

Representor ID: RCRP-047

UI Representor ID: 837

UI Representation ID: 893

Representor Name: India Chard

Representor Organisation: Ashberry Strategic Land

Policy: Policy GS2		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
	No	
Paragraph		
Compliance Comment		
<p>As noted in a separate response to policy GS1, Ashberry Strategic Land have a concern that the delivery of housing over the plan period will be compromised by the over-reliance on delivery in Central Milton Keynes, where 16,000 homes are forecast to be built. Ashberry Strategic Land do not consider that the delivery of 16,000 homes, which averages c.650 homes every year, is realistic for several reasons. As with strategic scale growth on the edge of the urban area, the delivery of homes in Central Milton Keynes is not disputed as being sound part of the overall spatial strategy. However, unlike the strategic growth sites, the majority of development in Central Milton Keynes would be on sites that have not been identified in the New City Plan. Given the lack of identified sites, it is unclear how the 16,000 homes can be considered as being deliverable or developable.</p> <p>The analysis in the SHLAA suggests the mass redevelopment of sites in Central Milton Keynes which are in existing use. This includes areas of occupied offices and existing residential areas. There can be no certainty that these areas will be available – particularly on the wholesale basis that would be necessary to achieve the numbers suggested.</p> <p>Even if such sites were available, there is an issue with the viability of the high-density development that would be required to meet the numbers. There are several consented schemes in Central Milton Keynes that have yet to commenced due to the current viability challenges. Whilst there is a prospect of some of these sites becoming viable due to changes in s106 agreements or shifts in the financial market, it is not realistic to expect all permissions to be delivered. Without a fundamental change in the financial climate, as is demonstrated by the current situation, it there can be no certainty that the uplift in delivery rates needed to deliver 16,000 homes in Central Milton Keynes over the plan period can be achieved.</p> <p>Additionally, the viability challenges suggest that the delivery of affordable housing will be affected over the plan period, as lower levels will inevitably be secured in schemes where this can be justified on a case-by-case basis to get sites out of the ground.</p>		

To address this issue, it is considered that the allocation of additional land should be considered to 'top-up the supply of available sites. As set out in response to policy GS1, it would be logical for suitable sites in the rural area to be allocated to not only boost the supply of available housing land but make an important contribution to supporting the vitality of the rural area, which is largely ignored by the New City Plan.

Modification Comment

The level of development attributed to Central Milton Keynes reduced to a realistic level that can be justified as being deliverable, with a supplementary line added for rural growth, equivalent to the capacity of any new site allocations made in the New City Plan

Appear at examination?	Yes
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Appear at examination reason?

To discuss in more detail issues with the assumptions around the deliverability of homes in Central Milton Keynes and the need for an allowance for development in the rural settlements.

Representor ID: RCRP-047

UI Representor ID: 837

UI Representation ID: 893

Representor Name: India Chard

Representor Organisation: Ashberry Strategic Land

Policy: Policy GS1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
	No	
Paragraph		
Compliance Comment		
<p>Ashberry Strategic Land consider that the lack of a strategy for growth in the rural areas of Milton Keynes is an omission from the Plan that needs to be addressed prior to it being capable of being found sound.</p> <p>At a high level, a spatial strategy which focuses the majority of growth on the urban area of Milton Keynes is logical as this is the area with the majority of population, services, facilities and public transport connections, meaning greater opportunities for sustainable development.</p> <p>However, this negates that fact that c 50% of the authority area is rural and contains many villages and market towns. To remain vital, rural settlements need an element of new development to invigorate stagnating populations, helping ensure existing services and facilities benefit from the patronage required to enable them to survive. This is particularly relevant to schools, which suffer from a lack of new families moving into their catchment, which leads to dwindling class sizes potential closures, which can have a major impact on rural communities.</p> <p>A lack of development also impacts on other rural services such as shops and pubs, which are integral to supporting rural communities. These services are particularly important in the case of an aging rural population, which can suffer from isolation due to more limited bus services, meaning it is essential that the Local Plan includes measures to support them.</p> <p>Whilst policy GS1 includes reference to rural growth being delivered via Neighbourhood Plans, in reality very few Neighbourhood Plans, both in in Milton Keynes and elsewhere in the country, choose to allocate housing unless this is to accord with the requirements of a higher order plan – or in some cases in recognition that allocating land for residential development provides a period of protection from speculative planning applications.</p> <p>Ashberry Strategic Land therefore consider that the approach set out in the New City Plan fails to properly recognise the issues faced by rural areas and doesn't do enough to support local communities.</p> <p>The Sustainability Appraisal Report (2025) includes a summary of why smaller allocations are not considered as realistic site options. (paragraph 5.3.20). This reaffirms the expectation that rural growth will be addressed through neighbourhood</p>		

