



Strategic Planning & Research Unit

For and on behalf of
Various Clients

Representation to the Plan:MK Examination
Matter 2

on behalf of
Various Clients

Prepared by
**Strategic Planning Research Unit
DLP Planning Limited**

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Strategic Planning & Research Unit

Prepared by: Roland Bolton Bsc (Hons)
MRTPI Senior Director

Approved by: Roland Bolton Bsc (Hons)
MRTPI Senior Director

Date: June 2018

Strategic Planning & Research Unit

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Tel: 01234 832740
Fax: 01234 831 266

Tel: 01142 289190
Fax: 01142 721947

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0.0 INTRODUCTION

0.1 These responses to the Inspectors matters and questions are made on behalf of Various Client's with land interests in Milton Keynes and who have experience of delivering housing schemes within the city.

1.0 MATTER 2: SPATIAL STRATEGY

a) Issue 1 – Plan Vision & Objectives

i. 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?

1.1 The Spatial Strategy is not considered to be the most appropriate strategy given the evidence base (NPPF paragraph 182). It is considered that the most appropriate strategy would clearly allocate MKE as a site to deliver in the plan period and not as a Reserve Site and would also include a greater range of medium and small site which would assist in achieving the delivery of the housing requirement. Such a Strategy could be achieved by modest Main Modifications and would overcome past issues the council have experienced in terms of delivery of the strategic allocations.

ii. 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?

1.2 The isolation of MK as its own self contained HMA in the SHMA does not reflect the future opportunities of the city as outlined in the NIC report or MK Future 2050. The strategic objective of delivering a minimum of 26,500 new homes between 2016 and 2031 is considered to be unambitious.

iii. Q2.3 What is the rationale for the inclusion of Policy MK1? Is it necessary and justified given that it broadly repeats paragraph 14 of the NPPF? (see PPG para 12-011-20140306).

1.3 There is no objection to MK1, however we would comment that by making this policy align with extant policy it maybe shortening the life of the plan given that the revised guidance is due to be published by the end of July.

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

i. Q2.4 Is the proposed Plan period consistent with national policy at paragraph 157 of the National Planning Policy Framework (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?

2.1 No.

2.2 While paragraph 157 refers to an appropriate timescale preferably 15 years, paragraph 47 states that LPA's should:

“identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;”

- 2.3 The fact that the Council have been able to identify the Reserve Site East of Milton Keynes (MKE) is a clear indication that it is possible to identify sites to meet the whole of the housing requirement for the period to 2037/8. Indeed, there are a number of representations that highlight other potential sites that could be allocated to meet the housing requirement for the additional years including the sites identified by our clients and others in their Reg19 submissions.
- 2.4 A timeframe to 2037/38 would be appropriate especially given the strategic nature of the proposed allocations.
- ii. 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 MKFutures 2050 and NIC reports?*
- 2.5 No.
- 2.6 At present the timescale has been determined by the Council's assessment of its urban capacity including the existing SUE's plus those green field sites that have recently been granted planning permission. The exception to this MKE which is not counted as contributing to the completions in the plan period and the South East Milton Keynes Strategic Urban Extension (SD13).
- 2.7 MK Futures 2050 requires 2,000 dpa up to 2026 and then 1750 to 2000 dpa afterwards (page 10 executive summary). For the plan period 2016 – 2031 this would require between 28,750 dwellings (10 x 2000 + 5 x 1750) and 30,000 dwellings compared to the 29,000 being allocated in the plan (paragraph 4.4).
- 2.8 The NIC “partnering for prosperity” suggest that housebuilding may need to double if the Arc is to reach its economic potential.
- 2.9 Page 9 of the NIC report highlights a program which should consider the opportunities including re-establishing Milton Keynes as a growth location of national significance. While this is a decision to be taken in the future (by 2020 according to Recommendation 2a) it nevertheless highlights the importance for at least planning for the baseline need for as long as possible, both to provide the lead in time for the new growth proposals but also to reduce the future level of land which will need to be allocated.
- 2.10 By adopting a shortened time period and conditioning the release of the Reserve Site until after 2031 the approach of the Council is increasing the pressure on future plan makers who will not only need to consider what additional levels of growth need to be planned for but also to plan for the baseline needs from 2031 onwards.
- 2.11 The strategy of the submission plan does not provide a suitable foundation for the levels of growth in either report. The MK2050 2,000 completions a year on average between 2016 and 2026 are unlikely to be secured from the existing commitments and other urban allocations. It will require a greater range of sites.
- 2.12 To continue this level of development there will also be a need to add further strategic sites into the range of available sites prior to 2031. The Reserve Site could clearly assist in meeting these higher levels of future need if it was not restricted to coming forward after the plan period.

iii. Q2.6 Are there wider issues around cooperation, governance and funding that indicate the need for a holistic strategy for any transformational growth rather than an individual approach through the current round of plan-making?

