

MILTON KEYNES COUNCIL RESPONSE TO INSPECTOR'S QUESTIONS FOR EXAMINATION HEARINGS – STAGE ONE

MATTER TWO: SPATIAL STRATEGY

QUESTIONS: Q2.1 – Q2.21

Issues 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?

2.1.1. Development of the spatial strategy has been given close consideration through the Sustainability Appraisal (SA) process, with a view to ensuring that the proposed strategy is consistent with national policy and will contribute to the achievement of sustainable development.

2.1.2. There is a lengthy ‘story’ to tell, in relation to development of the spatial strategy, which is explained within Part 1 of the SA Report. In particular, within Part 1 of the SA Report:

- **Chapter 6** - explains the process of arriving at a reasonable spatial strategy in late 2017. The chapter explains the context - namely evidence gathered through the various Regulation 18 consultations and engagement exercises - and explains a step-wise process that involved giving consideration to ‘high level issues/options’ and then ‘site options’.
- **Chapter 7** - presents an appraisal of the reasonable spatial strategy alternatives against the SA framework, comparing and contrasting the merits of the alternatives in terms of a range of sustainability issues/objectives and discussing potential ‘significant effects’.
- **Chapter 8** - presents the Council’s response to the alternatives appraisal, i.e. the Council’s reasons for supporting the preferred spatial strategy, in the light of the wide ranging sustainable development considerations (i.e. pros and cons) highlighted through the appraisal of reasonable alternatives.

2.1.3. Chapter 10 of the SA Report then presents an appraisal of Plan:MK against the SA framework, with stand-alone sub-sections, within each topic-specific section, giving consideration to the spatial strategy. The conclusion is reached that:

“[The Proposed Submission Plan [performs] notably well in respect of ‘Housing’ and ‘Businesses / economy / employment’ objectives, with the conclusion reached that there is the likelihood of ‘significant positive effects’ on the baseline. The appraisal also finds the plan to perform well in terms of several other objectives – notably ‘Transport’ – without going as far as to predict significant positive effects.

Significant negative effects are predicted only in respect of ‘Natural resources’ objectives, for the simple reason that the proposed South East MK urban

extension would result in significant loss of 'best and most versatile' agricultural land. A range of other specific draw-backs, issues and uncertainties are highlighted, including relating to South East MK (uncertainty regarding strategic community infrastructure, and a concern regarding cumulative impacts of growth here alongside completion of the Eastern Expansion Area and Strategic Land Allocation); and East of the M1 (distance and separation from CMK)."

- 2.1.4. On the basis of the discussion presented above, and expanded-upon within the SA Report, it is possible to conclude that the proposed spatial strategy represents sustainable development.
- 2.1.5. Focusing specifically on the question of whether Plan:MK presents a *positive* strategy, the primary point to note is the proposal to allocate land sufficient to deliver significantly (c.10%) above OAHN. As explained within the Housing Land Supply Topic Paper, there is a high probability that this will result in OAHN being delivered, or exceeded, in practice. This is considered a suitably positive approach, recognising that any attempt to plan for higher growth through Plan:MK would be premature, given the emerging sub-regional strategic growth context. A preferable approach will be to allocate land for additional growth, if necessary, through an early review of Plan:MK.
- 2.1.6. Secondly, there is a need to highlight the positive strategy that is proposed in respect of supporting employment growth. As explained within the Employment Land Topic Paper, on the best available evidence there is a need to provide for 47.5ha. land for new Class B8 (warehousing and logistics) uses over the plan period, in order to avoid a shortfall against demand. The proposal is to allocate South Caldecotte, which is able to deliver up to 57ha., which represents a positive strategy.
- 2.1.7. Finally, there is a need to highlight the proposed identification of East of M1 as a strategic reserve site as a notably positive step. Should funding become available for major infrastructure upgrades then planning permission will be granted at the site - subject to compliance with wider policy - and the site would deliver housing within the plan period, leading to a situation whereby the total quantum of homes provided for significantly exceeds OAHN.

