do so. However so far, the bulk of the information and information referred to has yet to be provided and a further meeting is being arranged.

The minutes also cover the consideration by Milton Keynes Council of the consultation by Aylesbury Vale.

Yours sincerely



Mike Galloway
Clerk to the Council



Milton Keynes Council

Extracts from minutes of Development Control Committee

Consideration of planning application to Milton Keynes Council 15/00619/FUL Salden Chase (South West Milton Keynes)

17th November 2016 - DCC49

RESOLVED:

That determination of the application be deferred to allow for further information to be provided in respect of the modelling processes used to complete the transport assessment and any further legal implications.

2nd February 2017 – DCC70

RESOLVED:

That determination of the application be deferred to allow further modelling and testing of the Transport Assessment.

9th March 2017 – DCC81

Councillor Bint stated that in the event that the determination was deferred it should also be to allow Officers of the Council to engage with the relevant objectors, and in particular Mr Heath, to examine the modelling used to complete the transport assessment and consider any evidence provided by other parties. There was also a need to consider what the nature of the school on the estate would be to assess the impact on traffic that would have and also a need to assess adequately whether those who later occupy the estate would use facilities such as employment, shopping and Rail links in Milton Keynes or Aylesbury.

RESOLVED:

That determination of the application be deferred until such time as Aylesbury Vale District Council have determined the Salden Chase application.

Full minutes available at <http://cmis.milton-keynes.gov.uk>

Milton Keynes Council

Extracts from minutes of Development Control Committee

Consideration of consultation by Aylesbury Vale DC on AVDC application reference 15/00314/AOP (MKC reference: 15/00223/CONS)

17th November 2016 – DCC50

The Committee considered a report in respect of a Consultation on application 15/00223/CONS.

The Committee was told that the Officers recommendation was that Milton Keynes Council submit a formal objection to the proposal for the reasons stated in the report.

The Committee heard from Councillor Witt (Newton Longville Parish Council) Mr S Heath, Councillor E Thomas (West Bletchley Council), Ms. E Rawlinson (Chair of Residents Association), Councillor J Nicholas (Shenley Brook End and Tattenhoe Parish Council), Ms A Ravn-Aagaard (Chair of Bletchley Park Residents Association), Mr A Franks, Councillor K Geaney (Shenley Brook End and Tattenhoe Parish Council), Mr M Hyde (Applicants Agent) Councillor Clancy Councillor Wales and Councillor Geaney.

Speakers made reference to the following issues;

The existing facilities at Milton Keynes Hospital did not have capacity for the increase in population and no funding would be made available through the application to improve facilities.

- The development would result in significant traffic problems for existing communities.
- There has been a lack of disclosure of traffic data between the developer and local authorities resulting in significant uncertainty as to the potential impact of the proposed development and thereby make a decision process impractical.
- The A421 did not have the capacity to take the additional traffic that this development would create.
- Development already underway within Milton Keynes Borough on land abutting the A421 should have been taken into account when assessing the transport implications of this development.
- There would also be unsustainable increase in traffic on the V1 and V2 grid roads.
- There was uncertainty as to the legal position of proposed highways works.
- There is a misuse of models in determining the traffic flow and potential impact from the development.

- The traffic plan relies on a northern flow of traffic, which was unrealistic when considering the financial benefit of using Bletchley or Leighton Buzzard for commuting to London.
- Any objection to the scheme should be supported by evidence as Aylesbury Vale do not presently have a local plan and may have no alternative but to approve the application which would have significant detrimental impact on Bletchley and surrounding Communities.
- Any plans should take account of the proposed Oxford/Cambridge Expressway and East/West railway.
- The potential S106 contributions are unlikely to be adequate to address the full infrastructure requirements of the proposed development.
- The proposed development did not provide for infrastructure before expansion.

The applicant's agent told the Committee that duplicate applications had been submitted to Aylesbury Vale District Council and Milton Keynes Borough Council two years previously and discussions had been had with both authorities to seek to address the issues identified. This resulted in revisions having been submitted in August 2016 to address those features.

The Committee heard that from the outset the Developer had acknowledged that there would be implications for Milton Keynes and that they would require mitigation, however the S106 contribution would be with Aylesbury Vale District Council to accord with relevant regulations and that it was for the two Authorities to negotiate settlements that complied with the regulations.

The Committee heard representations from Councillors Clancy, Wales and Geaney reiterating the points raised by previous speakers.

Councillor A Geary asked the Committee to consider the Senior Planning Officer's recommendation at paragraph 6.0 of the committee report as this provided a succinct summary of the objections raised in so far as;

'The application fails to take account of the level of services and facilities required to meet the day-to-day needs of its future residents and fails to make a proportionate contribution towards an increase in the capacity of existing facilities within Milton Keynes to satisfy these increased demands and to mitigate the impact of the proposed development on existing services and infrastructure in Milton Keynes'

He further advised the Committee that he welcomed the recommendation that the Committee reserve the right to make further comment as the process progresses, and suggested that the Chair and Vice Chairs take responsibility for discussing any future issues with Ward Councillors and provide feedback as required, rather than have the matter put before the Committee.

