

**Matter 5: Strategic Site Allocations and Urban Extensions**

Issue 1 – General approach and principles

**Q5.2** *Overall, has the approach to the allocation of the new strategic housing sites in Policies SD13-15 been based on a clear, robust process of site assessment and informed by sustainability appraisal? Are the reasons for selecting the preferred strategic sites and rejecting others clear and sufficient? Would any inaccuracies in the assessment significantly undermine the overall conclusions??*

- 1.1 The Consortium set out in its representation to the Submission Plan (paragraphs 3.76 to 3.84) that the strategic approach to development is flawed.
- 1.2 In particular, the approach adopted is not based on a clear, robust process of site assessment informed by a sustainability appraisal.
- 1.3 The Consortium’s representations to Draft Plan:MK identified (paragraphs 3.8 to 3.13) that the February 2017 Sustainability Appraisal (SA) rated Site G (the Consortium’s land) better than all other sites assessed. The reasons given at this stage for not allocating the site were that, given the site lies within Central Bedfordshire, more work is needed. It is unclear what further work this refers to, but given that this broad location is allocated for growth within Central Bedfordshire under Policy CS1 ‘Milton Keynes Growth Area’, and the existing Milton Keynes Core Strategy makes a commitment to review development in this location under Policy CSAD1, substantial work should already have been complete in the consideration of this location for growth. Adopted policy CSAD1 states that the Review of the Core Strategy (to be in place in 2015) will be ‘led by the NPPF... and the requirements of the duty to co-operate with adjoining authorities’.
- 1.4 The reasons given for not allocating site G are therefore not clear and sufficient. The reasoning in the February 2017 SA is contradicted by the reasoning given for not allocating site G in the more recent SA of November 2017. This new appraisal deems that ‘Central Bedfordshire Local Plan is seemingly not supportive of cross boundary expansion in this location’, whilst at the same time identifying that Central Bedfordshire had identified a ‘series of linked villages’ that clearly did support development in this location.
- 1.5 The contradictions and inaccuracies in the assessment do not provide a clear and robust justification to inform the site allocations in Plan:MK. Furthermore, if the assessment of the site as the most sustainable location of development had been considered further, in light of the (then) allocation of the site in Central Bedfordshire, there might finally have been a joined-up approach to development on this administrative boundary.
- 1.6 In order to rectify this error, the Council needs to allocate the Hayfield site for development. Because the wider site is no longer allocated in the Submission Central Bedfordshire Local Plan for development prior to 2035 (following the Plan:MK dismissal of the site), wording will be needed to ensure that the site can be brought forwards as part of a wider proposal. The following wording is suggested: -

***Aspley Villages***

*Milton Keynes will work with Central Bedfordshire in order to co-ordinate and deliver this allocation with the potential for wider development in Central Bedfordshire, including: -*

- *A strategic approach to access;*
- *Co-ordination with any wider development proposals;*
- *An integrated approach to SUDs;*
- *Linear parks extended into the allocation where appropriate;*
- *Delivery of new social and community infrastructure a necessary; and*
- *The opportunity for Park and Ride to be considered as part of any wider development.*

Issue 2 – Milton Keynes East (MKE) Policy SD14

- 1.7 The Consortium asserts in conjunction with many others making submissions to Plan:MK that the OAHN is too low, and the Plan period is too short. If the inspector concurs with this assessment, additional sites will be required to accommodate necessary development.
- 1.8 The Consortium believes that, had site assessments been carried out in conjunction with Central Bedfordshire Council, Milton Keynes is likely to have drawn the same conclusions as the South East Regional Plan Panel as set out in the Consortium representations to Draft Plan:MK (paragraphs 2.42 to 2.43), that development in Central Bedfordshire, as part of the 'Aspley Guise' linked villages is a more sustainable location for growth than MKE. This approach was also separately enshrined in Local Plan policies for MK and CB as set out above, to work together to deliver growth in this sustainable location, which has been effectively ignored (although the supporting infrastructure has been delivered, or is underway).
- 1.9 Following allocation of the more sustainable location for development at site G / the Eastern Broad Area, the inclusion of MKE as a contingency site is a potential way to address the identified housing shortfall, once the Hayfield site is allocated. The allocation would be contingent on funding and delivery of a strategic infrastructure. The viability and deliverability of the site therefore needs to be subject to rigorous testing before development could begin.