



MILTON KEYNES LOCAL PLAN (Plan:MK) EXAMINATION

STAGE 1 HEARING SESSION

MATTER 5

CENTRAL BEDFORDSHIRE COUNCIL

JUNE 2018

Central Bedfordshire Councils (“CBC”) representations to the Pre-Submission Milton Keynes Local Plan (“Plan:MK”) raised significant concerns in relation to Policy SD14 Milton Keynes East (MKE). Our concerns primarily lie in the assessment of the location and whether it has been included within the local plan as a viable and deliverable allocation following an appropriate assessment process and informed by a robust Sustainability Appraisal (SA). Inconsistencies in approach to the assessment of sites through the SA including the discounting of four other locations based upon the level of growth over the OAN that they would deliver; and the combination of options to create an 8+ Option which does not appear to have been appropriately tested, are all areas upon which CBC has raised concern and sought clarification.

CBC’s Pre-Submission representations should therefore be read alongside this Statement which builds upon our initial representations.

Matter 5: Strategic Site Allocations and Urban Extensions

Issue 1 – General Approach & Principles

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?

CBC does not consider that Policy SD14 (MKE) has been based upon a sufficiently clear, robust process of site assessment. As stated within our Regulation 19 representation, we have significant concerns relating to the assessment of the site through the Sustainability Appraisal process and the uncertain level of growth that the proposed location may deliver. It is also very unclear how the allocation of the strategic site MKE accords with the MK Futures 2015 Visioning work commissioned by MK Council.

Our concerns are now greatly enhanced by the proposed extension to the site to the east of the M1 as no further clarification has been provided as to the extent of the growth associated with the initial proposed allocation or indeed the newly proposed extension to it. It is also unclear from the Modifications proposed if the addition of further land to the east of the M1 has been tested through the SA process – either as an entire site and against the four options that have previously been discounted due to the excessive level of growth above the OAN that they could deliver. It is therefore CBC’s view that the reasons for the selection of the preferred site to the east of the M1 above other potential locations, are unclear and insufficient.

It is noted that in response to the Inspectors letter dated 9th May 2018 (Ref INS1) within which the Inspector’s Initial Observations and Questions are set out, the response letter from MK Council to the Inspector, dated 3rd June 2018 (Ref INS1a) states :

You have sought clarity on “what growth level options have been systematically appraised and whether any growth level options have been considered ‘unreasonable’”, and you go on to note that: “... the SA discounted some site options on the basis that they would create a buffer in excess of 15% above OAN. The rationale for this approach needs to be examined, particularly if circumstances enable MKE to deliver during the plan period which the SA advises could result in a theoretical 21% buffer.”

The rationale for ruling out spatial strategy options that would involve provision for a quantum of homes, in the plan period, greater than 15% above OAHN was the understanding of the strategic context, as explained within Section 6.2 (e.g. the lack of unmet needs). The view of Officers and AECOM (working in collaboration) in late 2017 was that the allocation of MKE to deliver 3,000 homes in the plan period would enable, and indeed necessitate, lower growth within the urban area, and at South East MK (in the plan period), such that the total number of homes provided for, within the plan period, would not exceed OAHN plus 15%.

CBC is greatly concerned by the response of MK to the Inspectors letter, in that it indicates that the full potential and capacity of the urban area is not being maximised. It identifies that greenfield land is being brought forward for development ahead of possible brownfield land within the urban area and land that is more accessible and sustainable to deliver growth. This is considered to be highly inappropriate and unsustainable. It is the view of CBC that in order to justify the allocation and delivery of greenfield land, it is essential that maximising the potential of the urban area is prioritised in the first instance. Furthermore, lower growth at South East MK within the plan period may have a detrimental impact upon the sustainability of this location and the ability to deliver the necessary infrastructure to ensure the development meets the needs of future residents and communities.

The letter also identifies that the decision to allocate MKE to deliver 3,000 homes in the plan period was taken in ‘late 2017’. CBC is therefore very concerned that the lateness of such a decision, which has such a significant impact for the residents and communities of both Milton Keynes and Central Bedfordshire, as well as the local and strategic road network, has not been based on a robust evidence base or tested through the Sustainability Appraisal process.

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?

As set out within our Regulation 19 representations, Central Bedfordshire Council (CBC) supports the approach set out in paragraph 4.4 of the proposed submission plan to deliver the identified OAN for Milton Keynes (MK) and to identify sufficient land to enable the delivery of a 9.7% buffer above the OAN through this plan. CBC has also shown support for Policy DS2 which identifies that the housing needs will be met within the boundary of Milton

Keynes and that development will be focused on, and adjacent to, the existing urban area of MK.

