

Core Strategy

Legal Compliance and Soundness Self Assessment

March 2011



www.milton-keynes.gov.uk/core-strategy-submission

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1 Submission Details

Title of Development Plan Document		Core Strategy	
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Submission Date	1 st March 2011		
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2 . Introduction

2 Introduction

2.1 This document has been prepared by Milton Keynes Council as a self assessment of the soundness of the Milton Keynes Core Strategy. The document fulfils two purposes. These are:

1. To demonstrate that the preparation of the Core Strategy meets the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended); and
2. To demonstrate that the plan is "sound". For a Core Strategy to be sound it should be justified, effective and consistent with national policy. Further detail on soundness is set out in PPS12 and the Planning Inspectorate document [Examining Development Plan Documents: Soundness Guidance](#)

2.2 The Core Strategy, up to and including the Preferred Options Stage, was prepared under the 2004 version of PPS12 and the corresponding Town and Country Planning (Local Development) (England) Regulations 2004. All subsequent stages of the documents were prepared using the 2008 version of PPS12 and the amended 2008 Regulations. Due to this, stages 1 to 3 of the Statutory Requirements use the pre-2008 regulations version of the Planning Advisory Service self assessment toolkit while stages 4 and 5 use the post 2008 regulations version.

2.3 It should be noted that there were two Regulation 27 consultation (publication) periods. This is because following the first publication period in early 2010, aspects of the strategy were revised. Subsequently a further six week publication period in late 2010 was held. Details of both publication periods are set out in 'Stage 4: Publication'.

3 Statutory Requirements

Stage 1: Pre-production

Activity	Statutory Requirement	Evidence Provided
Is the DPD identified in the LPA's adopted Local Development Scheme (LDS)?	The Act s19(1)	Yes. The Core Strategy was first identified in the 2005-2008 Local Development Scheme (LDS). Subsequent LDSs have been adopted since then and the most recent, the 2009-2012 LDS stated that the Core Strategy would be adopted by 2010. The 2008/09 Annual Monitoring Report and 2009/10 Annual Monitoring Report identify the reasons for the slippage in the original and subsequent Core Strategy timetables.
Has the commencement of the DPD been recorded?		Cabinet approved the 2006-2009 Local Development Scheme on 26th September 2006 . This LDS is the first document that records that work had begun on the Core Strategy. Work on the MK2031: Long Term Growth Study , informing the Core Strategy, began in April 2005.
Have any details set out in the LDS, such as the role, rationale or scope of the DPD, met?	The Act s19(1)	Document profiles in the 2005-2008 LDS and the current 2009-2012 LDS , set out the role, rationale and scope of the Core Strategy
Is baseline information being collected and evidence being gathered to set the framework for the SA?	The Act s19(5)	Evidence and baseline data was gathered for the MK 2031 Growth Study SA Scoping Report and subsequently the Core Strategy SA Scoping Report . SA Technical Document

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
		1 presents the data collected for the Core Strategy SA Scoping Report.
Are you collecting information on the conservation objectives of any European wildlife (Natura 2000) sites?	Conservation (Natural Habitats etc)(Amendment)(England and Wales) Regulations 2006	There are no designated European wildlife (Natura 2000) sites in the area covered by the Milton Keynes LDF. A full appropriate assessment was not required as the nearest site is the Ouse Washes SAC in Cambridgeshire and was not considered that it would be affected by growth in Milton Keynes. This exemption is detailed in the Appropriate Assessment Screening Report and confirmed in letters from the Environment Agency and Natural England .
Have you consulted the four statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the SA Report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations specify the consultation procedures for plans requiring SEA.	Yes. Copies of the SA Scoping Report and a corresponding letter were sent to the four bodies.

Stage 2: Issues and Options (regulation 25 consultation)

Activity	Statutory Requirement	Evidence Provided
Have the "specific consultation bodies" been consulted – or are there any of these bodies which, because of the nature of this DPD, do not need to be consulted at this stage?	Regulation 25(1)(a) [Specific Consultation Bodies are defined in Regulation 1]	Section 3 of the Submission Consultation Statement explains that the "statutory consultation bodies" were consulted during the issue and options stage. Details of these bodies can be found in the Milton Keynes Statement of Community Involvement (SCI).

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
Have the “general consultation bodies” been identified and consulted - and are those bodies consulted consistent with the approach set out in the adopted SCI?	Regulation 25(1)(b) [General Consultation Bodies are defined in Regulation 1]	Section 3 of the Submission Consultation Statement explains that the "general consultation bodies" were consulted during the issue and options stage. Details of these bodies can be found in the SCI .
Does the consultation contribute to the development and sustainability appraisal of the options?	The Act s19(5)	<p>The MK2031 Stage 1 & MK2031 Stage 2 Community Feedback reports summarise consultation responses from the MK2031 process and explain how they helped shape the growth options.</p> <p>Paragraph 3.11 and Appendix A6 of the Submission Consultation Statement explains how responses to the consultation of the issues and options were used to shape the options.</p> <p>The SA Scoping Report was issued for consultation at this stage and SA Technical Document 1 document shows the responses. These informed the full SA of the options.</p>
Are you keeping a record of the bodies being consulted; how they are being consulted, and the main issues they have raised?	Regulation 28(1)(c)	<p>Appendix A6 of the Submission Consultation Statement presents a summary of the issues raised during the Regulation 25 consultation.</p> <p>Appendix A2 of the Submission Consultation Statement lists all the bodies and persons invited to make representations under Regulation 25.</p> <p>Specific and general bodies who were have been consulted are set out in the SCI.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
Are you developing a framework for monitoring the effects of the DPD?	Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 specifies the requirements for monitoring the significant environmental effects of implementation of plans	Potential indicators for the Core Strategy were first drawn up in preparing the SA Scoping Report in October 2006. They were further developed in the Sustainability Appraisal Report for the Preferred Options. The Preferred Options Report set out proposed monitoring target and indicators. The finalised monitoring process is set out in Chapter 17 of the Submission Core Strategy .
<i>Have you arranged to send to the GO copies of documents used in consultation?</i>	<i>Not statutory, but will assist the later stages where the Secretary of State has a statutory role</i>	The Government Office for the South East were sent documents at the appropriate consultations stages. Appendix A2 of the Submission Consultation Statement lists the Government Office for the South East as a statutory consultee that were sent hard copies of the consultation material. This is set out in section 3.5 of the Submission Consultation Statement .

