

**Matter 2: Spatial Strategy**

Issue 1 – Plan Vision & Objectives

**Q2.2** *Do the spatial objectives of the Plan accurately reflect the existing issues and future opportunities / challenges facing Milton Keynes Borough?*

1.1 The spatial objectives of the Plan broadly reflect the issues that will affect Milton Keynes over the next 15 years or more. However, insufficient thought has been given to the infrastructure and transport improvements critical to support the spatial strategy. Linked to the lack of cross-boundary co-ordination of these matters the Plan does not provide sufficient certainty that necessary infrastructure to support the provision for housing and jobs will be delivered.

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?*

**Q2.5** *Is a 12 or 13 year Plan period sufficient*

1.2 No. A Plan period of 12 or 13 years is not sufficient. Paragraph 157 of the NPPF states that '**Crucially, Local Plans should: ... be drawn up over an appropriate time scale, preferably a 15-year time horizon ...**' (our emphasis). There is no justification for a shorter Plan period than that specified in government guidance. There are no good reasons why a 12 or 13 year time period is appropriate, and no reason why Plan:MK could not adopt a 15 year time scale, or longer.

1.3 Milton Keynes Council may seek to argue that they can carry out a quick, partial review of Plan:MK to reflect forthcoming infrastructure proposals. However, it has a poor track record in reviewing planning policy. The existing MK Core Strategy adopted in 2013 states (in accordance with a commitment made at the Council's previous Core Strategy examination) that the Council will undertake an early review of the Core Strategy in the form of Plan:MK with the aim of having an adopted plan in place in 2015. This is, then, some 3 years behind schedule.

1.4 Furthermore, Plan:MK needs to begin to reflect much longer term considerations, such as a fundamental shift in mass transport provision (and use), and this needs to inform the revisions to the Plan now. In the Consortium's view, Milton Keynes is already falling behind in its facilitation for modal shift and enabling the city to become more efficient (see below, and the Consortium's submission on Matter 7).

**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?*

1.5 The Council's evidence base indicates that without transformation of the city's transportation network, Milton Keynes will soon reach critical congestion levels (LTP4 p28, p30 (MK/TRA/001)), due in part to ongoing increases in levels of in-commuting (LTP4, p39). Medium-long term interventions in LTP4 include proposals up to 2036, which should be considered in Plan:MK, and discussed with the neighbouring authorities, from where many of the journeys causing congestion originate. These strategies for infrastructure need to be implemented now, as they will underpin the

transformation that will be needed in levels of housing and employment growth that must emerge through the work carried out by the NIC and MK:Futures 2050, and housing uplift sought through the revisions to the NPPF and standard calculation for OAN.

**Q2.7** *Would a longer Plan period unduly pre-empt the spatial choices advocated in the MKFutures 2050 and NIC reports -making?*

1.6 A longer Plan period would not pre-empt the choices that need to be made in relation to the NIC and MK:Futures work. Plan:MK already (appropriately) makes reference to the MK Futures 2050 recommendations. The inclusion of additional housing and infrastructure will assist in enabling the uplift in housing and infrastructure that is required across Milton Keynes. Flexibility will be needed where necessary including contingency sites to enable an effective, deliverable Plan that is in accordance with the presumption in favour of sustainable development.

**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)?*

1.7 See the Consortium's response above in paragraph 1.3. The Consortium wrote to the Council in 2014 to express their concern over the lack of progress towards Plan:MK. In its response dated 7 November 2014 MKC implied that the need to address the Duty to Co-operate, and produce a Plan that was sound, would take longer than the timescale envisaged (correspondence attached in Appendix 1). The Consortium has no confidence at all that the Council has the ability to carry out a quick review of Plan:MK, even if this was a partial review, based on its previous track record.

**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?*

1.8 The simple solution is for Plan:MK to be prepared with a timescale to 2036. This would co-ordinate the Plan with LTP4.

1.9 PPG recognises that reserved sites, or sites to be delivered outside of the Plan period can be included in the Local Plan, stating that '*If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan*' (ID 12-018020140306).

1.10 Any increase in the Plan period will need to ensure that the sites included to provide for the OAN are deliverable in the required timescale, with the inclusion of additional sites where there is any uncertainty (contingency sites). PPG (ibid) advises '*Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies*'.

## APPENDIX 1: CORRESPONDENCE WITH MKC

### Correspondence regarding Plan:MK Timescale

30 October 2014  
L 141020 DJ MK LDS



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Dear Mr Wilson

## **PLAN:MK LOCAL DEVELOPMENT STRATEGY**

We write on behalf of the South East Milton Keynes Consortium, which comprises Taylor Wimpey, Miller Strategic, Harcourt Developments and Martin Grant Homes. We note that the Council has recently published a revised Local Development Scheme for the period 2014-2017. Importantly the LDS sets out the timescale for the production of the emerging development plan documents within the borough, including Plan:MK.

