

## **PLAN:MK Examination**

### **Inspector’s Matters, Issues and Questions**

Note 1: It is necessary that in answering the following questions, if respondents consider there is a soundness deficiency (having regard to the Council’s proposed modifications in MK/SUB/004) they should make clear how the Plan should be changed.

Note 2: Statements on Matters 1-7 need to be submitted by Noon on Friday 22 June 2018 for the Stage One Hearings. Statements on Matters 8 & 9, Matter 3 Questions 3.42-3.44 and Matter 7 questions 7.11-7.13 need to be submitted by Noon on Monday 13 August 2018 for the Stage Two Hearings.

Note 3: Policy references are to the principal policies at issue but other parts of the Plan may be relevant.

Note 4: A small number of Inspector abbreviations particular to Milton Keynes (MK) are used in this document and are as follows:

caMKox – The Cambridge-Milton Keynes-Oxford Arc or Corridor

CMK – Central Milton Keynes as shown on Figure 1 of the submitted Plan (p.29)

CMKAP – Central Milton Keynes Alliance Neighbourhood Plan

EWR – East West Rail

Expressway – The proposed A428/A421 link along the caMKox. Generally references are in the context of the A421 ‘missing link’ between Milton Keynes and Bicester.

NIC – National Infrastructure Commission (mainly the November 2017 report and recommendations)

Note 5: The revised National Planning Policy Framework (NPPF) is due to be published in Summer 2017. For the avoidance of doubt, all references to the NPPF in this document are to the original 2012 version in accordance with the proposed transitional arrangements.

#### **Matter 1: Legal requirements and the Duty to Co-operate**

Q1.1 Is the Plan compliant with the Planning and Compulsory Purchase Act (2004) (as amended) and the 2012 Regulations? In particular, is the Plan compliant with the Local Development Scheme and the Statement of Community Involvement?

Q1.2 What is the status of the Site Allocations DPD (currently at an advanced stage of examination)? Will it be superseded by the adoption of Plan:MK? Is the relationship between the SADPD and Plan:MK clearly articulated in Plan:MK?

Q1.3 Has the Habitats Regulation Assessment adequately assessed the effects of Plan:MK, either alone or in combination with other relevant projects and plans, on the integrity of internationally protected sites? Have Natural England commented on and/or agreed the HRA scope and conclusions? Is there a clear and justified threshold/distance for screening European sites?

- Q1.4 Has the Sustainability Appraisal adequately assessed the likely environmental, social and economic effects of Plan:MK? Does the appraisal demonstrate that the Plan has been tested against all reasonable alternatives? In particular:
- i) Has the inter-relationship of effects, including cumulative impacts, been addressed?
  - ii) Is there adequate coverage of all reasonable alternatives (sites and policies)?
  - iii) Are reasons for rejecting alternatives and discounting unreasonable options clearly given?
  - iv) Is the SA proportionate and relevant in contributing to the evidence base of Plan:MK (NPPF paragraph 167)?
- Q1.5 Does the Plan as a whole accord with s19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended) by including policies that are designed to secure that the development and use of the land in the Borough contribute to the mitigation of, and adaptation to, climate change?
- Q1.6 Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are applicable to the Plan’s preparation, as required by the Duty to Co-operate? Is this sufficiently evidenced by the Duty to Cooperate Statement (Document MK/SUB/008) and the various memoranda and statements, mainly signed in early 2018, contained within it?
- Q1.7 What mechanisms will be put in place to ensure that there is future cooperation in relation to cross boundary issues that may arise as development within Plan:MK progresses? Are there cross-boundary issues in relation to any of the proposed site allocations such as transport and other infrastructure requirements? Please explain.
- Q1.8 Other than Strategic Objective 4, does the Plan provide for effective outcomes in terms of cross-boundary issues?
- Q1.9 Does the Plan set out a clear strategic policy framework (NPPF paragraphs 156 and 184) for the preparation of Neighbourhood Plans (NPs)? How will any inconsistencies between emerging NPs and the Plan be resolved?
- Q1.10 Does the Policies Map illustrate the appropriate information? Are all relevant land-use designations shown on the Policies Map? (NPPF – para 157, 4<sup>th</sup> bullet point). Is there a schedule of modifications to the Policies Map?

## **Matter 2: Spatial Strategy**

### Issue 1 – Plan Vision & Objectives

- Q2.1 Does the overall spatial strategy for Plan:MK present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?

- Q2.2 Is the Plan, based on the spatial portrait and sustainability appraisal baseline, providing an appropriate response to address the issues that influence the Borough as a place? Do the spatial objectives of the Plan accurately reflect the existing issues and future opportunities / challenges facing Milton Keynes Borough?
- Q2.3 What is the rationale for the inclusion of Policy MK1? Is it necessary and justified given that it broadly repeats paragraph 14 of the NPPF? (see PPG para 12-011-20140306).

Issue 2 – Emerging Growth Context, Plan Period and Plan Review (the long-term growth strategy)

- Q2.4 Is the proposed Plan period consistent with national policy at paragraph 157 of the National Planning Policy Framework (NPPF)? If the Plan period was extended to 2036 / 2038 what additional evidence is required and, very indicatively, what timeframe would be reasonable for any additional work and consultation to be completed?
- Q2.5 Does a 13 or 12 year period on plan adoption provide sufficient certainty for housing and economic growth in the short to medium term? Would it allow for appropriate foundations for the potential transformational growth envisaged in the MKFutures 2050 and NIC reports?
- Q2.6 Are there wider issues around cooperation, governance and funding that indicate the need for a holistic strategy for any transformational growth rather than an individual approach through the current round of plan-making?
- Q2.7 Is it necessary for soundness that Plan:MK be modified to provide a basis for the longer term growth agenda? Would this unduly pre-empt the spatial choices advocated in the MKFutures 2050 and NIC reports (for example further opportunities for sustainable intensification within the urban area and growth locations along the caMLox arc once EWR and the Expressway are implemented)?
- Q2.8 Would a policy commitment in Plan:MK to a review within a specified timeframe represent an appropriate response to MK Futures 2050 and NIC recommendations? Is there confidence this would be justified and effective given a similar approach was contained within the 2013 Core Strategy (Policy CSAD1)?
- Q2.9 What does a plan review for MK potentially look like? Are processes emerging to coordinate strategic growth that would consolidate existing cross-boundary collaborations with other Local Authorities and the LEP(s)? (NIC recommendations 7&8)
- Q2.10 If the Council is committed to a review of the Plan, what would be the justification for strategic reserve sites for delivery post 2031? Does this reflect or pre-judge the ongoing work on a wider strategy and infrastructure planning for future substantial growth? Is there evidence in the MKFutures 2050 or NIC reports for east of MK being a strategic direction of growth?