Stage 3: Preferred options (regulation 26 participation)

Activity	Statutory Requirement	Evidence Provided
Is the DPD being prepared in accordance with the LDS?	The Act s19(1)	The February 2007 partial update to the 2006-2009 LDS was approved at the time of the Preferred Options consultation. The Preferred Options Report was prepared in accordance with the document profile and the preferred options consultation occurred inline with the adopted document timeline.
Have you assessed the preferred options against: <ul style="list-style-type: none"> consistency with national policy? 	<ul style="list-style-type: none"> The Act s19(2), s24 and Schedule 8 Regulation 13(6) 	Section 1.4 of the Preferred Options Report sets out how, at the time, the Preferred Options were consistent with National Policy, the emerging South East Plan and the

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
<ul style="list-style-type: none"> • general conformity with the RSS or SDS for London • conformity with the core strategy DPD or old policy (unless the DPD will supercede the old policy) 		<p>Milton Keynes South Midlands (MKSM Sub Regional Strategy)</p>
<p>Are you having regard to -</p> <ul style="list-style-type: none"> • adjoining RSSs, the SDS for London or Welsh Spatial Plan (as appropriate where either of these adjoin the plan area)? • the National Planning Framework for Scotland? 	<ul style="list-style-type: none"> • The Act s19(2) • Regulation 15(1)(g) 	<p>Milton Keynes (South East region) lies at the centre of the MKSM sub-region, which incorporates parts of the South East, East of England and East Midlands regions. At the time of the consultation the MKSM Sub Regional Strategy (SRS) was more recent than the three Regional Planning Guidance documents for the regions it covers. The SRS was taken into regard in the preparation of the Preferred Options Report, as was the draft South East Plan, and this is made clear in section 1.4.</p>
<p>Are you having regard to -</p> <ul style="list-style-type: none"> • the community strategy of the authority or other authorities whose area comprises part of the area of the LPA? • Any other LDD adopted by the authority 	<p>PCPA 2004 s.19(2)</p>	<p>The Preferred Options Report forms part of the spatial element of the Sustainable Community Strategy. This is made clear in the introduction and paragraphs 1.5.3 to 1.5.6 of the Preferred Options Report The Waste DPD was not adopted when the Preferred Options report was published although although the document is referenced in paragraph 5.3.1</p>
<p>Are you having regard to the other matters and strategies relating to -</p> <ul style="list-style-type: none"> • resources? • the RDA's Regional Economic Strategy? 	<ul style="list-style-type: none"> • The Act s19(2) • Regulation 15 • <i>This list includes matters referred to in Annex B of PPS12 additional to the</i> 	<p>The Preferred Options Report has regard to all of these issues, some with supporting background documents. All documents referred to in the Core Strategy are listed in the Bibliography.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
<ul style="list-style-type: none"> • infrastructure provision and any transport plan? • utilities infrastructure • integration of transport and land use policies? • waste strategies? • hazardous substances and accidents? • climate change? 	<p><i>requirements set out in the Act and Regulations</i></p>	<p>The resources to deliver the strategy, whether financial, land, labour or other resources are considered alongside each preferred policy direction in the report.</p> <p>SEEDA's Regional Economic Strategy is covered in Chapter 7 of the Preferred Options Report. This has influenced the proposed direction for the Milton Keynes economy.</p> <p>Infrastructure, including both transport and utilities, is covered through policy directions in the Serving Existing Communities and the Growing New Communities sections. The Local Investment Plan identifies key infrastructure and the funding sources to deliver the strategy. MKC consulted extensively with all relevant infrastructure providers.</p> <p>Section 5.4 of the Preferred Options Report states how a co-ordinated approach has been taken with land use and transport policies, through the Local Transport Plan and Core Strategy, to reduce reliance on the car, promote sustainable transport policies and encourage behavioural change.</p> <p>Section 5.3 of the Preferred Options Report states how MKC was at an advanced stage of the process of adopting a Waste DPD. The Waste DPD would identify solutions and policies regarding coping with a higher level of waste as a result of growth while seeking to reduce waste production and increase recycling.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
		<p>Climate change issues and policies to combat it are raised in Chapter 5 of the Preferred Options Report, Managing Our Impacts. This section refers to the climate change strategies and matters that influenced the policy directions.</p> <p>It is considered that issues relating to hazardous substances and accidents are more related to a site allocations DPD. The Health and Safety Executive were consulted all stages of the process but no comments were received.</p>
<p>Have you undertaken the necessary sustainability appraisal of alternatives in arriving at the preferred options?</p>	<p>The Act s19(5)</p>	<p>Yes, a summary of the appraisal of the alternatives is in the Preferred Options Sustainability Appraisal Report.</p> <p>The MK2031 Sustainability Appraisal Report specifically looked at locations for growth. This informed the Preferred Options.</p>
<p>Have you prepared the Sustainability Report?</p>	<p>The Act s19(5)</p>	<p>Preferred Options Sustainability Appraisal Report</p>
<p>Have you screened the plan options for likely significant effects on European Wildlife (Natura 2000) sites?</p>	<p>Conservation (Natural Habitats &c) (Amendment) (England and Wales) Regulations 2006 [forthcoming Regulation 85B]</p>	<p>The Appropriate Assessment Report describes the screening process and concludes that a full assessment is not required. This position is supported by Natural England and the Environment Agency.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
If necessary (see above) have you made an Appropriate Assessment of the plan options in Habitats terms?	Draft Habitats Regulations no 85B Conservation (Natural Habitats &c) (Amendment) (England and Wales) Regulations 2006 [forthcoming Regulation 85B]	N/A
Have you set out clear reasons for the preferred options and a précis of the alternatives and why they were rejected?	Regulation 13(1)	The Preferred Options Sustainability Appraisal Report and the Preferred Options Report set out a summary of why various policy directions and spatial options were rejected and why the Preferred Options were selected.
Are you ready to seek participation on the preferred options and consult on the sustainability report (including any findings on Appropriate Assessment)?	Regulation 26	Authorisation was sought on 26th June 2007 from Cabinet to consult on the Core Strategy Preferred Options report and the SA report.
<i>Have you prepared a housing trajectory (where relevant to the DPD being prepared)?</i>	<i>Non-statutory, although Regulation 48 requires information on net additional dwellings to be given in the AMR. See PPS12 paras 4.25 and 4.48.</i>	No housing trajectory was included in the Preferred Options Report but was located within each Annual Monitoring Reports since 2004/05. The Submission Core Strategy contains a housing trajectory in chapter 18.
Where sites are to be identified or areas for the application of policy defined, are you preparing sufficient illustrative material to - <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map? • inform the community about the location of proposals? 	Regulation 9	<p>The Proposals Map Alteration shows the allocation of the Strategic Reserve Areas. This is a separate document to be viewed alongside the existing Local Plan Proposals Map.</p> <p>The Key Diagram in the Preferred Options Report indicated the location of the South East SDA. However, the SDA has been removed from the Submission Core Strategy.</p>