- 2.13 The present round of plan making has been undertaken in relative isolation encouraged by the fact that MK was defined as having its own HMA with boundaries contiguous with its own administrative boundary. The proposed changes to National Guidance does not seek to fundamental change the present approach although the introduction of statements of common ground might assist clarify the inter relationship between neighbouring authorities. None of this suggests that a delay, or a postponement of decisions regarding how the city should meet its own needs would result in a more integrated strategy with neighbouring authorities. The needs of the city as projected by ourselves and others are substantial and need to be met in full by this plan. Resorting to an early review is simply diminishing the plan led system. This plan should meet in full the housing requirement and should put in place suitable policies and allocations to do so. There should not be a delay in meeting the development needs of MK based upon a vague hope that neighbouring authorities might join together to provide a more comprehensive sub regional strategy as there is no such history of such cooperation.
- 2.14 Making full provision to meet development need in this plan will provide a suitable and sustainable base for future decisions on how to accommodate any increase in demand as a result of the EWR.

iv. 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 MKFutures 2050 and NIC reports (for example further opportunities for sustainable intensification within the urban area and growth locations along the caMLox arc once EWR and the Expressway are implemented)?

- 2.15 Yes – there are two reasons for this firstly to make the plan compliant with paragraph 157 of the NPPF and to second to meet the test of soundness a plan has to be flexible in accordance with paragraph 14 of the Framework.
- 2.16 Paragraph 157 of the Framework states that crucially, Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon but also that Plans should take account of longer term requirements. While there is uncertainty regarding the precise level of additional development that might be focused Milton Keynes the direction of travel is very clear and can and should be reflected in decision made with regard to this plan.
- 2.17 Paragraph 14 of the Framework states Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. The growth agendas set out by both MK2050 and NIC both highlight the nature of such change that the plan might be expected to accommodate. So to demonstrate the flexibility required by the Framework the plan should be able to demonstrate how it might accommodate these changes without the need for a full review.
- 2.18 Adding an additional 5 years to the plan period would not pre-empt future decisions as it will only be planning for growth and the projected level.
- 2.19 The future higher levels of growth associated with the EWR along the caMLox arc will be additional to these planned levels of growth. Plans will be required to be reviewed

every 5 years and this will be the time when these higher levels of growth can be suitably addressed. Planning to meet the known level of need in full for the next 15 years provides a sound basis from which to undertake future planning for the additional levels of growth (which are as yet unknown).

- 2.20 The impact of these reports in the examination of this plan is that they both highlight the potential for high levels of economic growth in the future. In considering the various approaches and underlying assumptions which go into the assessment of the OAN this general optimism regarding the areas economic future should be borne in mind. This is to be discussed further in matter 3.
- 2.21 Our assessment of current need combined with the potentially long lead in times for strategic allocations (referred to in paragraph 5.29 of our matter 3 response) requires the allocation and delivery of EWR in this plan so that completions can occur prior to 2031. While the whole allocation may not be built out by 2031 its allocation will not prejudice options for meeting higher levels of growth.
- 2.22 Decisions on how to meet the additional growth along the caMKox Arc will need to be completed very soon.
- 2.23 This is because these decisions regarding the distribution of growth between authorities will need to be fed into the local plan process almost immediately. Local Plans take at least 5 years to proceed from initial drafting to adoption. If these decisions are made by the end of 2018 then new local plans can be produced and sites allocated and adopted by 2023. This will then allow for a 10 year period for any new strategic allocations to go through the planning process and therefore be likely to deliver first completions by 2033.
- 2.24 The consequence of this timing is that allocations in exiting plans may be taken up faster than anticipated if economic growth starts driving demand.
- 2.25 Allocating a base line of sites now up to 2037/8 would provide flexibility in the above timescale allowing for what will undoubtedly be an interesting debate between authorities as to the likely impact of the infrastructure on both the demand for housing and its location.

v. 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)?

