



JUNE  
20TH  
2018

# PLAN:MK Examination

## STATEMENT FOR MATTER 2: SPATIAL STRATEGY

Iceni Projects Limited on behalf of  
Redrow Homes (South Midlands)  
and Merton College Oxford and  
Wavendon Residential Properties  
LLP (Landowners)

ICENI PROJECTS LIMITED  
ON BEHALF OF REDROW  
HOMES (SOUTH MIDLANDS)  
AND MERTON COLLEGE  
OXFORD AND WAVENDON  
RESIDENTIAL PROPERTIES

20<sup>th</sup> June 2018

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**PLAN:MK Examination**  
STATEMENT FOR MATTER 2:



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## 1. ISSUE 1 – PLAN VISION AND OBJECTIVES

### Question 2.1 and Question 2.2

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*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?*

*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?*

- 1.1 No, the NPPF's proposed application of the presumption in favour of sustainable development in relation to plan making means the Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This flexibility is not evident in relation to the future changes that might occur in the plan area with the establishment of East West Rail (EWR) and the Expressway.
- 1.2 The location of Milton Keynes in the centre of the Cambridge-Milton Keynes-Oxford Arc (caMKox Arc) and the planned implementation of key transport infrastructure are evidently the main issues influencing the borough as a place and offer future opportunities for Milton Keynes.
- 1.3 The MK Futures 2050 report (MKMIS001) identifies as one of its 'six big projects' that Milton Keynes city becomes the 'hub' of the caMKox Arc. The report (page 40) describes the potential for Milton Keynes to become a much stronger hub within the caMKox Arc and that planned road and rail improvements will enable the expansion of companies now based in Oxford and Cambridge as well as other education, business and technological industry growth aspirations.
- 1.4 The report at page 41 goes on that: *"we believe that Government interest in investing in the arc is a once-in-a-generation opportunity for our city"* and further that: *"developments connected to the city by East West Rail, and the expressway, could prove to be the most sustainable pattern of growth."*
- 1.5 It is essential the Local Plan put forward an ambitious growth strategy to take advantage of this planned infrastructure investment and located strategic housing growth where it can be well connected by this transport infrastructure predominantly to the south and south-east of the city.

- 1.6 The Strategic Objectives of the Local Plan (page 8) do highlight the need to reflect the recommendations of the MK Futures 2050 Commission Report and its six big projects including making Milton Keynes the hub of the Cambridge-Milton Keynes-Oxford growth corridor (objective 1) and to reflect the National Infrastructure Commission Interim Report (November 2016) and support development along the Cambridge-Milton Keynes-Oxford growth corridor (objective 3).
- 1.7 These Strategic Objectives however do not appear to have adequately been carried forward in the formulation of policies and site allocations in the Plan.
- 1.8 The current strategy, although proposing the South East Milton Keynes Strategic Urban Extension (Policy SD13) in this general area also seeks to locate a significant urban extension to the east of the M1 (Policy SD14) to potentially be delivered after the plan period.
- 1.9 As stated in our original representations to the plan it is unclear how land to the east of the M1 could possibly be expected to adequately connect to the existing urban area and achieve the distinctive character of development evident within Milton Keynes, such as the grid road system. The development of this land would result in urban sprawl to the eastern side of the M1, which would result in an urban area physically disconnected from the remainder of Milton Keynes with no obvious long term defensible boundary to prevent further encroachment into open countryside to the east.
- 1.10 Notwithstanding the proposed EWR and Expressway the wider area to the south-east of Milton Keynes is a highly sustainable location for growth. The Eastern Expansion Area and Strategic Land Allocation continue to be guided by the Local Plan through policies SD6 and SD8. The area already allocated in policy will deliver large footprint employment development, new housing, highway improvements to the A421 and A5130, including Kingston roundabout, a new secondary school and the provision of a dedicated public transport route.
- 1.11 Land at Wavendon Golf Club located immediately south of Lower End Road (which forms the southern boundary of the Strategic Land Allocation) and offers the opportunity to expand this growth area and locate development in a location which already benefits from planned infrastructure investment currently supporting the Eastern Growth Area.
- 1.12 Further given the increase in employment development in the Eastern Expansion Area of some 80 hectares the Local Plan does not consider the benefits of locating additional housing in these areas of employment growth. The benefits of locating employment and residential uses together contribute to delivering patterns of sustainable development.