Activity	Statutory Requirement	Evidence Provided
<p>Have you made copies of the “pre-submission proposals documents” and a statement of the “proposals matters” available for inspection?</p>	<ul style="list-style-type: none"> • Regulation 26(a). • Regulation 27 allows anyone to make representations and specifies a period of six weeks. • The LPA must consider all representations received (see Regulation 27(3)). 	<p>Yes. Details can be found in section 4 of the Submission Consultation Statement.</p>
<p>Have you published the presubmission proposals documents, proposals matters and a statement that the documents are available for inspection (at specified places and times) on the website?</p>	<ul style="list-style-type: none"> • Regulation 26(b) • Regulation 24 gives definitions and Regulation 27 facilitates representations (see above) 	<p>The statement of matters for the Preferred Options consultation is set out in Appendix B1 of the Submission Consultation Statement.</p>
<p>Have you sent to the “DPD bodies” (ie all those you consulted at the Regulation 25 stage)-</p> <ul style="list-style-type: none"> • the proposals for the DPD? • supporting documents that are relevant to the body? • notice of proposals matters? • A statement that the documents are available for inspection (at specified places and times)? 	<ul style="list-style-type: none"> • Regulation 26 (c) • Regulation 24 gives definitions and Regulation 27 facilitates representations (see above) 	<p>Section 4 of the Submission Consultation Statement and the corresponding B Appendices set out the consultation procedures used for the Preferred Options consultation.</p>
<p>Have you advertised in a local paper giving notice of the proposals matters and where and when the presubmission proposals documents can be inspected?</p>	<ul style="list-style-type: none"> • Regulation 26(d) • Regulation 24 gives definitions and Regulation 27 facilitates representations (see above) 	<p>Copies of the advertisements are set out in Appendix B1 of the Submission Consultation Statement.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Evidence Provided
Do the participation arrangements comply with the SCI?	The Act s19(3)	Yes. Details are contained within Section 4 and Appendices B1 to B6 of the Submission Consultation Statement .
<i>Have you sent the Government Office and the Planning Inspectorate copies of the proposals for the DPD and supporting documents?</i>	<i>Not statutory, but will assist the later stages where the Secretary of State and the Inspector have statutory roles.</i>	GOSE and the planning inspectorate were sent both hard and electronic copies of the Preferred Options Report and supporting documents during the consultation period.
Are you keeping a record of the number of representations made and the issues raised?	Regulation 28(1)(d)	They are stored in the online Limehouse consultation software. The Submission Consultation Statement contains details of the Preferred Options consultation procedure.

Stage 4: Publication

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Have you prepared the sustainability appraisal report?	The Act section19(5) Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	PPS12 paragraphs 4.38 – 4.43 SEA Guide Chapter five		Sustainability Appraisal Report (February 2010) Sustainability Appraisal Addendum (October 2010) SA Technical Document 1 SA Technical Document 2 SA Technical Document 3 SA Technical Document 4

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Have you made clear where and within what period representations must be made?	Regulation 28(2) and (3)		The period must be at not less than 6 weeks from when you give notice under Regulation 27(e) (see below	Yes. Details are contained in Sections 5 and 6 of the Submission Consultation Statement .
Have you made copies of the following available for inspection: <ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? 	Regulation 27(a)		Regulation 24 gives definitions	Yes. Details are contained in Sections 5 and 6 of the Submission Consultation Statement .
Have you published on your website the following: <ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? statement and details of where and when documents can be inspected? 	Regulation 27(b)		Regulations 2 and 24 give definitions	Yes. Details are contained in Sections 5 and 6 of the Submission Consultation Statement .
Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1):	Regulation 27(c)		Regulations 2 and 24 give definitions	Yes. Copies of a sample letter can be seen in appendices C4 and D3 of the Submission Consultation Statement .

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<ul style="list-style-type: none"> A copy of each of the proposed submission documents The statement of the representations procedure? 				
<p>Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> the statement of the representations procedure? where and when the documents can be inspected? 	Regulation 27(d)		Regulations 2 and 24 give definitions	Yes. Copies of a sample letter can be seen in appendices C5 and D4 of the Submission Consultation Statement .
<p>Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> the statement of the representations procedure where and when the documents can be inspected? 	Regulation 27(e)		Regulation 24 gives definitions	Yes. Details of the advertisements are set out in sections 5 and 6 of the Submission Consultation Statement .
<p>Have you requested the opinion of the regional planning body (or the Mayor in London) on the general conformity of the development plan document with the regional spatial</p>	The Act section 24 Regulation 29	PPS12 paragraph 4.21	The period is six weeks from when you make copies available for inspection under Regulation 27(a)	Not required due to Schedule 5, paragraph 15(3) of the Local Democracy, Economic Development and Construction Act 2009 which removed this requirement.

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
strategy (or spatial development strategy)?				

Stage 5: Submission

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Are you ready to submit the DPD?	The Act section 20(2)(b)		If you are not ready to submit, you may need to do more work on the development plan document or consider withdrawing and republishing a revised version.	It is not considered that there were any major issues revealed during the two publication periods that the Council agrees with.
Are there any major issues revealed by the representations on publication?	The Act section 20(1)			All relevant submission documents and the issues raised during the two publication periods are available on the Core Strategy Submission Webpage .
Are all the relevant documents in place?	Regulation 30(1)		Regulation 30(1) sets out the documents which must be submitted in addition to the development plan document.	
Has the development plan document been prepared in accordance with the local development scheme?	The Act, section 19(1)	PPS12 paragraph 4.50; 4.53 – 4.55	The Act section 15(2) and Regulation 8 note the matters specified in the local development scheme	The contents of the DPD are in accordance with the description of the Core Strategy in all Milton Keynes Local Development Schemes.
Does the development plan document's listing and description in the local development scheme match the document?			The box on local development schemes in PPS12 after paragraph 4.55 sets out milestones	The original timescales set out in the Local Development Schemes were not met. The reasons for this are set out the in the LDF sections of MKC's Annual Monitoring Reports

