Dear Mr Banks

Milton Keynes Core Strategy Examination
Policy AD/1 & SLA Boundary

This letter sets out the full comments by JB Planning on behalf of The Fairfield Partnership (TFP) on the proposed new Policy AD/1 as tabled on day 2 of the Examination, in response to an invitation by the Inspector for written comments on the new policy.

However, before doing so, in seeking to be of assistance to the Inspector, we also comment briefly on the suggestion made during day 3 of the Examination, that there should be an amendment to the proposed boundary of the Strategic Land Allocation (SLA).

Both sets of comments below are made without prejudice to the written legal opinions and to the submissions to the lawfulness of the Revised Proposed Submission Core Strategy (RPSCS) and other evidence submitted to the Examination previously.

SLA BOUNDARY

To recap briefly, during day 3 of the Examination, as part of a discussion on the SLA boundary and schedule of development, the possibility that the secondary school should be provided outside the SLA boundary, on land to the north of Wavendon village (SHLAA land parcel reference EX1n was mooted. There was also discussion on the inclusion of strategic landscape buffers and the need to protect the setting of existing settlements, most notable Wavendon.

In response to this discussion, JB Planning suggested that it would make sense, and would reinforce the soundness of the RPSCS if the land to the north of Wavendon (comprising SHLAA land parcels EX1n and EX1h) was included within the SLA boundary, thereby facilitating better links between the SLA and existing City, and enabling the landscape setting of Wavendon and the potential for coalescence to be properly addressed. Other parties commented that they would, in terms of good town planning and masterplanning, support the inclusion of these land parcels within the SLA boundary.
By way of assistance to the Inspector, we enclose herewith a revised Proposals Map extract showing the suggested SLA boundary. The use of the eastern part of the additional land included within the boundary for a secondary school as suggested by Barton Willmore to the Examination would, subject to masterplanning through the Development Framework process, appear reasonable and include scope to protect the landscape setting of Wavendon. Similarly, the western part would allow for residential development to the north, with the scope to include open space to protect the landscape setting of the Wavendon to the south. (A line demarcating the maximum southern extent of any built development has been indicated on the enclosed plan, however this is only by way of illustrating a point of principle and it is considered that this point would be addressed in the Development Framework for the SLA rather than the line included on the Proposals Map.)

The inclusion of the additional land should not prejudice or overly delay the effective delivery of the SLA as both parcels of land have already been subject to rigorous assessment through the Sustainability Appraisal process.

COMMENTS ON POLICY AD/1

(The following paragraphs have been numbered for ease of reference.)

Preamble

1. During day 1 of the examination there was much debate regarding whether the RPSCS is in general conformity with the Regional Strategy (RS) and is sound, in particular due to the proposed housing target in the RPSCS being substantially lower than the housing requirement in the RS. Counsel for TFP submitted a written legal opinion to the Examination stating that, as it stood, there was no option open to the Inspector other than to find the RPSCS not in general conformity as (para. 4):

   “…on no reasonable view could the shortfall between the [RPSCS] and the RS … be in general conformity with the [RS] and [thus] nor could the [RPSCS] as a whole …”,

   nor could it be found sound, as the RPSCS has regard to the proposed revocation of the RS.

2. TFP maintains the position set out in this legal opinion. Conversely, the Council maintains that although the proposed housing target in the RPSCS is not strictly in conformity with the housing requirement in the RS, the Core Strategy as a whole, including the proposed housing target, is in general conformity.

3. Towards the end of the debate on day 1 of the Examination, the Inspector invited those attending, in particular certain parties acting on behalf of landowners and/or developers, to consider overnight whether there was any way by which the RPSCS should be amended to address the issue of general conformity, and specifically, the difference in housing numbers.

4. In response to this invitation, a new policy – Policy AD/1 – was tabled at the opening of day 2 of the Examination (Examination Document AD/1). Neither TFP, nor those acting on its behalf, were party to the preparation of the new policy. During the subsequent discussion on the new policy, the Council suggested a number of amendments (Examination Document MKC/21). Since then, the Council has suggested further amendments to the new policy (Examination Document MKC/21a).
5. During the discussion JB Planning made a number of representations on the new Policy and associated supporting text. These written comments set out those representations in full, including the justification for them.