Issue 3 - Settlement Hierarchy (Policy DS1)

Q2.11 Does the Plan provide a sound framework for the roles that will be played by various parts of the Borough in meeting the development needs over the plan period? In particular:

- i) Are the settlement hierarchy (Policy DS1) and the broad apportionment of growth within the respective development strategies (Policies DS2, DS3 and DS4) consistent with the Plan’s vision and strategic objectives?
- ii) Is the settlement hierarchy founded on robust evidence and consistent with national planning policy? Is it justified?
- iii) Is the role of ‘Key Settlements’ sufficiently clear? Does the policy comply with paragraph 154 of the NPPF which requires that policies should provide a clear indication of how a decision maker should react to a development proposal?

Q2.12 Does Policy DS1 provide effective guidance for development proposals on unallocated sites in or on edge of existing key and rural settlements? How will the risk of inconsistency of policy application be assessed? Do Policies DS1 & DS2 represent ‘blanket’ policies that restrict housing development and prevent other settlements from expanding?

Q2.13 Will there be enough growth in key settlements and villages to help support sustainable rural communities? Is Plan:MK consistent with paragraph 55 of the NPPF which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities?

Q2.14 Does the Plan strike an appropriate balance of growth between the four strands identified at tier 1 of the settlement boundary? Has the Plan maximised the potential re-use of previously developed land? Is the spatial strategy potentially over-reliant on a small number of large strategic sites? Is the Plan clear on the status and spatial implications of the Your:MK estate regeneration and the potential of wider ‘Renaissance:CMK’ in the MKFutures 2050 report?

Issue 4 – Role of Neighbourhood Plans (NPs)

Q2.15 Is the Plan sound in placing an emphasis on neighbourhood plans for the ‘villages and rural settlements’? What is the existing NP coverage at this level? In reviewing or preparing rural NPs against Plan:MK what scale of development would be adjudged as being consistent with this tier of the hierarchy? Have rural NPs been prepared against an up-to-date OAN?

Q2.16 Is the Plan justified and consistent on placing emphasis on NPs in rural settlements when there are extant NPs for areas within the built-up parts of the City?

- Q2.17 Does Plan:MK avoid duplicating planning processes that will apply to the neighbourhood areas<sup>1</sup>? In particular, with the CMKAP, as well as the various NPs for communities within urban Milton Keynes and the rural NPs?
- Q2.18 Has the preparation of Plan:MK given appropriate consideration to the role of key settlements and other sustainable rural settlements in positively contributing to additional growth during the Plan period? How have the Strategic Housing Land Availability Assessment (SHLAA) and SA processes considered site options presented at tiers 2 and 3 of the settlement hierarchy?
- Q2.19 The SHLAA advises that it has factored in approximately 2500 commitments in the rural area taking account of made Neighbourhood Plans. It advises that other rural Neighbourhood Plans are forthcoming which will deliver local sites for housing. If so, has any supply been factored in for these communities? Paragraph 2.22 of the SHLAA then states that rural sites presented through the call for sites have been passed on to local town and parish councils and not assessed in the MK SHLAA. Is this a reasonable approach? Should an updated Local Plan provide the strategic context for updating, reviewing and preparing Neighbourhood Plans? Through the approach taken, has supply in the rural areas been under-estimated?

Issue 5 – The Open Countryside (Policy DS5) & Linear Parks (Policy DS6)

- Q2.20 Is Policy DS5 justified and consistent with national policy? Please explain.
- Q2.21 Are the linear parks correctly shown on the Policies Map?

**Matter 3: The overall need and requirement for housing. The strategy and land supply to meet the requirement. (principally Policy DS2 and Table 4.3)**

Issue 1 - Context and potential transformational growth

- Q3.1 What is the status of the MKFutures 2050 and NIC reports? Did they provide a realistic or firm foundation for considering options for alternative, higher housing numbers at the time of preparing and submitting Plan:MK?
- Q3.2 Should the proposed housing numbers in the reports be regarded as: (1) evidence of an objectively assessed housing need; or (2) a policy objective for growth that informs a higher housing requirement; or (3) neither at this stage on grounds of prematurity?

Issue 2 – Determining the full OAN

- Q3.3 Having regard to NPPF paragraph 159 (first bullet point), for MK is the functional Housing Market Assessment wider than the administrative boundary? If so, is the evidence and approach to the HMA justified in determining the housing numbers for Plan:MK, including

---

<sup>1</sup> PPG paragraph 043 Reference ID: 41-043-20140306

the approach of adjoining authorities who may be partially within the ambit of a wider MK housing market? Is it clear there is no unmet need from adjoining authorities?