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Have the timescales set out in the local development scheme been met?				
Has the development plan document had regard to any Sustainable Community Strategy for its area (like a county and district)?	The Act section 19(2)	PPS12 paragraph 4.34 – 4.35; 4.50		The role and influence of the Sustainable Community Strategy (SCS) on the Core Strategy is set out in section 3 of the Submission Core Strategy. Milton Keynes Sustainable Community Strategy 2004-2034 (2008 Refresh)
Is the development plan document in compliance with the Statement of Community Involvement (where one exists)?	The Act s19(3)	PPS12 paragraph 4.50; box after paragraph 4.26	Before the statement of community involvement is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried out met the regulations (as amended).	Yes. Details of compliance with the Statement of Community Involvement are set out in the Consultation Statement .
Has the council carried out consultation as described in the Statement of Community Involvement?	Regulation 32(1)(c)			
Has the development plan document been subject to sustainability appraisal?	The Act section 19(5)	PPS12 paragraph 4.39 – 4.43; 4.50		Sustainability Appraisal Report Sustainability Appraisal Report Addendum Sustainability Appraisal of Reasonable Alternatives (January 2011) SA Technical Document 1 SA Technical Document 2 SA Technical Document 3 SA Technical Document 4
Has the council provided a final report of the findings of the appraisal?	Regulation 32(1)(a)	SEA Practical Guide, chapter five		

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Is the development plan document to be submitted consistent with national policy?	The Act section 20(2) and Schedule 8	PPS12 paragraphs 4.30 – 33; 4.50	You need to be sure changes made up to the time of submission are compliant with the requirements	Yes, with the exception of less than 60% of proposed development being on previously developed land (PPS3 requirement). This is due Milton Keynes being a New Town and the subsequent lack of brownfield sites. The Government Offices no longer provide such confirmations.
Does the development plan document contain any policies or proposals that are not in general conformity with the Regional Spatial Strategy? If yes, is there local justification? Has the council got confirmation from the regional planning body about the general conformity of the plan with the Regional Spatial Strategy?	The Act s 24(1)(a); 24(2) and 24(4) Regulation 29	PPS12 paragraphs 4.30 – 33; 4.50	In London the requirement is for general conformity with the spatial development strategy (The London Plan)	Core Strategy policies relating to housing land supply and strategic Development Areas (CS1, 2, 5 and 6) do not fully comply with South East Plan policies MKAV1 and MKAV2. The Core Strategy proposes a lower level of housing growth up to 2026 than set out in the South East Plan. The justification for this is set out in Section 5 of the Submission Core Strategy and in the Housing Technical Paper . South East Plan policy MKAV2 states that the approximate jobs target for the Milton Keynes Growth Area should match the housing target. The Submission Core Strategy sets a higher target of 1.5 net new jobs per net new dwelling. This is based on local reasoning. Justification for this is set out under Policy CS3 in the Submission Core Strategy and the accompanying Employment Technical Paper .

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
				<p>The high court judgement on <i>R (Cala Homes (South) Limited) vs Secretary of State for Communities & Local Government (No. 2) [2011]</i> ruled that the ministerial statement and letter from the Chief Planner (Steve Quartermain) on 10th November 2010 were lawful. This means that LPAs should have regard to the Government’s stated policy commitment to abolish the regional tier of development plan policy as a material consideration. MKC considered this to have significant weight with regards to departing from the housing growth requirements of policies MKAV1 and MKAV2 of the South East Plan.</p> <p>The South East England Regional Assembly and South East Partnership Board have been dismantled. Therefore confirmation cannot be sought from the regional plan making body.</p>
<p>Does the development plan document comply with the 2004 regulations (as amended)?</p> <p>Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?</p>	<p>The Act section 20(2), 20(3) and 20(5)(b)</p>	<p>PPS12 paragraphs 4.36; 4.50</p>	<p>Requirements relating to publication of the prescribed</p>	<p>The Milton Keynes Core Strategy complies with LDF Regulations.</p> <p>Details of where the documents have been made available, what advertisements were used and what bodies were informed are contained within the Consultation Statement.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<p>Has the council placed local advertisements?</p> <p>Has the council notified the development plan document bodies?</p> <p>Does the development plan document contain a list of superseded saved policies?</p>	Regulations 13(1), 13(2), 13(5) and 30(1)		documents are listed later in this table.	A full list of saved Local Plan policies that will be superseded by the Core Strategy is contained within Appendix C of the Submission Core Strategy .
<p>Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map?</p> <p>If yes, have you prepared a submission proposals map?</p>	Regulations 13(4) 14 and 30(1)(b)	PPS12 paragraphs 4.6 -4.7; 8.1-8.3		Policy CS5 allocates growth areas at the sites identified as Strategic Reserve Areas SR1 to SR4 on the Adopted Local Plan Proposals Map . These allocations are shown on the Proposals Map Alteration .
<p>If the development plan document is not a core strategy, is it in conformity with the core strategy?</p>	Regulation 13(6)			N/A
<p>Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> Which bodies and persons were invited to make representations under Regulation 25 How they were invited 	<p>The Act section20(3)</p> <p>Regulation 30(1)(d)</p>		This will bring forward material from the Consultation statement (see Stage 2 above)	Details of the regulation 25 consultation are set out in Sections 2 & 3 and Appendix A of the Consultation Statement .