Housing Requirement

6. The Council maintains its position that the proposed housing target of 28,000 dwellings (an annualised target of 1,750 dwellings) is in general conformity with the RS and in compliance with the NPPF. This is despite evidence such as the Housing Technical Paper of February 2011 (Examination Document B136), which categorically acknowledged (para. 1.4, our emphasis) that:

“In order to be in conformity with the [RS] the original Pre-Submission version of the Core Strategy (February 2010) sought to meet the [RS] requirement in full…”

7. It is also clear from the evidence submitted to and the discussion at the Examination that the Council reduced the proposed housing requirement for the Borough from 41,360 between 2006 and 2026 (an annual to requirement of 2,068) to 28,000 between 2010 and 2016 (an annual requirement of 1,750) solely in response to the Government’s stated intention to revoke Regional Strategies. There can be no debate on this point, the multitude of evidence including the February 2011 Core Strategy Submission Statement of Consultation, which explains (para. 6.1, our emphasis) that:

“The revocation of the [RS] led to a review of the Core Strategy. In August 2010, the Members of the Local Development Framework Advisory Group outlined changes to the Core Strategy that they wanted to see made in light of the removal of the South East plan housing figures. These changes were signed off by Full Council on 14 September 2010.”

8. Since the Council took this decision, the Court of Appeal has held in Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWCA Civ 639 that:

“It would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies.”

9. It is therefore without doubt that the Council acted unlawfully in this case, albeit without the contemporaneous knowledge that it had done so. However, the Council persists in unlawfully having regard to the Government’s stated intention to revoke Regional Strategies, stating on 1 June 2012 in its Examination Statement on Matter 1 (Examination Document MKC/6, para. 6.2) that:

“Given the clear intention of Government to revoke Regional Strategies, it is now for local authorities to address the implications of the dramatic change in economic circumstances since the South East plan was prepared.”

10. The Council’s justification for setting a housing target substantially lower than the requirement in the RS now appears to rely predominantly on “the global slowdown” and economic “downturn” (Examination Document MK/6, paras. 6.2 and 6.4). As noted to the Examination during the discussion on this matter, in February 2010 the Council stated in the Pre-Submission Publication Version of the Core Strategy (Examination Document B109, para. 5.12) that:
“It is not considered that the Timeline and Housing Trajectory are unrealistic given the current climate.”

11. Thus it is fair to say that in January 2010 the Council considered the RS housing requirement, both quantitatively and spatially, to be realistic and deliverable. Yet the Council is now claiming that by August / September 2010 – the period during which the decision was taken to reduce the housing figure – the RS housing figure for Milton Keynes was so unrealistic and undeliverable, that it had to be reduced by 7,000 dwellings within the Borough, and a further 10,990 dwellings in adjoining districts (the South West and South East SDAs in Aylesbury Vale and Central Bedfordshire respectively). Overall, this represents an effective deletion of almost 18,000 dwellings from a requirement in the RS for 49,950 dwellings in and adjacent to the City of Milton Keynes – a reduction of over 36%. This very clearly seems to be an attempted retrospective justification for the housing target now proposed and is simply not credible.

12. A significant amount of evidence has been submitted to the Examination in support of the RS housing requirement. These comments support that evidence, but do not seek to review it in detail. In short, the Council’s approach to setting its “housing target” belies a fundamental misunderstanding of current national policy.

13. The NPPF sets out a “presumption in favour of sustainable development”, which should be seen as a “golden thread” running through both plan-making and decision taking. With regard to plan-making, this means (para. 14, our emphasis) that:

   “Local Plans should meet objectively assessed needs … unless … any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole…”

14. The NPPF continues (para. 17, our emphasis):

   “…a set of core land-use planning principles should underpin … plan-making [including that] Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wide opportunities for growth”

15. The NPPF clearly requires (para. 47, our emphasis) that:

   “To boost significantly the supply of housing, local planning authorities should … use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing”

16. Whilst para. 47 continues “as far as is consistent with the policies set out in this Framework”, this is a reference to the need to avoid adverse impacts on environmental and other constraints, and not a provision that allows for an authority to propose significantly less housing land than is necessary to meet the full, objectively assessed, housing requirement.