- 1.13 The Local Plan does not adequately seek to deliver sustainable development and misses opportunities to focus growth in an area which is already benefiting from substantial investment by virtue of the existing Eastern Growth Area notwithstanding additional benefits which would be delivered with the establishment of EWR and the Expressway.
- 1.14 Instead it seeks to focus growth to the east of the M1 which would require its own additional significant new infrastructure to be delivered.
- 1.15 The growth already being delivered to the south-east of Milton Keynes is evidence of its highly sustainable location and it is set to become even more sustainable once the planned strategic infrastructure projects are fully realised. Directing further levels of growth here through the current Local Plan will ensure it can take advantage of existing and proposed planned infrastructure and employment growth.
- 1.16 In relation to Transport Issues the Local Plan's Evidence Base and in particular documents MKTRA004 (Milton Keynes Multi-Modal Model) does not appear to have assessed the potential transport impacts from further development to the south-east of Milton Keynes despite the area of land being considered in the Initial Sustainability Appraisal (MKSUB 013) as Growth Option G.
- 1.17 Further, the Strategic Flood Risk Assessment (MKFLO003) identifies that the wider area of land is not a risk of flooding.
- 1.18 Hence it can be seen from reference to the evidence base that the wider area of land to the south east of the city is a highly sustainable location for growth by virtue of proximity to existing and planned services and facilities and by lack of physical constraints.
- 1.19 The Local Plan, by failing to be informed by this evidence base, is not positively prepared and is unsound.

## 2. ISSUE 2 – EMERGING GROWTH CONTEXT, PLAN PERIOD AND PLAN REVIEW

### Question 2.4

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*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 As stated in our original representations to the Local Plan, we do not consider that the limited plan period is sufficient in the planning and meeting of sustainable development.
- 2.2 The NPPF at paragraph 157 clearly states that it is crucial that Local Plans be drawn up over an appropriate time scale, preferably a 15-year time horizon. Although it is noted that the Local Plan will be tested against the current NPPF it is nevertheless relevant to reflect on the Government's intention, through the Draft NPPF (paragraph 22) that: *“Strategic policies should look ahead over a **minimum** 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”* (our emphasis).
- 2.3 The Council's decision to plan for a period up to 2031 appears unchanged from the view set out in the Core Strategy (2013) Policy CSAD1. However, this policy assumes a Local Plan would have been in place by 2015. This is clearly not the case anymore as, at the earliest, the Local Plan will be adopted in 2018 although most likely 2019. The Council's position to retain the original end date of the Local Plan at 2031, despite timescales for adoption slipping by at least three years, results in an unsound plan that is not consistent with national policy and not positively prepared.
- 2.4 It is essential that in order to deliver a sound plan that the period for its focus should extend until at least 2034 and additional housing allocations explored to ensure adequate provision is made over this period.

### Question 2.5

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*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 In addition to our comments on question 2.4 we also consider that the short plan period does not lay foundations for transformational growth envisaged by these key reports.
- 2.6 The focus of the reports is the ambitious growth strategy that Milton Keynes should benefit from its central location in the caMKox Arc supported by the Government's significant infrastructure investment in EWR and the Expressway.
- 2.7 Limiting the plan period in the way that has been also limits the amount of housing growth that will be planned and hence presents a disconnect between aligning infrastructure and housing growth.

### Question 2.6

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*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 It is essential that the development strategies of adjoining boroughs are aligned particularly with reference to the transformation growth envisaged for the sub-region. The Central Bedfordshire Local Plan, currently at Examination stage, covers a period to 2035 and as part of its strategic allocations proposes significant growth in the Marston Vale area located to east of the A421 and comprising up to 5,000 dwellings and a minimum of 40 hectares of employment land (Policy SA2). The Plan's Spatial Strategic Approach (paragraph 5.4) seeks that spatial growth should be supported by new strategic infrastructure such as EWR and the Expressway and further, the site allocation policy also requires it to be linked to a station along the EWR route. Plans are advancing for this area as shown by recent submission of a planning application for the Marston Vale site.
- 2.9 The Central Bedfordshire Local Plan in addition identifies a large area at Aspley Guise as land for Future Growth (section 7.9). This area along with others, for the purposes of the Local Plan, comprise those areas which may be required to serve development needs in the longer term beyond the plan period or potentially at an earlier point in time



if the wider context changes. It considers that there is significant potential based on its location and Central Bedfordshire’s position right at the centre of the caMKox Arc.

