

**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?**

The spatial strategy perpetuates a serious flaw, which is present in the current Core Strategy. It proposes to allocate the majority of development in large strategic-scale sites, within land in the control of a small number of parties. This approach has consistently led to the under-delivery of housing against the Council's targets, a matter which is identified in the sustainability appraisal (SA) for Plan:MK<sup>1</sup>. The SA also proposes solutions to the problems it identifies, including allocating a range of small and medium sized sites, and providing greater support to small and medium sized house builders<sup>2</sup>. This is consistent with recent statements of Government policy. However, the proposed spatial strategy fails to heed this advice. This, coupled with the failure to plan for sufficient housing, either for the plan period or beyond, means that the spatial strategy within Plan:MK is not fit for purpose.

**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?**

We have noted above that the Plan is not based on the findings of the SA, which identify the need for a spatial strategy with a different mix of sites.

The Plan as a whole does not reflect the findings of the NIC report, or MK Future 2050. It also ignores the long lead time required to deliver the strategic sites have been the staple of house building in Milton Keynes. By ignoring the need to plan now for future growth, it will lead to unnecessary delays in meeting the Government's commitments, as set out in the NIC Report, and the Autumn Budget Statement 2017.

**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?**

NPPF Paragraph 157 refers to a timescale of 15 years, and NPPF paragraph 47 refers to the need to plan, where possible, up to year 15. It is clearly possible to plan further into the future, and there are clear benefits to doing so, particularly

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<sup>1</sup> Plan:MK Sustainability Appraisal (November 2017), paragraph 6.2.17.

<sup>2</sup> Ibid, paragraph 6.2.18.

in light of the need to meet the Government's growth agenda for the caMKox corridor (which we have summarised in our representations).

**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?**

No, this would be inadequate. The Government's growth agenda suggests that 15 years should be a minimum term for which to plan. Proposing a low level of housing, and failing to identify new strategic locations for growth which can begin to progress through the planning process, will delay the delivery of the large-scale growth required. There is no good reason for having failed to identify sufficient housing at this stage. It would be appropriate to do so, given Milton Keynes' current and historic role as a centre for housing and economic growth.

**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?**

There will be a need for a holistic approach in due course, but there is no reason why this should not be built on the foundations laid by Plan:MK.

**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)?**

Yes, the Plan as drafted is very limited, and will simply delay the delivery of growth to meet the Government's agenda. In the context of the level of development which the NIC Report and Autumn Budget Statement 2017 suggest are required, allocating sites for development, and identifying future locations for growth, will only help to streamline the subsequent process. Future Local Plans should be able to build on Plan:MK, and they should not be required to begin by making up the deficit in housing need proposed by the current draft of the Plan. Failing to identify growth opportunities at this stage will limit the amount of development which can be built by 2050, at the centre of the caMKox arc, thus undermining Government policy as set out within the Budget Statement.

**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)?**

The Council have not considered the policy commitment to a review contained within the Core Strategy to be binding, and they have failed to meet it. Their track record is of lengthy plan preparation, and proposals which lead to a significant under-supply in housing. At appeal, they have not considered the failure to meet the timescale for an early review to have undermined the Core Strategy's policies at all. There would be no incentive for them to actually deliver a review within a specified timeframe, and their track record suggests they would not.

We are concerned that more must be done at this stage, through Plan:MK, to properly meet the need for housing, and begin effectively planning for future growth to meet the requirements identified for the caMKox arc. The evidence, both of the Core Strategy and its implementation, and the current draft Plan, suggests that the Council intend to simply continue with the same strategy, which is not working; they allocate a few large sites, which deliver housing more slowly than the Council anticipate (see our representations). Whilst the NIC report is mentioned in the draft Plan, the Council have shown no appetite in practice for anything other than more of the same. They have not sought to identify any potential locations for strategic growth, other than what they believe may be required to meet their (we believe constrained) proposed housing target. They have not engaged with opportunities such as the Aspley Guise Triangle, identified by Central Bedfordshire in their emerging Local Plan as an opportunity which should be explored for future growth to meet the needs of the caMKox arc. They have shown no appetite to allow development in the rural areas, beyond that which is already proposed. And there can be no confidence that they will progress a new local plan quickly following the adoption of Plan:MK. The Core Strategy was adopted on the basis that it was a pragmatic short-term solution, to be remedied by an early review which never came. It is important that this is not allowed to happen again, after five lost years.