17. With regard to establishing an objectively-assessed need, the NPPF clearly requires that local authorities should (para. 159):
“...have a clear understanding of housing needs in their area [and should] prepare a [SHMA] to assess their full housing needs ... [the SHMA] should identify the scale ... of housing ... that the local population is likely to need over the plan period which ... meets household and population projections, taking account of migration ... addresses the need for all types of housing, including affordable housing ... and caters for housing demand and the scale of housing supply necessary to meet this demand”

18. The proposed housing target of 1,750 dwellings per annum first appeared in a report to the LDF Advisory Group meeting on 9 September 2010 (Examination Document C1.29a), referenced as ‘Option 2’ (of three options – the other two options being 1,500 or 2,000 dwellings per annum), being described as a figure that was (our emphasis):

“consistent with average completion rates in the Borough over the last 5 years”

19. The 9 September report followed on from a discussion paper considered at the previous LDF Advisory Group meeting on 26 August 2010 (Examination Document C1.28c), which had considered five growth options ranging from 1,250 to 3,370 dwellings per annum. Option 2 – 1,700 dwellings per annum, was described as (our emphasis):

“trend based rather than based on an assessment of need”

20. In contrast, with regard to Options 3 and 4 – 2,080 or 2,130 dwellings per annum, the commentary stated:

“evidence base in place”

21. And with regard to Option 5 – 3,370 dwellings per annum, the commentary stated that it was derived from:

“locally based evidence”

22. Since August / September 2010, the Council has not carried out any other quantitative objective assessment of need, but has simply sought to retrospectively justify the proposed housing target of 1,750 dwellings per annum with an increasing quantity of references to the “the global slowdown” and economic “downturn”.

23. The Council’s justification as to why the housing target should not be higher than proposed in the RPSCS is now seemingly fourfold, that (Examination Document MKC/8, para. 1.13):

- Current Government household projections for Milton Keynes are an average of 1,560 per year up to 2031 (no source is provided for this figure, and population projections are to some extent affected by historic and planned levels of housing provision thus calculations can be circular – i.e. a historically consistent level of housing completions can result in very similar projected population growth, irrespective of other “needs”);

- The housing target is significantly above recent rates of completion (in fact, only around 5-8% above historic rates of completion);
- Economic growth, linked to which was the need for housing, has been, and is forecast to be, significantly slower that at the time the RS was prepared (yet the Council accepts that economic growth has outpaced housing delivery resulting in the noted increase in inward commuting and is projected to continue to do so); and

- The rationale behind the housing figures in the RS has been undermined as these allowed for significant inward migration [which is no longer at the same level] alongside natural growth (although the Council has no evidence to support this point, and national long-term figures would suggest otherwise).

24. In essence, these four points represent the Council’s “objective assessment of housing needs”. However, this “objective assessment” is presented in terms of a retrospective justification for the figure in the RPSCS, which is lower than the figure in the RS, with which the Council acknowledges it has to be in “general conformity”.

25. The Council’s approach appears to be, on the one hand, not to plan for objectively-assessed “needs” but to set what it considers to be a “realistic and deliverable target” (Examination Document MKC/8, para 1.10), but on the other hand, to argue that the proposed target represents the objectively-assessed “needs”. These two approaches are fundamentally different and the Council cannot continue to argue both.

26. It is clear that the Council has not undertaken an “objective assessment of housing needs” as required by the NPPF. On this basis, the RPSCS is not sound. It is therefore clear that the proposed housing target cannot be viewed as a figure based on any quantitative objective-assessment of housing needs. On this basis, the RPSCS is not sound. It is further clear that the housing needs of the Borough are considerably greater than the proposed housing target. On this basis, the RPSCS is not sound.

Housing Land Supply

27. During the five-year period 2006 to 2011, during which the annualised RS requirement for the Borough was 2,068 dwellings, 8,510 dwellings were completed, a shortfall of 1,830 dwellings (approximately 18%).

28. The NPPF requires that Councils identify a five-year supply of available and deliverable housing land, and that either 5% or 20% (where there has been persistent under-delivery of new dwellings against established targets) of additional land also be identified.

29. Using the RS requirement of 2,068 dwellings, the five-year supply for the Borough would be 10,857 (the 5% requirement) or 12,408 (the 20% requirement).

30. It is accepted practice that (refer to appeal ref. APP/X3025/A/10/2140962, paras. 11 and ID159-170) that where there has been a shortfall in delivery over the previous five years (of a plan period), this shortfall should be made-up within the short-medium term, i.e. the forthcoming five years. On this basis, the five-year requirement for the Borough would be 12,687 (the 5% plus shortfall requirement) or 14,238 (the 20% plus shortfall requirement).

31. It is TFPs position that, due to the persistent under-delivery between 2006 and 2011, the 20% plus shortfall figure should be applicable.
32. In summary, it is clear that there is less than a five-year supply of available and deliverable housing land. On this basis, the RPSCS is not sound.

