



PLAN:MK EXAMINATION

STAGE ONE

HEARING STATEMENT ON BEHALF OF THE SOCIETY OF MERCHANT VENTURERS

MATTER 2: SPATIAL STRATEGY

1. Introduction

1.1 The Society of Merchant Venturers (SMV) have been engaged with the Plan:MK process since its inception, making submissions to various stages of the preparation of the Plan and commenting on evidence base studies. SMV together with Gallagher Estates control land to the north of Milton Keynes which is capable of delivering strategic levels of growth, during the plan period and beyond to help meet the MK Futures 2050 Commission report and the National Infrastructure Commission's (NIC's) proposed Cambridge-Milton Keynes-Oxford Arc growth strategy.

1.2 This statement seeks to provide responses following the questions on Matter 2: Spatial Strategy, set out in the Inspector's Matters, Issues and Questions, dated May 2018.

2. Issue 1 – Plan Vision & Objectives

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 As set out previously whilst SMV welcomes the broad principles of the spatial strategy which focusses development on Milton Keynes, there is concern as expressed below and in other submissions, that the framework on which that strategy is based will not achieve the vision of the plan.

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 SMV considers that the Plan's spatial objectives fall short of addressing the future opportunities/challenges facing Milton Keynes Borough, in that the vision and aims of the MKFutures 2050 and NIC reports is not being realised (see Issue 2 below for further details).

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).

2.3 This is primarily for the MKC to answer. However, it is important to note that proposed changes to the NPPF are very likely to alter the context for any statement or policy on sustainable development. Therefore SMV believes that in addition to meeting the PPG, such further complication is best avoided by removing Policy MK1.

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

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?

2.4 Paragraph 157 of the NPPF states a preference for plans to be drawn up to cover a 15 year time horizon. With an end date of 2031 and assuming adoption before the end of 2018, the plan would have a time horizon of just 13 years. More importantly, paragraph 157 requires that plans take account of longer term requirements.

2.5 SMV notes that longer term requirements are presented in the MKFutures 2050 and NIC reports and as set out in response to Matter 3, there are also alternative higher figures for OAHN for the period to 2031. Given previous delays in delivery from identified allocations and suggestions that current allocations face delivery difficulties, SMV believes that extending the plan period and identifying strategic reserve sites is the way to satisfy NPPF paragraph 157.

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?

2.6 Given the response above, it is clear that SMV does not agree that the relatively short plan period on adoption will allow for the progression of the necessary strategic growth sites that will be necessary to enable the growth envisaged in the MKFutures 2050 and NIC reports. SMV notes that an exhibition of concepts which could contribute to the development needs of the Cambridge – Milton Keynes – Oxford growth corridor is being held in Milton Keynes contemporaneously with the Examination in July.

2.7 SMV and Gallagher have such a site at North Milton Keynes which can provide links to the public transport hub at Wolverton and has land on both sides of the M1. It is capable of delivering some 14,000 homes up to 2050 (see site profile at **Appendix 1**) and being identified as a strategic reserve site would give SMV and Gallagher the confidence to make the necessary investment to further promotion of this strategic development site.

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?

2.8 The NIC report and MK Futures 2050 report provide the background evidence to enable a long-term strategy accommodating transformation growth to be developed. At this stage however, SMV believes that the full extent of the capacity of Milton Keynes Borough to accommodate the necessary growth, has yet to be tested (e.g. North Milton Keynes). Nevertheless, it would appear that at some time in the future an holistic cross-boundary

strategy will be required, but not until such time as the capacity of Milton Keynes Borough has been thoroughly tested.

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)?

2.9 SMV believes that for soundness reasons Plan:MK should be modified to provide a basis for the longer term growth agenda and this further emphasises the need to identify the North Milton Keynes area as a strategic reserve allocation.

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)?

2.10 Whilst SMV accepts that the necessary work to establish a long-term strategic plan to meet emerging growth needs will take additional time, there is significant concern that repeated short term review periods will provide only short term solutions. Whereas the long-term growth envisaged, clearly requires a longer term strategy.

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)

2.11 This is a question for MKC, however, through the duty to cooperate process and growth corridor consultation mechanisms, SMV believes that structure is readily available to enable this work to be undertaken.

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?