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<ul style="list-style-type: none"> A summary of the main issues raised How the representations have been taken into account? 				
<p>Have you prepared a statement giving:</p> <ul style="list-style-type: none"> the number of representations made under Regulation 28(2) a summary of the main issues raised <p>OR</p> <ul style="list-style-type: none"> that no representations were made? 	<p>The Act section20(3) Regulation 30(1)(e)</p>			<p>The summary of representations is set out in Section 6 and Appendix D of the Consultation Statement.</p>
<p>Have you collected together all the representations made under Regulation28?</p>	<p>The Act section20(3) Regulation 30(1)(f)</p>			<p>All representations made under both regulation 28 publication periods are available on the Submission Core Strategy Webpage.</p>
<p>Have you assembled the relevant supporting documents?</p>	<p>The Act section20(3) Regulation 30(1)(g)</p>			<p>All the supporting and background documents are available electronically on the Submission Core Strategy Webpage</p> <p>Paper versions of the documents are available to view at the Civic Offices in Central Milton Keynes.</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
Has your council approved the development plan document for submission?	The Act section 20		The full council has to approve the development plan document for submission (requirements are set out in Local Authorities Functions Regulations)	Full Council approved the Core Strategy for publication and subsequent submission on 14/09/2010 .
<p>Have you sent the Secretary of State (the Planning Inspectorate) a paper copy of the following:</p> <ul style="list-style-type: none"> the development plan document? the submission proposals map (unless there are no site allocation policies)? the documents prescribed in Regulation 30(1)? 	<p>The Act s20(1) and 20(3)</p> <p>Regulations 30(1) and 30(2)(a)</p>		Regulation 49 deals with the availability of documents and the time of their removal.	<p>Both paper and electronic copies of the documents were sent to the Planning Inspectorate.</p> <p>Submission Letter to Planning Inspectorate</p>
<p>Have you sent the Secretary of State (the Planning Inspectorate) an electronic copy of the:</p> <ul style="list-style-type: none"> development plan document? submission proposals map (unless there are no site allocation policies)? documents prescribed in Regulation 30(1)? 	<p>The Act s20(1) and 20(3)</p> <p>Regulations 30(1) and 30(2)(b)</p>		<p>Electronic copies of some of the representations and supporting documents may not be practicable.</p> <p>Regulation 49 deals with the availability of documents and the time of their removal.</p>	<p>Both paper and electronic copies of the documents were sent to the Planning Inspectorate.</p> <p>Submission Letter to Planning Inspectorate</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<p>Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> The development plan document? The documents prescribed in Regulation 30(1)? 	Regulation 30(3)(a)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	<p>Electronic versions of all the documents and paper copies of the core submission documents are available MKC Libraries.</p> <p>Paper copies of the documents are available at the Civic Offices.</p> <p>The documents are also available on the Core Strategy Submission Webpage</p>
<p>On your website, have you published the:</p> <ul style="list-style-type: none"> development plan document submission proposals map sustainability appraisal report Regulation 30(1)(d) statement Regulation 30(1)(e) statement supporting documents (where practicable) representations made under Regulation 28 (where practicable) statement as to where and when the development plan document and the documents are available? 	Regulation 30(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	<p>Core Strategy Submission Webpage</p>

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<p>For each specific consultation body invited to make representations under Regulation 25(1), have you sent the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • adopted statement of community involvement • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents you consider relevant to each body • statement as to where and when the development plan document and the documents are available? 	Regulation 30(3)(c)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	Specific consultation bodies were sent electronic copies of the core documents. Submission Letter to Specific, General and Interested Bodies
<p>For each general consultation body invited to make representations under Regulation 25(1), have you sent:</p> <ul style="list-style-type: none"> • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	Regulation 30(3)(d)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	General consultation bodies were notified of the details of submission via letter or email. Submission Letter to Specific, General and Interested Bodies

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<p>Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> the title of the development plan document? the subject and area covered by the development plan document? notification that the documents prescribed in Regulation 30(1) are available for inspection where and when they can be inspected? 	Regulation 30(3)(e)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	The notice was placed in the Milton Keynes Citizen on Thursday March 10th 2011.
<p>Have you given notice to persons who have requested to be notified that submission has taken place?</p>	Regulation 30(3)(f)		You should do this as soon as reasonably practicable after submitting to the Secretary of State	Persons who wished to be notified of submission were contacted either by email or letter. Submission Letter to Specific, General and Interested Bodies
<p>If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> published the time and place of the examination and the name of the person appointed to carry out the examination on your website 	The Act section20 Regulation 34			The examination dates have yet to be announced.

3 . Statutory Requirements

Activity	Statutory Requirement	Guidance Reference	Additional Notes	Evidence Provided
<ul style="list-style-type: none">notified those who have made representations on the published development plan document which have not been withdrawn of these detailsadvertised these details?				

4 . Soundness

4 Soundness

Justified

Key Question	Possible Evidence	Evidence Provided
Participation		
Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	<p>It is considered that the production of the core strategy has sought to effectively engage with the local community and other key stakeholders from the outset of the process.</p> <p>The Consultation Statement describes the consultation process, which parties were involved and the subsequent impacts on the formulation of the Core Strategy. Consultation was undertaken in accordance with the Milton Keynes Statement of Community Involvement.</p> <p>The MK2031 Community Engagement Stage 1 Feedback Report contains summaries of feedback from early MK2031 consultation phases. This was used to help formulate the later spatial options of MK2031. The Stage 2 Feedback Report summarises the responses on these spatial options.</p>
Research/Fact Finding		
Is the content of the development plan document justified by the evidence?	Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals	The Core Strategy Audit Trail clearly shows where, when and for what policies the key pieces of the evidence base fed into the plan making process.

Key Question	Possible Evidence	Evidence Provided
<p>What is the source of the evidence?</p> <p>How up to date and convincing is it?</p>	<p>Sections of the pre-submission proposals documents</p> <p>Sections of the preferred strategy report</p> <p>Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</p> <p>Sections of the consultation statement</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> • reports to the council on the issues raised during participation, covering both the front-loading and formulation phases • any other information on community views and preferences <p>The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>Appendix 24 in Technical Document 4 of the Sustainability Appraisal sets out the sustainability summaries of the submission policies.</p> <p>Figure 1.2 (page 4) in the Submission Core Strategy sets out how all the other Milton Keynes related strategies link in and influence the content of the Core Strategy.</p> <p>The background text of individual Submission Core Strategy policies sets out the justification and evidence of those respective policies.</p> <p>The Housing and Employment Technical Papers tie together the evidence and justification in these topic areas.</p>

4 . Soundness

Key Question	Possible Evidence	Evidence Provided
<p>What assumptions had to be made in preparing the development plan document?</p> <p>Are the assumptions reasonable and justified?</p>	<p>Sections of the development plan documents setting out the assumptions</p> <p>Sections of the sustainability appraisal report setting out the assumptions</p> <p>A very brief statement for each assumption as to how the evidence led to the assumption</p> <p>Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<p>Chapter 2 Milton Keynes: The Story of The Place sets out the key contextual information of the Borough. This informed the context for the plan and the vision and objectives.</p> <p>Assumptions used in the Sustainability Appraisal process are set out in Appendix 9 in SA Technical Document 2</p> <p>Assumptions are used in the delivery of the plan e.g. Phasing of housing development, infrastructure delivery.</p> <p>Other assumptions included current national policy not changing dramatically and a continued growth agenda. This has subsequently changed post 2010 General Election with the publication of the Localism Bill and the future National Planning Framework. It is also assumed that RSSs will be revoked and made no longer part of the development plan by the Localism Bill.</p> <p>In the post recession economic climate, it is assumed that achieved housing delivery rates will fluctuate against the plan target. Details of assumptions relating to housing delivery are set out in the Housing Technical Paper.</p>
<p>Alternatives</p>		