Councillor A Geary also sought the Committees approval that he or a subsequent Chair or responsible Cabinet Member, attend any meeting of the Aylesbury Vale

District Council Development Control Committee to represent the views of Milton Keynes Council.

Members of the Committee confirmed their support for the recommendation to object to the application on the grounds identified in the report and the comments made to the Committee, but urged the Officers to ensure that the objections were evidence based and in the terms of the relevant policies held by Aylesbury Vale District Council.

RESOLVED

1. That the Committee support the recommendation to object to the application, taking further account of the impact on Health Facilities and the Traffic implications for the immediate vicinity and the wider negative impact on the existing residents of Milton Keynes whose existing services would face further and unsustainable demand.
2. That objections be made in written form taking account of relevant policies held by Aylesbury Vale District Council.
3. That any written representations be circulated to the Committee and be agreed with the Chair and Vice Chairs of the Committee in advance of submission to Aylesbury Vale District Council.
4. That the Chair and Vice Chairs write a joint letter in support of the objections on behalf of the Committee.
5. That the Chair or any subsequent Chair and/or the responsible Cabinet Member be requested to attend any relevant meeting of Aylesbury Vale District Council Development Control committee to make representations on behalf of the Committee and Council.

Full minutes available at <http://cmis.milton-keynes.gov.uk>

NEWTON LONGVILLE PARISH COUNCIL

Tel: 01908-367799
Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall
Whaddon Road
Newton Longville
Buckinghamshire
MK17 0AT

Office Hours: Mon, Wed & Fri 9:30 am – 3:30 pm

6th June 2016

To: Members of Strategic Development Management Committee
Aylesbury Vale District Council

By email

Dear Councillors

Planning Application 15/00314/AOP – Objection

Introduction - Process

1. We do not believe this application is ready to be determined for the reasons given in earlier correspondence.
2. However, if it is going to be considered then before you go further please consider amending your procedure and treat the speakers from the parish councils within Milton Keynes in whose area part of the application site is, as well as Milton Keynes Council (MKC) itself, in the same way that parishes within AVDC are by MKC and allow 5 minutes each to speak rather than treating them as part of the “objectors” speaking limit. MKC has regularly afforded similar courtesy to AVDC parishes and principle authorities on its boundary and we believe it is only right this is reciprocated by AVDC.
3. If despite all you will hear you are nevertheless minded to grant permission then we urge you to defer for officers to bring back to the committee when full details all conditions and the full proposed section 106 agreement are available. The parish council and others should have the opportunity to make representations on these matters. We therefor urge the committee to retain control over this application.
4. An impression has been put forward that there are different applications to the two planning authorities, there are not. The applications to both Aylesbury Vale and Milton Keynes Council are identical (as they are required to be by the law).
5. We apologise to members that matters are being raised now in such detail, however the points have been highlighted to officers since 26th September 2016 by letter attached but not dealt with despite reminder. Following a letter sent on 30th May 2017 a response was sent on 2nd June however we do not believe this deals with all the points raised.



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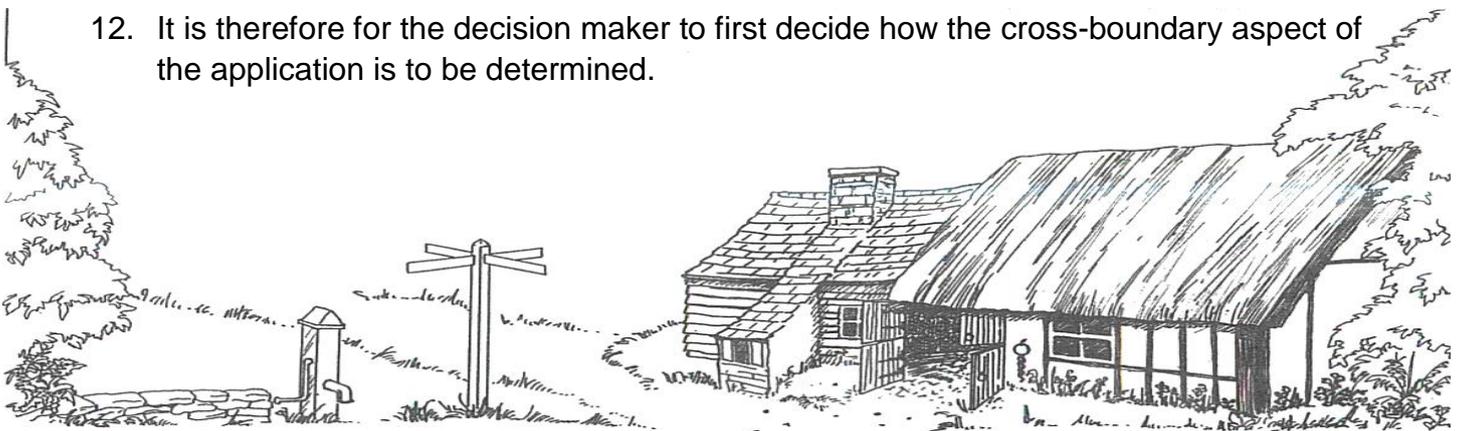
6. Amongst other things, despite being requested over eight months ago, on 26th September 2016, we have still not been provided with the raw data used within the Transport Assessment section of the Environmental Statement, nor various communications which justify claims by the applicants that aspects have been agreed by AVDC, BCC and MKC.
7. For the reasons given in more detail below, we hope the committee will defer consideration of the application and require the applicants to submit a fresh Environmental Statement. This should be a new complete single (albeit multi-volume) Environmental Statement with does not constitute a “Paper Chase” as ruled out by the House of Lords in Berkeley.