**Comments on Policy AD/1**

33. There are a number of fundamental failings with the concept, construct and detail of both the proposed new policy, and the proposed supporting text.

34. To consider first the rationale and justification for the new policy, as contained in the supporting text. **Paragraph 1** of the supporting text states:

   Projections of future changes to the population and economy are subject to significant uncertainties. Continued high levels of immigration to Milton Keynes or a higher rate of economic growth which results in higher demand for housing may have negative social, economic and environmental consequences. Such consequences could include increasing commuting into the city, and increasing overcrowding, sharing and concealed households. There may be adverse implications for the wider housing market area if the homes required to support the workforce, or population pressures, exceed the supply of housing land delivered within the authority boundary or in planned extensions to Milton Keynes urban area in adjoining authorities as the South East Plan anticipates.

35. As this text is a statement of facts, no objection is raised to it, nor comments on it necessary. It is notable that, whilst the Council commented on and suggested amendments to other parts of the supporting text, and to the new policy itself, both during the debate at the Examination and in its subsequent written proposed amendments, it made no comment on this paragraph. It can therefore be assumed that the Council acknowledges and accepts the facts highlighted in the paragraph and the implications therein.

36. **Paragraph 2** of the supporting text states:

   The Council also acknowledges that the SHMA suggests a substantial gap between forecast affordable housing need and potential affordable housing supply. The Council’s choice of the scale of overall housing to be accommodated inevitably limits the number of affordable homes that can be delivered. The likely gap between affordable housing need and provision will have negative socio-economic consequences.

37. As this text is also a statement of facts, no objection is raised to it, nor comments on it necessary. Again, it is notable that, as with the first paragraph, the Council made no comment on this paragraph during either the debate at the Examination or in its written proposed amendments. It can therefore be assumed that the Council also acknowledges and accepts the facts highlighted in this paragraph and the implications therein, including the explicit acceptance that the RPSCS would, in all likelihood, not be in compliance with the NPPF.

38. **Paragraph 3** of the supporting text (the amendments shown are those proposed by the Council) opens:

   The level of new housing required across the Borough during the period 2006 – 2026 in strict accordance with the South East Plan is 41,360 homes (an average of 2,068 per annum) and within the MK growth area overall is 52,350 (2,617.5 per annum).
39. The original text is accurate. Thus the insertion of the word ‘strict’ into the opening sentence of Paragraph 3 of the supporting text is unnecessary and unsupported and has no sound statutory basis. Equally, the originally-suggested term “required” is more accurate than the Council’s suggested term “for”, thus the former should be the term used.

40. Paragraph 3 continues (the amendments shown are those proposed by the Council):

    The Council has concerns about the deliverability of this number of homes and therefore proposes to make provision at this stage for the delivery of 1,750 homes per annum (28,000 in total by between 2010 and 2026) which represents an increase in the average housing completion rate over the last 5 (1,660) 10 (1,560) and 20 (1,610) years.

41. Again, it is notable that, as with the first and second paragraphs of the supporting text, the Council made no comment on this part of the third paragraph during either the debate at the Examination or in its written proposed amendments.

42. As noted above, the NPPF clearly requires that local authorities should “use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing” in order to “boost significantly the supply of housing”. As set out above, the Council has not undertaken any quantitative objective assessment of need that supports any figure less than the requirement in the RS.

43. On this basis, the second sentence of the third paragraph of the proposed supporting text is contrary to the NPPF and cannot be included.

44. Paragraph 3 concludes (the amendments shown are those proposed by the Council):

    An additional provision of \[\] homes will be allocated in Plan: MK and adjoining the urban area to meet the requirements of the South East Plan, subject to the objective assessment of needs to be produced in accordance with paragraph 47 of the National Planning Policy Framework.

45. This sentence further underlines the point that a quantitative objective assessment of housing needs, as required by the NPPF, has not been undertaken. It appears to state that when an objective-assessment of housing needs has been carried out (presumably by the Council), if this assessment concludes that a greater amount of housing is required up to 2026 than is currently proposed, additional housing land will be allocated to meet this need, albeit in Plan: MK, which will not be adopted for a few years. However, with Plan: MK having an end date of 2031, rather than 2026, this sentence can alternatively be read as referring to the rolling forward of the currently proposed housing target of 1,750 dwellings per annum, and the resultant “additional” land for 8,750 dwellings (or some other figure) for the period 2026 to 2031 being allocated within Plan: MK.

