
Plan:MK Examination

Further Written Statement
submitted on behalf of Gallagher Estates Limited
(ID: 1149194)

Matter 2: Spatial Strategy

June 2018

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Gallagher Estates Limited**

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CONTENTS

1.0	Introduction	1
2.0	Response to Matter 2	2

1.0 INTRODUCTION

- 1.1 This written statement is submitted on behalf of Gallagher Estates Limited in response to Matter 2 relating to Spatial Strategy in Plan:MK.
- 1.2 This statement supplements the representations we submitted at the regulation 19 consultation stage on behalf of Gallagher Estates, relating to Land at North Milton Keynes (NMK), an omission site which was considered as an alternative option to the Milton Keynes East (MKE) strategic allocation.
- 1.3 On behalf of Gallagher Estates, we have submitted written statements to Matters 1, 2, 3 and 4.
- 1.4 We look forward to participating in the examination hearings and assisting the Inspector with his assessment of the plan's soundness and legal compliance.

2.0 MAIN MATTER 2: SPATIAL STRATEGY

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

Q2.5 Does a 13 or 12 year period on plan adoption provide sufficient certainty for housing and economic growth in the short to medium term? Would it allow for appropriate foundations for the potential transformational growth envisaged in the MK Futures 2050 and NIC reports?

- 2.5.1 No, a short plan period of just 12-13 years from adoption will not allow for appropriate foundations for longer term, potentially transformational, growth envisaged in the MK Futures 2050 and NIC reports.
- 2.5.2 Paragraph 47 of the NPPF requires authorities to, inter alia, 'identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, **where possible, for years 11-15**'.
- 2.5.3 Clearly, Plan:MK does not provide for a longer term supply of land for housing. This is surprising given the local circumstances for delivering growth at Milton Keynes through large scale development sites, in the past, at present and as envisaged in the future. Such developments involve relatively long lead-in times, including work to prepare development frameworks, prepare and submit planning applications and to bring forward the development including strategic infrastructure.
- 2.5.4 In our view, Milton Keynes is one of few locations in the country where planning for the long-term is entirely necessary in order to ensure that development and infrastructure needs are properly planned for and delivered.
- 2.5.5 We therefore conclude that the plan period proposed does not represent a positively planned or justified plan, and is therefore unsound. To address this soundness issue, the Council should extend the plan period to at least 15 years.

Q2.7 Is it necessary for soundness that Plan:MK be modified to provide a basis for the longer term growth agenda? Would this unduly pre-empt the spatial choices advocated in the MK Futures 2050 and NIC reports (for example further opportunities for sustainable intensification within the

urban area and growth locations along the caM[K]ox arc once EWR and the Expressway are implemented)?

- 2.7.1 Yes. As stated in our response to the Regulation 19 Plan:MK consultation, NMK represents a more sustainable growth opportunity when compared with other alternatives including MKE. As we have stated in our response to Matter 1, there is a risk that the Council's SA in comparing NMK with either MKE or the other option east of the M1, but not both east of the M1 sites as a comprehensive/cumulative scheme, risks comparing 'apples and pears'.
- 2.7.2 As set out in our written statement in response to Matter 1, the selection of MKE instead of NMK is, at best, marginal. As set out elsewhere in our statement, there are also significant uncertainties regarding the site's deliverability given there can be no certainty over the outcome of the HIF Bid.
- 2.7.3 NMK provides a clear long-term growth option, of a significantly larger scale than MKE, which does not rely upon cross-boundary cooperation and for which the likely environmental, social and economic effects have been considered. If, however, MKE represents the full extent of growth east of the M1 Motorway which would be acceptable in the long term, or could unduly pre-empt spatial choices about other opportunities, which we say should include NMK.
- 2.7.4 Taking the above into account, and putting aside our view that NMK is a more sustainable strategic growth option when compared to MKE, Plan:MK should identify that (in addition to the strategic allocations identified in Plan:MK) longer-term expansion should be at NMK and not a further phase of development to MKE.

Q2.8 Would a policy commitment in Plan:MK to a review within a specified timeframe represent an appropriate response to MK Futures 2050 and NIC recommendations? Is there confidence this would be justified and effective given a similar approach was contained within the 2013 Core Strategy (Policy CSAD1)?

- 2.8.1 No. There is significant uncertainty regarding the form of the plan review which could come forward post-Plan:MK, including whether this could be a joint plan prepared with neighbouring authorities. Generally, it should have been more straightforward for the Council to have brought forward the review of the Core Strategy as required by Policy CSAD1 than the review of Plan:MK is anticipated to be, due to the increased level of

growth which is to be planned for and in seeking to secure wider place making objectives associated with the transformation of Milton Keynes within the growth arc.

2.8.2 Barton Willmore acting on behalf of Gallagher Estates helped to draft Policy CS1A in the 2013 Core Strategy. This was accepted by the Core Strategy Inspector at that time as a pragmatic solution in the circumstances that existed in 2012/13.

2.8.3 As Plan:MK will be required to be reviewed within 5 years of its adoption, we would question the merit of a policy commitment for a review with a specified – presumably shorter – timeframe.

Q2.10 If the Council is committed to a review of the Plan, what would be the justification for strategic reserve sites for delivery post 2031? Does this reflect or pre-judge the ongoing work on a wider strategy and infrastructure planning for future substantial growth? Is there evidence in the MKFutures 2050 or NIC reports for east of MK being a strategic direction of growth?

2.10.1 As stated in our further written statements and in our Regulation 19 stage consultation response, the inclusion of MKE in our view already pre-judges decisions regarding the future substantial growth of Milton Keynes. We strongly contend that a decision now to breach the M1 Motorway and allocate MKE, in preference to NMK, is not justified.

2.10.2 We therefore recommend that in order to make Plan:MK sound, the allocation of MKE should be deleted, either with NMK replacing it and the contribution towards meeting needs within the plan period to 2031, or for the assessment of transformational long-term growth options to be deferred to a future review of Plan:MK.