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. The vision and objectives of Plan:MK are notably positive, reflecting the desire to retain the pioneer spirit – the ‘can do’ attitude - that is associated with MK, and a desire to capitalise on the considerable long-term growth opportunities that present themselves. This is reflected most notably in **Plan Objective 1**, which confirms the need for Plan:MK to be in accordance with the MK Futures 2050 priorities, as far as possible.
- 2.2.2. However, at the same time, the plan vision and objectives are suitably high-level, recognising that there are many uncertainties in respect of long term growth issues and opportunities which necessitate flexibility. Plan:MK should not implement any measures that could serve to unduly foreclose future growth options. There is a need to strike a balance between ambition and caution, taking account of ‘knowns’ and ‘known unknowns’.
- 2.2.3. A primary ‘known’ is that east/west transport infrastructure serving the Corridor will be focused on the southern part of MK. It is also known (or at least fair to assume) that there will be growth on the south-western edge of MK at Salden Chase, within Aylesbury Vale District, and to the east of MK, within Central Bedfordshire District, where the proposal is to deliver a series of new villages within the Marston Vale, and also strategic employment growth at J13 of the M1. These ‘knowns’ are reflected in **Plan Objectives 3 and 4**.
- 2.2.4. With regards to ‘known unknowns’, there are four related considerations:
- The precise route that will be taken by the caMKox Expressway.
 - Where future growth - i.e. growth over and above that proposed within the plan will be focused.
 - The Vale of Aylesbury Local Plan (VALP) commits to an early view, as part consideration will be given to the possibility of one or more new settlements, and it is known that there are strong contender locations in the Winslow area (west of MK); and it is also known that the VALP SA Report (2018) examines ‘reasonable alternative’ spatial strategy options involving further growth at Whaddon Chase, Saldon Chase and (to a lesser extent) Eaton Leys. However, it is not possible to pre-judge the findings of the early review.

- Where future growth - i.e. growth over and above that proposed within the Central Bedfordshire Local Plan (2018) - will be focused within Central Bedfordshire. There is a commitment to an early 'Partial Review' to enable consideration of caMKox issue/opportunities,¹ and it is known that the possibility of new linked villages within the Apsley Guise Triangle (to the east of MK) is an option that has been given close consideration by Central Bedfordshire in the past. However, there is no way to pre-judge the findings of the forthcoming assessment / Partial Review.

2.2.5. In the light of these 'knowns' and 'known unknowns', the Plan objectives seek to steer a pragmatic course.

2.2.6. The Plan objectives were then taken forward through the consideration of spatial strategy alternatives, as discussed within Part 1 of the SA Report. A range of spatial strategy alternatives were established, and in turn subjected to appraisal and consultation - that they were (and remain) demonstrably 'reasonable' in light of the objectives of the plan, in accordance with the regulatory requirement (Schedule 12(2) of the SEA Regulations 2004).

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).

2.3.1. This was a legacy of Policy CSA which was required to be inserted into the Core Strategy adopted in 2013. Five years on, we agree that it is not necessary and its deletion is therefore included in the schedule of proposed main modifications.

¹ The Plan document helpfully explaining the reasons as follows: *"While the potential of Central Bedfordshire to play a core role in relation to the caMKox Arc is acknowledged in the recent National Infrastructure Commission reports, and the Government's response in the Autumn Budget 2017: the timing, service and route selection for new strategic road and rail infrastructure, needs further development and definition. Related issues such as potential for capacity upgrades of the A1 have still to be resolved. These decisions, for example on new east-west rail stations, will have a major impact on the scale of development and growth potential at strategic sites... The Council is therefore putting in hand a further assessment of the Identified Areas for Future Growth to run alongside emerging decisions on strategic infrastructure routes, timing and services, together with provision of wider infrastructure and delivery support. This assessment will inform a Partial Review of this Plan which will contribute to the ongoing work in the Central Corridor Area... The Partial Review is proposed to start within six months of adoption of this Plan and complete as soon as decisions on routeing and financial commitment to strategic infrastructure are in place."*

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?

2.4.1. The Plan period began in 2016 and lasts for 15 years, in accordance with the NPPF (para 157) requirement that: “Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon.” Plan MK has been prepared in good time, with submission to Government within two years of the start of the Plan period, and so there is not considered to be any justification for extending the Plan period.

2.4.2. In order to extend the time horizon of Plan:MK to 2036/2038, the research currently being prepared through the Metropolitan MK Strategic Growth Study would need to be completed (anticipated December 2018) and its outputs considered through the Strategy for 2050 (Council approval anticipated in spring 2019). This would then need to be translated into draft statutory policy, including undertaking the necessary SEA/SA process, updating any other supporting studies (SHMA, transport and employment land studies etc.) and the necessary community engagement process. It is considered this could be completed by perhaps spring 2020 at the earliest. This expedited timetable would not allow for any strategic plan-making with neighbouring authorities which would otherwise be possible under the currently proposed arrangements. The Council considers that a preferable approach is to commit to an early review of Plan:MK, recognising the emerging sub-regional strategic growth context.

