



DOCUMENT 3

Flitcroft House
114-116 Charing Cross Rd
London WC2H 0JR
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Milton Keynes Cabinet Members,
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

2 October 2017

BY EMAIL

Dear Councillors,

PROPOSED SUBMISSION VERSION OF PLAN:MK

I write to you on behalf of our clients, Wavendon Residential Properties LLP and Merton College Oxford, in advance of Milton Keynes Council's Cabinet Meeting scheduled for tomorrow (3 October). We understand that one of the items of the Agenda (Item 12) relates to the emerging Plan:MK and seeks Cabinet approval to progress to the Proposed Submission version of the document.

Having reviewed the background papers and recommendations from officers relating to this item, we write to urge Members to delay progress on the Plan:MK until further progress is made on the emerging strategies and key infrastructure developments such as the MK Futures 2050 work, East-West Rail and the National Infrastructure Commission's recommendations for the Cambridge-Milton Keynes-Oxford Growth Corridor (which is due to report in Autumn 2017).

This alternative option is presented in Para 3.2 of the Cabinet Report, but is discounted on the grounds of the delay that would ensue, which officers consider to be unacceptable and unnecessary and risking Government intervention. Our clients disagree with this view for the following reasons:

- To proceed with the Plan:MK would be to proceed with a spatial approach that pays little regard to the location and function of critical new transport infrastructure. The Plan:MK should be aligning homes and jobs around this infrastructure and not trying to retrofit this in the future.
- Proceeding with the current draft strategy could result in lasting and irreversible damage to Milton Keynes by creating a system that allows development that predicates key future transport routes both in and out of Milton Keynes
- The allocation of only part of the wider area to the southeast of Milton Keynes (as currently proposed by draft Policy SD13) not only excludes highly sustainable land within the growth area location, but leads to unsustainable development patterns occurring elsewhere that do not offer the same potential to align growth with infrastructure. It cannot properly be said to be the most appropriate strategy for the area and is likely to result in the current draft Plan:MK being found unsound. Our clients and other concerned stakeholders have aptly highlighted why this is the case, in addition to explaining why it is wholly inadequate in terms of Strategic environmental assessment (see attached note from Denton's Solicitors).
- Any delay would be temporary (perhaps 6-9 months) and is an approach that has been favoured by neighbouring authorities (e.g. Aylesbury Vale) in order for them to maximise the benefits of planned new transport infrastructure

- Government intervention is highly unlikely, given the adopted Core Strategy is NPPF compliant having been adopted in 2013. The plan still has 9 years still to run and is therefore not out of date at this stage
- The new standardised methodology for calculating housing need results in negligible change to the planned housing number (i.e. from 1,766 to 1,831 dwellings per annum – only 65 dwellings per annum higher) articulated the draft Plan:MK and significantly underplays the potential of South East Milton Keynes in terms of its potential to accommodate significant growth.
- There is little or no logic in pursuing a new Local Plan if the MK Futures 2050 work is not going to inform it. This study should be a key component of the Local Plan's evidence base.

In summary, to delay would be the most responsible action at this juncture, as it constitutes sensible and sound plan making, a principle for which Milton Keynes has historically been an exemplar. We therefore respectfully urge Members to resolve to pause work on Plan:MK for 12 months or, if earlier, until the appropriate work relating to significant infrastructure projects within the sub-region have been finalised.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'J. Waterhouse'.

James Waterhouse
DIRECTOR