

## Plan:MK Examination Matter 2: Spatial Strategy

### Statement on Behalf of Bovis Homes Limited

#### 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. No. It is acknowledged that the supply of new homes can sometimes be best achieved through planning for larger scale development such as urban extensions and these are proposed on the periphery of Milton Keynes and, to a lesser extent, the Key Settlements (Newport Pagnell, Olney and Woburn Sands). However, Plan:MK's housing strategy has an over reliance of housing growth being delivered on strategic/large allocations rather than adopting a more balanced approach. The spatial strategy places too much emphasis on delivering new homes at, in particular, Milton Keynes, to the detriment of other settlements, including Castlethorpe.
2. The Sustainability Appraisal (MK/SUB/005) at paragraph 6.2.23 explains that Other Villages are notably smaller and are suited to allocation through Neighbourhood Plans rather than through Plan:MK. None of these other settlements are said to stand-out as being associated with a particular growth opportunity that might warrant examination through Plan:MK (with a view to allocation of land). However, this misses the point that there should have been an appraisal of a reasonable alternative which would have provided a more balanced approach to delivering housing need.
3. At paragraph 6.5.7, the Sustainability Appraisal dismisses more growth in the rural area based upon the comments contained in the Initial Sustainability Appraisal (February 2017). However, it is instructive to note that at pages 32 and 33 of the Initial Sustainability Appraisal concerning Urban versus Rural Development there was only one minor difference between the 'scoring' of Option A (continuation of the current strategy of limited growth in the rural area) and Option B (still focusing housing at Milton Keynes with more growth in the rural area). This related to the re-use of previously developed land. Even allowing for urban regeneration, Plan:MK is having to allocate greenfield land in any event even.
4. When appraising the 5 different spatial options in terms of housing delivery, the Interim Sustainability Appraisal also concluded that *'this appraisal suggest (sic) a strategy which delivers housing in line with policy options A, B, D and E would likely result in the most positive social and economic effects over the short, medium and long-term and minimise negative environmental effects. Furthermore, given the need to deliver 6,775 homes*

*through the Local Plan, a strategy that seeks to deliver homes in several different locations and not focusing on only one of the growth options above would result in a more robust strategy that will likely deliver homes in the short, medium and long-term'* (emphasis added). Option D was small scale development to support rural settlements and guide the preparation of remaining neighbourhood plans.

5. A greater proportion of any new housing allocations should be spread across settlements within the rural area and clear guidance provided about their scale of growth. Extensions to rural settlements can equally make a positive contribution to the delivery of new homes. Some housing being developed at an appropriate scale for a settlement would still deliver new homes at a sustainable location and would also provide the opportunity to enhance or maintain the vitality of rural communities. Indeed, Plan:MK includes a Strategic Objective which seeks the protection of existing key services and facilities in sustainable rural settlements and to encourage the development of further provision, including shops, world class schools, community and health services. These aspirations can only realistically be achieved through growth at rural settlements.
6. As identified later in this Statement, the spatial strategy advocated by Bovis Homes is recognised as delivering a sustainable form of development in the National Planning Policy Framework (the NPPF). At the rural settlements there can be a choice of sites of varying sizes and types to cater for all housebuilders, expedite delivery of new homes and enable market housing to be of such a scale that the delivery of affordable homes can be secured to meet the local community's needs. By way of context, in 2012 affordable housing formed 26.1% of the total housing stock of the Borough. However, the proportion of affordable housing in the rural area was only at 8.5%. The spatial strategy proposed by Plan:MK will not redress this imbalance and hence a more balanced approach is required.

*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?*

7. For the reasons already provided, Plan:MK does not provide an appropriate response because it fails to provide a framework for some growth to occur at other sustainable locations to meet their needs.

*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).*

8. The policy is unnecessary.

## **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 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?*

9. The NPPF refers to Local Plans being drawn up over an appropriate timescale, preferably a 15-year time horizon, to take account longer term requirements. The Plan:MK time period is 2016 to 2031. By the time Plan:MK is adopted at the end of 2018 (according to the Local Development Scheme) there will be only 13-years remaining of this period. Accordingly, the Plan does not accord with national policy concerning the desirable timescale for Local Plans and should be extended to 2036.
10. As a general guide to timescale to rectify the plan period deficiency, it would potentially take the Council around 6 months to produce the necessary Proposed Modification allowing for some element of public consultation. This timescale would allow for the re-assessment of the housing and other growth requirements, updating the spatial strategy and the identification of omissions sites, especially at rural settlements such as Castlethorpe.

*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?*

11. Bovis Homes consider that the MKFutures 2050 and National Infrastructure Commission reports should be for consideration as part of the next Local Plan when there is greater clarity concerning matters such as the funding and realisation of growth along the Cambridge-Milton Keynes-Oxford Growth Corridor.