Application not dealt with in accordance with Environmental Regulations

8. The report to committee purports to deal only with the aspects of the application within the Aylesbury Vale DC boundary, however we contend that is a fundamentally flawed approach and that in particular account needs to be taken of the overall transport implications of the complete application, not simply those parts which happen to be within Aylesbury Vale. Traffic does not respect administrative boundaries.
9. Whilst the government guidance does give any more detail about handling cross-boundary applications under planning law as such, the Environmental Impact Regulations clearly apply to the site as a whole.
10. We asked DCLG for clarification on how cross boundary applications should be considered. Their response makes clear that whilst it is for each planning authority to decide how it deals with the application:

“I can confirm that where a site which is the subject of a planning application straddles one or more local planning authority boundaries, the applicant must submit identical applications to each local planning authority. We would expect neighbouring local authorities in such situations to work closely together in handling the application, and on the timing of any decisions.”[DCLG]

11. Given this is a cross-boundary application we contend that this requires a holistic approach which does not simply consider the actual land within each planning authority boundary but considers the development overall and the effect on all surrounding communities. To imagine that either Aylesbury Vale or Milton Keynes Council should simply ignore the effect on communities not within its own boundaries is plainly in conflict with the ethos of joint working and cooperation within the National Planning Policy Framework.
12. It is therefore for the decision maker to first decide how the cross-boundary aspect of the application is to be determined.

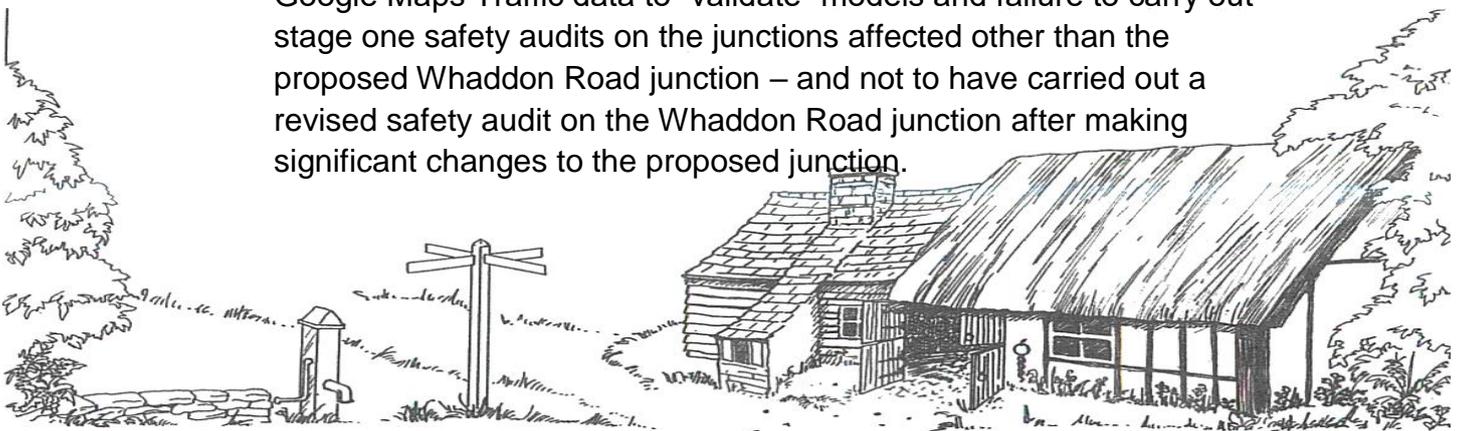


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13. We urge the committee to consider the application for the site as a whole rather than an artificial boundary running along the local authority boundary as if the world ceases at a local authority boundary. Traffic within Milton Keynes impacts traffic within Aylesbury Vale and vice-versa.