Key Question	Possible Evidence	Evidence Provided
Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?	<p>Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p>	<p>MK2031 was the process which devised, consulted upon and assessed the spatial options for Milton Keynes' growth. It included extensive consultation, testing and sustainability appraisal.</p>
Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?	<p>Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p>	<p>The MK2031 Community Engagement Stage 1 Feedback Report contains summaries of feedback from early MK2031 consultation phases. This was used to help formulate the later spatial options of MK2031. The Stage 2 Feedback Report summarises the responses on these spatial options.</p>
Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?	<p>Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy 	<p>The options and directions contained within the Issues & Options Report and Preferred Options Report covered policy options to support growth rather than the individual growth location options.</p>
	<p>Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p>	<p>Sections A6 and B7 of the Consultation Statement contain summaries from the Issues & Options and Preferred Options consultations and subsequent recommendations. They were used to help steer the decision making process.</p>
	<p>Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p>	<p>Appendix 10 of SA Technical Document 2 details the various policy options that were assessed. This is summarised in the Sustainability Appraisal Report The Preferred Options Policy Directions were assessed further in Appendix 12 in SA Technical Document 3.</p>
	<p>Sections of the consultation statement explaining how the main findings of consultation support the decisions</p>	

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Key Question	Possible Evidence	Evidence Provided
	<p>Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>Any other documentation showing how alternatives were developed and evaluated</p> <p>A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>The LDF Advisory Group Reports between August 5th and September 9th 2010 detail the various options considered for revising the Core Strategy. The minutes also clearly set out how and why the revised strategy was chosen.</p> <p>The SA Report Addendum (October 2010) and SA of Realistic Alternatives (January 2010) papers drawn up for the Submission Core Strategy show various alternatives considered and their assessment.</p> <p>The Housing Technical Paper explains the various option for housing growth in Milton Keynes for the Revised Core Strategy.</p> <p>The Employment Technical Paper explains the reasoning behind the employment policies in the Submission Core Strategy.</p> <p>The Core Strategy Audit Trail clearly shows where, when and for what policies the key pieces of the evidence base, member decisions and national and regional policy fed into the plan making process.</p>
<p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</p> <p>Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</p>	<p>Both the MK 2031 Growth Strategy SA and the Core Strategy SA reports set out how the various options for the locations of growth and policy options perform. For the MK 2031 Growth Strategy SA Report these are set out in section 9. For the Core Strategy Sustainability Appraisal Report the performance of the options in set out in section 7.3.</p>

Key Question	Possible Evidence	Evidence Provided
	Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies	Since the Preferred Options Stage of the Core Strategy there have been changes to the policy decisions in the strategy. These changes are set out in Section 14 of the Sustainability Appraisal Report and the SA Report Addendum (October 2010) .
Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?	Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons	The Milton Keynes Core Strategy builds on regional guidance in the South East Plan and MKSM Sub-Regional Strategy and applies it to the MK context to create a vision, objectives and policies. An example of this is the move away from the 1:1 ratio between new dwellings and net new jobs to a 1:1.5 ratio. This is considered in line with past Milton Keynes growth and meets our aspirations to grow out of the recession.
Does the strategy take forward the regional context reflecting the local issues and objectives?	The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy Representations received from the regional development agency/regional planning body Representations from the Government Office Reports or copies of correspondence as to how the representations have been considered and dealt with	However, the Submission Core Strategy also heavily relies on local strategies and guidance. It should be noted that the letter from the DCLG, dated 10 November 2010, stated that the intention to scrap Regional Strategies should be treated as a material consideration. Government Offices no longer provide advice on the content of Core Strategies.

Effective

Key Question	Possible Evidence	Evidence Provided
Deliverable		

4 . Soundness

Key Question	Possible Evidence	Evidence Provided
<p>Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</p> <p>A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy</p> <p>A core strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>Sections of the development plan document which identify the main issues addressed</p> <p>Sections of the development plan document which indicate the priority outcomes</p>	<p>The issues and the priorities of the Submission Core Strategy (pages 18 & 19) draw influence from the Sustainable Community Strategy. The most important issues identified that will be taken forward in the Submission Core Strategy are set out in paragraphs 3.5 and 3.6.</p> <p>Chapters 2 and 3 set out the issues that the document seeks to address.</p> <p>Chapter 4 sets out a 14 point vision for the Milton Keynes Borough in 2026.</p> <p>Chapter 4 also contains 16 strategic objectives which will be used to guide and monitor the delivery of the vision.</p> <p>The evidence base helped establish many of the issues that need to be addressed.</p> <p>It is considered that the Core Strategy clearly identified what the issues are that the document is seeking to address and sets out clear priorities that the document is seeking to achieve.</p>
<p>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>Sections of the regional special strategy which identify cross-boundary issues.</p> <p>Sections of the development plan document setting out cross-boundary issues and the response to them</p>	<p>The original MK2031 study was a cross boundary process that involved Aylesbury Vale DC and Mid Bedfordshire DC (now part of Central Bedfordshire Council) to identify how Milton Keynes could grow.</p>

Key Question	Possible Evidence	Evidence Provided
	<p>Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</p> <p>Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</p>	<p>Over the summer of 2010, when Milton Keynes Council revised its growth targets all support for current or near future cross boundary growth was removed. Details of these changes can be found through the Core Strategy Audit Trail and the Housing Technical Paper.</p> <p>Submission Core Strategy strategic objective 2 in relates to joint working with other authorities on potential future growth. This is expressed more fully in policy CS6.</p> <p>Milton Keynes Planning Officers are members of the Cross Boundary Officers Group (CBOG) which meets regularly to discuss cross boundary issues with Aylesbury Vale DC and Central Bedfordshire Council. This group will be further developed through the South East Midlands Local Enterprise Partnership.</p>
Does the development plan document contain clear objectives?	<p>A spatial portrait which identifies the key issues facing the area</p> <p>A core strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</p>	<p>The Submission Core Strategy objectives are contained within Section 4 following the vision. The objectives were created through consultation, evidence base and sustainability appraisal to address the issues identified in the story of place (Chapter 2) and policy drivers (Chapter 3).</p> <p>Monitoring of the objectives is set out in Chapter 17.</p>
Are the objectives specific to the place; as opposed to being general and applicable to anywhere?	The spatial portrait and the commentary in the development plan document as to how the objectives derive from it	Submission Core Strategy Chapter 2 Milton Keynes: The Story of the Place, outlines a spatial portrait of the