However, it is CBC's view that in respect of MKE, the plan is not positively prepared as an appropriate assessment of the location, which now includes the proposed extension, has not been adequately or appropriately tested against four other potential locations (which have previously been discounted) through the Sustainability Appraisal process. Until the location has been thoroughly tested against all other possible options, it is considered to be highly inappropriate and premature to include it within the local plan as a long term strategic site/direction of growth.

CBC is fully aware of the context within which the local plan has been prepared. Whilst CBC are supportive of the Government agenda to deliver significant levels of growth within the Cambridge-Oxford Corridor, and of the commitment of Milton Keynes to help meet these needs, we would have strong reservations about the suitability of delivering such significant growth in this location within the plan period ahead of a full, robust assessment through a sustainability appraisal.

It is noted that in response to the Inspectors letter dated 9th May 2018 (Ref INS1) within which the Inspector's Initial Observations and Questions are set out, the response letter from MK Council to the Inspector, dated 3rd June 2018 (Ref INS1a) states :

You have sought clarity on "what growth level options have been systematically appraised and whether any growth level options have been considered 'unreasonable'", and you go on to note that: *"... the SA discounted some site options on the basis that they would create a buffer in excess of 15% above OAN. The rationale for this approach needs to be examined, particularly if circumstances enable MKE to deliver during the plan period which the SA advises could result in a theoretical 21% buffer."*

The rationale for ruling out spatial strategy options that would involve provision for a quantum of homes, in the plan period, greater than 15% above OAHN was the understanding of the strategic context, as explained within Section 6.2 (e.g. the lack of unmet needs). The view of Officers and AECOM (working in collaboration) in late 2017 was that the allocation of MKE to deliver 3,000 homes in the plan period would enable, and indeed necessitate, lower growth within the urban area, and at South East MK (in the plan period), such that the total number of homes provided for, within the plan period, would not exceed OAHN plus 15%.

CBC is greatly concerned by the response of MK to the Inspectors letter, in that it indicates that the full potential and capacity of the urban area is not being maximised. It identifies that greenfield land is being brought forward for development ahead of possible brownfield land within the urban area and land that is more accessible and sustainable to deliver growth. This is considered to be highly inappropriate and unsustainable. It is the view of CBC that in order to justify the allocation and delivery of greenfield land, it is essential that maximising the potential of the urban area is prioritised in the first instance. Furthermore, lower growth at

South East MK within the plan period may have a detrimental impact upon the sustainability of this location and the ability to deliver the necessary infrastructure to ensure the development meets the needs of future residents and communities.

The letter also identifies that the decision to allocate MKE to deliver 3,000 homes in the plan period was taken in 'late 2017'. CBC is therefore very concerned that the lateness of such a decision, which has such a significant impact for the residents and communities of both Milton Keynes and Central Bedfordshire, as well as the local and strategic road network, has not been based on a robust evidence base or tested through the Sustainability Appraisal process.

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?

As previously identified, it is unclear from the Sustainability Appraisal and the local plan, the extent of the overall allocation and the quantity of development proposed. It is therefore unknown if sufficient evidence exists to suggest if the allocation and the quantity of development proposed at this location is appropriate.

As the extent of the allocation proposed through the pre-submission plan is unknown, it is impossible to determine if the proposed extension (as included in the proposed modifications (PM44) is necessary or appropriate for the delivery of the location or the Soundness of the plan. Given that the plan as submitted identifies sufficient sites to deliver over and above the identified OAN for the plan period, and that land to the east of the M1 would be in addition to this, it is unlikely that the proposed extension of the allocation is necessary for Plan Soundness. This position is further supported by MK Council's letter to the Inspector (3rd June 2018, Ref INS1a) which clearly identifies that the allocation of MKE to deliver 3,000 homes in the plan period would enable, and indeed necessitate, lower growth within the urban area, and at South East MK (in 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?

As previously identified there are potentially four other growth locations that have not adequately been assessed in order to deliver significant sustainable growth within Milton Keynes. It is also apparent from the letter from MK Council to the Inspector (3rd June 2018, Ref INS1a) that there is further capacity within the urban area of Milton Keynes which has yet to be fully considered and utilised. Until the location to the east of the M1 is considered alongside the four alternative locations, and the full potential of the urban area is achieved, CBC consider that it would not be appropriate to allocate the site or consider expanding the location in either the short or medium term. This is further supported by the fact that the site/location is physically separated from Milton Keynes by the M1 and to date, no solution or funding to cross the M1 has been identified.