- 2.26 No.
- 2.27 The CS Policy was inserted by the inspector in order to render the plan sound. On appeal the Council have argued that this commitment to an early review (and the production of a site Allocation Plan) in the CS does not impact upon the weight to be attached to the plan even once these time periods had been exceeded. This being the case therefore a commitment to an early review, even on a specified timetable, will not be regarded by the LPA as anything more than a device to secure an adopted plan. It has not, and we would suggest will not, place the LPA under any obligation or pressure to undertake an early review.

vi. Q2.9 What does a plan review for MK potentially look like? Are processes emerging to coordinate strategic growth that would consolidate existing

cross-boundary collaborations with other Local Authorities and the LEP(s)? (NIC recommendations 7&8)

- 2.28 A further review of the Local Plan will incorporate cross boundary allocations. Such extensions into other LPA's are already being planned for example the South West Milton Keynes Consortium's allocation in the emerging VALP being examined at the same time as this plan is an example of how such future allocations maybe achieved.
- vii. 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?***
- 2.29 Even if the LPA is committed to a review, the long lead in times for large scale urban extensions require that the principle be established as early as possible in the plan making process. This is the justification for the Reserve Site to be upgraded into an allocation. The only justification for not allocating the site for development now is one of funding (submitted plan paragraph 4.22) and if this is secured then there is no other constrains preventing the site from coming forward.
- 2.30 The Topic Paper: Housing land supply (also covering site selection) section 8 summarises the position of the Reserve Site in terms of policy DS2 and Table 4.3 of Plan:MK. This establishes that East of M1 (Land north of J14) should be allocated as a strategic reserve site. It states that the site will deliver some 3,000 additional housing in the plan period if central government funding is in place to deliver the enabling infrastructure (including the bridge over the M1).
- 2.31 The Topic Paper refers to the careful consideration at the Regulation 18 Stage as the site was proposed as a strategic allocation. The Paper also refers to the close attention to the site through SA work and in particular the examination of 'reasonable alternatives' as providing justification for the allocation. The MKE allocations was considered as option B in the SA and table 14 on page 48 provides a summary of the SA's findings. The conclusion of the assessment of reasonable alternatives (SA page 65) was that option B Land East of the M1 motorway (Milton Keynes East) and Option C Land to the South East of Milton Keynes (Milton Keynes South East) were considered to be suitable for allocation over the plan period if implemented appropriately, taking account of planning constraints when designing the scheme and incorporating the necessary mitigation measures.
- 2.32 The evidence base therefore justifies the allocation of MKE for development now, the conditionality, of the allocation is the securing of funding notable for a road bridge. This is not in our view required in order to deliver the initial phases of development.
- 2.33 MK Futures 2050 states that based on work undertaken by the Commissions it concluded that it would not be possible to accommodate the scale of growth within the City current development boundaries without undermining the city's unique qualities and that it would be desirable to accommodate much, but by no means all, of the city's additional growth to 2050 in substantial new developments; adjacent to the city (possibly even on the east side of the M1) as well as elsewhere inside the wider functional economic area (page 37).

- 2.34 The submitted evidence base has assessed alternative development options and determined that some 3,000 dwellings maybe delivered on MKE in the plan period subject to securing funding for the bridge over the M1.
- 2.35 In light of this and the other considerations set out above we have recommended changes to the following policies in the submitted plan:
- a. Policy DS2 to include the site as an allocation (DLP reg 19 paragraph 2.6 provides the revised policy wording)
 - b. Policy SD12 to allow development to proceed in phases (DLP reg 19 paragraph 2.12 provides the revised policy wording)
 - c. Policy SD14 to allow development to proceed with alternative funding for infrastructure (DLP reg 19 paragraph 2.20 provides the revised policy wording)

BEDFORD - BRISTOL - CARDIFF - LEEDS - LONDON - MILTON KEYNES - NOTTINGHAM - RUGBY - SHEFFIELD

BEDFORD

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832 740
Fax: 01234 831 266
bedford@dlpconsultants.co.uk

BRISTOL

Broad Quay House (5th floor)
Prince Street
Bristol
BS1 4DJ

Tel: 0117 905 8850
bristol@dlpconsultants.co.uk

CARDIFF

Sophia House
28 Cathedral Road
Cardiff
CF11 9LJ

Tel: 029 2064 6810
cardiff@dlpconsultants.co.uk

LEEDS

Princes Exchange
Princes Square
Leeds
LS1 4HY

Tel: 0113 280 5808
leeds@dlpconsultants.co.uk

LONDON

The Green House
41-42 Clerkenwell Green
London
EC1R 0DU

Tel: 020 3761 5390
london@dlpconsultants.co.uk

MILTON KEYNES

Midsummer Court
314 Midsummer Boulevard
Milton Keynes
MK9 2UB

Tel: 01908 440 015
Fax: 01908 357 750
miltonkeynes@dlpconsultants.co.uk

NOTTINGHAM

1 East Circus Street
Nottingham
NG1 5AF

Tel: 01158 966 620
nottingham@dlpconsultants.co.uk

RUGBY

18 Regent Place
Rugby
Warwickshire
CV21 2PN

Tel: 01788 562 233
rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD / SPRU

Ground Floor
V1 Velocity Village
Tenter Street
Sheffield
S1 4BY

Tel: 0114 228 9190
Fax: 0114 272 1947
sheffield@dlpconsultants.co.uk