

Plan:MK Examination

Our ref 12491/03/MS/MT
Date June 2018
On behalf of Berkeley

Matter 2: Spatial Strategy

1.0 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?

- 1.1 Berkeley considers the overall spatial strategy for Plan:MK provides a cautiously positive framework for growth, and that some of the core components of it will help to contribute towards the achievement of sustainable development through well planned strategic growth to the city. In particular, the spatial directions of development and the identified next phases for Milton Keynes' ongoing plan-led growth are a core part of the spatial strategy which set some foundations for achieving sustainable development.
- 1.2 However, Berkeley does not agree that it is a positive framework which is consistent with national policy, on the basis that:
- 1 The plan horizon is not sufficiently long (i.e. it is less than 15 years) to represent a suitably strategic and positive framework to address how Milton Keynes will grow over the medium-to-long term, in the context of NPPF para 157;
 - 2 The plan does not provide for meeting full housing needs, which we consider are greater than set out in the evidence;
 - 3 The plan does not provide for the right mix of employment land to address employment needs over the plan period.
 - 4 The plan does not – through its Policy SD14 - present a positive and effective approach to releasing the growth potential of the MKE allocation.

These issues are addressed elsewhere in our matters statements, but cumulatively they lead to a conclusion that the overall strategy is not consistent with national policy. 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?

- 1.3 As established above, Berkeley supports the Council's in-principle approach to its spatial strategy, but does not think it extends far enough in terms of the scale and horizon of growth for which it plans. In principle, Plan:MK seeks to address the strategic vision within the MK 2050 vision to focus development on strategic sites. However, Berkeley is concerned that, mindful of

the future opportunities / challenges facing MK, the vision and objectives within the plan are at odds with the way some policies are drafted to limit the reach of the Plan.

- 1.4 To meet the challenge of the 2050 vision in full, a bold strategy for Milton Keynes which is more akin to the 1970s Plan that served MK so well¹ should be reflected in Plan:MK. The approach is not sufficiently ambitious to address the future challenge of housing need in the Borough, particularly given ambitions to grow MK to a city of c.1/2 million population by 2050 (INS2a).

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).

- 1.5 This is considered a matter for the Council to comment.

2.0 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?

Is the proposed Plan period consistent with national policy at paragraph 157 of the NPPF?

- 2.1 No, because at the time of adoption of the plan it will not be possible for the plan to cover a 15 year period, nor to take a long term view. Research² has found that the average time it takes to examine and scrutinise a local plan is 16.8 months. On this basis, adoption could reasonably be expected in 2019/20, thereby effectively reducing the plan period to c.11 years upon adoption. The plan will therefore fall significantly short of the 15 years identified at paragraph 157 of the NPPF which requires Local Plans to be drawn up over an appropriate timescale of preferably 15 years to ‘plan positively’ for longer term requirements. The Council should extend the plan period to 2036 as a minimum to cover a 15 year period. It is noted that the Regulation 18 ‘Strategic Development Directions Consultation’ January-April 2016 was based upon a plan period extending 15 years from adoption.

If the Plan period was extended what additional evidence is required and what timeframe would be reasonable for completion?

- 2.2 If the plan period was extended to 2036 / 2038 Berkeley consider only limited additional evidence would be required. Whilst modifications would be needed and the Council would need to address the implications of any additional sites (or changes to existing reserve sites) that might need to be brought forward to meet development needs, including through SA, much of the evidence would be drawing upon work MKC has already undertaken. There is existing evidence on matters such as development needs, with official demographic projections for housing and economic forecasts for employment both extending beyond the current plan-period

¹ Lichfields is familiar with the 1970 Plan for MK having been the economic planners who, working alongside Llewellyn Davies, helped to prepare it. It is to the credit of the 1970 Plan that its approach had sufficient positivity and flexibility to successfully guide the spatial strategy for the growth of the New Town for over thirty years. The contrast with Plan:MK’s failure to look ahead even 15 years is striking.