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?

2.5.1. The work to support the Strategy for 2050 is being prepared using Plan:MK as the baseline, looking at how development beyond the Plan:MK horizon can meet the city’s ambition for greater transformational growth. The 12/13-year plan period gives sufficient certainty for that assumption, allowing the next plan to set more ambitious, yet deliverable growth targets. This approach recognises that putting in place higher targets at this stage would not be realistic or achievable, and that rolling forward the

existing targets over a longer plan period would not fulfil the Council's long-term growth ambition.

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?

- 2.6.1. The NIC made several recommendations that point to the importance of strategic planning and governance on a cross-boundary basis, with local authorities, central government and other bodies working in a coordinated way. The longer-term growth of Milton Keynes, beyond that proposed in Plan:MK, will require effective joint-working, for example, to agree each authority's contribution towards housing targets across a wider geography; to develop an approach for how local services are funded across authorities; or to manage strategic infrastructure projects. The Metropolitan MK Strategic Growth Study is looking at the possible delivery mechanisms that could be used to manage growth (for example, locally controlled development corporations, operating on a cross-authority geography). The proposed Strategy for 2050 will make recommendations for how this might work, allowing such approaches to be pursued for the next local plan or a joint statutory plan with neighbouring local authorities. It would be premature to attempt to align existing and emerging local plans without undertaking that further work.
- 2.6.2. The current round of plan-making will contribute significantly to the momentum that is building across the caMKox Corridor, whilst at the same time not pre-judging future decisions, or running the risk of unduly foreclosing future growth options. The next round of plan-making will be more explicitly focused on responding to the Corridor-related issues and opportunities.

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)?

- 2.7.1. The longer term growth of Milton Keynes should be an issue for the next local plan, rather than Plan:MK. Modifying Plan:MK at this stage, ahead of the further work currently underway would pre-empt consideration of the spatial implications of the growth advocated by the MK Futures 2050 and NIC reports. Deferring the adoption of Plan:MK in order for that further work to be completed and incorporated into the plan

would create an unacceptable and unnecessary delay, leaving the authority at risk of an ongoing policy vacuum.

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)?

2.8.1. Including a policy commitment to an early review of Plan:MK would be appropriate and provide reassurance that the authority is giving due priority to addressing long-term, transformational growth. The timing of any early review should be contingent on the adoption of the Strategy for 2050 and achieving progress with developing robust collaborative relationships with neighbouring authorities, central government and other relevant bodies which give confidence in being able to deliver strategic growth.

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)

2.9.1. As mentioned above, a Metropolitan MK Strategic Growth Study is being prepared to provide recommendations to the Strategy for 2050 for the future growth of MK. This study is being prepared jointly with South Northamptonshire Council and Aylesbury Vale District Council. Through that work, an effective geography for future strategic planning will be identified which, with appropriate support from the relevant local authorities, could form the basis for a future statutory spatial plan in order to deliver long-term growth in this area. The study will also look at the potential for other mechanisms to manage effective delivery, which could be in the form of a locally-led development corporation that covers development locations in more than one local authority area.

2.9.2. Arrangements currently exist for a 'Central Area Growth Board' covering the 17 local authorities in the centre of the caMKox arc. At this stage, the Growth Board does not have any plan-making powers conveyed to it, but it could provide a starting point for a future strategic governance body.

2.9.3. Work is also ongoing with Aylesbury Vale District, South Northamptonshire, Central Bedfordshire, Luton Borough and Bedford Borough Councils to prepare a Housing Deal to commit to additional and accelerated housing growth in the period to 2025. This provides further opportunities for co-ordinating future joint working.

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 MK Futures 2050 or NIC reports for east of MK being a strategic direction of growth?

2.10.1. East of MK is proposed as a strategic reserve site in Policy SD14 on the basis that the site will become a highly suitable location for growth *if and when* major infrastructure upgrades are in place. There is the potential to deliver a comprehensive new community in a relatively unconstrained location, well linked to CMK by new transport infrastructure, and with new strategic employment land delivered adjacent to the M1 motorway. The decision to allocate it as a strategic reserve site was made subsequent to careful consideration through Regulation 18 consultation (in particular, the site was included in Draft Plan MK) and work to examine ‘reasonable alternatives’ through the SA process.

