



## MATTER 2 (ISSUES 1-3)

# **SPATIAL STRATEGY**

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## 1.0 Introduction

### 1.1 Background

- 1.1.1 Bidwells LLP have been instructed by Persimmon Homes/Charles Church Midlands (PHM) to provide the Inspector examining the Milton Keynes Local Plan ('Plan:MK', MKSUB001) with a hearing statement in relation his Matter 2, "*Spatial Strategy*" specifically issues 1, 2 and 3 (Inspector questions Q2.1 – Q2.11).
- 1.1.2 We have already addressed the majority of these issues in the PHM Reg 19 representations and for brevity have referred directly to it in answering the questions where we have nothing further to add to a specific issue.

## 2.0 Issue 1 – Plan Vision and Objectives

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

- 2.1.1 PHM concerns in respect of the overarching development strategy as expressed within Policy DS1 of the Submission Plan:MK remain. We do not consider the strategy is sufficiently flexible and robust to enable it to deliver sufficient housing to meet objectively assessed housing needs. As noted in our representations to Matter 3, it is considered that the amount of housing development that is being planned for in the Borough will not adequately meet the OAN for the area during the plan period. It is not shown to be the most appropriate strategy having regard to the evidence base.
- 2.1.2 The lack of adequate assessment at the site options stage is reflected through to the Plan:MK which subsequently fails to have a consistent and coherent strategy for growth. Insufficient regard has been given to the potential for delay associated with the emerging strategic growth context.
- 2.1.3 Delivery of new housing is over-reliant upon the delivery of urban extensions over which there are uncertainties and significant infrastructure provision that is beyond the plans role and remit.
- 2.1.4 This approach will not help to address the rolling 5-year housing land supply requirements and address the pace of delivery overall. We elaborate on this in our Matter 5 Statement.

### 2.2 **Q2.2 Is the Plan, based on the spatial portrait and sustainability appraisal baseline, providing an appropriate response to address the issues that influence the Borough as a place? Do the spatial objectives of the Plan accurately reflect the existing issues and future opportunities/challenges facing Milton Keynes Borough?**

- 2.2.1 Our representations to Matter 3 are relevant. Its reliance on SEMK to deliver with East M1 as a fallback is not an appropriate strategy. This stems from an inadequate assessment and SA process. Both sites are constrained in terms of start times and pace of delivery which does not reflect the need for early delivery and completion of the site within the plan period in order to alleviate the existing housing pressures facing the Borough.

- 2.2.2 The reliance on these specific strategic sites that are not in single ownership and/or contracted to a housebuilder are matters that can cause significant delays along with a need for significant infrastructure investment to deliver a first phase of development, evidenced by the Council's response at INS1a on funding issues.
- 2.2.3 The impacts of the CaMKoX arc and its potential implications for these sites is still unknown. The current strategy should be capable of being sound now. The suggested review period to align with the wider growth strategy for the corridor presents the opportunity to progress development in these specific locations in a future plan once these variables become fixed.
- 2.2.4 The Plan:MK does not seek to address the affordability issue by identifying sites for more than the OAN.

## 3.0 Issue 2 – Emerging growth context, plan period and plan review (the long-term growth strategy).

- 3.1 **Q2.4 Is the proposed plan period consistent with national policy at paragraph 157 of the NPPF? If the Plan period was extended to 2036/2038 what additional evidence is required and, very indicatively, what timeframe would be reasonable for any additional work and consultation to be completed?**
  - 3.1.1 The Plan:Mk should cover a 15 year period. There is no justification for departing from the NPPF in the Borough.
  - 3.1.2 If the Plan period is to be extended we do not consider that the current evidence base or site allocations are suitable to be extrapolated to 2036. It requires a reassessment of MK Edge options against this extended housing target requirement and all reasonable alternatives.
  - 3.1.3 It is our view that further SA work is required now to rectify the shortcomings to the Submission Plan:MK in its current period to 2031. To extrapolate to 2036, this would require revisiting the site selection process to test site options to deliver the additional amount of 1,750 dwellings per annum with a 10% buffer (i.e. an additional 9,625 dwellings) using the MKC OAN.
  - 3.1.4 Should the EEFM approach be preferred, this would require the additional quantum of 7,835 identified for the plan period to 2031 (averaging at 2,155dpa) plus further land for another 10,775 homes to extend to 2036.
  - 3.1.5 Alternatively, if Bidwells FOAN is preferred, beyond the additional quantum of 9,875 homes to 2031, land for an additional 11,455 homes would be required (at 2,291 per annum) to project to 2036.
  - 3.1.6 The SA requires updated to meet the SEA regulations and this additional level of growth could be assessed as part of that work. Any timeframe should allow for a further round of consultation of revised site options based on detailed evidence including an up to date review of any site-specific issues.

- 3.2 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).**
- 3.2.1 PHM participated in the 2013 Core Strategy examination where Policy CSAD1 was debated. At the time it was considered necessary to render the CS sound, rather than risk it being found unsound due to insufficient growth targets having been identified at the time. The Plan:MK has taken far longer to prepare and PHM consider another policy of this nature needs to be carefully worded to be effective. It should not be used to mask the real issue – that the Council has not given sufficient time or resources to Plan:MK to deliver a robust and properly evidenced spatial strategy to 2031.
- 3.2.2 The Plan:MK needs to be found sound to 2031 and its policies should reflect that. We have stated in our representations and below, that we consider MKE should not be included now. Instead the plan could include a mechanism to set a clear early target for review as part of the MKFutures 2050 and wider infrastructure strategies as part of the transformational growth plans.
- 3.3 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 of pre-judge the ongoing work on a wider strategy and infrastructure planning for future substantial growth? Is there evidence in the MK Futures 2050 or NIC reports for east of MK being a strategic direction of growth?**
- 3.3.1 PHM maintain its objection to this approach of identifying an allocation for delivery beyond the plan period. We are still unclear on whether the Council is seeking a specific allocation of the land identified to be East M1 at this juncture, as evidenced by draft Policy SD13 and the commitment to producing a Supplementary Planning Document for the site or if it is truly supposed to be setting down a marker for the future direction of growth as a strategic reserve site for which the future direction of travel is still being considered and is at best, aspirational at this stage. The text surrounding East M1 and its purpose changes throughout the Plan:MK and evidence base. The Proposals map gives it the same status as an allocated site yet the evidence base does not contain sufficient detail to demonstrate that the site is a viable option for early delivery in the event that the housing delivery continues to fail to keep pace with the housing targets.
- 3.3.2 We have questioned its treatment within Plan:MK on several occasions with no clear response from the Council to our submissions. We consider this pre-judges the ongoing work for the transformational growth plans and the sustainable selection of sites through the next plan review.

## 4.0 Issue 3 – Settlement Hierarchy (Policy DS1)

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

**i) Are the settlement hierarchy (Policy DS1) and the broad apportionment of growth within the respective development strategies (Policies DS2, DS3 and DS4) consistent with the Plan’s vision and strategic objectives?**

**ii) Is the settlement hierarchy founded on robust evidence and consistent with national planning policy? Is it justified?**

4.1.1 PHM agree that the main focus should be on expanding Milton Keynes City with proportionate growth in the key settlements and villages. We reference our comments on Matters 1 and 2 in the context of the specific growth locations included within the Tier 1, Strategic Growth Areas of DS1 and DS2 which includes SEMK and East M1.