
Plan:MK Examination

Further Written Statement
submitted on behalf of Gallagher Estates Limited
(ID: 1149194)

**Matter 5: Strategic Site Allocations and Urban Extensions
Issue 2 - Milton Keynes East (MKE) (Policy SD14)**

June 2018

Plan:MK Examination

**Further Written Statement submitted on behalf of
Gallagher Estates Limited**

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Prepared by:	Michael Knott	Michael Knott
Checked by:	Michael Knott	Michael Knott
Authorised by:	Michael Knott	Michael Knott

The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

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1.0 INTRODUCTION

- 1.1 This written statement is submitted on behalf of Gallagher Estates Limited in response to Matter 5 relating to the strategic site allocation, Milton Keynes East (MKE) as set out in Policy SD14 of Plan:MK.
- 1.2 This statement supplements the representations we submitted at the regulation 19 consultation stage on behalf of Gallagher Estates, relating to Land at North Milton Keynes (NMK), an omission site which was considered as an alternative option to the Milton Keynes East (MKE) strategic allocation.
- 1.3 On behalf of Gallagher Estates, we have submitted written statements to Matters 1, 2, 3 and 5.
- 1.4 We look forward to participating in the examination hearings and assisting the Inspector with his assessment of the plan's soundness and legal compliance.

2.0 MAIN MATTER 5: STRATEGIC SITE ALLOCATIONS AND URBAN EXTENSIONS

Issue 2 – Milton Keynes East (MKE)

Q5.5 Based on all the evidence, is the Plan positively prepared in respect of MKE and is the identification of this long term strategic site/direction of growth adequately justified? Are the references to MKE as a long term option post 2031 justified?

- 5.5.1 We have commented on this issue in our written statements for Matters 1 and 2.
- 5.5.2 The allocation of MKE in Policy SD14, with the stated objective of meeting long term needs, potentially beyond the plan period, is not justified. As we have set out in our representations to the Regulation 19 Plan:MK consultation and in our written statements for Matters 1 and 2, the Council's evidence does not provide clear support for this vitally important decision regarding the long-term strategic expansion of Milton Keynes, namely whether to expand to the north, as we are promoting on behalf of Gallagher Estates, or to breach the M1 Motorway.
- 5.5.3 The allocation of MKE in Plan:MK is seemingly, to a large degree, based upon an assertion that this location will be well-related and able to contribute towards the CaMKoX Growth Arc, they say more so than other alternatives including NMK. This position is based upon an unduly simplistic assessment, which appears to have placed very little or no weight on the challenges of creating an integrated new community to the east of the M1 Motorway.
- 5.5.4 Furthermore, given the impact of the M1 Motorway, which both physically, visually and perceptually will separate MKE from the rest of Milton Keynes, we consider that MKE will not contribute towards the positive place making objectives set out in the MK Futures 2050 Report, and as promoted by the NIC, when compared with the opportunities for a high quality, mixed, sustainably integrated direction of growth at NMK.
- 5.5.5 Unlike other allocations in the plan including Eaton Leys and South East Milton Keynes (SEMK) which both will benefit from access to the proposed Expressway and East-West Rail, MKE will be physically divorced from the rest of Milton Keynes and is self-evidently focused upon good access to J14 of the M1 Motorway. This approach in our view will encourage car travel, contrary to paragraph 34 of the NPPF.

5.5.6 As we have set out in our other written statements, the identification of MKE through Plan:MK is not justified. On that basis, the allocation of MKE, either to meet long-term needs as proposed in Policy SD14, or brought forward earlier in the plan period, is an unsound approach.

5.5.7 In order for the plan to be positively prepared, which should include meeting the higher OAN of at least 2,000 dpa (30,000 over the plan period 2016-2031) (see our response to Matter 3), Plan:MK should identify NMK as the strategic direction of travel, as an alternative to MKE.

Q5.6 Is the overall size of the allocation and the quantity of development proposed appropriate? Is the proposed extension of the allocation in the proposed modifications (PM44) necessary for plan soundness? What would this modification mean in terms of site capacity and any delivery within the plan period?