*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?*

12. The reality is that some form of wider regional/sub regional planning strategy is required for the Growth Corridor to co-ordinate a wider spatial strategy.

*Q2.7 Is it necessary for soundness that Plan:MK be modified to provide a basis for the longer term growth agenda? Would this unduly pre-empt the spatial choices advocated in the MKFutures 2050 and NIC reports (for example further opportunities for sustainable intensification within the urban area and growth locations along the caMLox arc once EWR and the Expressway are implemented)?*

13. No. Bovis Homes consider that the MKFutures 2050 and National Infrastructure Commission reports should be for consideration as part of the next Local Plan when there is greater clarity concerning matters such as the funding and realisation of growth along the Cambridge-Milton Keynes-Oxford Growth Corridor.

*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)?*

14. Although there is logic in making a commitment for a review of Plan:MK within a specified time period, the scepticism in the question is well-founded. The issue is that a sizeable number of the key strategic decisions will not necessarily be solely in the hands of the Borough Council but will be decisions at Government or sub regional level over which a local plan will have limited influence, especially in terms of funding and delivering the major infrastructure required to support the substantial growth being envisaged along the Growth Corridor.

*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)*

15. The reality is that some form of wider regional/sub regional planning strategy will be required as context for the local plan review.

*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?*

16. Notwithstanding issues associated with MKFutures 2050 and the NIC reports, reserve sites may have relevance in the context of consideration of extending the plan period to 2036

### **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?*

17. Bovis Homes is concerned that the board apportionment of growth in Plan:MK does not provide an adequate framework/guidance for potential growth/development at rural settlements. Instead, Policy DS1 refers to development in compliance with Neighbourhood Plans/within defined settlement boundaries and Policy DS2 refers to small to medium scale development within rural settlements, appropriate to the size, function and role of each settlement to be delivered through allocations in Neighbourhood Plans currently being prepared.
18. Bovis Homes is seeking the inclusion of a more detailed settlement hierarchy which echoes the Core Strategy (the footnote 26 list the 18 Other Villages, including Castlethorpe, albeit these could be included in a table incorporated into Plan:MK):

**Table 5.1 Settlement Hierarchy**

<b>1. Milton Keynes City</b>				
<b>Main areas for development will be:</b>				
Central Milton Keynes	Uncompleted city estates	District centres: A) Bletchley Wolverton B) Kingston Westcroft	City Expansion Areas: Existing expansion areas, Strategic Land Allocation	Selective infill, regeneration and redevelopment opportunities
<b>2. Key Settlements</b>				
Newport Pagnell		Olney		Woburn Sands
<b>3. Selected Villages<sup>(25)</sup></b>				
Sherington		Hanslope	Bow Brickhill	
<b>4. Other villages</b>				
Villages with development boundaries <sup>(26)</sup>				
<b>5. Other settlements</b>				
Villages in the open countryside				

19. A minimum level of new homes for the Selected and Other Villages can be identified as guidance for the preparation of Neighbourhood Plans (if they remain the correct vehicle to allocate sites for development). It is proposed later that a minimum of 1,000 dwelling should be delivered at these rural settlements and it would be appropriate to expect a

minimum of 100 dwellings to be delivered at Selected Villages and a minimum of 50 dwellings at Other Villages.

*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?*

20. As drafted, Policies DS1 and DS2 can be interpreted as a blanket restriction on housing development at rural settlements. Yes, some housing development, albeit limited in scale, might be allowed within the defined development boundaries but other growth is restricted notwithstanding the suitability and sustainability credentials of a settlement (e.g. possessing shops, public house, school, bus route, etc. which exists, for example, at Castlethorpe) and ability to meet a local housing need, including affordable homes. Some growth might be allowed through the Neighbourhood Plan process outside the currently defined development boundaries but Plan:MK contains no clear context or guidance about the minimum level of growth to be delivered.

*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?*

21. Bovis Homes are concerned that Plan:MK does not provide an adequate framework for potential development at rural settlements and is inconsistent with the NPPF.
22. NPPF paragraph 54 refers to housing development in rural areas reflecting local need, particularly for affordable homes. The paragraph goes on to say that local authorities should consider whether allowing some market housing would facilitate the provision of significant affordable housing to meet local need. There is no specific evidence that Plan:MK has properly considered the housing needs of the rural settlements within the Borough. It would have been preferable for Plan:MK to have considered these matters and to have provided a minimum housing provision for each settlement and to provide guidance for the local community, via a Neighbourhood Plan, to determine the location of development.
23. Identifying a minimum housing provision for a rural settlement is also important to assist with sustaining the local services and facilities which exist and to provide the opportunity for local people to continue to live in the place where they were born and raised. This

echoes NPPF paragraph 55 where housing has the opportunity to enhance or maintain the vitality of rural communities and would deliver the aim of Strategic Object 7.