**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)**

There are good opportunities for cross-border strategic growth, and there is a strong logic behind this approach. One good example is the Aspley Guise Triangle, which has already been identified by the emerging Central Bedfordshire Local Plan as being an opportunity which that Council wish to pursue in the future, in the context of the caMKox arc.

**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?**

Plan:MK identifies the 'Key Settlements' as being 'chosen for development', but it contains no guarantees that any additional development will take place there, above existing commitments. It effectively abdicates responsibility for the spatial strategy in the rural areas. As such, the commitments in the Vision and Objectives relating to supporting rural communities, cannot be said to be supported by the policies within the draft Plan.

The Plan also fails to meet the commitment in Strategic Objective 3 to reflect the NIC Report's findings; the low level of development proposed, and inward-looking nature of the Plan fail to consider how to achieve a step-change in growth, or plan positively for future change.

- ii) Is the settlement hierarchy founded on robust evidence and consistent with national planning policy? Is it justified?**

Our objections relate to the way the proposed settlement hierarchy has not been translated into practical proposals for the rural area within the wider Plan.

- 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?**

There is little guidance within the Plan for the way that NPs approach future growth in the Key Settlements. We believe that this lack of strategic direction is likely to undermine the effectiveness of the Plan with regard to the rural area, where NPs can themselves be inward-looking, and have little or no regard to wider strategic opportunities.

For instance, Policy DS2 envisages small to medium scale development within rural settlements, which is to be brought forward by NPs being prepared. The NP for Woburn Sands, one of the three Key Settlements, has already been adopted, and contains no such allocations. It does however allow for further development, if this is allocated within Plan:MK. As such, both the NP and Plan:MK leave the allocation of development to the other plan, leaving a

situation whereby no development will be allocated. If this is the Council's intention, it is inconsistent with Policies DS1 and DS2.

**Q2.12 Does Policy DS1 provide effective guidance for development proposals on unallocated sites in or on the 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?**

The Plan as drafted does not make any allowance for sites to come forward on the edge of existing key and rural settlements, other than through NPs. Where NPs do not come forward, the effect will indeed be a blanket restriction on new development. We do not believe that this is appropriate, as it is inconsistent with national policy, which encourages the provision of development in both urban and rural areas, to support thriving and mixed communities, and for NPs to positively shape new development.

**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?**

Plan:MK could effectively lead to a complete restriction on development in much of the rural area within the Borough. Given the Council's track record in bringing forward new Local plans, this could remain the case for many years. This could have serious negative consequences on rural communities. It is well documented that a lack of housing leads to serious adverse social and economic consequences, and limits opportunities to provide suitably mixed 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?**

The Plan as drafted is far too reliant on a small number of large strategic sites. As we have noted in our response to Q2.1, this matter is identified by the sustainability appraisal, and we have also explained it in detail in our representations.

**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?**

We have explained above that we do not believe that the Plan's proposal to leave growth in the rural areas to NPs is sound, because it provides no strategic direction to NPS. NPs will be inward-looking and local in scale, and in the main they tend not to be prepared by planning professionals. There is no reason to believe that NPs will result in the best strategy for the rural areas as a whole, with regard to their social and economic needs. Existing NPs have not been prepared against an up-to-date OAN.

**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?**

The Key Settlements offer excellent opportunities for sustainable growth, as we have outlined in our representations, with regard to Woburn Sands. These opportunities are entirely ignored by the draft Plan.

**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 underestimated?**

Yes, Plan:MK should at least provide a strategic framework, including housing targets, for the rural area, which NPs will be required to deliver within a specific timeframe. As drafted, existing NPS, such as that for Woburn Sands, can remain as they are, making no allocations for new development.

It is also important to note that some parts of the rural area are far more rural than others. Settlements such as Woburn Sands, which are strategically well placed for new growth, due to their existing facilities, and strategic transport connections, should be considered more fully for the opportunities they present.