2.12 As set out above, SMV believes that a long-term strategic growth plan for Milton Keynes based on the MKFutures 2050 and NIC recommendations is the appropriate way forward. Should the current Plan continue as a short term stop gap, then the identification of strategic reserve sites will be necessary to provide the confidence to enable the necessary investment to release their potential. Currently just one site is identified and for reasons set

out in submissions on Matter 5, SMV does not believe that this is the most sustainable site, particularly when measured against North Milton Keynes.

Issue 3 - Settlement Hierarchy (Policy DS1), Issue 4 – Role of Neighbourhood Plans (NPs) & Issue 5 – The Open Countryside (Policy DS5) & Linear Parks (Policy DS6)

SMV has no response on these matters.



north of
**MILTON
KEYNES**

CONCEPT DOCUMENT | APRIL 2016

GALLAGHER
— ESTATES —

GALLAGHER ESTATES

“Gallagher Estates is one of the largest strategic land companies in the UK, promoting and developing residential and mixed use schemes in all geographical areas. We are not a house builder or contractor but play a unique role as master developer, taking forward and coordinating all aspects of the development process from initial site assembly through to master planning, planning promotion and Section 106 negotiations before delivering serviced land to the market place.”



INTRODUCTION

Milton Keynes Council has embarked on a review of the adopted Core Strategy, through Plan:MK. A consultation document titled “Strategic Development Directions” was published in January 2016 which included options for planning the future growth of Milton Keynes. The consultation document identified options around Milton Keynes, including land to the north of the town.

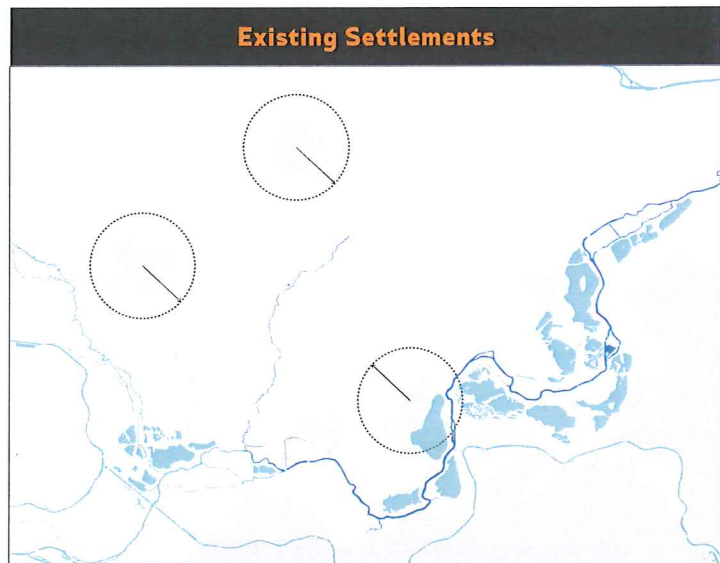
Gallagher Estates is promoting a major expansion area to the north of Milton Keynes, located to the east of the railway line and west of the M1 Motorway. This document provides an initial presentation of the concept proposals which have been produced which illustrate the potential of this area to accommodate strategic growth.

Gallagher Estates is seeking to engage with Milton Keynes Council and other consultees to appraise this strategic growth option and to help shape the preparation of more detailed proposals for the area.

**STRATEGIC
OVERVIEW
PLAN**

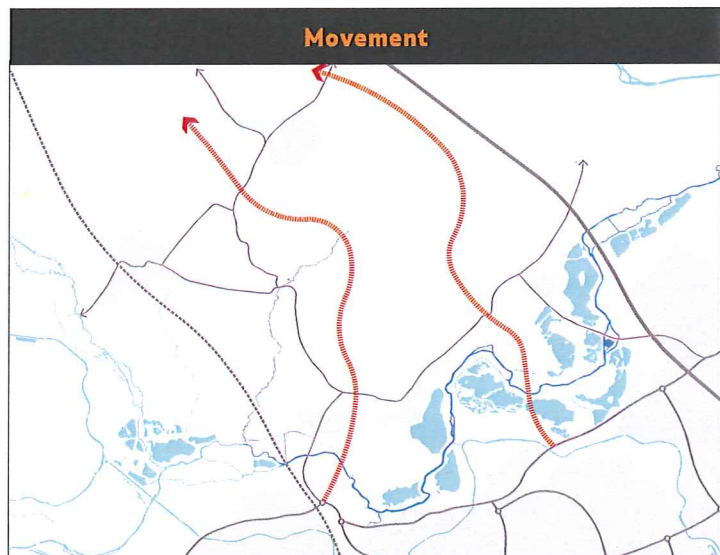
Existing Settlements

- The north western built up edge of Milton Keynes is defined by the neighbourhoods of Wolverton and Great Linford, broadly defined by the M1 to the east and the railway line to the west;
- The shallow river valley associated with the River Ouse provides a buffer to the scattered village structure of the wider landscape to the north, typical of this landscape character area, including Haversham, Little Linford, Castlethorpe and Hanslope.
- The identity and setting of existing villages in the landscape and would be maintained whilst becoming functionally integrated into the extension of Milton Keynes, consistent with the principles on which the New Town was founded.