- Q3.4 Has the housing requirement figure of at least 26,500 dwellings (2016-2031) (equivalent to 1766dpa) as set out in Policy DS2 been informed by a robust, credible assessment of the full objectively assessed need (OAN) for housing and is it positively prepared and consistent with national planning policy? In particular:
- i) Is the February 2017 Strategic Housing Market Assessment (SHMA) an appropriate starting point for setting the requirement in terms of its demographic assumptions (including future trends in household formation and migration), the account taken of market signals and affordability, forecast growth in employment including assumptions on economic activity rates and commuting and any other local circumstances?
  - ii) Are the various uplifts from the demographic starting point from the 2014 CLG Household projections of 1,513dpa to 1,766dpa soundly based?
  - iii) Is the SHMA’s estimate of 8,200 affordable dwellings in the Borough robust?
- Q3.5 Has the SHMA given sufficient attention (sensitivity testing) to the potential suppression of household formation rates, particularly in the 25-34 and 35-44 year old cohorts, having regard to the advice at PPG paragraphs 2a-015 and 2a-017?
- Q3.6 Taking into account the SHMA’s approach to other adjustments, is a 10% uplift for market signals a reasonable adjustment in light of the evidence on house prices and affordability in the context of the wider HMA?
- Q3.7 Is the 2016 EEFM a robust starting point to understand past economic trends and assess the likely change in job numbers and working age population? With regard to PPG paragraph 2a-018 should the SHMA give consideration to other models and/or past employment trends?
- Q3.8 How does the EEFM model deal with the following:
- (i) Commuting ratios;
  - (ii) Economic activity rates, unemployment, double-jobbing and any assumptions on increased economic activity in those aged 65+;
- In applying the “current (commuting) ratio” taken from the 2016EEFM what commuting figure was used in the SHMA?
- Q3.9 The SHMA identifies a positive uplift of 1739 dwellings to balance jobs and workers, contributing towards the submitted OAN of 1766 dpa. What should be made of alternative submissions that the EEFM provides an output for MK of 32,331 dwellings (2,155dpa) for the plan period? Please explain how the SHMA arrives a different figure from the EEFM and what assumptions have been applied. If those assumptions vary from the EEFM, how should I interpret the EEFM advice (April 2017)<sup>2</sup> that it is an integrated model that should not be subjected to “alternative estimates”?

---

<sup>2</sup> Extracts provided in OAN submissions from Bidwells and DLP

- Q3.10 Jobs growth has notably out-performed housing delivery in recent years (para 4.33 of Plan:MK) at a ratio of 3.5 jobs per dwelling. The submitted Plan states that the OAN aligns to the more cautious assessment of jobs growth in the Experian model at 1.06 jobs per dwelling and if the EEFM is realised the ratio would be 1.2 jobs per dwelling. Has the SHMA applied or sensitivity tested the Experian model and how is the ratio of 1.2 jobs per dwelling calculated?
- Q3.11 Does the adjustment of 1739 (116dpa) provide sufficient flexibility to meet forecast employment needs? Is there plausibility to the submissions that the adjustment (and therefore the full OAN) is too cautious?
- Q3.12 The SHMA finds a basis for making a series of adjustments for demographic factors, market signals/affordability and future jobs which cumulatively add up to 28,615 (or 1,908dpa). What justifies an approach of calibrating that adjustment to only the 1,739 for future jobs, so that the OAN is 26,493 (or 26,483)? In this regard is the SHMA consistent with PPG (para 2a-005-20140306) that assessment findings should be “transparently prepared”?
- Q3.13 Have any reasonable alternative OAN figures been assessed as part of sustainability appraisal?

Issue 3 Translating OAN into a housing requirement/target

- Q3.14 Are there any constraining factors (PPG paragraph 2a-004) that would inhibit consideration of a higher housing requirement/target than the OAN?
- Q3.15 Will the housing requirement in Plan:MK significantly boost the supply of housing as sought by paragraph 47 of the NPPF? Does it reflect the objectives to keep the planned growth of MK ‘on track’?
- Q3.16 What explains previous under-delivery of housing in MK? If the housing requirement were to increase in the plan period what evidence would indicate that it would be (a) sustainable and (b) deliverable?
- Q3.17 Has SA of the housing requirement in Policy DS2 assessed reasonable alternatives? How has sustainability appraisal been used to support the scale of housing provision in the Plan? [Are there negative (unsustainable) effects of lower or higher housing provision?]
- Q3.18 Is the housing requirement in Policy DS2 expressed as a net or gross figure? Has the figure taken into account the effects of estate regeneration? Is there any anticipated loss of existing housing stock?
- Q3.19 Would an adjustment to the housing requirement for affordable housing provision be justified? (PPG para 2a-029-20140306) What overall percentage of affordable housing has been achieved over recent years? Based on the thresholds in Policy HN2 how many

affordable housing units are likely to be delivered in the plan period on qualifying sites and from any other sources?

#### Issue 4 Wider Accommodation Needs

##### *Gypsies and Travellers*

- Q3.20 Is the 2017 Gypsy & Travellers Accommodation Assessment up-to-date and does it provide a robust and justified evidence base? Is the identified need for 19 pitches justified?
- Q3.21 Is there any evidence that the Plan should make provision for short stay stopping sites (transit sites) in line with Planning Policy for Traveller Sites? The GTAA refers to an Autumn 2018 Review, is there a commitment to undertake this and when would outputs be available?
- Q3.22 How will the needs of people who have permanently ceased to travel be addressed? Has consideration been given to a wider assessment of caravan and houseboat needs as required under Section 124 of the Housing and Planning Act 2016?

##### *Older persons*

- Q3.23 Explain how the needs of different groups in the community have been addressed in the SHMA and then the Plan, such as, but not limited to, families with children, older people, people with disabilities and people wishing to build their own homes. What conclusions does the 2017 SHMA reach in terms of the scale and mix of housing type needed, including in terms of tenure and size? (NPPF paragraph 159) How does the Plan reflect the findings?
- Q3.24 Is there evidence for the Plan to make specific provision for accommodation for elderly persons either as part of the housing mix (Policy HN3) or specific allocations for sheltered and supported accommodation? (See also PPG para 12-006-20150320).

#### Conclusion on Housing Requirement

- Q3.25 Overall, is the housing requirement in the plan justified? If not, what should it be?