46. On this basis, the third sentence of the third paragraph of the proposed supporting text is vague and imprecise, is meaningless, and does nothing to redress the issue which it is purported to be addressing, and cannot be included.
47. To consider the **proposed new Policy AD/1** itself, it is utterly meaningless. The first sentence of the new policy states (the amendments shown are those proposed by the Council):

   The Council will undertake an early review of the Core Strategy in the form of Plan: MK, to 2031 or such longer period as the Council chooses, with a projected end date to be completed by 2015.

48. The first part of the first sentence is simply a ‘commitment’ (albeit an unbinding commitment) that the Council will prepare a new Local Plan – Plan: MK (work on which has commenced), and that this will effectively replace the RPSCS. The remainder of the first sentence simply sets out an aspiration on the part of the Council that the new Local Plan would be adopted by 2015 with a plan period to 2031.

49. In short, the first sentence of the new policy is simply an aspirational statement by the Council that, putting the RPSCS to one side, it is preparing a new Local Plan to be called Plan: MK to cover the period 2015 to 2031, and that it hopes to have this plan in place by 2015. This statement does nothing to redress the issue which it is purported to be addressing – i.e. the RPSCS’s lack of conformity with the RS, and is therefore meaningless.

50. The second sentence states (the amendments shown are those proposed by the Council):

   This [Plan: MK] will take as its starting point the delivery of housing and employment requirements and the spatial approach of the South East Plan, to be considered in the circumstances that obtain including any relevant National Planning Policy Framework.

51. This is simply a statement of fact. Insofar as the RS remains part of the statutory development plan, Plan: MK would, as does the RPSCS, have to be in general conformity with the RS, and thus effectively “take as its starting point the delivery of housing and employment requirements and the spatial approach” of the RS. (If the RS were to be revoked, and there is no guarantee that the RS will be revoked, then there would be no requirement for Plan: MK to refer to the requirements or approach enshrined within it.)

52. However, as with the first sentence of the new policy, this statement does nothing to redress the issue which it is purported to be addressing – i.e. the RPSCS’s lack of conformity with the RS, and is therefore also meaningless.

53. In summary, with regard to the third paragraph of the supporting text, the originally-suggested term “required” should be used in place of the Council’s suggested “for”; the Council’s suggested insertion of “strict” is unnecessary; the second sentence is contrary to the NPPF and cannot be included; and the third sentence is vague and imprecise, is meaningless, and does nothing to redress the issue which it is purported to be addressing, and therefore cannot be included. With regard to the new policy itself, it does nothing to redress the issue which it is purported to be addressing – i.e. the RPSCS’s lack of conformity with the RS, and is therefore meaningless.
As identified above:

- The Council has not undertaken a quantitative objective-assessment of housing needs, as required by the NPPF. Its own evidence admits this. Thus there is no evidence base to support the adoption in the RPSCS of any housing requirement other than that required by the RS.

- There is a clear requirement in the RS, which was itself based on an objective assessment of need, for significantly more housing to be delivered than can be delivered by existing allocations plus those strategic allocations proposed in the RPSCS.

- During the five-year period 2006 and 2011, there was a shortfall in housing completions of 1,830 dwellings.

- There is less than a five-year supply of available and deliverable housing land.

In short, as it stands, the RPSCS is unsound. If it is to be found sound then it either needs to revert to its form at Pre-Submission stage, or be otherwise amended. Policy AD/1 as tabled at the Examination was the first attempt at amending the RPSCS to enable it to be found sound, however, as set out above, the new policy as tabled does nothing to redress the RPSCS’s lack of conformity with the RS, and thus fails in its task. Set out below is an alternative approach that would result in further housing land supply being brought forward to redress the difference between the RPSCS and the RS, thus allowing the RPSCS to be found sound and assisting the Council in demonstrating a five-year supply of housing land (albeit there would be a slight delay to this).

During the Examination, questions were asked by parties other than JB Planning as to why the Council had set a minimum threshold of 2,500 dwellings when considering sites for allocation in the RPSCS. The Council explained that this was considered the low-end threshold for “strategic” sites, and that it had intended to follow-up the RPSCS with a Site Allocations Development Plan Document (DPD), which would have considered the possible allocation of additional “small sites”; however, due to the changes in the planning system and the delay to the RPSCS, the Site Allocations DPD had been abandoned, and the potential allocation of additional small sites would be considered during the preparation of the new Local Plan – Plan: MK.