2.10.2. The work being prepared to support the Strategy for 2050 makes the assumption that growth proposed in Plan:MK will be delivered as planned, including the reserve site east of MK, recognising that delivery of that site may commence post-2031 depending on the outcome of the Housing Infrastructure Fund bid. Inclusion of that site within Plan:MK sets a marker for the ongoing growth of the city, rather than pre-empting the future long-term strategy. In many respects, this forms a similar principle to the approach taken in the 2013 Core Strategy to allocate four Strategic Reserve Areas that had previously been identified in the Milton Keynes Local Plan 2005.

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:

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?

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?

2.11.1. The three-tier settlement hierarchy set out in Policy DS1 is well established. There is little or no evidence to suggest that any other settlement(s) should be within a different tier, or that there is a need for one or more additional tiers.

2.11.2. There is a need, however, to clarify the broad approach to growth within each tier, which is essentially as follows:

- Tier 1 (MK urban area) - existing commitments will deliver homes, as will Plan:MK allocations and any additional allocations put in place through future neighbourhood plans. Windfall developments will be permitted within the urban area, in accordance with Plan:MK policy and supply will be also be increased through wider Council policy, notably in relation to estate regeneration.
- Tiers 2 and 3 (Key settlements and villages) - existing commitments will deliver homes, and new allocations may be put in place through future neighbourhood plans. Windfall developments will be permitted within the settlement boundaries, in accordance with Plan:MK policy.

2.11.3. To make Policy DS1 effective and help clarify the role of key settlements, we propose to modify it by inserting the following text before table 4.2:

'The provision of new homes and jobs will take account of the settlement hierarchy set out in table 4.2. The majority of development will be focused on and adjacent to, the existing urban area of Milton Keynes at the locations specified in table 4.2 and from selective infill, brownfield, regeneration and redevelopment opportunities. Within the rural area of the Borough most new development will be concentrated within the key settlements of Newport Pagnell, Olney and Woburn Sands. Elsewhere within the rural area new development will occur within villages and other rural settlements at locations identified in made neighbourhood plans.'

2.11.4. This approach is consistent with the plan's vision and objectives. The alternative option of allocating land for development at locations other than the MK urban area was given careful consideration during the course of preparing Plan:MK, including through the SA process, but ultimately the decision was reached that Plan:MK allocations should be only be within, and immediately adjacent to, the MK urban area.

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?

2.12.1. Development proposals on unallocated sites in or on edge of existing key and rural settlements will be contrary to Policy DS1, as proposed to be modified, and so will not be permitted, unless there are material considerations - presented with clear reference to other development plan policies - that serve to outweigh the conflict with Policy DS1.

2.12.2. It is not considered that Policy DS1 represents a blanket policy that will unduly hinder the expansion of settlements. Settlements wishing to expand should bring forward a neighbourhood plan, in accordance with the eighth bullet-point of Policy DS2.

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?

2.13.1. Numerous completions and commitments are in place within key settlements and villages (please refer to our answer to Q2.15 below which provides an overview of the housing commitments in the rural area), and the take-up of neighbourhood planning has been very high, such that all town and parish councils recognise the ability to bring forward additional housing growth, to address specific local needs, through a neighbourhood plan.

2.13.2. The Council is committed to supporting neighbourhood planning, with officers dedicated to working with town and parish councils to explore the potential benefits to bringing forward a new neighbourhood plan. Rural sites submitted through the 'call for sites' in 2017 have been passed on to town and parish councils, and officers work proactively to encourage town and parish councils to complete work necessary to understand specific local housing needs, e.g. through encouraging surveying work and/or a local Housing Needs Assessment².

2.13.3. On this basis, Plan:MK is 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.

² A Housing Needs Assessment technical support package is available, for free, through Locality, for those groups that qualify.

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 MK Futures 2050 report?

MK urban area

2.14.1. Plan:MK supports growth at the MK urban area as follows:

- Within the urban area - allocations are proposed to deliver 3,196 homes (accounting for proposed modifications), and a development management policy framework is proposed that is supportive of windfall development.
- On the edge of the urban area - South East MK and South Caldecotte are proposed allocations, and MK East is proposed as a strategic reserve site. In addition, site specific policies are proposed for several existing committed sites, with a view to guiding future reserved matters applications, and also any need for the resubmission of outline applications (should it transpire that the existing permission lapses).

Previously developed land

2.14.2. Plan:MK allocates all of the sites within the urban area that were found to be suitable within the SHLAA on previously developed land. The SHLAA identifies a number of sites as not suitable for allocation despite comprising an element of previously developed land; however, in each instance, this is on the basis of a clear and reasoned justification. As such, Plan:MK can be said to make best use of previously developed land.