4 . Soundness

Key Question	Possible Evidence	Evidence Provided
<p>Is there a direct relationship between the identified issues and the objectives?</p>	<p>Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</p>	<p>Borough and identifies the successes as well as the issues that need to be tackled. This is summarised into a SWOT analysis. This chapter, alongside the policy drivers in chapter 3, are linked to produce the Vision for the Borough, from which the objectives are drawn from.</p> <p>It is considered that the objectives are MK specific picking up on local context as well as regional and national policy drivers and issues.</p>
<p>Is it clear how the policies will meet the objectives?</p> <p>Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</p> <p>Relevant sections of the sustainable community strategy which identify its objectives</p> <p>Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives</p> <p>Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p>The policies contained within the Submission Core Strategy are extrapolated from the story of place, policy drivers, vision and the objectives, contained in chapters 2, 3 and 4. It is therefore considered that there are no gaps in the policies.</p> <p>Table 17.1 in the Monitoring and Managing chapter explicitly shows which policies will be used to meet the Core Strategy objectives.</p>

Key Question	Possible Evidence	Evidence Provided
<p>Are there realistic timescales related to the objectives?</p>	<p>Sections of the development plan document which address delivery and the timescales for key developments and initiatives</p> <p>Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</p>	<p>After each policy in the Submission Core Strategy there is a delivery section which explains how, by whom and when the measures in the policies will be delivered.</p> <p>In relation to housing developments and associated infrastructure requirements, timescales for each development area are set out in Table 5.5 Overarching Development Strategy.</p> <p>The Development Timeline in Chapter 18 shows how, where and when homes, jobs, infrastructure and services arising out of the core strategy will be delivered over the 16 year plan period.</p> <p>The housing trajectory (Chapter 18) sets out how the allocated housing growth will be delivered over the plan period. This position is supported by Milton Keynes Partnership and Gallaghers (a major landowner in Milton Keynes growth areas).</p> <p>The Housing and Employment Technical Papers details how the proposed timescales for delivering growth are realistic.</p>
<p>Are the policies internally consistent?</p>	<p>Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p> <p>A very brief statement explaining how the council considers its objectives are consistent</p>	<p>Milton Keynes Council believes that all the policies are internally consistent. The creation process has been informed by the Sustainability Appraisal process whereby potential conflicts between policies were identified and alterations made to mitigate this.</p>

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Key Question	Possible Evidence	Evidence Provided
<p>Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <p>Representations from the Government Office</p> <p>Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The 2009-2012 LDS explains what the scope of each DPD will be. The Submission Core Strategy will replace much of the 2005 Adopted Local Plan but not the development management polices. Details of the replacement of Local Plan policies are set out in Appendix C.</p> <p>The Core Strategy sits at the top of the LDF hierarchy and other DPDs and SPDs will hang off it. There is no replication of material in another LDF document and the Core Strategy does not contain material that should, or will be in another LDD.</p>
<p>Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>Sections of the development plan document that identify the key objectives and how they will be delivered upon</p> <p>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</p> <p>Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</p>	<p>The Submission Core Strategy objectives are linked to related policies in table 17.1. The delivery and implementation of policies is discussed following each policy box throughout the document.</p> <p>The realisation of the Core Strategy will assist in delivering the Sustainable Community Strategy and the targets identified in the LAA and table 17.1.</p>
<p>If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>Sections of the development plan document that show how the development management policies:</p> <ul style="list-style-type: none"> • will help to deliver the strategy • derive from, and elaborate on, the objectives and policies of the plan 	<p>There are no development management policies within the Core Strategy.</p>

Key Question	Possible Evidence	Evidence Provided
<p>Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</p> <p>Representations in respect of infrastructure</p> <p>Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</p>	<p>In order to enable the level of growth planned for Milton Keynes substantial level of infrastructure will have to be delivered. This will include schools, roads, utilities and open space. Submission Core Strategy Chapter 16 Delivering Infrastructure explains how it will be funded and how it will be managed. It refers to the Local Investment Plan as the document that identifies the necessary infrastructure to enable Core Strategy policies.</p> <p>Table 5.5 Overarching Development Strategy identifies key pieces of infrastructure that will be required for each growth area within the Borough.</p> <p>Chapter 5 Future Development Areas details pieces of infrastructure that will be required for the significant levels of growth planned for the Strategic Reserve Areas.</p> <p>Milton Keynes Partnership (MKP) works closely with the Council on the delivery of infrastructure to support the growth of Milton Keynes. This relationship is likely to change as many of MKP's functions are likely to be transferred over to Milton Keynes Council.</p>
<p>Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>Sections of the development plan document setting out delivery mechanisms and timescale</p> <p>Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</p>	<p>In the Submission Core Strategy the delivery sections for each policy are after each policy statement. These sections explain how, when and who is responsible of the delivery of the policies and plans.</p>

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Key Question	Possible Evidence	Evidence Provided
	<p>Research or studies that address matters of delivery and the realistic timescales</p> <p>Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</p> <p>Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder</p> <p>Correspondence from stakeholders on delivery mechanisms and timescale</p> <p>Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</p>	<p>The Development Management and Allocations DPD will build on the Core Strategy policies and provide further detail on delivering its objectives and policies. Preparation of these DPDs is set out the 2009-2012 LDS.</p> <p>In relation to infrastructure delivery and timescales these are set out in detail in the Local Investment Plan, which is updated annually.</p> <p>Various background studies developed for the Core Strategy suggested potential delivery mechanisms and timescales for possible Core Strategy policies. Such background studies include the Strategic Housing Land Availability Assessment, the Retail Capacity Study and the Employment Land Study.</p> <p>Summaries of representations in relation to infrastructure and delivery at the preferred options stage are set out in the Consultation Statement.</p> <p>Chapter 18 sets out a Development Timeline showing when the implementation of the policies in the plan will happen. The Timeline utilises the housing delivery set out in the Housing Trajectory in Chapter 17.</p>

Key Question	Possible Evidence	Evidence Provided
Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	<p>Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</p> <p>Representations in respect of infrastructure</p> <p>Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</p>	<p>Infrastructure delivery and timing is set out in Chapter 16 and the Local Investment Plan. This is what has informed the Development Timeline in Chapter 18.</p> <p>Summaries of representations in relation to infrastructure and delivery at the preferred options stage are set out in the Consultation Statement.</p>
<p>Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>Sections of the development plan document setting out responsibilities for delivery</p> <p>Correspondence showing how other stakeholders intend to support the delivery of the policies</p> <p>Reports by the council or the relevant stakeholder</p> <p>Representations from stakeholders on implementation</p> <p>Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</p>	<p>The Submission Core Strategy delivery sections for each policy are after each policy statement. These sections explain how, when and who is responsible of the delivery of the policies and plans. Each section makes specific references to partners of MK Council who will be involved in its implementation. Further detail is located within the Local Investment Plan.</p> <p>Two of the principal land owners relating to the delivery of the growth strategy (MKP and Gallaghers) are committed to implementing the strategy. This can be seen in their representations to the revised-submission publication consultation.</p>
<p>Does the development plan document reflect the concept of spatial planning?</p> <p>Does it go beyond traditional land use planning by bringing together – and integrating – policies for development,</p>	<p>Sections of the development plan document that reflect the plans or strategies of other bodies</p> <p>Expressions of support from bodies responsible for other strategies affecting the area</p>	<p>The Submission Core Strategy reflects the concepts of spatial planning as stated in paragraphs 30 to 32 of PPS1. It sets out a vision of the Borough and related objectives that go beyond traditional land use planning.</p>