5.6.1 In regard to the delivery of MKE as envisaged in Policy SD14, at best, the site would be brought forward during the plan period (2031) and would deliver a proportion of the overall development. Even on this optimistic basis, given the lack of any certainty regarding the HIF Bid which MKE is dependent upon, the MKE allocation is predicated upon a maximum quantum of development which the Council considers appropriate. The clear implication of this approach is that no further growth east of the M1 would be sustainable in the longer term, a position which is supported by the Council's sustainability appraisal. Otherwise, it is reasonable to presume the Council would have identified a larger long-term direction of growth east of the M1 which, rightly, it has not.

5.6.2 As set out in our response to Matter 1, we are concerned that the Council has failed to properly assess the long-term cumulative impacts of growth east of the M1 Motorway. The MKE allocation will not provide for a higher level of growth associated with the CaMKoX Growth Arc which is anticipated in the future.

5.6.3 We therefore maintain our objections and support the identification of NMK as an alternative, or possibly additional, large scale growth to MKE, alongside the other allocations in the plan.

Q5.7 What is the latest situation on the HIF funding bid in relation to this site? Does this provide a justification for revisiting the development trajectories for this site for both homes and employment? With or without HIF funding is there any certainty that some development could be brought forward at MKE within the plan period?

5.7.1 We note from the Council's response to the Inspector's initial questions (Document INS/1a; Appendix C) that an updated position is due in February 2019, following the next bid which the Council says it anticipates submitting to Government in December 2018.

5.7.2 The lack of any certainty regarding the outcome of the HIF Bid is a fundamental risk to the effectiveness of this proposed allocation. It cannot be regarded as sound in the current circumstances.

5.7.3 If the HIF Bid is unsuccessful, which is a rear possibility, then it is our view that none of the MKE allocation should be brought forward, a position which is consistent with the Council's Sustainability Appraisal.

Q5.8 Noting the proposed modification, are there any other reasonable options for consolidating this strategic option that could expand delivery east of Milton Keynes, including in the short to medium term?

5.8.1 No, for the reasons we have set out in our statements.

5.8.2 Instead, the Council should allocate NMK as the strategic direction of growth which could be brought forward during the plan period including delivery in the short to medium term.

Q5.9 Are the criteria in Policy SD14 justified and effective? Are the infrastructure requirements clearly set out and is it clear what developers are expected to provide to overcome constraints?

5.9.1 Policy SD14 is vague in terms of the quantum of development which is required. We have reviewed the representations submitted by the developer and have noted the options tested by the Council through the sustainability appraisal. The lack of any clarity in this regard is a matter of soundness, notwithstanding our position that the allocation should be deleted in any event.

5.9.2 It is also surprising that for a development of this strategic scale that Policy SD14, or any part of the plan, does not clearly identify the infrastructure requirements which are likely to be required to support development at MKE. The absence of any detail within the plan strongly suggests that the Council has not properly assessed this significant proposal. We do not consider Policy SD14 to be justified or effective.

Q5.10 How will the site connect, particularly by walking, cycling and public transport, to (a) CMK and Newport Pagnell; (b) other strategic employment areas; and (c) potential Expressway corridor?

5.10.1 Please refer to our response to Q5.6 above and our statement for Matter 1.

Q5.15 What will be the impact on the landscape character, biodiversity or any other special interests? Can any potentially adverse impacts be satisfactorily addressed?

5.15.1 The impact, and potential mitigation, has not been properly assessed by the Council as part of Plan:MK's preparation. The Council's sustainability appraisal is unclear in regard to mitigation and also appears to take an inconsistent approach when assessing alternative options including NMK.

5.15.2 The lack of evidence to support the Council's decision on the preferred longer term direction of growth at Milton Keynes is clearly a matter of soundness. In our view, a full and robust comparative appraisal of NMK with MKE, as proposed or a potentially smaller or larger variant, is essential.

Q5.16 Does Policy SD14 provide sufficient content to inform the preparation of a comprehensive development framework as required Policy SD12?

5.16.1 Not in our view, for the reasons set out above. The lack of clarity on Policy SD14 will extend discussions between the developer, the Council, stakeholders and the local community when preparing a development framework. This is based upon our quite relatively experience, on behalf of Gallagher Estates, in supporting the preparation of Strategic Land Allocation (SLA) Development Framework SPD in 2012/13.