14. Issues raised on 26th September 2016 included:

- Environmental Statement (ES) – Failure by the applicants to comply with Environmental Impact Regulations – Avoidance of a “Paper Chase” As the government’s Planning Practice Guidance makes clear, an ES may consist of one or more documents, but it must constitute a “single and accessible compilation of the relevant environmental information and the summary in non-technical language” (Berkeley v SSETR [2000] 3 All ER 897, 908).” What has been submitted does not comply with this.
 - A revised Environmental Statement (ES) has been submitted, however it has only been replaced in parts and to read through the ES means jumping from old to new.
 - Replacement of the odd page or part of a page may be acceptable in isolation, but if the documents are fundamentally changed as here then the relevant sections of the ES should be produced as a new document.
 - The updated Design and Access Statement is a short but complex example of the need to navigate two different documents together. The Transport Assessment is far worse. Over the past four months the applicants’ consultants Mouchel have made repeat changes to junction proposals. For each change proposed a further error or omission has been found. This does not indicate a robust or sustainable proposal.
- Missing Raw Traffic Data and correspondence between the applicants and the highways authorities and planning authorities.
- That at public meetings in West Bletchley and Newton Longville the applicants and their representative claimed that various matters had been “agreed” with the highways authorities and other consultees, but there is little or no detail of these discussions on the planning file.
- Other issues with Environmental Statement – inappropriate use of Google Maps Traffic data to “validate” models and failure to carry out stage one safety audits on the junctions affected other than the proposed Whaddon Road junction – and not to have carried out a revised safety audit on the Whaddon Road junction after making significant changes to the proposed junction.

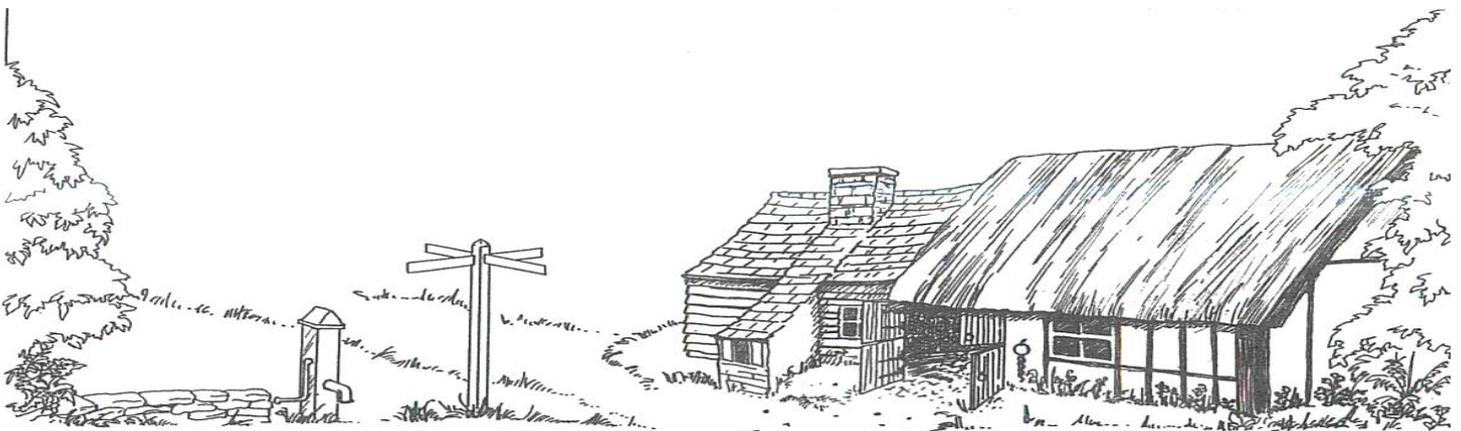


Milton Keynes Council planning policies

15. We ask members to carefully consider Milton Keynes Council policy CS6 (attached) including the delivery arrangements and how it should be applied to this application. Amongst other things there is a need to avoid the sort of situation described by residents in the wilderness of “Newton Leys South” that they are finding by being within the AVDC administrative boundary but largely looking to Milton Keynes for services.