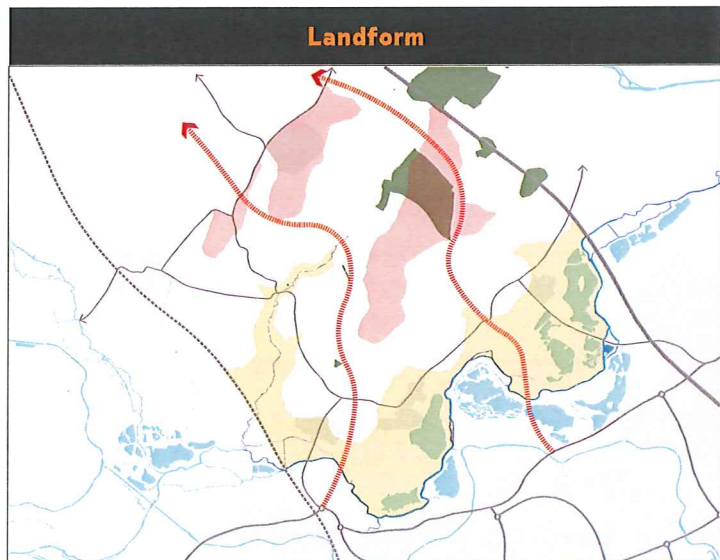
Movement

- The Station at Wolverton is situated on the West Coast Main Line and provides connections between Milton Keynes Central and London Euston to the south, and Northampton, Birmingham and Liverpool Lime Street to the north;
- **An extension to Milton Keynes** in this area provides the opportunity for a new railway station at Castlethorpe consistent with the Plan:MK Strategic Development Directions Consultation 2016;
- In accordance with the Milton Keynes Policy Framework, development in this location would facilitate, if required, extension of the grid road and reserve structure as part of perpetuating the distinctiveness and identity of Milton Keynes;



Landform

- The Bedfordshire and Cambridgeshire Claylands National Landscape Character Area, of which the land north of Milton Keynes form part, is characterised by: gently undulating lowland plateau divided by shallow river valleys; the River Ouse and its tributaries meander slowly across the landscape; variable, scattered woodland, including clusters of ancient woodland particularly on higher ground representing remnant ancient deer parks and Royal Hunting Forests.
- Land north of Milton Keynes is typical of the key characteristics identified in the Landscape Character Area assessment, with land rising from the shallow valley associated with the River Ouse at approximately 65m AOD to a plateau at 97m AOD to the north before dropping down to another valley and rising to another plateau adjacent to Castlethorpe and south of Hanslope;
- An area of ancient woodland occupies part of the central plateau to the north, with smaller fragments scattered within the wider landscape.