² Lichfields (April 2017) Planned and deliver – Local Plan-making under the NPPF: A five-year progress report

and providing evidence to roll forward housing and employment needs. Consultation would be required as part of main modifications, but there are clearly options already on the table to meet the extended needs over the longer timeframe, including MKE.

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?

- 2.3 Whilst a 13 or 12 year period on plan adopted would provide sufficient certainty for short term growth, it would fail to provide appropriate foundations for longer-term growth, and may not even provide certainty for development that would start in the medium-term and extend into the long-term. This fails to meet the requirements of the NPPF – in order to adequately plan for longer term requirements, the plan needs to cover at least a 15 year time horizon from adoption, let alone to form a foundation for transformative growth in the area.
- 2.4 The original 1970 Plan for Milton Keynes was bold and unequivocal as the basis for which the City’s growth ambitions would be realised. It set out a framework for the growth of the new City that followed over a near-40 year time period. The 1970 Plan has now reached the end of its intended life and whilst recent Local Plans (including the 2013 Core Strategy) have worked within the grain of the original strategy, now is the time for a bold and long-term strategy to guide the next phase of the City’s growth. The 2050 Vision shows the way, but long term statutory development plans are the vehicle for giving effect to this vision.
- 2.5 Furthermore, Plan:MK has already been prepared as an early review to the 2013 adopted Core Strategy; Policy CSAD1 of the Core Strategy required the early review to be in place in 2015. This timescale has not been achieved with this plan not likely to be adopted until at least four years after this adopted policy timescale. Milton Keynes cannot wait another six to seven years to develop another early review, as the time to build foundations to ensure rapid growth will have passed. Proposing an early review to an early review is not a strategy which will achieve positive development outcomes for Milton Keynes and certainly not set the foundations for transformative growth. Studies prepared for the MK Futures 2050 work explored the opportunities for growth of Milton Keynes to a population of around 500,000 by 2050 (INS2a).
- 2.6 The NIC report on the Cambridge –Milton Keynes – Oxford corridor, “*Partnering for Prosperity*” highlights the opportunity for “*the re-establishment of Milton Keynes as a development location of national significance, through the intensification and expansion of the town to a population of at least 500,000, in line with local aspirations. This presents an immediate opportunity for growth*” (Partnering for Prosperity, page 36). A Strategic Growth Study is being prepared to assess this scale of growth potential including how, when and where growth will be delivered in Milton Keynes. Growth of this scale cannot be achieved by 2050 without proactive development being achieved as soon as possible and MKE offers the ideal site to pursue this as early as possible though its potential to deliver in the plan period.

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?

- 2.7 The NIC Report is clear that “*if the arc is to maximise its economic potential, current rates of house building will need to double – delivering up to one million new homes by 2050*”. This scale of growth by 2050 is unprecedented in this location and will only come close to being achieved if the location is able to provide housing delivery as soon as possible. Although a holistic strategy for growth will clearly need to be established, it is clear that MKE would form part of any such strategy. It is accepted by the Council that Milton Keynes will need to expand in a concentric or radial fashion in all directions subject and MKE sits within a relatively unconstrained and sequentially preferable location compared to other sites proposed for outward expansion, as evidenced within the SA/SEA. The development of MKE within the plan period, would therefore not be prejudicial to any wider strategic directions of growth that may be pursued on the back of the MK Futures 2050 work or the awaited response from Government to the NIC’s recommendations. It is a logical location for expansion and provides Milton Keynes with a fighting chance of delivering the scale of housing envisaged by 2050 with early delivery.
- 2.8 With regards to funding, the current status of the HIF bid and MKE development capacity is set out in Berkeley’s Matter 5 Statement.

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 caMKox arc once EWR and the Expressway are implemented)?

Is it necessary for soundness that Plan:MK be modified to provide a basis for the longer term growth agenda?

- 2.9 The lengthening of the Plan:MK period to 2036/2038 would not only adhere to paragraph 157 of the NPPF but also enable the plan to make allowance for the long term growth agenda for Milton Keynes. It is not considered that the development of MKE would unduly pre-empt the spatial choices advocated in the MK Futures 2050 work or NIC reports because it is a logical expansion for Milton Keynes in the context of the scale of growth needed. Even without MK Futures 2050 or the NIC report, the scheme would meet development needs within the plan period and beyond and would adhere to NPPF paragraph 47 to boost significantly the supply of housing.

