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Plan:MK

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By Email Only

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Dear Mr Cheston

Examination of Plan:MK.

**Inspector's Advice following the Stage 1 Hearings: - Main Modifications
Introduction**

1. During the Stage 1 hearing sessions a number of main modifications were discussed and agreed by the Council. These should now be incorporated into the schedule of draft main modifications previously presented in Document MK/SUB/004. Consequently, this letter relates solely to a small number of critical main modifications which, having reflected on what was discussed in the hearings, and with reference to the written material before me, I now consider necessary for plan soundness.
2. At this stage I am not inviting any comments about the contents of this letter. That said, in outlining them now, I hope to have an informed discussion with the Council at the final session on 30 August on the likely timeframe for the examination going forward, including consultation on proposed main modifications.

Plan Period

3. To justify the Plan period to 2031 there would be a need to commit to a review within a defined timescale. I am persuaded there are particular circumstances relating to the need for coordinated strategic growth in Milton Keynes that would justify this approach. As discussed at the hearings, the Council's commitment to a review of Plan:MK should be formalised in a policy of the Plan as a main modification. The policy should set out the factors that will guide the timing of the review but in any event should commit to submitting a plan document containing strategic policies no later than 2022. Additional supporting text to the policy should contextualise the particular circumstances for the timing of the plan review, including the current plan period to 2031 as well as the developing background for very substantial, aspirational growth along the Cambridge-Oxford Arc.

Objectively Assessed Need (OAN) and housing requirements

4. I have reflected on the written evidence, the discussion at the hearings and the Council's subsequent clarification on the application of the East of England Forecasting Model (EEFM) (Examination document MK/EXAM/013). Based on what is before me, I see no need at this stage to recommend any adjustments to the submitted OAN of 1,766 dwellings per annum for plan soundness. The Council's clarification on the EEFM should accompany the main modifications consultation and I will consider any related submissions before preparing my report.
5. As discussed at the hearings the Strategic Housing Market Assessment (SHMA) considers the accommodation needs of older persons as part of the overall housing requirement. The SHMA advises of an institutional population increase of 1,032 persons over the plan period. The Planning Practice Guidance at paragraph 3-037 states that

housing provided for older people, including residential institutions (Use Class C2), should count against the housing requirement. The SHMA seeks to quantify the 1,032 persons as translating into a need for 1,173 care home bedspaces (allowing for vacancies) and thus amounting to an equivalent 878 dwellings if the C2 provision did not materialise and existing stock were not vacated as assumed.

6. As I interpret it, the SHMA at paragraphs 6.22 and 6.23 advises two options. Firstly, if no specific provision is made to plan for the forecast C2 provision, to include the 878 dwellings assumed to be vacated by such households as part of the housing requirement. At the hearings the Council confirmed the submitted Plan makes no specific provision for C2 accommodation (for example, site allocations or requiring specific provision as part of the strategic sites). There was a verbal indication at the hearings the Council could be minded to include the 878 dwellings as part of the housing requirement.
7. The second option in the SHMA would be to establish a separate target for C2 provision and monitor the supply of bedspaces. The SHMA at paragraph 6.23 advises. "However, if this approach is preferred, it will be necessary to consider the extent to which some older persons assumed to need residential care (and therefore not counted as part of the OAN) may be diverted to Extra Care housing, and therefore should be counted as part of the housing requirement."
8. One of the action points from the Stage 1 hearings requires the Council to clarify its position on older person accommodation and the 878 figure. To assist on this point, having reflected further on the evidence before me, I would recommend the Council includes a separate target for C2 provision (some 1200 bedspaces) within Policy DS2 which is then cross-referred to in Policy HN3 and for this to be reflected in the monitoring framework of the Plan. Having made this modification it would be a matter for the Council to consider whether any further adjustment to the housing requirement would be necessary for older persons accommodation. This may well be discussed further when we examine development management policies (including the HN policies) at the forthcoming Stage 2 hearings.

Housing Land Supply

9. I am satisfied that the Council's trajectory for delivery is broadly justified. The only exception is South East Milton Keynes where, notwithstanding the Council's positive approach to delivery, the timetable needs to be put back by one year so that initial completions would be in 2023/24. It would be a matter for the Council to consider the re-profiling of delivery at this strategic site over the plan period, including the 450 units projected to be delivered in the year 2030/31. Nonetheless, some 50 units should not be counted in the year 2022/23 for the purposes of deliverable supply. The relevant documents will need to be updated.

Primary Shopping Area

10. The proposed Primary Shopping Area (PSA) in the City Centre would not be justified or consistent with national policy. It should be revised to reflect the existing PSA in the adopted Core Strategy and this would need to be a main modification. The full reasoning will be set out in my report.

Consideration of potential main modifications

11. The views I have expressed in the hearing sessions and in this letter on potential main modifications and related policies map changes are based on the evidence before me, including the discussion that took place at the Stage 1 hearing sessions. However, my final conclusions on soundness and legal compliance will be provided in the report which I will produce after the consultation on the potential main modifications has been

completed. In reaching my conclusions, I will take into account any representations made in response to the consultation. Consequently, the views I expressed during the hearing sessions and in this letter about soundness and the potential main modifications which may be necessary to achieve a sound plan could alter following the consultation process.

12. If you require any clarification on the contents of this letter, please contact me through the Programme Officer.

Yours sincerely

David Spencer

Inspector.