



Report

Milton Keynes Council

LDF client support

25 October 2009

POS Enterprises Ltd is the operational arm of the Planning Officers Society.

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Milton Keynes Council: Concise report on draft Core Strategy pre-submission document.

1 Introduction

Milton Keynes Council invited POS Enterprises (POSe) to act as a 'critical friend' in an appraisal of its draft Core Strategy submission document. The 'critical friend' role in this instance is set out fully in the POSe proposal sent to the authority's Chief Spatial Planner on 23rd September 2009. The Council requested a wider brief than many of our clients, it covers:

- *An assessment of how the work undertaken to date stands against the tests of soundness;*
- *Observations on the clarity and internal consistency of the document in planning policy terms and its readability as Plain English;*
- *Recommendations on actions considered necessary to deal with any areas of weakness or where clarification is desirable; and*
- *Advice on approaches to the finalisation of the publication core strategy which are considered important in making it likely that it they be found to be sound.*

2 Background

In view of the Council's tight timetable for publication of the Core Strategy submission document, the POSe consultant, Stephen Olivant, undertook a strategic review of a limited range of earlier LDF documents and evidence reports. This was helped considerably by reference to the note written by a PINS Inspector after his advisory visit to the authority in July 2009. The research helped the consultant to form an 'outsider' view of the spatial planning issues that face the Borough.

A Core Strategy workshop was held at the authority's offices on 13th October. The participants were Ian Haynes the Chief Spatial Planner, Bob Wilson the Development Plans Manager, members of the development plans team, a representative of the legal team, and the POSe consultant. The all-day event was very helpful because it enabled Stephen Olivant and the officers to:

- *Develop a wider appreciation of the local and regional context for the Core Strategy, the Council's approach and the work undertaken to date;*
- *Explore the significance of particular issues and decisions at previous stages of Core Strategy preparation;*
- *Agree on the likely effectiveness of the authority's approach and practical pointers by POSe towards preparing a sound plan; and*
- *Provide POSe with the opportunity to make specific suggestions on what needs to be done by Council staff prior to submission.*

3 Report

This concise report follows shortly after the workshop, so it does not rehearse the specific advice given by the POSe consultant to Council staff at the event. Instead it contains essential summary information for the authority as it moves quickly towards publication of the submission document. To meet the Council's requirement for POSe to advise upon the clarity, consistency and readability of the draft submission document, a marked-up edited version is an appendix to this report.

4 Overview

The scale and complexity of development covered in the Milton Keynes Core Strategy dwarfs most other local development frameworks in the country. The development plans staff are commended for their impressive progress in preparing this plan. The PINS advisory visit in July revealed no significant flaws in the soundness of the plan's preparation and this was confirmed in the strategic research by the POSe consultant.

However, there is more work to be done by the authority. It was recommended by POSe at the workshop that, prior to publication of the submission document; development plans staff and a legal officer should undertake the recommended self-assessment tests to ensure soundness and compliance with government guidance, double-check that the planned delivery of development and infrastructure can be substantiated, and carry out rigorous editing of the submission document.

5 Evidence base

The short timetable for this review did not allow an exhaustive examination of the weighty evidence base that lies behind the Core Strategy. Therefore, at the workshop the POSe consultant recommended key actions for the officers at this late stage in plan preparation:

- The Development Plans team would benefit considerably at the Examination by starting now to build up an 'audit trail' of key evidence, linking how evidence was fed into the Sustainability Appraisal and used at the earlier stages of plan preparation (Issues & Options and Preferred Options) and to produce the submission document.
- The nature and scale of new development in the Core Strategy is likely to lead the Inspector and other parties at the Examination to probe deeply to check that the Council

(with its neighbouring local authorities and key infrastructure and services providers) will be able to deliver the planned major development on time with the necessary physical infrastructure and social facilities. So the level of commitment to the plan by key partner organisations should be double-checked.

- The Local Development Scheme can be regarded as part of the evidence base for the Core Strategy. The Council should be confident that the important 'delivery' matters that have been delegated by the Core Strategy to lower-level DPDs and SPDs (such as masterplans and developer contribution mechanisms) will be produced at a rate that keeps ahead of the timetable for major developments.

6 Submission document

A strategic review of the Council's earlier core strategy documents supplied to the POSe consultant led him to conclude there were no significant problems of 'unsoundness' in the plan preparation process, or in the draft submission document. Considering the breadth and complexity of the spatial planning issues in the Borough, the submission document is a creditable effort, but it requires rigorous editing for the following reasons:

- It needs to be more coherent and consistent in its role as the principal spatial strategy of the Council;
- It should be more user-friendly for development management (it has to stand up to day-to-day interpretation by planning staff, councillors, applicants and other parties concerned with planning applications, infrastructure provision, planning appeals etc);
- It should be understandable for non-technical readers who may not have an intimate knowledge of the Borough, or some of the abbreviations by the authority; and
- The text and policies relating to the delivery and implementation of major projects and infrastructure should be strengthened to give greater certainty to the development industry and many other bodies involved.

It is likely that, even after the suggested editing, the Government Office and PINS may still consider the plan is too wordy. However, document length is not a criterion for soundness and it is evident that the councillors will be more comfortable with a fully descriptive and comprehensive Core Strategy.

7 Further action

A marked-up edited version of the draft submission document has been supplied separately to officers as an appendix to this report. It recommends a considerable amount of editing and POSe is aware that it will put pressure on the development plans team to complete it in time for the Cabinet meeting on 24th November.

POSe would be pleased to respond if the planning officers or councillors require more explanation or further assistance.

Stephen Olivant for POS Enterprises