The currently adopted development plan is provided by the Local Plan extant policies (2005) and the Core Strategy (2013). The Core Strategy was the subject of an examination in 2012, which assessed the 'soundness' of the document. One of the Proposed Modifications introduced to the Core Strategy at the examination stage was a timetable for the preparation of the Plan:MK. The timetable is expressed in Policy CSAD1 as follows:

*'The Council will undertake an early review of the Core Strategy in the form of Plan:MK, to 2031 or such longer period as the Council chooses, with the aim of having an adopted plan in place in 2015. This will be led by the NPPF approach of objective assessment of housing, employment and other needs and the requirements of the duty to co-operate with adjoining authorities.'*

The introduction of this policy at the examination stage was necessary to ensure that the acknowledged deficiencies of the Core Strategy would be rectified promptly. For example, the adverse consequences of under provision of housing are identified in the Core Strategy at para 5.16, including increased commuting and overcrowding.

The new LDS sets out the timescale for preparation of the Plan:MK as follows:

- Summer 2015: Preferred Option consultation;
- Early 2016: Submission Draft Plan published for consultation;
- Summer 2016: Submission and Examination of plan; and
- Late 2016/17: adoption of the plan.

The Consortium is deeply concerned about the substantial delay to Plan:MK envisaged by the LDS compared to the Core Strategy – up to 2 years delay in the date of adoption. The programme is clearly contrary to the commitment in Policy CSAD1 and risks giving rise to the adverse consequences of under provision of housing and other development that the Core Strategy identifies.

Furthermore, the delay means that once again the opportunity to achieve a co-ordinated plan-making process with the adjoining authorities is at risk of being lost. The Central Bedfordshire Development Strategy was submitted to the Secretary of State earlier this week and therefore will be at examination early in 2015. The delay in the Plan:MK process means that the evidence base may well not be in place to inform debate at that examination about the future direction of growth of MK. This is a key issue under the duty to co-operate in that the urban area of MK will inevitably expand into adjoining authorities including Central Bedfordshire.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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At the very least what is required to inform discussion at the Central Bedfordshire examination is a comprehensive SHMAA that addresses the requirements of the full Housing Market Area, which comprises MK, Aylesbury Vale, Central Bedfordshire, Bedford and Luton (as confirmed in paragraph 6 of the Aylesbury Vale Inspector's Report of January 2014). MKC should therefore act promptly to prepare this key piece of the evidence base and should be proactive in co-ordinating with the relevant authorities. If this is not done then we will move into the next cycle of plan-making with an uncoordinated and fractured approach, which is at risk of damaging the economic prospects of MK and inflicting onto local residents the adverse social consequences that the adopted Core Strategy identifies.

The Consortium therefore requests that the council urgently reconsiders the LDS and undertakes to accelerate the programme of Plan:MK, including preparation of the SHMAA as a key component of the evidence base. There is already in existence an extensive evidence base relating to the potential directions of growth for Milton Keynes, including the Milton Keynes Growth Study (2006). Furthermore, the council is currently consulting on a range of technical documents that will inform the preparation of Plan:MK. This should allow an accelerated programme to take place that, although it may not achieve the programme contained in Policy CSAD1, could be put in place before the adverse consequences of further delay become significant.

I look forward to your response on this important matter.

Yours sincerely

**David Jackson MA MRTPI**  
Director

*cc: Consortium Principals*



**Carole Mills**  
**Chief Executive**

**Anna Rose**  
**Service Director: Planning and Transport**

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7 November 2014

Mr D Jackson  
Savills  
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Dear Mr Jackson,

### **PLAN:MK LOCAL DEVELOPMENT STRATEGY**

Further to your letter of 30 October, I would remind you that the wording of the Core Strategy policy CSAD 1 states 'with the aim of having an adopted plan in place in 2015'. I recognise your frustration with the timing of the relative Plans but we try to ensure our Plans are found sound and take account of all of the considerations within our remit. The Duty to Co-operate is a new legal requirement and as I am sure you will have seen across the country, many recent Plans have failed to progress because of their failure to meet this legal requirement. That may be a concern for Central Bedfordshire.

As for the under provision of housing the Council has land with planning permission and land allocated for over 20,000 homes and is not short of strategic sites. The shortfall applies to a future 5 year land supply calculation and this is being addressed as we proposed in the Core Strategy by way of a Site Allocations Plan.

We have a Planners Forum based on the SEMLEP area and this is one of the ways we seek to maintain our duty to co-operate. That will continue and you may have seen the Duty to Cooperate Topic Paper in the current Plan:MK consultation. Part of our evidence is now in the public domain- the SHMA and this is reflected in our Topic Papers. So there is progress being made and we have agreed with Central Beds and others to review our HMAs in light of the new Census data.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Mills'.

Development Plans Manager  
Milton Keynes Council