#### **Matter 3: Issue 5 - Housing Land Supply**

- Q3.26 Overall, will the submitted allocations in Plan:MK provide sufficient flexibility to help deliver the spatial strategy?
- Q3.27 Having regard to the Housing Supply Topic Paper (MK/TOP/002) and proposed trajectory and accompanying spreadsheet of sites submitted in the schedule of proposed modifications (SUB/MK/004), is the housing implementation strategy in Policy DS2 sufficiently clear? In particular is the submitted Plan clear on:
- (i) What comprises and justifies the housing trajectory?



- (ii) What is the anticipated deliverable and developable supply of housing land over the plan period, including any contingency for resilience (for example: the submitted 9.7% buffer)?
- (iii) How decision makers should calculate a five year deliverable supply?
- (iv) What contingency measures would be called upon were monitoring to identify a deficiency in the deliverable supply prior to a plan review?

Q3.28 Should Plan:MK include a policy to ensure that sufficient housing land is delivered if monitoring identifies that any of the strategic sites would be appreciably delayed? If so, what action would be appropriate and how and when would it be triggered?

Q3.29 Is there robust evidence underpinning the calculation of the land supply for the Plan Period? In particular:

- i) are the allowances for total existing commitments clear? To what extent, if any, does it include allocated sites from the un-adopted Site Allocations DPD? Do any allowances from SADPD allocations take into account proposed main modifications to that plan?
- ii) Is the capacity from estate regeneration and urban intensification (for example Campbell Park) justified?
- iii) Is the windfall allowance adequately justified?
- iv) Has appropriate consideration been given to lapse rates for planning permissions?
- v) Is there any dispute that a 20% buffer should be added to the deliverable supply to address persistent under-delivery?
- vi) Having regard to the PPG (3-035-20140306), and the preference for Sedgefield, what would be the justified approach to make good the shortfall in delivery since 2016?

Q3.30 Does the evidence indicate that reasonable conclusions have been drawn about site capacities, having regard to density assumptions and any specific viability, infrastructure or other barriers to delivery? *[Please note: the specifics of individual strategic sites will be considered separately under Matter 5].*

Q3.31 What lead-in times and delivery rates (including number of developers/outlets per site) have been used to underpin the assumptions regarding the deliverability of strategic sites (in particular SD6, 7, 8, 9, 13, 15)? What is this based on? Where is it set-out? Are the projected delivery rates, particularly in the next five years, on some of the established strategic sites (notably SD6, 7 and 8) reasonable given past performance?

Q3.32 As of 1 April 2018 (or 1 April 2017 if 2018 data not available) what would the five year requirement be, for both the ‘Sedgefield’ and ‘Liverpool’ methodologies, assuming a 20% buffer for under-delivery against an annualised, flat trajectory?

Q3.33 Is there robust, credible evidence demonstrating the capacity of the development sector to complete and sell this quantity of housing in the Borough in the next 5 or so years?

Q3.34 What has inhibited the achievement of comparable annual housing delivery targets in the 2013 Core Strategy? Is Plan:MK’s approach to strategic sites at risk of repeating a similar performance? If so, what measures have been considered to de-risk delivery of the Plan?

Q3.35 Is there a sufficient range of housing supply sources (and sites) in Plan:MK to bolster delivery? To achieve significant growth in a sustainable way (including critical mass to support infrastructure) are there realistic, reasonable and sustainable alternatives in a MK context other than sustainable urban extensions? How have the SHLAA and SA processes considered small and medium sized housing sites?

Q3.36 Is the proposed buffer in the housing land supply (29,000 homes to meet the need for 26,500 homes equivalent to 9.7%) justified and positively prepared? Does this provide a sufficient and robust approach for potential uncertainties over capacity at South East MK? Would a 9.7% buffer in supply provide reasonable resilience?

#### Housing Land Supply Conclusions

Q3.37 Will there be a five year supply of deliverable housing land on adoption of Plan:MK?

Q3.38 Will there be a five year supply of deliverable pitch provision for gypsies and travellers?

Q3.39 Is there likely to be a sufficient supply of developable housing land throughout the lifetime of the Plan?

Q3.40 Is there appropriate consistency and totalling between the figures for various sources of supply within Chapter 4 of Plan MK (Tables 4.1 and 4.2) and between figures in Chapter 4 and Appendix A of the Plan (Table 18.2)?

Q3.41 For those who submit the Plan would be unsound in terms of housing delivery, how should Plan:MK be changed to ensure that it is deliverable and therefore effective?

#### **Matter 3: Issue 6 – delineation of settlement boundaries [Stage Two Hearings]**

Q3.42 Is the approach to the review of settlement boundaries justified and effective? Are the methodology and key assumptions in the 2017 Settlement Boundary Study reasonable and appropriate to the circumstances in MK?

Q3.43 Does Plan:MK incorporate the proposed amendments to settlement boundaries in the Settlement Boundary Study? Have any circumstances changed since November 2017 which would trigger the need for further amendments?

Q3.44 How does the delineation of settlement boundaries in Plan:MK align with the ongoing processes of preparing and reviewing neighbourhood plans?

**Matter 4 The overall need and requirement for jobs and the strategy and land supply to meet the requirement**

Issue 1 – Employment Development Strategy (Policy DS3)

- Q4.1 Does the Plan set out a clear and positively prepared economic vision and strategy for the area (NPPF paragraph 21) consistent with the 2017 MK Economic Development Strategy (MK/EMP/005)?
- Q4.2 Is the Plan sufficiently clear in Policy DS3 on the number of jobs being planned for? In particular:
- i) Should Policy DS3 contain a net jobs target for the plan period? Are the monitoring targets in Appendix F satisfactory in assessing the performance of the Plan?
  - ii) Should Policy DS3 contain a target for the provision of employment land?
  - iii) Is Policy DS3 clear on those key and strategic sites for local and inward investment which will meet anticipated employment needs over the plan period?
- Q4.3 Is there appropriate consistency between Plan:MK, the Council’s employment land evidence and the SEMLEPs Strategic Economic Plan on the approach to key future job sectors and key employment sites in the Borough?