Proposed Development

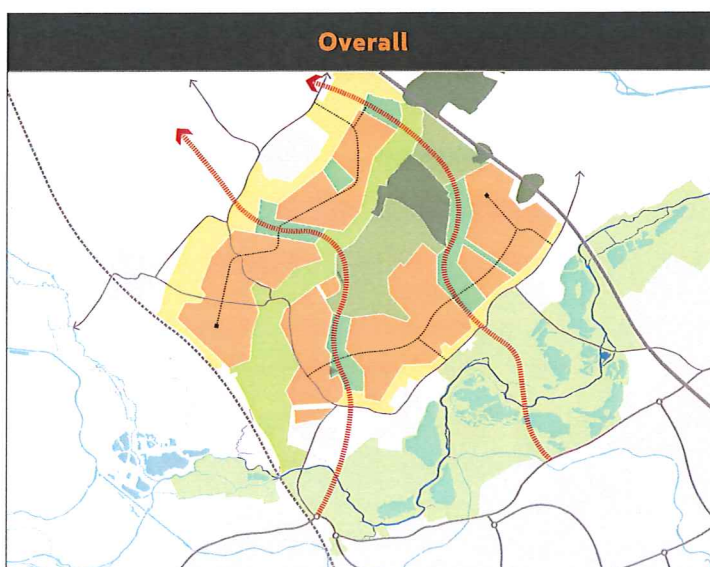
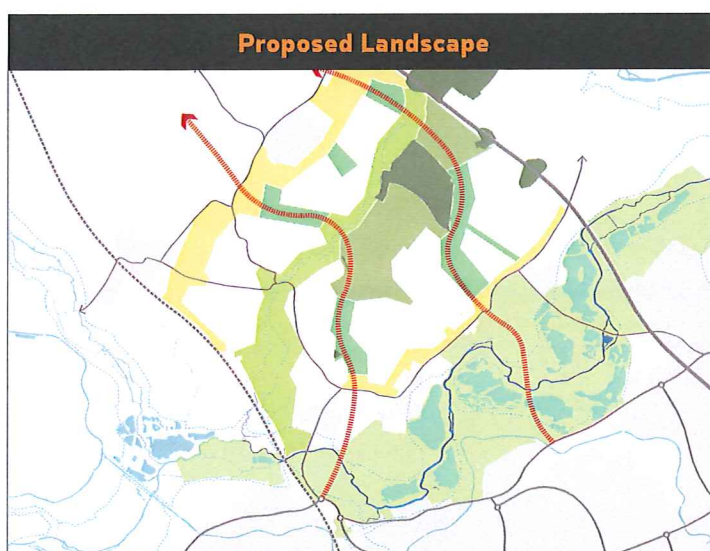
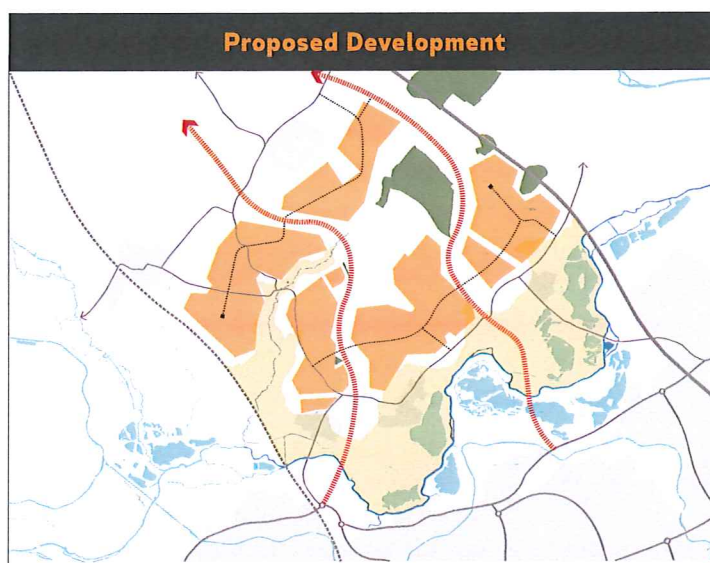
- Low lying land associated with the river valleys and higher ground plateau, provides the natural 'frame' for development outside the floodplain and below ridgelines;
- The development envelope will be responsive to the grain of the landscape, respecting existing public rights of way, field boundaries, settlements, ancient woodland and landscape features;
- Land north of Milton Keynes has the ability to accommodate a series of new neighbourhoods, which will have the ability to function as sustainable extensions in their own right or collectively, and come forward in phases.

Proposed Landscape

- Land north of Milton Keynes will embrace the opportunities presented by the landscape character to perpetuate the distinctiveness of the locality and the wider landscape;
- Low lying land associated with the river valleys and flood plain will be maintained as open space and provide an extension to the linear park network synonymous with Milton Keynes;
- The plateau landscape will be respected and integrated as part of a multifunctional green infrastructure network, providing visual connections back to Central Milton Keynes and Great Linford to the south and to the church tower of Hanslope to the north;
- The ridge and valley landscape will be connected by a series of linear open spaces to provide a green grid both separating and running through the heart of new neighbourhoods, providing high quality amenity and biodiversity opportunities.