Whilst it is recognised that large-scale strategic sites can be the best way of bringing forward significant amounts of new housing in the long-term, the contribution of small sites to housing delivery should not be overlooked, particularly in meeting a short-term shortfall in provision. In essence, the absence of additional small site allocations in the Site Allocations DPD means that only one part of the housing land supply for Milton Keynes will be brought forward over the next few years. The allocation of such sites within the forthcoming Plan: MK would raise housing completions closer to that required by the RS, but it will take a few years for Plan: MK to be prepared, examined and adopted. In the interim, it would be appropriate to consider an alternative source of additional small sites.

This approach has recently been adopted by Cheshire East Council to address the shortfall in its five-year supply of housing land until its new Local Plan can be adopted. Whilst it might appear that the circumstances are slightly different at Milton Keynes, the principles of ensuring a five-year supply are the same.
Keynes in that RPSCS is further advanced, the RPSCS does not address the need to identify additional small sites, thus in effect, the situation is the same.

59. In summary, until such time as a quantitative assessment of housing need has been completed, and the housing requirement in the RS can be reviewed, and the proper allocation of additional small sites be brought forward through Plan: MK, it is considered that an interim solution is necessary if the RPSCS is to be found sound. Set out below is a revised version of the new policy that seeks to achieve this (the amendments shown are those proposed us).

Policy AD/1a

Set out below is an alternative version of Policy AD/1. This is based on examples of similar policies such as that adopted by Cheshire East Council and included within the now-adopted South Kesteven Core Strategy and includes principles (criteria) that reflect those that are to be applied to the SLA. This alternative wording of the new policy is consistent with the general presumption in favour of sustainable development as laid out in the NPPF.

The Council will undertake an early review of the Core Strategy and saved policies from the 2006 Local Plan in the form of Plan:MK, to 2034 or such longer period as the Council chooses, with a projected end date of to be completed by 2015. This will take as its starting point the delivery of housing and employment requirements and the spatial approach of the South East Plan, to be considered in the circumstances that obtain including any relevant National Planning Policy Framework.

In the interim, and where the Council is unable to identify a 5 year supply of available and deliverable housing land in accordance with national policy, applications for housing of between 25 and 250 dwellings on sites of between 1 and 10 hectares, and that are within or adjacent to the existing City Development Boundary, and are capable of being fully developed within 5 years of the granting of outline or full planning permission, will be permitted in accordance with the following principles:

1. Provide homes of a range of sizes, types and tenures, including affordable housing at a level in line with the Council’s current SPD, or successor policy.

2. Create a sustainable, safe and high quality development which is well integrated with and accessible from the existing city.

3. Insofar as is relevant, the structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, the linear parks and strategic flood water management.


5. Link to the surrounding road, redway and grid road network.

6. Maintain the character and integrity of existing settlements.
7. Apply, as a minimum, the highest standards of sustainable construction in force at the time that permission is granted, with the aim of creating an energy and water efficient development.

8. Where appropriate, create strategic landscape boundaries to soften the impact of the development on the adjacent and surrounding open countryside.

9. Take a strategic and integrated approach to flood management and provide a strategic and sustainable approach to water resource management, including Sustainable Urban Drainage Systems (SUDS) and flood risk mitigation.

10. Provide residents with access to a high quality ICT network.

11. Provide or contribute to new or improved education, health, recreation, social and/or community facilities and services, via Section 106 and/or Community Infrastructure Levy agreements.

12. In all other respects do not conflict with other provisions in this Plan.

60. Clearly, there would need to be further amendments to the RPSCS to reflect this approach, these primarily consisting of a revision to Table 5.2: Housing Land Supply Position to reflect the RS requirement. It would also be appropriate for the Council to consider preparing a schedule of sites that meet the criteria listed above. Quantitatively, the delivery of just 60 dwellings per annum on just 6 additional sites, or just 30 dwellings per annum on 12 additional sites, would go beyond redressing the difference between the proposed RPSCS housing land supply position and the RS, and enable the full RS requirement to be met.

61. If a Sustainability Appraisal is required of this new policy, then it should be undertaken as a matter of urgency; however with regard to many sites that might come forward, it is likely that a significant amount of the appraisal work necessary will already have been undertaken.

We trust that the Inspector will find the above of assistance. Should you have any queries regarding the above, or require any further input or comment from us, please do not hesitate to contact us.

Yours sincerely

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Encs
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