Issue 2 – Demand/Suitability of Employment Land Supply

- Q4.4 How does the amount of employment land relate to overall jobs growth estimates and are there any factors in MK which may inhibit the economic potential of the area which Plan:MK needs to be alert to (NPPF paragraph 160)?
- Q4.5 Does the evidence, including the Employment Land Topic Paper (MK/TOP/001) robustly demonstrate the need to release additional employment land during the Plan period?
- Q4.6 Is Plan:MK (Policies DS3, ER1 and ER2) consistent with national policy in avoiding the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose?

Issue 3 – Strategic Employment Sites

- Q4.7 Is the approach to the allocation of South Caldecotte as the principal strategic employment allocation based on a clear, robust process of site assessment (including the Employment Land Review and Economic Growth Study Phase 2 Delivery Strategy) and informed by sustainability appraisal? Were any reasonable alternative employment sites to South Caldecotte considered when preparing Plan:MK?
- Q4.8 Is deliverability of the South Caldecotte site likely to be affected by any final route options of either the Expressway and/or EWR?

- Q4.9 What will be the impact on the landscape character of the Greensand Ridge, the special interests of Bow Brickhill church and Danesborough Iron Age Fort, on-site priority habitat (lowland meadow) and the settlement identity and living conditions of residents at Bow Brickhill? Can any potentially adverse impacts be satisfactorily addressed?
- Q4.10 Given the site is primarily intended for warehouse and distribution uses is it reasonably related to the strategic road network and wider accessibility via the M1? Is the site reasonably connected by transport modes other than the car for employees? Are there any local highway factors (for example proximity of level crossings) which would lead to a conclusion that the transport impacts would be severe?
- Q4.11 Would the allocation be effective? (would it be delivered?) Is there market demand for the intended uses at this location?
- Q4.12 The Council has prepared a Consultation Draft Development Framework SPD for the proposed allocation dated February 2018. With regard to NPPF paragraph 153 what is the inter-relationship between the SPD and the content of Policy SD16? Should Policy SD16 and/or its supporting text cross-reference the SPD?
- Q4.13 What role, if any, would strategic employment land supply at MKE (Policy SD14) make during the plan period?

Issue 4 – Policies for managing Employment Development (Policies ER1-9)

- Q4.14 Are the proposed policies for employment development effective, justified and consistent with national policy?
- Q4.15 Do Policies ER1 and ER2 (as the principal policies) provide clear, justified and effective guidance for assessing proposals for employment land and premises?
- Q4.16 Does Policy ER9 provide appropriate guidance for proposals related to the rural economy?
- Q4.17 Taken together with other policies in the Plan, do the policies for the Economy provide a sound basis for sustaining and promoting economic growth in the Borough?

**Matter 5: Strategic Site Allocations and Urban Extensions**

*Please note the strategic employment site (Policy SD16) will be considered under Matter 4.*

Issue 1 – general approach and principles (Policies SD1, SD11, SD12 & SD17)

- Q5.1 Are the strategic site allocations as a whole consistent with the strategic objectives for Milton Keynes Borough? Are all the strategic sites technically ‘allocations’ or do some now have planning consent (particularly those carried forward from the Core Strategy and Eaton Leys)? What is the planning status of sites SD6, SD7, SD8, SD9 and SD15?

- Q5.2 Overall, has the approach to the allocation of the new strategic housing sites in Policies SD13-15 been based on a clear, robust process of site assessment and informed by sustainability appraisal? Are the reasons for selecting the preferred strategic sites and rejecting others clear and sufficient? Would any inaccuracies in the assessment significantly undermine the overall conclusions?
- Q5.3 Are the generic policy requirements for strategic sites in policies SD1, SD11, SD12 & SD17 justified and effective? Are the various proposed modifications to Policies SD1, SD11, SD12 and SD17 necessary for plan soundness (See PMs 23, 24, 34, 35 & 50 in MK/SUB/004)?
- Q5.4 Are any of the strategic sites in Flood Zones 2 or 3? Are the allocations consistent with paragraph 100 of the NPPF which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change?

Issue 2 – Milton Keynes East (MKE) (Policy SD14)

- Q5.5 Based on all the evidence, is the Plan positively prepared in respect of MKE and is the identification of this long term strategic site/direction of growth adequately justified? Are the references to MKE as a long term option post 2031 justified?
- Q5.6 Is the overall size of the allocation and the quantity of development proposed appropriate? Is the proposed extension of the allocation in the proposed modifications (PM44) necessary for plan soundness? What would this modification mean in terms of site capacity and any delivery within the plan period?
- Q5.7 What is the latest situation on the HIF funding bid in relation to this site? Does this provide a justification for revisiting the development trajectories for this site for both homes and employment? With or without HIF funding is there any certainty that some development could be bought forward at MKE within the plan period?
- Q5.8 Noting the proposed modification, are there any other reasonable options for consolidating this strategic option that could expand delivery east of Milton Keynes, including in the short to medium term?
- Q5.9 Are the criteria in Policy SD14 justified and effective? Are the infrastructure requirements clearly set out and is it clear what developers are expected to provide to overcome constraints?
- Q5.10 How will the site connect, particularly by walking, cycling and public transport, to (a) CMK and Newport Pagnell; (b) other strategic employment areas; and (c) potential Expressway corridor?
- Q5.11 What is the ‘fast mass-transit system’ and is safeguarding a route for it justified?

- Q5.12 Are there potential transport implications arising from MKE for communities in Central Bedfordshire and, if so, has this formed part of the Duty to Co-operate dialogue?
- Q5.13 Has the MKE location been considered as part of the MKMMM Local Model validation work and the Traffic Forecasting Report?
- Q5.14 Are there any implications of growth to the east of MK on air quality in Olney (A509 traffic)? What is air quality monitoring revealing at Olney and would growth at MKE be at odds with measures identified in any relevant Air Quality Action Plan?
- Q5.15 What will be the impact on the landscape character, biodiversity or any other special interests? Can any potentially adverse impacts be satisfactorily addressed?
- Q5.16 Does Policy SD14 provide sufficient content to inform the preparation of a comprehensive development framework as required Policy SD12?