Overall Concept

- The Overall Concept illustrates how land north of Milton Keynes could come forward as a sustainable extension that would embrace and perpetuate the key characteristics of the town;
- An extension to the linear park system, grid road and neighbourhood structure combined with a strong response to the unique landscape characteristics of the locality provides the framework for low gross densities and a high quality environment, which makes Milton Keynes so successful and desirable for its residents;
- In responding to the Plan:MK Strategic Development Directions Consultation 2016, the Overall Concept is deliberately bold and forward thinking, demonstrating the opportunities for growth in the longer term in accordance with best practice;
- The unique neighbourhood structure advanced by the proposals allows for an initial tranche of growth to come forward to meet the identified need over the next 15 years, with the potential for further extension over the longer term if required. The Concept Plan on the following page illustrates how land north of Milton Keynes can contribute to development over the Plan:MK period.



north of
**MILTON
KEYNES**

“Mixed use
neighbourhoods
will nestle into the
landscape below the
ridge line, with good
connections to Central
Milton Keynes”

CONCEPT PLAN

“ Extension of the
linear park network
will provide a
landscape framework
characteristic of
Milton Keynes ”



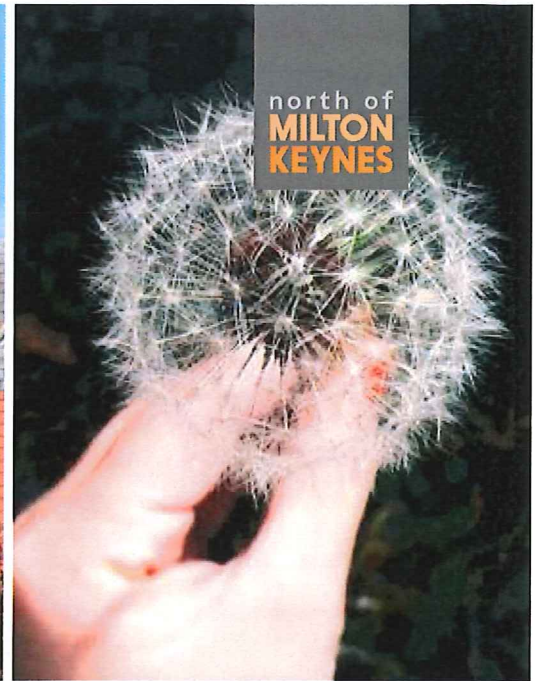
PROPOSALS

The Concept Plan illustrates three distinct neighbourhoods, related to but maintaining the identity of the villages of Haversham and Little Linford, and linked to Wolverton and Great Linford by a combination of potential new grid roads, existing highways and a network of foot and cycle routes through an extension to the linear park network.

The new neighbourhoods could bring forward approximately 280 hectares of development land and a greater proportion of open space, with the potential to yield between 8,000 and 10,000 units at an average of 30 and 35dph. Subject to discussions with key stakeholders, it is envisaged that each neighbourhood would contain a range of retail, community and education facilities and/ or could provide some shared facilities between the villages, such as a secondary school.



“ The identity and setting of existing villages in the landscape and would be maintained whilst becoming functionally integrated into the extension of Milton Keynes, consistent with the principles on which the New Town was founded ”



“ Low lying land associated with the river valleys and higher ground plateau, provides the natural ‘frame’ for development outside the floodplain and below ridgelines ”



“ The concept maintains the low density approach characteristic of Milton Keynes but allows for variations in density within this framework as part of creating a distinct place ”



BENEFITS

A major expansion area to the north of Milton Keynes offers the following potential benefits:

“ The area offers potential for strategic growth of scale, potentially to be delivered in phases, to make a significant contribution to meeting housing and other development needs. ”

“ Opportunities to enhance existing and provide significant new areas of public open space including extending the Linear Park network into the new development. ”

“ The land could be physically connected to Milton Keynes, through extensions to the Grid Road network for travel by bus and private car; access to existing and proposed rail stations; provision of high quality Redways to promote walking and cycling; and the potential for a new access with the M1 Motorway. ”

“ A ‘Garden Town’ with high quality housing and major employment, helping to secure the provision of major new infrastructure. ”

“ Gallagher Estates’ proven track record of delivering major growth at Milton Keynes. ”

“ Development which is respectful of the natural and historic environment of the area. ”

“ The land is entirely within Milton Keynes Council’s administrative boundaries and does not rely upon cross-boundary cooperation. ”



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Barton Willmore

Tom Looker

The Blade,
Abbey Square,
Reading
Berkshire
RG1 3BE

T: 0118 943 0000

F: 0118 943 0001

E: info@bartonwillmore.co.uk

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