Would this unduly pre-empt the spatial choices advocated in the MK Futures 2050 and NIC reports?

- 2.10 No. This is because the MK Futures 2050 and NIC reports provide a higher-level framework that – insofar as it relates to the growth of Milton Keynes - give the relevant Local Plan the task of determining the relevant spatial choices.
- 2.11 With regards to the impact this could have on further opportunities for sustainable intensification within the urban area, the ongoing work by the Council’s MK Futures 2050 team understands that the scale of growth Milton Keynes will need in the future cannot be achieved in

the existing urban area through intensification and densification alone and the city will need to expand. MKE is consistent with this.

- 2.12 The same logic applies to the impact on growth locations along the Cambridge –Milton Keynes – Oxford arc. To meet its economic potential, delivery of up to one million new homes is required by 2050. The delivery of MKE would deliver just 0.5% of the homes required in this location. Combined with the fact that it is in a sustainable location on the edge of the urban area with few constraints (as demonstrated through the SA), delivery of MKE would clearly not impinge on the delivery of any of the growth locations along the arc. In fact, it provides an opportunity for early delivery to the expansion of Milton Keynes which is needed as an early stepping stone to achieving the aspirational growth targets.

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)?

- 2.13 It is not considered that a policy commitment to a review is an appropriate response. As stated above, and as recognised in Q2.8, the 2013 Core Strategy itself gave the commitment to an early review. For Plan:MK to contain a similar commitment would in effect be proposing an early review of an early review. This is the antithesis of a “*genuinely plan-led*” system advocated by the NPPF.
- 2.14 Milton Keynes needs a suitably long-term plan in place to set the foundations for a scale of development to form a solid foundation for meeting the scale of needs identified in the MK Futures 2050 and NIC reports. Expanding the timeframe of Plan:MK and bringing MKE into the plan as an allocation rather than a reserve allocation means that a long-term view to development can be taken and MKE can make a significant contribution to meeting needs in the plan period. In time a review will come to reflect the new evidence, but there is no need for review commitment in Plan:MK to do so.

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)

- 2.15 No comment, as a plan review is not appropriate, see response to Q2.8.

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?

- 2.16 As set out above, a review of the plan is not deemed appropriate. Indeed, Berkeley’s view is that by increasing the timeframe of the plan to 15 years once adopted, the adoption of MKE as a full rather than contingent/reserve allocation will make a significant contribution towards the additional development needs.

- 2.17 The allocation of MKE cannot be seen to pre-judge a wider delivery strategy because it is a sustainable location which is relatively unconstrained and would be a key location for development regardless of the overall scale of growth planned for. Furthermore, the clear link between the allocation of MKE and the HIF funding cannot be overstated. The criteria for HIF includes that it must support delivery of up-to-date Local Plans (either implementing the Local Plan or helping to get it in place), and in that context it is anticipated that HIF will be unlocking sites allocated within current or emerging Local Plans. In short, the success of the HIF bid is linked to the MKE site being identified in Plan:MK, with the physical infrastructure that HIF would unlock similarly an important building block for delivering the objectives of MKFutures 2050 and the Cambridge-MK-Oxford arc. If the HIF funding is lost, so will the ability of Milton Keynes to make a much needed early start in achieving the highly aspirational growth targets for the area as a whole.
- 2.18 The report produced by Milton Keynes Futures 2050 Commission entitled ‘Milton Keynes: Making a Great City Greater’ (MK/MIS/001) states in the section ‘Accommodating Inclusive Growth’ that, *“Therefore, it would be desirable to accommodate much, but by no means all, of the city’s additional inclusive growth to 2050 in substantial new developments; these would be adjacent to the city (possibly even on the east side of the M1) and elsewhere inside the wider functional economic area”*. The Strategic Growth Study being prepared to look at how, when and where growth of metropolitan Milton Keynes could be delivered to achieve even greater growth (a population of 500,000 people based on the NIC recommendations) will be published in December 2018.

