Milton Keynes Council Core Strategy
Examination in Public

Response of Legal & General Assurance Society Limited to the Inspector's Matters and Issues (273027)

Matter 2 – Development Strategy, Settlement Hierarchy
## Contents

1. **Introduction** ............................................................................................................. 3
2. **Matter 2 – Development Strategy, Settlement Hierarchy** .......... 4
# 1 Introduction

## Background Context

1.1 This statement has been prepared by Drivers Jonas Deloitte on behalf of Legal & General Assurance Society Limited (L&G) to respond to the following Matter raised by the inspector as part of the Independent Examination of the Milton Keynes Core Strategy Development Plan Document (DPD):


1.2 L&G has also responded in separate statements to:

- Matter 4 – Economy and Town Centres; and,
- Matter 5 – Transport.

1.3 All responses to the Inspector’s Matters and Issues are made in the context of L&G’s asset, Midsummer Place shopping Centre, Milton Keynes (Midsummer Place).

## Midsummer Place

1.4 L&G is the owner of Midsummer Place located in Central Milton Keynes. Midsummer Place forms part of the town’s main shopping area and comprises circa 40,000 sq m of retail floorspace.

1.5 L&G is a long term investor in the central area of Milton Keynes and is continually seeking to improve the existing retail offer of Midsummer Place. Discussions are also on-going with council officers on the development of further retail floorspace through an extension to Midsummer Place.

1.6 As a landowner and investor in the town centre L&G is keen to ensure that local retail policy correctly reflects national guidance which encourages development which supports the town centre first. In particular L&G seeks to ensure that retail policies recognise that Central Milton Keynes should be the focus for retail investment and that additional retail should be focused in the Primary Shopping Area in the first instance.

## Previous Representations

1.7 On behalf of L&G we have submitted representations to each stage of the Core Strategy. These representations still remain valid and include:

- Issues and Options (March 2007);
- Preferred Options (November 2007);
- Pre-Submission Version (March 2010); and,
- Conformity with SEPlan (August 2011).
2 Matter 2 – Development Strategy, Settlement Hierarchy

273027- Legal & General Assurance Society Limited

Issue 2.1

In general, does the Core Strategy provide clear, sound guidance about the roles that will be played by various parts of the borough in its future development?

2.1 No comment.

Issue 2.2

Is the settlement hierarchy and broad scale and direction of growth a set out in Policy CS 1 properly justified?

2.2 It considered that the Milton Keynes Core Strategy does not properly justify the settlement hierarchy as set out in Policy CS 1.

2.3 The adopted South East Plan (2009) identifies Milton Keynes as a growth area, a centre for significant change and also a “diamond for investment and growth”. With the expectation to evolve significantly. Central Milton Keynes (CMK) is identified for significant growth as a Primary Regional Centre.

2.4 The Coalition Government intends to abolish RSS under Section 109 of the Localism Act. However, RSS’s currently remain in place until a formal process of testing the impacts of their revocation in respect of Strategic Environmental Assessment (SEA) is complete and the Secretary of State takes the formal step of issuing the instrument abolishing RSS’s. At the time of submission of this Statement, the South East Plan (2009) remains a material consideration in the determination of planning applications. The evidence base that underpins the policies and assumptions of the South East Plan remains and post abolition of the RSS’s, the evidence base will continue to be both relevant and valid.

2.5 The introductory, contextual and spatial elements of the Core Strategy do make clear the sub-regional role of CMK, but not its regional and local roles.

2.6 The Core Strategy recognises that growth is essential to maintain and improve economic prosperity and that as a sub-regional centre it should continue to develop as such. In light of wider economic changes over recent years, the over-riding targets have been adjusted to reflect up-to-date predictions and the move from regional policy to economic geographies. Notwithstanding, this adjustment, the Core Strategy is clear in stating that further growth is planned for.
2.7 The detailed policies for CMK focus on its regional role, particularly in light of retail. However this is not made clear through the Core Strategy objectives. The NPPF states that significant weight should be placed on the need to support economic growth through the planning system in order to build a strong and competitive economy.

2.8 The success and viability of town centres, CMK in this instance, is recognised as being of national importance to the Government through NPPF and the Portas Review. Whereby town centres are at the heart of communities and to ensure a network and hierarchy of centres is defined that is resilient to anticipated change.

2.9 This updates but also reflects the South East Plan which specifically identifies CMK as a Primary Regional Centre and where major retail should be located, with no out of centre demand until 2026 (to which our submission statement on Matter 4, Issues 4.6 and 4.7 relates).

2.10 In regional and sub-regional terms CMK should be the emphasis for growth and change within the local authority area. Given this clear emphasis, the Core Strategy needs to be consistent in recognising CMK’s role in the settlement hierarchy as well as the retail hierarchy and strengthen the associated policies accordingly.

2.11 The contextual wording and title of Section 5 considers growth and change across Milton Keynes, growth and change for such a young city is not just related to new homes and jobs, as stated in Policy CS1, but all land uses to support the sustainable development of a growing community.

2.12 Accordingly, it is considered that Table 5.1 ‘Settlement Hierarchy’ of the Core Strategy should be amended with CMK sitting above the list of all other ‘main areas for development’ as the focus for town centre uses, followed by Milton Keynes City and the remainder of the existing hierarchy.

2.13 In addition reference to ‘Milton Keynes City’ does not have a definition within the Core Strategy. The plan at Figure 1.1 highlights the ‘Urban Development Area Boundary’. Figures 5.1 and 5.2 Key Diagrams relates to the ‘Urban Area’.

2.14 The use of terminology and to what it relates need to be made clear and consistent throughout the Core Strategy.

**Issue 2.3**

**Is there a sound policy framework for the rural areas of the borough?**

2.15 No comment.

**Issue 2.4**

**In terms of their guidance and specificity, is the balance between the area-based policies and Table 5.7 appropriate?**

2.16 No comment.

Word Count: 742 (excluding Section 1 - Introduction)