Consideration of Highways and Transport Implications

16. You already have a copy of the report commissioned from Transport Consultants by David Tucker Associates (DTA) which was commissioned NLPC and West Bletchley Council (WBC) as well as in the submissions from Steve Heath.
17. There is a recent High Court decision that makes clear that account must be taken of the existing highway situation and not simply that a development proposal must “wash its own face” from a highways impact point of view - see attachment reviewing a recent High Court decision. In it not sufficient to say “the problem already exists therefore we can ignore it”.
18. There appears to be an ongoing fundamental misunderstanding as to who is responsible for decisions on highways matters within a planning application. This is a matter for AVDC as the Local Planning Authority, not BCC as the local Highways Authority (HA). Whilst the BCC as HA may provide advice, the actual decision is for the planning decision maker. Whilst highways works may well be subject to a Highway Act section 278 agreement with MKC as the local Highways Authority, this may only follow a planning approval and the details of what is proposed including an adequate demonstration of the impact on the existing highway network is a planning matter for consideration by the Local Planning Authority.
19. So far no explanation has been provided by the applicants to explain the rational or justification for the removal of a left in, left out junction to the A421 as originally proposed. We understand the only reason for the change is the applicants do not wish to pay the costs of the infrastructure changes that would be needed to support provision of the out part of the proposed junction. So instead they are merely assuming the traffic that would have used that junction can instead use the remaining two proposed junctions.



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20. The applicants' consultants Mouchel contend that the majority of the highways impact of the site will be towards Milton Keynes – and from a public transport point of view in particular would point towards Central Milton Keynes rail station in particular rather than to Bletchley or Leighton Buzzard. The traffic that would have exited the development from the A421 junction will now instead have to exit to Whaddon Road and access the MK highways network via Bottledump Roundabout. The T-junction proposed is only a short distance from the MK boundary and yet is the sort of junction that is now being either closed off or limited to left-only out with in MK due to the number of serious and fatal road traffic collisions they have been at such junction on the MK grid road network in recent years.
21. Much extensive analysis of the highways aspects has been undertaken by Steve Heath, a Newton Longville resident, he will detail this in a separate submission. We urge you to challenge the applicants on the issues raised.

Overall, we believe there is sufficient justification in the objections you have to reject this application now and urge you to do so. In the alternative please require the applicants to submit a new compliant Environmental Statement and ensure that all outstanding requests for data and other information are complied with.

Yours sincerely



Mike Galloway
Clerk to the Council



NEWTON LONGVILLE PARISH COUNCIL

Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall
Whaddon Road
Newton Longville
Buckinghamshire
MK17 0AT

30th May 2017

Ms Susan Kitchen
Corporate Planner
Aylesbury Vale District Council
The Gateway
Gatehouse Road,
Aylesbury
HP19 8FF

Dear Ms Kitchen

Planning Application 15/00314/AOP – Salden Chase (South West Milton Keynes)

The aim of this letter is to advise you on the Parish Council current views on the revised application of the development of nearly 1,900 houses on an arable, greenfield site only 200 metres from our village of some 850 houses.

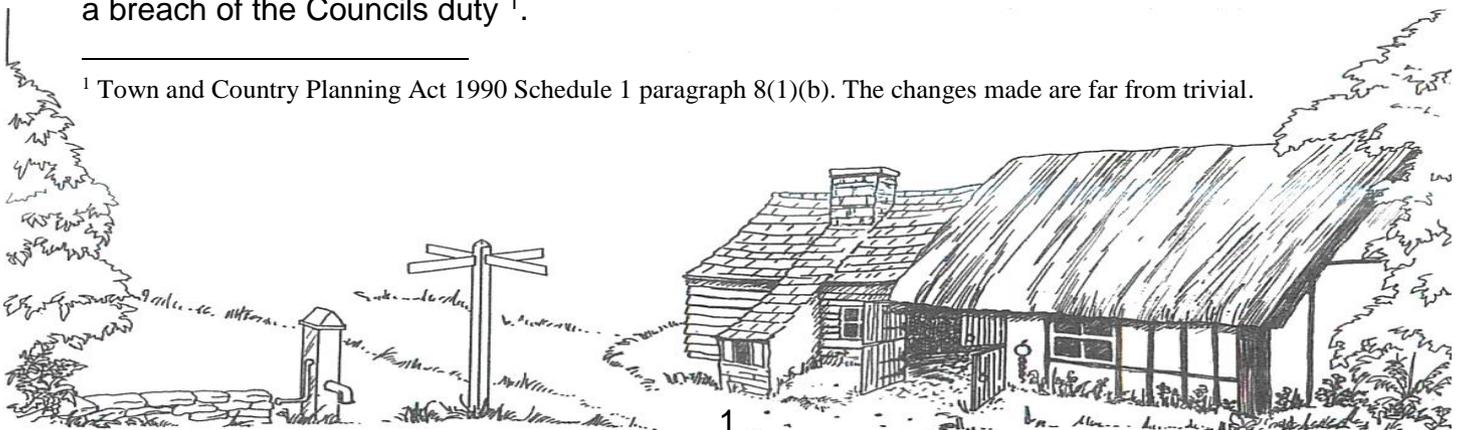
We believe it is inappropriate to take the application to a meeting on 7th June, for the reasons below and in addition as this is the day before the general election and hope you can confirm to us that this meeting will not take place. We believe it unfair to have such a critical development for our village discussed at that time, when participants are likely to be consumed with other matters.

In addition, there remain matters of substance that we feel need to be explored before the application is considered by the committee.

