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Plan:MK

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7 June 2018

Dear Mr Cheston

Council's Response to Inspector's Initial Observations & Questions

I would like to thank you and your colleagues for the comprehensive response to my initial observations and questions (doc INS/1). In a number of areas, the letter provides me and others with helpful illumination on the approach the Council has taken. It also provides useful updates on strategic issues where matters are evolving since Plan:MK was submitted for examination.

I am pleased to note that the Council will prepare an addendum to the Duty to Co-operate statement. No timeframe has been specified but if it can be assembled in time to accompany the Council's statement for Matter 1 that would be helpful. If this timeframe is challenging please advise through the Programme Officer on any alternative.

Turning to Sustainability Appraisal (SA) and specifically page 8 of your letter. This presents a number of reflections on the presentation of alternative options and the need to cross reference between Tables 6.6 and 7.1 of the SA report. It would certainly be helpful to me in advance of the hearings, if there was some clarity on coding/labelling the options so they can be discussed with some consistency. Therefore, the short answer to the question posed at the end of the third paragraph on page 8 is 'yes'. I would be grateful for the Council to produce a short, focussed update as soon as practicable and for it to be published on the examination website either as a standalone document or as an appendix to the Council's Matter 1 statement.

More generally on the issue of SA (including the requirements of SEA) your letter is correct that my principal focus will be on the judgements that informed the assessment of the preferred option against reasonable alternatives, why any unreasonable options were discounted and how these are transparently recorded in the SA documentation. I appreciate the balancing act of ensuring a clear audit trail of assessment through the various stages of plan-making whilst avoiding SA becoming an unmanageable paper chase. In my experience simple cross-referencing and summary tables can provide effective mechanisms in ensuring the audit trail is clear. SA remains 'live' during the examination and is likely to be revisited as a consequence of the examination and any proposed main modifications.

I note the Council is working on updating the housing land position as of 1 April 2018. If this could be made available in good time for the

forthcoming stage 1 hearings that would be a positive step, however, it would need to be available by 22 June 2018. If that is not feasible, the alternative would be to consider it at a session in the Stage 2 hearings.

As part of the updated housing land supply position, I would envisage an update to the trajectory and spreadsheet presented in the schedule of modifications so that it is transparent as to: (1) what has been delivered in the initial two years of the plan period (and any update on any under-delivery); and (2) what is profiled to be delivered in the five years from plan adoption (assuming a 2018/19 year) and then developed in the subsequent period from 2023/4 to plan end. The Council may also wish to give consideration to updating the Housing Land Supply Topic Paper or at least be prepared to assist me in terms of where there may be interim figures in that Paper which should be revised in light of the latest evidence. In particular, I will be looking at those sites either in the pipeline or being allocated through Plan:MK which the Council considers are key to delivering the housing requirement over the next 5-6 years.

I also note that the Council has outlined some further suggested modifications in its response. Again, for my benefit and for others, it would be helpful if these were incorporated into a revised composite list of modifications to be republished prior to the Stage 1 hearings. As recognised, modifications remain a 'live' matter, and it would be useful to version control the schedules as the examination progresses.

Yours sincerely

David Spencer
Inspector.