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Key Question	Possible Evidence	Evidence Provided
<p>and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>Representations in respect of services provided by other agencies</p> <p>Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>It ties in with the Milton Keynes Sustainable Community Strategy and the LAA to deliver agreed locally specific outcomes that will deliver social, economic and environmental outcomes. Clear indicators to measure these outcomes and objectives are set out in Chapter 17.</p> <p>The Core Strategy builds on the plans and strategies of other Milton Keynes Council departments and external organisations. These partners are also key to the delivering the level of growth and the accompanying policies contained within the DPD. These plans and strategies are detailed throughout the document in each relevant section. They are also listed in Appendix B Bibliography and Relevant Documents.</p> <p>Figure 1.2 shows how the Core Strategy relates to and interacts with other MKC and non-MKC owned strategies and plans building on the concept of spatial planning.</p>
<p>Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council’s views about the matter?</p>	<p>Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>There is a commitment within the Core Strategy to accord with national planning policy.</p> <p>Chapters 17, 18 and Appendix 2: Risks, Actions and Contingencies set out how the Submission Core Strategy will react to changing circumstances and events.</p>
<p>Flexible</p>		

Key Question	Possible Evidence	Evidence Provided
<p>Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</p> <p>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based <p>Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</p> <p>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>Paragraphs 17.5 to 17.8 in the Submission Core Strategy explain how the strategy will react to external changes and deal with flexibility.</p> <p>The monitoring indicators used in Chapter 17 were primarily drawn from the Sustainability Appraisal Report, Local Area Agreement indicators, the DCLG list of Core Output Indicators, National Indicators and existing monitoring arrangements set out in previous Annual Monitoring Reports. This will enable officers to detect early changes in conditions which could affect the delivery of Core Strategy objectives.</p> <p>Appendix D: Actions, Risks and Contingencies contains a table detailing how the individual objectives could be put off track by events and risks. It suggests potential actions that would ensure that the strategy would not be severely affected, It also sets out contingency actions if major change is needed.</p>
<p>Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</p> <p>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>Appendix D: Actions, Risks and Contingencies of the Submission Core Strategy contains a table detailing how the individual objectives could be put off track by events and risks. It suggests potential actions that would ensure that the strategy would not be severely affected, It also sets out contingency actions if major change is needed.</p> <p>Paragraphs 5.6 to 5.13 provide detail on the delivery of the Development Strategy.</p>

4 . Soundness

Key Question	Possible Evidence	Evidence Provided
<p>Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing</p>	<p>A section of the development plan document which expressly addresses flexibility</p> <p>Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing</p>	<p>The flexibility of the housing and employment growth strategies are further explained in the Housing and Employment Technical Papers.</p> <p>Flexibility is expressly addressed in Chapter 17 and paragraphs 18.6 and 18.7 of Chapter 18 and of the Submission Core Strategy.</p> <p>Key targets linked to the objectives of the Core Strategy are set out in table 17.1.</p> <p>Appendix D: Actions, Risks and Contingencies contains a table detailing how the individual objectives and targets could be put off tract by events and risks. It suggests potential actions that would ensure that the strategy would not be severely affected and also sets out contingency actions if major change is needed.</p> <p>The flexibility of the housing growth strategy is referenced in Policy CS2 and further explained in the Housing Technical Paper.</p>
<p>Monitoring</p>		
<p>Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>Sections of the development plan document setting out indicators, targets and milestones</p> <p>Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</p>	<p>Chapter 17 Monitoring and Managing of the Submission Core Strategy sets out the approach to monitoring the impacts of the strategy. The table at the end of the chapter sets out the monitoring indicators and targets</p>

Key Question	Possible Evidence	Evidence Provided
	Reference to any other reports or technical documents which contain information on the delivery of policies	that will be used to measure the success of implementing the strategy's objectives. These indicators and targets will be reported in Annual Monitoring Reports . The Housing trajectory and Development Timeline are contained within Chapter 18.
Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<p>Sections of the development plan document setting out indicators, targets and milestones</p> <p>Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</p> <p>Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</p>	Chapter 17 of the Submission Core Strategy explains how progress against the targets and trends in monitoring will be report in the Annual Monitoring Report .
Are suitable targets and indicators present (by when, how and by whom)?	<p>Sections of the development plan document setting out indicators, targets and milestones</p> <p>Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</p>	<p>Suitable targets were drawn up to fit with SMART guidelines alongside the objectives. Many of the targets were drawn from existing plans such as the Sustainable Community Strategy, Local Area Agreement targets and the Local Transport Plan 2.</p> <p>Not all indicators have specific targets as many are contextual in nature. National Indicators are used where relevant.</p>

4 . Soundness

Consistent with National Policy

Key Question	Possible Evidence	Evidence Provided
<p>Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>If yes, is there a local justification?</p>	<p>Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</p> <p>Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy</p> <p>Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</p> <p>Representations from the Government Office on the preferred strategy or the submitted development plan document</p> <p>Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</p>	<p>PPS3 paragraph 41 states that in order to ensure the effective use of land there is a national annual target to ensure that at least 60% of new housing is built on previously developed land. This is not possible in Milton Keynes due to the level of growth required. Milton Keynes is a new town primarily built on agricultural land and therefore does not have a sufficient supply of previously developed land to develop. However, when available MKC does encourage the development of housing on previously developed land.</p> <p>Chapter 2 of the current Adopted Local Plan has a 20% target for housing to be built on previously developed land. This is not likely to be increased as the majority of the growth set out in the Core Strategy has been carried forward from the local plan, with the exception of the Strategic Reserve Areas and additional level of rural growth.</p>
<p>Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>If so, why have they been included?</p>	<p>Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</p> <p>Representations from the Government Office</p> <p>Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>Milton Keynes Council believes that the Submission Core Strategy does not contain any policies that do not add anything to national guidance. All policies in the Core Strategy are relevant to the Milton Keynes context and its vision and objectives.</p> <p>After the 2010 General Election, Government offices no longer provide representations regarding the content of DPDs.</p>

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