3.0 Issue 3 - Settlement Hierarchy (Policy DS1)

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:

- 3.1 This is considered a matter for the Council to comment.
- 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?**
- 3.2 This is considered a matter for the Council to comment.
- ii) Is the settlement hierarchy founded on robust evidence and consistent with national planning policy? Is it justified?**
- 3.3 This is considered a matter for the Council to comment.
- iii) Is the role of ‘Key Settlements’ sufficiently clear? Does the policy comply with paragraph 154 of the NPPF which requires that policies should provide a clear indication of how a decision maker should react to a development proposal?**
- 3.4 This is considered a matter for the Council to comment.

Q2.12 Does Policy DS1 provide effective guidance for development proposals on unallocated sites in or on edge of existing key and rural settlements? How will the risk of inconsistency of policy application be assessed? Do Policies DS1 & DS2 represent ‘blanket’ policies that restrict housing development and prevent other settlements from expanding?

3.5 This is considered a matter for the Council to comment.

Q2.13 Will there be enough growth in key settlements and villages to help support sustainable rural communities? Is Plan:MK consistent with paragraph 55 of the NPPF which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities?

3.6 This is considered a matter for the Council to comment.

Q2.14 Does the Plan strike an appropriate balance of growth between the four strands identified at tier 1 of the settlement boundary? Has the Plan maximised the potential re-use of previously developed land? Is the spatial strategy potentially over-reliant on a small number of large strategic sites? Is the Plan clear on the status and spatial implications of the Your:MK estate regeneration and the potential of wider ‘Renaissance:CMK’ in the MKFutures 2050 report?

3.7 This is considered a matter for the Council to comment.

4.0 Issue 4 – Role of Neighbourhood Plans (NPs)

Q2.15 Is the Plan sound in placing an emphasis on neighbourhood plans for the ‘villages and rural settlements’? What is the existing NP coverage at this level? In reviewing or preparing rural NPs against Plan:MK what scale of development would be adjudged as being consistent with this tier of the hierarchy? Have rural NPs been prepared against an up-to-date OAN?

4.1 This is considered a matter for the Council to comment.

Q2.16 Is the Plan justified and consistent on placing emphasis on NPs in rural settlements when there are extant NPs for areas within the built-up parts of the City?

4.2 This is considered a matter for the Council to comment.

Q2.17 Does Plan:MK avoid duplicating planning processes that will apply to the neighbourhood areas? In particular, with the CMKAP, as well as the various NPs for communities within urban Milton Keynes and the rural NPs?

4.3 This is considered a matter for the Council to comment.

Q2.18 Has the preparation of Plan:MK given appropriate consideration to the role of key settlements and other sustainable rural settlements in positively contributing to additional growth during the Plan period? How have the Strategic Housing Land Availability Assessment (SHLAA) and SA processes considered site options presented at tiers 2 and 3 of the settlement hierarchy?

4.4 This is considered a matter for the Council to comment.

Q2.19 The SHLAA advises that it has factored in approximately 2500 commitments in the rural area taking account of made Neighbourhood Plans. It advises that other rural Neighbourhood Plans are forthcoming which will deliver local sites for housing. If so, has any supply been factored in for these communities? Paragraph 2.22 of the SHLAA then states that rural sites presented through the call for sites have been passed on to local town and parish councils and not assessed in the MK SHLAA. Is this a reasonable approach? Should an updated Local Plan provide the strategic context for updating, reviewing and preparing Neighbourhood Plans? Through the approach taken, has supply in the rural areas been under-estimated?

4.5 This is considered a matter for the Council to comment.

5.0 Issue 5 – The Open Countryside (Policy DS5) & Linear Parks (Policy DS6)

Q2.20 Is Policy DS5 justified and consistent with national policy? Please explain.

5.1 This is considered a matter for the Council to comment.

Q2.21 Are the linear parks correctly shown on the Policies Map?

This is considered a matter for the Council to comment.