We, our residents, West Bletchley Parish council and Whaddon Parish council are equally affected by the proposed development. By the meeting going ahead as planned we will all be afforded an unfairly short of time to respond. There has been no consultation with residents on any of the changes made after August last year. The later changes are far from trivial, they are key to how traffic is supposed to flow through a development and on existing roads.

This situation has been exacerbated it appears by the fact that AVDC was in receipt of key documents from the applicants six weeks before the cancelled committee meeting, on May 17th 2017, but these were not all made public. Some documents were put online on 8th May, but as of today no formal notification of these changes have been made to either ourselves, West Bletchley Parish Council or Whaddon Parish Council. We feel that this is a breach of the Councils duty ¹.

¹ Town and Country Planning Act 1990 Schedule 1 paragraph 8(1)(b). The changes made are far from trivial.



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Bucks County Council Highways have told us that their report for this application (as attached to the report for 17th May) was based on updated documents provided by Mouchel (applicant's specialist) in April 2017 and the BCC report quotes from the updated documentation.

These are not the documents that were placed online by AVDC on 8th May which are dated February 2017 and March 2017. All submissions from the applicant and particularly the most recent ones should be on the AVDC planning website. As of this morning (30th May) the documents referred to by BCC are not listed, despite having been specifically requested from officers on 19th May and followed up twice since then.

We trust that situation will be resolved as a matter of urgency and that consultation for an appropriate minimum period will be undertaken of at least 21 days with all those who have commented before and all relevant other consultees and parish councils being notified of the changes.

Applying the Wheatcroft² principles we believe mean that if the current changes to the application are to be accepted by AVDC, then as a minimum AVDC should notify the proposed changes to all who have responded so far to the application.

In the same vein, we are not convinced that the changes made in August 2016 should have been accepted as valid changes to an application.

Our understanding is that AVDC should at that point have rejected the changes and advised the applicants to either withdraw their application and submit a new application, or that the application as submitted in January 2015 would be determined.

In the circumstances, we believe that AVDC should now call a halt to this and ask the applicants to withdraw their application. Therefore, leaving to the applicants to submit a new application if they wish to do so.

Any new application should include:

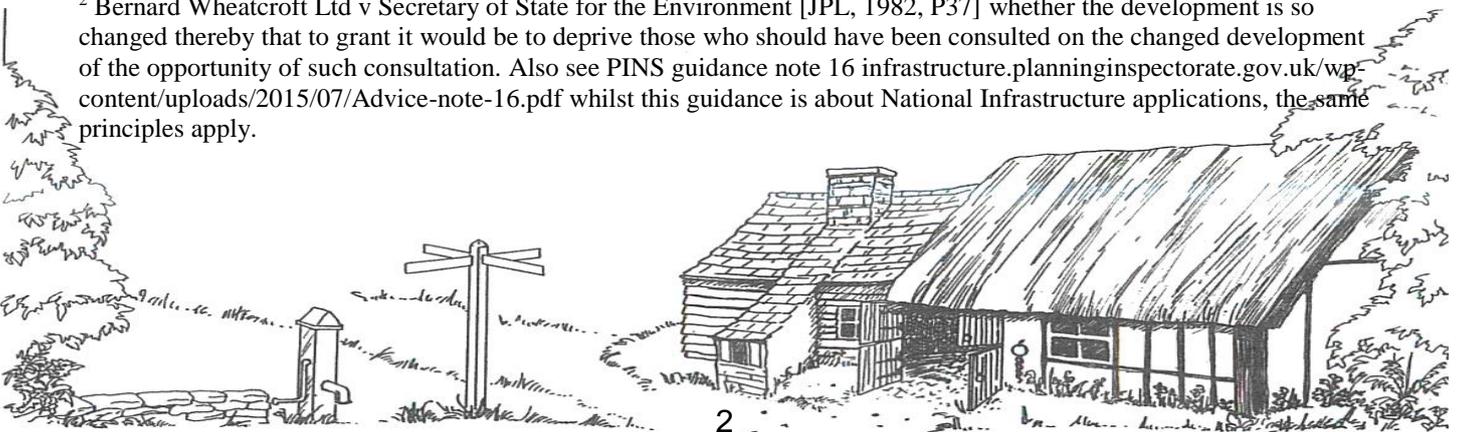
- a new Environmental Statement
- updated traffic surveys and accident records from a current date within 2017
- take account of the current housing supply situation in Aylesbury Vale.

Much of what the application relies on is out of date and fails to take account of recent growth.

Challenges

We have challenges on multiple issues. This letter confines itself to those which in our opinion are the most serious.

² Bernard Wheatcroft Ltd v Secretary of State for the Environment [JPL, 1982, P37] whether the development is so changed thereby that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation. Also see PINS guidance note 16 infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/07/Advice-note-16.pdf whilst this guidance is about National Infrastructure applications, the same principles apply.



