



MILTON KEYNES COUNCIL: EXAMINATION OF PLAN:MK.

Response on behalf of the Guinness Partnership. Representor ID1147068.

Matter 2: Spatial Strategy

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?

1.1 The proposed Plan period is inconsistent with national policy at paragraph 157 in that it does not provide for at least a 15 year strategy at date of adoption. The LDS (MK/Mis/003) indicates that adoption of Plan:MK is anticipated in late 2018. Therefore, the Plan needs to provide for the 15 year period from April 2019 until at least March 2034 and ideally to either 2036 or 2038.

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?

1.2 A 13 or 12 year period on plan adoption does not provide sufficient certainty for housing and economic growth in the short to medium term. With Milton Keynes record of under-delivery resulting from over reliance on large strategic housing sites (see paragraphs 6.2.13-6.2.18 of the SA). The MK:Futures Report (MK/MIS/001) indicates (page 36) that **“we strongly believe that it is in the city’s best interest to promote a higher rate of growth through to 2050 at ‘the continued expansion rate’ somewhere between 1,750 and 2,000 homes per annum.”**

1.3 The current Core Strategy (table 5.2) requires an annual interim annual requirement of 1,750 dwellings (2010-2026) which would increase to 1,766 per annum in Plan:MK (2016 to 2031), this is within the lower section of the range envisaged in MK:Futures. Significant growth is envisaged in the short term to address under delivery against the Core Strategy, it is therefore illogical to then expect delivery to reduce. Given the emphasis in MK:Futures for continuation of growth in Milton Keynes, it is essential that the housing requirement (alongside assessing 5 year supplies) adequately contributes to this objective.

1.4 The current proposed 12 or 13 year plan period upon adoption does not provide sufficient foundation for continuing the growth in delivery to achieve (even at the minimum of 1,750dpa) envisaged to achieve the long term growth aspirations in MK:Futures. This is highlighted by the reduced delivery envisaged in the trajectory submitted alongside the Plan (MK/SUB/004a2). The need to increase housebuilding is also emphasised in the NIC Report

(MK/INFF/004) which concludes (page 3) **“that rates of housebuilding will need to double if the arc is to achieve its economic potential”**.

- 1.5 The current strategy in Plan:MK in only planning to 2031 does not provide sufficient framework to deliver the long term increased housebuilding envisaged by either the NIC of MKFutures 2050.
- 1.6 Although the Council (paragraph 4.6) commits to reviewing the Plan within 5 years, there was also a commitment (Policy CSAD1) within the current Core Strategy (adopted July 2013) to undertake an early review of this document with the aim of adoption in 2015. The current Core Strategy and proposed submission Plan:MK both only had a 13 year life at adoption. The Council’s record of under delivery against the Core Strategy together with the very significant increases in delivery anticipated until 2022 mean that the current strategy presupposes this is achieved. If a longer plan period was proposed, there is greater chance that it can include greater flexibility to address any unforeseen issues, including continued poor delivery from strategic sites.

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 No. There was a commitment in the 2013 Core Strategy as explained in paragraph 1.6 of this statement. However, three years past the deadline, the Local Plan was only submitted for examination, and not adoption as envisaged. This therefore undermines confidence that a review will be undertaken within a specified timeframe.
- 1.8 Furthermore, the over-reliance of large strategic sites with associated under delivery means that the it is essential for the plan to be realistic in delivery.

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?

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?

- 1.9 No, although policy DS2 indicates that “New housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes” (my underlining), the approach of policy DS5 restricts development opportunities outside of development boundaries. Therefore, unallocated sites adjacent to the existing urban area of Milton Keynes would be suitable following DS2, although these are then restricted by DS5. This conflict needs address to ensure that sustainable proposals adjacent to the urban area of Milton Keynes are approved. This is essential given the concerns over housing delivery within the authority.