Mix of sites

2.14.3. The proposed housing land supply includes a mix of sites, varying from very small commitments and proposed allocations within the MK urban area, to committed and proposed strategic urban extensions to the MK urban area and to key settlements. The housing trajectory shows the potential for a five-year housing land supply to be maintained throughout the plan period, and the mix of sites is considered sufficient to minimise the risk of any unanticipated dip.

Your:MK estate regeneration and 'Renaissance:CMK'

2.14.4. The Plan:MK policy framework is supportive of estate regeneration and wider efforts to intensify uses within certain parts of the urban area, whilst avoiding being overly

prescriptive. There is a need for flexibility, recognising ongoing work to establish issues/opportunities. It is for this reason that the proposed housing land supply / trajectory does *not* assume any supply from these sources, beyond the supply that is already committed.

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?

2.15.1. It is the Council’s position that the Plan is sound in placing an emphasis on neighbourhood plans for the ‘villages and rural settlements’. See further discussion above, under Q2.11 and Q2.13.

2.15.2. Should any future neighbourhood plan wish to propose a significant level of growth, then the merits of any such proposal would be judged against the policies of Plan:MK in the round. There is no Plan:MK policy which serves to suggest that the quantum of homes proposed through neighbourhood plans should be restricted, or limited in any way.

2.15.3. The made rural neighbourhood plans were prepared in the knowledge that there is a considerable housing need, but would not necessarily have sought to take account of the precise OAN figure, recognising that the OAN figure applies to MK as a whole.

2.15.4. The [Neighbourhood Plan Designation \(PDF, 4MB\)](#) details which parishes are currently involved in the neighbourhood planning process and the stages they are at. For completeness, the table below highlights all of the made neighbourhood plans within the Borough of Milton Keynes. The village and rural settlements are highlighted in [green](#).

| Neighbourhood Plan | Stage | Number of homes allocated | Plan Period |
|-----------------------|----------------------------|---|-------------|
| Woburn Sands | Made | None | 2014-2026 |
| Lakes Estate | Made | 170 | 2015-2026 |
| Central Milton Keynes | Made | None | 2015-2026 |
| Wolverton | Made | Encourages redevelopment of the Agora site but this is not a proper site allocation as no quantum of homes is given | 2015-2025 |
| Great Linford North | Made | None | 2013 -2026 |
| Great Linford South | Made | None | 2013 -2026 |
| Newport Pagnell | Made | 1400 | 2016 -2031 |
| Walton | Made | c.500 | 2016 -2026 |
| Olney | Made | 300 | 2016 -2031 |
| Castlethorpe | Made | 32 | 2015 -2030 |
| Sherington | Made | 45 | 2016 -2031 |
| Woughton | Made | None | 2017 -2031 |
| Stony Stratford | Made | None | 2018 -2026 |
| Campbell Park | Examination | 225 | 2018 -2026 |
| West Bletchley | Regulation 16 consultation | 50 excluding potential redevelopment of Wellington Place | 2016 -2026 |
| Hanslope | Pre-Reg 14 draft | 315 | 2018 -2031 |
| Stantonbury | Reg 14 draft | 100 | 2016 -2031 |
| Ravenstone | Reg 14 draft | 8 | 2018 -2031 |

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?

2.16.1. As detailed within the SHLAA report ([MK/HOU/004](#)), the proposed urban site allocations were selected in the light of the extant neighbourhood plans for areas within the built-up parts (i.e. urban) of the City.

2.16.2. Paragraph 4.24 of the plan explains that the Council's approach to delivering new development in villages and rural settlements places the emphasis on the remaining neighbourhood plans to be prepared. That emphasis has not been extended to the built-up parts of the City because the extant NPs for these areas have generally provided only a limited amount of additional housing which cannot be relied upon to make a significant contribution to the level of housing needed over the plan period.

Q2.17 Does Plan:MK avoid duplicating planning processes that will apply to the neighbourhood areas³? In particular, with the CMKAP, as well as the various NPs for communities within urban Milton Keynes and the rural NPs?

2.17.1. As noted in Q1.9, there may be 'exceptional circumstances' where strategic policies in Plan:MK may be inconsistent or in conflict with policies in an existing neighbourhood plan.