Issue 3 – South East Milton Keynes (SEMK) (Policy SD13)

- Q5.17 Based on all the evidence, is the Plan positively prepared in respect of SEMK and is the identification of this strategic site adequately justified?
- Q5.18 Is the overall size of the allocation and the quantity of development proposed appropriate? Should additional land be included within the allocation to make it sound, including those areas indicated in the schedule of proposed modifications (PM39 & PM40)?
- Q5.19 Is the trajectory for completions at SEMK over the plan period realistic? Does it take account of any necessary comprehensive development framework approach and is there in-built flexibility to resolve any barriers to delivery? Are lead-in times and delivery rates reasonable?
- Q5.20 What degree of certainty can be given to the capacity of the site having regard to the route options for the proposed Expressway and necessary safeguarding and buffer of a possible route? Is it correct that route options B and C for the Expressway would both affect SEMK?
- Q5.21 Are there other infrastructure interdependencies, how do they relate to the phasing of development, are they made clear in the Plan and have they been adequately taken into account?
- Q5.23 How will uncertainty about deliverability of the SEMK allocation be addressed and mitigated if necessary? Is there evidence to support SEMK being able to sustainably come forward in two distinct sites, north and south of the railway?
- Q5.24 Are the specific policy requirements in Policy SD13 justified and deliverable? Are the infrastructure requirements clearly set out (particularly education and health) and having regard to the LIP is it clear what developers are expected to provide to overcome

constraints? Would the proposed modifications (including PM38) be necessary for soundness?

- Q5.25 Will the separate identities of Bow Brickhill, Wavendon and Woburn Sands and settlement fringe sensitivities in general be adequately protected through the Plan’s policies?
- Q5.26 What will be the impact on the landscape character of the Greensand Ridge, the function of the site as part of the green infrastructure, openness & tranquillity of this part of the Borough, biodiversity and the special interests of Bow Brickhill church and Danesborough Iron Age Fort? Can any potentially adverse impacts be satisfactorily addressed?
- Q5.27 Is the proposed allocation of 7 permanent gypsy/travellers pitches as part of this strategic site soundly based? How will this provision be delivered?
- Q5.28 Does Policy SD13 provide sufficient content to inform the preparation of a comprehensive development framework as required Policy SD12?
- Q5.29 Taking into account physical and planning constraints, infrastructure and land ownership, is SEMK capable of being delivered in a manner envisaged by Plan:MK? Is the allocation viable?

Issue 4 – Campbell Park and Central Bletchley (Policies SD18 & SD19)

- Q5.30 What is the planning status of various sites at Campbell Park? What is already committed and what additional development is allocated through Plan:MK? Is there an agreed masterplan that remains extant? Are the various sites that make up Campbell Park clearly identified? Are there any sites that are potentially undeliverable or would not be justified for inclusion? Conversely, have any sites/areas been omitted? Is there an appropriate plan, showing the various parcels intended for development at Campbell Park?
- Q5.31 What density of development is assumed at Campbell Park? Has the capacity of the site been under-estimated? Should the density of development at Campbell Park be consistent with the CMKAP yield of 250 dwellings per hectare?
- Q5.32 What scale of development is anticipated at Campbell Park within the next five years and is this reasonable?
- Q5.33 What does Policy SD18 add to what is already set out in the general principles for strategic principles and in Policy HN1 (Housing Mix) and the suite of design policies? Is it providing appropriate strategic direction and coordination at this key location?
- Q5.34 What is the intended outcome of Policy SD19? How would development within Policy SD19 be assigned, if at all, to the housing land supply figures in Table 4.3? Is there evidence to positively identify opportunities for development within the SD19 area?

Issue 5 – Other Strategic Sites (Policies SD9, SD15 & SD19-21) and medium/small housing allocations (Appendix A)

- Q5.35 What is the planning status of Newton Leys (Policy SD9)? What does its identification as a ‘special area’ mean? Is there certainty/clarity on the proposed link road within the site? Is this a strategic cross-boundary matter and part of the Duty to Co-operate?
- Q5.36 What is the planning status of the housing allocation at Eaton Leys (Policy SD15)? Have the proposed modifications in MK/SUB/004 satisfied Historic England’s concerns regarding archaeological assets and consistency with paragraph 141 of the NPPF?
- Q5.37 Are the sites in Policies SD19, SD20 and SD21 genuinely strategic sites? Are there comparable medium and smaller Plan:MK allocations or allocations carried forward from the SADPD in Appendix A of the Plan which merit a similar approach in terms of site specific issues relating to the nature and scale of development as set out in PPG para 12-010-20140306 - the ‘what, where, when and how questions’?
- Q5.38 Is Plan:MK justified and effective in scheduling site allocations in an appendix rather than in a policy? Are there potential consultation / transparency issues with the submitted appendix approach?
- Q5.39 Have the medium and smaller Plan:MK housing allocations been based on a clear, robust process of site assessment and informed by sustainability appraisal? In particular:
- i) Has an appropriate methodology been used and has it been applied consistently?
  - ii) Are the reasons for (a) selecting the sites in Policies SD19-20 and at Appendix A as the ‘preferred sites’ and (b) rejecting other potential options for medium/smaller housing sites been set out clearly and sufficiently?
  - iii) Would any inaccuracies in the assessments significantly undermine the overall soundness of the Plan?
- Q5.40 What threshold was applied to site size in determining the allocations? Is it consistent with the PPG (3-010-20140306) which states that plan makers will need to assess a range of different site sizes and should consider all sites capable of delivering five or more dwellings?