- 2.10 Section 7.9 of the Plan also sets out that the areas for future growth identified are a response to proposals for strategic infrastructure delivery including EWR and the Expressway.
- 2.11 It is evident that the approach of Plan:MK differs both in relation to the plan period and also its approach of allocating a strategic reserve site to the East of the M1 and away from planned strategic transport infrastructure delivery in the area.
- 2.12 The emergence of a potentially more holistic approach is identified in the Duty-to-Cooperate Statement (MK/SUB/008). Paragraph 3.23 sets out the commitment for joint working to identify growth opportunities across the caMKox Arc to include ambitious levels of growth in excess of current identified targets in order to respond to the Government’s committed capital funding of key significant infrastructure. However it is our view that there should be an immediate focus on capitalising on the national focus on the caMKox Arc and that this should not be delayed any further,
- 2.13 The lack of coordinated implementation of this cross boundary growth strategy indicates the need for a holistic approach to deliver transformational growth and an alignment of strategies across both Plan:MK and the Central Bedfordshire Plan.

#### **Question 2.7**

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*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)?*

- 2.14 Yes, in order to Plan:MK is sound and positively prepared it should be modified to reflect the growth potential of the wider south-east Milton Keynes area and build on the opportunities offered by EWR and the Expressway in the same way that the Central Bedfordshire Local Plan is seeking to do (see our response to Question 2.6 above). This will ensure that the plan is based on effective joint working with neighbouring authorities and is effective.
- 2.15 The allocation of the east of the M1 site which is intended to be delivered after the plan period and is not geographically located where it would benefit from this infrastructure

growth would pre-empt spatial choices advocated by the MKFutures 2050 and NIC reports.

### Question 2.8

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*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)?*

- 2.16 The current process was in itself intended as an early review of the Plan. As this has evidently been delayed by a number of years with the previous Core Strategy policy (CSAD1) envisaging a plan to be adopted by 2015, a further delay to delivery of a comprehensive plan will not lead to the achievement of sustainable development.
- 2.17 Even if a policy commitment for a plan period were included the status of the East of the M1 allocation would pre-empt this future process given it is not intended to be delivered within this plan period.
- 2.18 If it is the Inspector's view that the plan period remain as proposed (until 2031) with a policy commitment for an early plan review then it is essential that the East of the M1 site allocation be deleted to ensure a holistic plan review can take place which will appropriately reflect the wider growth aspirations of the MKFutures and NIC reports.

### Question 2.9

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*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)*

- 2.19 As stated in our original representations to the Local Plan the wider southeastern Milton Keynes area was identified as a significant area for growth within the sub-regional context in 'The New Plan for Milton Keynes – A Strategy for Growth to 2031', published in 2006. This document included an extensive growth area at southeast Milton Keynes (including Wavendon Golf Club) for 7,000 to 8,000 new dwellings (comprising 4,800 in Milton Keynes and 3,200 in Mid Bedfordshire District between 2016 and 2021).
- 2.20 As stated above in answers to questions 2.8 and 2.6 if the Inspector considers a plan review were to be an appropriate mechanism to include in Plan:MK then it must ensure a holistic cross-boundary strategy with Central Bedfordshire reflecting wider aspirations of the caMKox Arc.

**Question 2.10**

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*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?*

- 2.21 As stated in our response to the above questions there is no justification for a strategic reserve site post 2031 and the allocation of the site would prevent wider holistic planning of the area and a potential cross boundary approach with other authorities in the caMKox Arc, most notably Central Bedfordshire.
- 2.22 The evidence in both the MKFutures and NIC reports indicate the benefits of growth associated with implementation of EWR and the Expressway which are proposed to be routed the south and east of the town and not in the geographical vicinity of the proposed East of the M1 allocation.