

Proposed Submission Plan:MK October 2017: Guidance note for respondents

A. Introduction

The Proposed Submission Plan:MK and its supporting documents are being published in order for representations to be made prior to its submission for examination. Once Milton Keynes Council (MKC) chooses to submit Plan:MK it will become the task of an independent Inspector appointed by the Planning Inspectorate to examine and decide whether it can be adopted – this means that any representations made between 8 November and 5pm on 20 December 2017 will be forwarded to the Inspector.

Representations on the Proposed Submission Plan:MK should address the purposes of examination set out in the Planning and Compulsory Purchase Act 2004 (as amended):

1. Does the Plan:MK comply with the **legal requirements**?
2. Is Plan:MK a **sound** plan for the future of Milton Keynes?

B. Legal Compliance

This concerns whether the **process** of preparing Plan:MK a Local Plan has met the relevant legislative requirements. You should consider the following before responding on its Legal Compliance:

- Has the programme for preparing the Proposed Submission Plan:MK followed the programme set out in the Council's most recent Local Development Scheme?
- Has the process of preparing the Proposed Submission Plan:MK been in accordance with the Council's most recent Statement of Community Involvement?
- Does the Proposed Submission Plan;MK meet the requirements for content and consultation set out in the Town and Country Planning (Local Planning) Regulations 2012?
- Has the Council complied with the requirements arising from the duty-to-cooperate on strategic and cross-boundary issues introduced by the Localism Act 2011?
- Do the Sustainability Appraisal and Habitats Regulatory Assessment accompanying the Proposed Submission Plan:MK form a suitable assessment of the sustainability of the Council's proposals, and follow the relevant legislation and guidance?

C. Soundness

This concerns the actual **content** of the Proposed Submission Plan:MK October 2017. You should consider the following before responding on its soundness:

- **Positively Prepared:** Where it is reasonable to do so and consistent with achieving sustainable development; does the Proposed Submission Plan:MK seek to meet objectively assessed development needs in full, in addition to the unmet development needs of any neighbouring authority where this applies?
- **Justified:** When considered against the evidence and any reasonable alternatives, is the plan the most appropriate strategy to meet Milton Keynes' development needs?
- **Effective:** Will the Proposed Submission Plan:MK be deliverable over the intended period to 2031, and is it based on effective joint working on relevant cross-boundary strategic priorities?
- **Consistent with national policy:** Would the Proposed Submission Plan:MK enable the delivery of sustainable development in accordance with the National Planning Policy Framework?

If you think that the addition of a new policy or proposal would be necessary to make Plan:MK sound, you should consider whether or not the matter is already dealt with by national policy or adequately covered by existing local planning guidance such as Supplementary Planning Documents. If this is the case, it is unlikely to be necessary for it to be duplicated.

D. General advice when responding

The Inspector will have to deal with a large number of responses in a limited amount of time, and may be unable to deal with responses which are not made in the correct way:

- Responses should either be made through MKC's online portal; or by emailing or posting the relevant form which is available on MKC's consultation portal, website or at the deposit points for the duration of the consultation.
- Attachments should only be submitted where they are necessary to support the response (e.g. plans or images) – responses that simply state 'see attachment' may not be accepted
- Responses should be brief and 'to the point' – the Inspector will be interested in the points being made, rather than how they are put across, and may not have time to consider letters or emails written as prose.
- The consultation is not a vote, and the Inspector will give the same weight to an issue whether it appears in hundreds of responses or only in one. Where a group (for example a residents association or action group) shares a common view on how the Proposed Submission Plan:MK or one of the supporting documents should be changed, it will assist the Inspector if the group only makes a single response. In such cases the response should indicate how many people the group represents, and how the group's response has been authorised.

For the Local Plan and Policies Map Schedule:

- Responses should specifically address either soundness or legal compliance.
- Objections to the Plan must clearly explain why it is either unsound or not legally compliant, and where possible set out the modifications that are therefore considered necessary to remedy this.
- Responses on soundness should avoid generic statements such as 'congestion will just get worse' or 'there is not enough infrastructure to support the additional houses'. Such concerns and reasons for considering why the Proposed Submission Plan:MK is unsound or not legally compliant must be explained more specifically.

For the Sustainability Appraisal and Habitats Regulations Assessment:

The Sustainability Appraisal and Habitats Regulations Assessment are required to inform the drafting of the Proposed Submission Plan:MK and in order for it to be legally compliant, but their findings are also open to consultation. Responses must specifically address the conclusions made in either the Sustainability Appraisal or Habitats Regulations Assessment, and not solely be a comment on the proposals made in the Proposed Submission Plan:MK.

For all documents, responses must be received by 5pm on 20 December 2017. Late responses will not be accepted or considered by the Inspector as part of the examination.