**Matter 6: Central MK, Retail and Leisure**

- Q6.1 Does Plan:MK set out a positively prepared strategy for viable centres and the provision of shopping, which is justified, effective and in line with national policy?
- Q6.2 Is the retail and leisure strategy (Policy DS4), as articulated through Policies SD2, SD3 and SD4 for CMK justified and effective? Is it broadly consistent with the CMKAP? Has the evidence base for Plan:MK evolved since the CMKAP?
- Q6.3 Is the delineation of the CMK boundary and the broad zones within the CMK boundary (Figure 1 of Plan:MK) justified? In particular is the primary shopping area appropriately



defined and is the inclusion of the Xscape complex and land bounded by Avebury Boulevard, Secklow Gate, Childs Way and Marlborough Street justified<sup>3</sup>? Would the expansion of the PSA dilute efforts to redevelop sites and develop remaining blocks with the primary area of the City centre given the latest evidence on the capacity for additional non-food retail floorspace?

- Q6.4 Is criterion 5 of Policy DS4 sufficiently clear on the scale of development envisaged at new residential developments? What developments would it apply to and is this clear in the relevant policies for strategic sites? Is Policy ER15 sufficiently clear?
- Q6.5 Are there consistency issues between Plan:MK and CMKAP on ‘classic MK infrastructure’ which would require resolving for the soundness of Plan:MK?
- Q6.6 Is criterion 6 of Policy DS4 justified and consistent with national policy?
- Q6.7 What is a “CMK Renaissance”, is it justified for Plan:MK to reference it in Policy DS4 and how is it likely to come forward?
- Q6.8 Are the scales of development identified in Policy SD3 for CMK justified? Does it take account of extant permissions? Are there consistency issues between the policy and residential allocations in Appendix A, Table 18.2? Is the inclusion of land ‘east of John Lewis Car Park’ as a residential allocation justified?
- Q6.9 Is the approach to centres in the hierarchy in Policy ER10 soundly based and is Appendix G accurate and up-to-date?
- Q6.10 Are the thresholds for impact assessments in Policy ER11 soundly based and supported by robust and credible evidence? Have alternative thresholds been considered?
- Q6.11 Table 6.3 refers to the concepts of primary and secondary frontages in relation to non-retail uses in Policy ER19. Is the approach and content of the Table justified and are the frontages accurately defined on the Policies Map?

## **Matter 7: Infrastructure and Viability**

### Issue 1 – Whether the overall approach to transport is justified, effective and consistent with national policy

- Q7.1 What is the likely effect of the proposed scale and distribution of development in Plan:MK (above the reference case (existing planned/committed growth)) on existing transport infrastructure and traffic levels? How has this been assessed and is the transport evidence up-to-date and robust? Are the impacts from the proposals in Plan:MK on the strategic road

---

<sup>3</sup> See also proposed modification PM25 in MK/SUB/004

network understood and is there sufficient detail in the LIP on the likely costs and funding sources of any strategic road network improvements?

- Q7.2 Does Plan:MK reflect and assist delivery of the latest MK Local Transport Plan?
- Q7.3 Are there strategic proposals to manage traffic levels within MK in the medium to long term, for example Park & Ride, bus priority measures and rapid mass transit systems? Is there any certainty of their delivery within the Plan period or evidence to justify laying foundations (such as route safeguarding) in Plan:MK for their future implementation?
- Q7.4 With reference to MK Local Investment Plan, what specific improvements to transport infrastructure or policy responses are proposed or will be required to support transport demands arising the Plan’s overall strategy, including levels of growth?
- Q7.5 As part of transitioning to a low carbon future and securing modal shift, does the Plan sufficiently recognise the potential of new transport technologies (i.e. electric vehicles) as well as increasing non-car modes such as public transport, walking and cycling?

#### Issue 2 - Infrastructure to support growth

- Q7.6 Does the infrastructure evidence demonstrate that Plan:MK is soundly based and that the proposals within the Plan can be delivered in a timely and satisfactory manner?
- Q7.7 Through existing, expanded or new provision, would there be capacity in infrastructure and services to serve the planned housing growth with reference to:
- i) Power (gas/electricity networks)
  - ii) Schools
  - iii) Health facilities
  - iv) Leisure, public open space & allotments; and
  - v) Waste water treatment
- Q7.8 Are there contingencies for the potential non-delivery of infrastructure? Is the Plan sufficiently flexible to deal with this?

#### Issue 3 – Policy INF1

- Q7.9 Is Policy INF1 justified, effective and consistent with national policy? Does the policy strike an appropriate balance between providing certainty that the planning obligations sought by the development plan meet the 3 tests at NPPF paragraph 204 and the caution at paragraph 153 of the NPPF that SPD should not add unnecessarily to the financial burdens on development?
- Q7.10 Is the Council contemplating CIL? Where off-site infrastructure is required is there evidence of a deliverable approach that would not contravene the pooling restrictions? Is the

approach in Policy INF1 to voluntary agreements for joint infrastructure, across sites, robust and effective?

**Matter 7: Issue 4 Viability [Stage Two Hearings]**

Issue 4 – Plan-wide Viability

- Q7.11 Has the preparation of the Plan ensured that collectively its policies and proposals are viable and deliverable? (NPPF paragraphs 173-177). Is there a reasonable prospect that necessary infrastructure to support the Plan’s proposals will be delivered in a timely fashion?
- Q7.12 Does the viability assessment work take account of all the Plan’s policy requirements? Does it show that there would be a competitive return to developers and landowners?
- Q7.13 In addition to funding from development, how will other agencies and organisations will be involved in delivering this spatial Plan? What level of commitment/agreement is there? Are there review mechanisms given the changeable nature of funding? Explain what funding is currently secured and what funding gap remains?