24. Further, in his review of the Rural Economy and Affordable Housing in 2008, Lord Taylor found that restrictive planning practices had contributed towards many smaller rural villages becoming 'increasingly unsustainable communities, unaffordable for those who work there, losing jobs and services'. Accordingly, the concept of sustainability is not just about location but extends to social and economic factors and this is part of the reason why the NPPF refers to development in the rural areas maintaining thriving rural communities.

*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?*

25. The Local Plan's housing strategy relies on a small number of larger strategic sites to deliver housing growth over the plan period. At Milton Keynes the strategic allocations where most of new housing is to be provided are controlled by a small number of promoters/housebuilders. This degree of control can affect delivery rate of new homes, limit opportunities for other housebuilders to enter the market and impede competition to the detriment of future occupiers. Bovis Homes' consider that a wider choice of residential sites of varying sizes are required across the Borough to meet the needs of all sectors of the housing market and the local community, especially at rural settlements.
26. Larger strategic sites do not always develop as quickly as expected. There is the time taken to secure planning permission, the acquisition of the land, the approval of reserved matters, the discharging of conditions, the technical approval process and the letting of the infrastructure contract all add to delivering new homes.
27. The South East Growth Area's capacity and, potentially, delivery is also dependent upon early decisions being taken about critical infrastructure routes associated with the Growth Corridor. Indeed, Plan:MK Table 4.3 specifically refers to this site only being delivered once the route for the Cambridge-Milton Keynes-Oxford Expressway has been agreed and the availability of land confirmed. Although the Growth Corridor has the support of the Government via the National Infrastructure Commission, it remains unclear when such decisions will be taken to enable a coherent master plan to confidently be prepared for the South East Growth Area.

28. Even assuming outline planning permission might be granted in 2020 for the South East Growth Area then there can be no certainty the suggested 3,000 dwellings will be delivered by 2031. The 2 recent research reports prepared by Lichfields provide helpful information about the time taken to deliver strategic allocations and the sales rates achieved on large sites. When combined, these research report indicate that it may still take up-to 18 months for the first dwelling to be constructed and that sites over 2,000 units will deliver on average 160 units per annum. Based on this research, there would be about 9½ years remaining of the plan period and only some 1,520 dwellings would be constructed rather than 3,000 dwellings.
29. As a local example of the concern raised, at Campbell Park outline planning permission was granted by the Council in 2007 but the site has delivered less than a third of the approved 2,400 new homes in the subsequent 10-year period.

#### **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?*

30. The Borough Council's previous indication that rural settlements should accommodate a minimum of circa 1,000 dwellings should be reinstated. In Bovis Homes' submission this figure should be in addition to any commitments or outstanding allocations to take account of any of the following factors: updating of the spatial strategy as sought in this Statement; providing range of housing sites rather than the focus being on strategic/large allocations; an extension to the plan period to 2036 and a potential change to the housing requirement arising from Matter 3. Further, based upon the inclusion of the settlement hierarchy referred to above, a minimum housing provision can be specified for each type of settlement. This approach would provide the necessary guidance for the preparation of Neighbourhood Plans (if they are to be the vehicle to allocate sites at the local level).
31. Bovis Homes' understands that the Castlethorpe Neighbourhood Plan, which is now in force and includes a small housing allocation, was not based upon any specific objectively assessed housing needs assessment for the Parish. Instead, as its states in the Plan, the allocation was made available for housing by the owner. This again underscores the point made by Bovis Homes that the actual needs of the other settlements within the Borough have not be fully considered with the emphasis being placed upon hopefully delivering the



urban extensions sites rather than reducing such risk by adopting a more balanced spatial strategy which can deliver housing and other benefits for the wider community.

*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?*

32. Bovis Homes considers that housing allocations can be identified by both Local and Neighbourhood Plans. The key issue is that there is guidance for the delivery of housing growth at a rural settlement and there is a default provision in place if, for whatever reason, there is a failure for a Neighbourhood Plan to be reviewed.

*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?*

33. No specific comments are made by Bovis Homes.

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?

34. No. The reasons for this answer have been set out already in this Statement.

*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?*

35. Following the general structure of this question, Bovis Homes assessment is that the Borough Council has not, in drafting Plan:MK, properly and fully considered or assessed what contribution could be made by sites at rural settlements to meeting the housing need and thereby make an effective contribution to delivering the range of new homes required by the wider community. A more robust and balanced spatial strategy is required.

36. There is a need for the spatial strategy to be revisited to provide identify a level of growth to occur at rural settlements which would then provide the necessary guidance for the preparation of Neighbourhood Plans. Without some managed growth at these settlements,

the housing needs of the community will not be met and it is unlikely that the local facilities will be protected let alone enhanced.

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