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Highways and Transport is inter alia a key and major focus. Our transport analysis expert is currently completing another paper, which we will shortly be sending to all appropriate parties. This will provide a detailed and definitive rebuttal of the latest iteration of the application submission revised by Mouchel.

We believe that this is such a substantial issue that as a matter of urgency the application should be withdrawn until consensus has been reached - based on verifiable traffic data information that can be properly and thoroughly audited and analysed.

However, in that context we are being unfairly hampered by the following:

- The consistent and egregious failure by the applicants to provide the background data to justify their various proposals;
- The apparent failure by the AVDC to provide records of the communications about the application as part of the online planning file. These records would, we believe, address at least the following:
 - the changes to the application; and
 - what may, or may not, have been agreed between the applicants and AVDC, Buckinghamshire County Council Highways, Milton Keynes Council by whom and on what basis. Various documents submitted by the applicants are littered with claims that certain things have been “agreed” by AVDC, BCC and MKC.

Until this missing data is provided we cannot fairly and fully assess what the applicants have put forward.

Amendments to the application

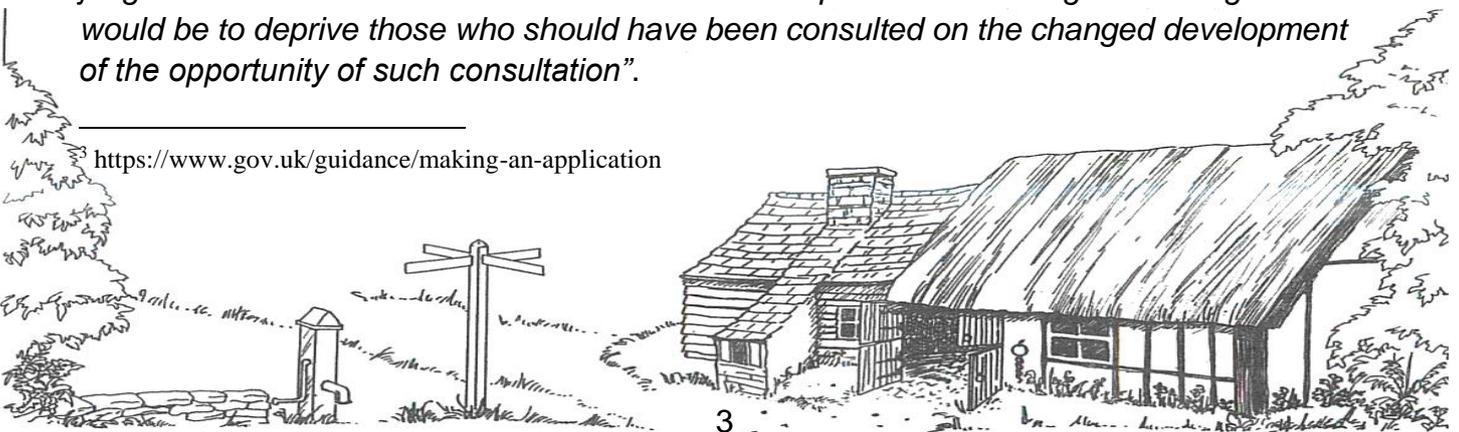
Returning to the repeat amendments to the details of the application, we note the relevant paragraph from the governments Planning Practice Guidance on amending applications:

"Can an applicant amend an application after it has been submitted?"³

It is possible for an applicant to suggest changes to an application before the local planning authority has determined the proposal. It is equally possible after the consultation period for the local planning authority to ask the applicant if it would be possible to revise the application to overcome a possible objection. It is at the discretion of the local planning authority whether to accept such changes, to determine if the changes need to be re-consulted upon, or if the proposed changes are so significant as to materially alter the proposal such that a new application should be submitted."

In the 'Wheatcroft' judgement the High Court considered the issue of amendments in the context of conditions and established that *"the main, but not the only, criterion on which... judgment should be exercised is whether the development is so changed that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation"*.

<https://www.gov.uk/guidance/making-an-application>



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Therefore, we do not believe the changes made in August 2016 should have been processed as amendments.

Our position is firm: we believe the nature of the amendments in August 2016 and the further amendments, the missing data and the timing of the meeting where they are to be discussed are major and as such that the development is so changed that the application should not be considered on 7th June 2017. We believe that we and others should have been consulted on the changes and to do so would be to deprive us and others of our rights to be consulted and comment with sufficient time to do so.

Despite what is said about the need to re-consult on the most recent changes, we contend the correct approach is that the applicants should have already been compelled to have withdrawn their application, on the basis of the proposals which contain inaccurate, incomplete analysis and factual flaws but primarily as a result of the changes made since the application was submitted in January 2015.