**Matter 8: Policies for managing development [Stage Two Hearings]**

Issue 1 – Homes and Neighbourhoods

- Q8.1 Does the Plan adequately address the needs for all types of housing and the needs of different groups in the community as required by paragraph 50 of the NPPF? Do Policies HN1 (Housing Mix and Density), HN3 (Supported and Specialist Housing) and HN4 (Adaptability of Homes) give clear and sufficient guidance about the basis on which planning applications will be determined in order to meet the Plan’s expectations in this regard?
- Q8.2 Is the Borough wide target for affordable housing in Policy HN2 sufficiently clear and is it viable and deliverable? Does the Policy present a pragmatic approach to deliver a variety of affordable housing options and is it consistent with national policy? Should the Policy allow for off-site contributions where this would aid viability under Part B of the policy?
- Q8.3 Is Policy HN4 consistent with the Written Ministerial Standard (March 2015) and Planning Practice Guidance on optional technical standards for housing? In particular are the proposed nationally described space standard and accessibility standards:
- i) Locally justified by the particular evidence for MK as required by PPG? (paras 56-002-20160519) Does the Council’s 2017 assessment (MK/HOU/002) for NDSS justify the inclusion of the standard in Policy HN4? What is the evidence base for accessible and adaptable housing (PPG paras 56-005 to 007-20150327)? Having regard to PPG para 56-009-20150327 should M4(3) housing only be applied to affordable provision?
  - ii) Viable taking into account all other Plan:MK requirements? (PPG 56-003-20150327)
  - iii) Have the impacts of Policy HN4 been considered as part of the assessment of housing land supply in terms of net densities and market delivery?

- Q8.5 Are the requirements in Policy HN5 for self-build and custom housebuilding justified and deliverable? Is it consistent with the PPG content at Section 57 (July 2017)?
- Q8.4 Having regard to the robustness of the evidence, does Plan:MK make adequate provision for the housing needs of the Gypsy and Traveller and Travelling Showpeople communities? Is the assessment of capacity on committed sites robust? Are previously allocated sites clearly identified as ‘allocations’ for Plan:MK? Provision at SEMK will be considered under Matter 5 but in general terms, is the approach to the allocation of Gypsy and Traveller provision based on a clear, robust process of site assessment and informed by sustainability appraisal?
- Q8.5 Is there any risk that site conditions and constraints might prevent development of the allocations in Policy HN11 or adversely affect their viability and delivery?
- Q8.7 Are the criteria in Policies HN11 and HN12 justified and consistent with national planning policy?
- Q8.8 In all other respects, are the Plan’s policies for homes and neighbourhoods soundly based?

#### Issue 2 - Design & Sustainable Construction

- Q8.9 Are the design policies in Plan:MK justified, effective and consistent with national policy? Are they unduly prescriptive and would they allow for appropriate innovation consistent with MKs modernity?
- Q8.10 Is the requirement for a 19% carbon reduction above Part L 2013 Building Regulations and on site renewable energy generation or connection to a renewable energy scheme that contributes to a further 20% reduction in the residual carbon emissions justified, effective and consistent with national policy (NPPF paragraphs 95 and 96)? Would it be viable in combination with other policy requirements of Plan:MK?
- Q8.11 The PPG states that all new homes already have to meet the mandatory national standard in the Building Regulations of 125 litres/person/day. Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations requirement of 110 litres/person/day (PPG para 56-014-20150327). Is the standard of 110 litres/person/day in Policy SC1 justified on available, up-to-date evidence?
- Q8.12 The PPG also states that it will be for a local planning authority to establish a clear need based on, amongst other things, a consideration of the impact on viability and housing supply of such a requirement. Has this been done? Will the standard of 110 litres/person/day be viable?

Issue 3 – Education, Health and Leisure

- Q8.13 Is the requirement in Policy EH6 for a Health Impact Assessment for all residential schemes over 50 units soundly based?
- Q8.14 Is the approach to hot food takeaways in Policy EH8 justified and consistent with national policy and in particular PPG para 53-006-20170728? Does the submitted evidence base comply with PPG Section 53 on ‘Health and Wellbeing’?
- Q8.15 In all other respects, are the Plan’s policies for education and health soundly based?
- Q8.16 Are the submitted open space standards in Appendix C soundly based?

Issue 4 - Environment & Heritage

*Natural Environment*

- Q8.17 Do Policies NE1-6 (with reference to the proposed modifications in the Statements of Common Ground appended to the Duty to Cooperate Statement and presented in the schedule of proposed modifications) provide clear, justified and effective guidance for the protection and enhancement of the Borough’s landscape, biodiversity and geodiversity? What is the evidence, or what are the measures, that will enable assessment against impacts on ‘tranquillity’ in Policy NE5?
- Q8.18 Are Policies NE1 and NE3 consistent with paragraph 117 of the NPPF, in particular, with regard to the need to plan for biodiversity at a landscape-scale across local authority boundaries, and, identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation?
- Q8.19 What is the latest position on a Green Infrastructure Strategy for MK? Is Policy NE4 soundly based in its approach to Green Infrastructure?

*Flood Risk and Water Management*

- Q8.20 Is Plan:MK based on the most up-to-date Water Cycle Study and Strategic Flood Risk Assessment?
- Q8.21 Are amendments needed to Policies FR1 and FR2 for Plan soundness as suggested by Environment Agency, Anglian Water and the Internal Drainage Board?

*Historic Environment*

Q8.22 Is Policy HE1 justified, effective and consistent with national policy? In particular does it accord with NPPF paragraphs 132-135 in relation to proposals that may result in harm or loss to a heritage asset?

Issue 5 – Other Policies

Q8.23 Is Policy CC1 (Percent for Art), justified and effective? Has it been considered as part of the plan-wide viability assessment? How will the requirement be lawfully implemented in the context of the CIL Regulations 2010 (as amended)?

Q8.24 Are the Plan’s policies for transport and connectivity soundly based?

**Matter 9: Monitoring [Stage Two Hearings]**

Q9.1 Is the proposed monitoring framework robust and effective? What are the intended mechanisms and timescales for monitoring the implementation and effectiveness of the policies and proposals in the Plan?

Q9.2 Does it provide for co-operation and participation and are appropriate participants involved? Are the Duty to Cooperate bodies embedded in the delivery/ monitoring of the Plan?

Q9.3 Are suitable arrangements in place for reviews at appropriate times? Is it clear when monitoring will trigger action?