2.17.2. In the case of the Central Milton Keynes Alliance Plan (CMKAP) made in June 2015, this reflected policies in the existing Local Plan (adopted in 2005) and the Core Strategy (adopted in 2013). Plan:MK is intended to update and largely replace both the Local Plan and the Core Strategy and it is therefore inevitable that some differences in approach will arise.

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?

2.18.1. The preparation of Plan:MK has involved giving appropriate consideration to the role of key settlements and other sustainable rural settlements in positively contributing to additional growth during the plan period.

2.18.2. The process is well explained within Chapter 6 of the SA Report ([MK/SUB/005](#)). Specifically, the possibility of Plan MK allocating sites within the rural area (or allocating a quantum of homes, to be delivered through neighbourhood plans) is discussed within Chapter 6, as follows:

- Section 6.2 (paras 6.2.19 to 6.2.23) deal with 'Growth opportunities elsewhere', seeking to demonstrate that - having taken account of recent completions and

³ PPG paragraph 043 Reference ID: 41-043-20140306

commitments, and also noting the Council's commitment to not overriding made neighbourhood plans - there is little or no strategic argument for Plan:MK allocations within the rural area.

- Section 6.3 - does not present additional analysis, but does include a brief section (para 6.3.9) explaining that the SHLAA does not examine rural site options.
- Section 6.5 - considers some additional evidence - namely the findings of the alternatives appraisal work completed in early 2017, and published for consultation within the February 2017 Interim SA Report ([MK/SUB/013](#)) - before concluding that, "...on the basis of appraisal findings, and recognising additional strategic considerations... it was determined that nil allocations in the rural area is a clear preferred option, hence the approach to growth should be a constant across the district-wide reasonable spatial strategy alternatives."

2.18.3. As such, it is fair to say that the option of Plan:MK directing growth to the rural area was considered through the SA process, before being ruled-out as 'unreasonable' in late 2017, i.e. at the time of identifying reasonable spatial strategy alternatives for formal appraisal and consultation. Rural housing sites submitted through the SHLAA 'call for sites' process were passed on to the appropriate town and parish councils for their consideration in neighbourhood plan preparation or review.

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?

2.19.1. No, the housing trajectory does not assume any delivery through sites allocated by emerging neighbourhood plans. Whilst there is a high likelihood of some additional supply through future neighbourhood plans in the rural area, there is no way to quantify the amount of supply, and hence no potential to account for this supply within the Plan:MK housing trajectory.

2.19.2. As discussed under Q2.13, sites submitted through the SHLAA 'call for sites' have been passed on to town and parish councils, with a view to encouraging the allocation of sites through neighbourhood plans, where such allocations would address specific

identified local housing needs. This is considered a reasonable approach, in light of the strategic context (as discussed under Q2.18).

2.19.3. It is considered that Plan:MK, as currently drafted, will provide the strategic context for updating, reviewing and preparing neighbourhood plans.

2.19.4. As outlined in Section 6.2 of the SA report ([MK/SUB/005](#)), the housing supply for Plan:MK takes account of the 'made' neighbourhood plans and existing commitments of the three key settlements and also a number of other rural settlements with 'made' neighbourhood plans. Other rural settlements are notably smaller and growth proposals through neighbourhood plans are unlikely to be of a significant scale, therefore whilst it is acknowledged that some additional supply through future neighbourhood plans in the rural area has not been accounted for in Plan:MK, it is not felt that this would lead to a significant under-estimation of supply.

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

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

2.20.1. It is the Council's position that Policy DS5 (Open Countryside) is justified and consistent with national policy. This is based on the following considerations:

- ***Designation of the Open Countryside is defined by the Policies Map.*** The Policies Map was determined by the Settlements Boundary Study (2017) replacing the previous settlement boundaries which were designated in 1995. This achieves the requirements of paragraph 55 of the NPPF which encourages development away from rural areas and only permitting the development of isolated homes if there be mitigating circumstances.
- The principles of protecting the Open Countryside ***align with the Landscape Sensitivity Study (2016) and Landscape Character Assessment (2016)***. This conforms with paragraph 17 (point 5) of the NPPF that indicates that consideration should be given to the role and character of different areas whilst protecting the intrinsic make-up and beauty of the countryside, and paragraph 28 of the NPPF which notes the importance of supporting a prosperous rural economy.
- ***The policy is in line with PPG Paragraph: 001 Reference ID: 8-001-20140306*** which states that local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.

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

2.21.1. The adopted Local Plan GIS layer for linear parks has been carried forward into Plan:MK unchanged. No amendments have been made to the layer since the adoption of the Local Plan.