plans – but highlights the challenges in producing such plans due to funding cuts. This reinforces Ashberry Strategic Land's concerns that neighbourhood plans will not be progressed in many rural villages, harming their future vitality.

SA, paragraph 5.3.20 acknowledges that there are suitable sites available in rural settlements, but notes that site selection would be a major exercise. Ashberry Strategic Land do not consider that this is a reason not to allocate sites in the villages. This is particularly the case in the context of the lack of specific sites identified for residential development in Central Milton Keynes (as discussed further below) – an area which forms a major part of New City Plan's land supply.

SA paragraph 5.3.20 goes on to acknowledge that there are clear arguments for rural growth to meet local needs for young people and to generally maintain village vitality, which echoes the points that Ashberry Strategic Land make above. Despite this, the option does not appear to have been given any proper consideration.

Box 5.1 of the SA report sets out a rationale that large scale strategic growth enables an infrastructure first approach to be taken, so that key community amenities and other infrastructure can be provided viably and in a timely way. That may be true in urban areas but that is not a good reason to avoid development in rural areas.

The scale of growth in rural villages would be aligned to the availability of services and facilities available – and would generally support existing services and facilities rather than require new infrastructure to be provided.

National policy seeks to support development in rural areas. NPPF (December 2024). Paragraph 83 sets out that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

NPPF paragraph 110 recognises that 'opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'. Paragraph 110 also refers to 'significant' developments being focused on sustainable locations – rural developments would not be significant.

NPPF (paragraph 88) sets out that planning policies should enable the retention and development of accessible local services and community facilities.

The above policy extracts highlight that there is a clear intention for development in rural areas to be supported in Local Plans, and not ignored as is currently the case in the draft New City Plan.

Whilst Ashberry Strategic Land do not consider that the overall strategy of focusing development on the urban area and within strategic allocations needs to change, what is needed is additional allocations to support rural areas – and make up the shortfall in supply that will inevitably be the case in Central Milton Keynes. If the allocations are not possible, the minimum should be the identification of a number of homes to be delivered in the main rural settlements, including Castlethorpe, which would inform the need for, and scope of a neighbourhood plan.

As noted above, Ashberry Strategic Land note that a significant number of homes (16,000) are expected to be delivered in Central Milton Keynes over the plan period. This matter is addressed in separate comments on policy GS2. However, Ashberry Strategic Land consider that growth in the rural area could help compensate for the likely shortfall in delivery in Central Milton Keynes over the plan period.

Whilst there is a 19% buffer in land supply, this level of contingency is necessary given the reliance on a small number of large strategic sites to meet the Local Housing Need, which makes delivering the expected number of homes each year ultra-sensitive to any delays – which are more commonplace with larger sites.

Modification Comment

Ashberry Strategic Land consider that additional allocations need to be made in rural settlements to support their ongoing vitality and to make up for a likely shortfall in delivery in supply in Central Milton Keynes.

Appear at examination?	Yes
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Appear at examination reason?

To discuss the justification for the need for specific changes to be made to the Spatial Strategy