In our letter of 26th September 2016 about "amendments" to the Environmental Statement being inappropriate, we said it had caused a "paper chase" contrary to the House of Lords' decision in Berkeley⁴.

This would have been avoided had a new application been required by AVDC, in turn requiring updated traffic information – which would have obviated one of our major concerns and issues.

Consultation

The Court of Appeal summarised the general principles relating to consultation within the context of administrative law⁵.

"108 It is common ground that, whether or not consultation of interested parties and the public is a legal requirement, if it is embarked upon it must be carried out properly. To be proper, consultation must be undertaken at a time when proposals are still at a formative stage; it must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response; adequate time must be given for this purpose; and the product of consultation must be conscientiously taken into account when the ultimate decision is taken."

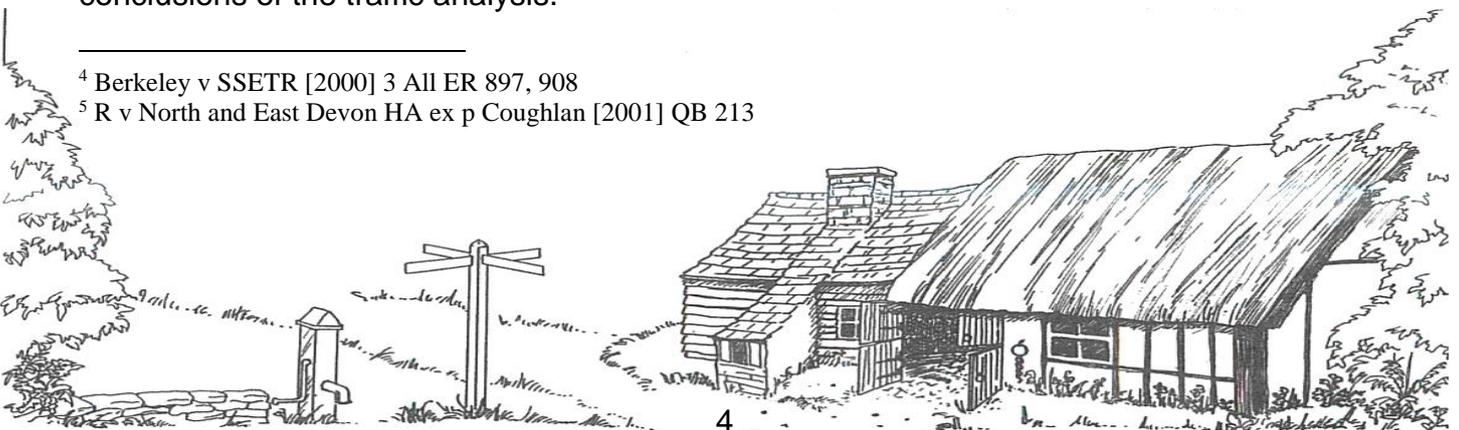
This shows the lack of detail provided so far and lack of sufficient reasons for the changed proposals mean the consultation process, in our opinion has been flawed.

Traffic flow data

Turning now to an issue that has disturbed us greatly: on behalf of the applicants, Mouchel have failed adequately, correctly and properly to produce verifiable evidence to support the conclusions of the traffic analysis.

⁴ Berkeley v SSETR [2000] 3 All ER 897, 908

⁵ R v North and East Devon HA ex p Coughlan [2001] QB 213



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It is a matter of record that the applicants have failed to do so in at least three subsequent revisions to their proposals.

As you will no doubt concur: the planning system is not meant to permit amendments to be repeatedly made. It is not a system that provides endless resubmission until the right answer in the eyes of the applicants has been reached. Traffic analysis is not a hypothetical process. It is an empirical process based on the collection of verifiable data, rigorous analysis and modelling using industry-approved software.

Furthermore, we believe Mouchel have used incorrect data, incorrect modelling, and out of date versions of software tools.

Mouchel have, by their own admission, done none of the preceding. It therefore follows inevitably that their traffic analysis without credibility or substance.

Summary

Given the inability of the applicant to produce an accurate, proper, well-researched traffic analysis; the failure to consult or cooperate with us in any substantive way, we request that the applicants are asked to withdraw their application, and only resubmit once a proper, verifiable traffic analysis has been conducted to that is agreed by all sides in advance.

We believe the applicants have not complied with the requirements to serve appropriate notice on all owners⁶. In particular that they have not served notice on the Milton Keynes Parks Trust.

Finally, the timing and scheduling of the meeting and the apparent lack of crucial papers on the website have not afforded us adequate time to prepare.

Yours sincerely



Cllr Nigel Gausden
Chairman
Newton Longville Parish Council

CC: Chairman and members of SDMC and local ward members

⁶ See Planning Practice Guidance paragraph 025 Reference ID: 14-025-20140306
<https://www.gov.uk/guidance/making-an-application#Ownership-Certificate-and-Agricultural-Land-Declaration>

