



For and on behalf of
Central Milton Keynes Town Council

EXAMINATION OF MILTON KEYNES CITY PLAN 2050 MATTER 4 HEARING STATEMENT

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1.0 INTRODUCTION

- 1.1 This response to Matter 4 of the Inspector's MIQs in respect of the Milton Keynes City Plan 2050 has been prepared by DLP Planning Limited on behalf of Central Milton Keynes Town Council. This statement builds upon the objections raised previously in our response to the Regulation 19 consultation and our other submitted hearing statements. We have only responded to those questions that are relevant to our previous objections.
- 1.2 This examination is being conducted under the transitional arrangements of the NPPF 2024 and so all references to the NPPF relate to the 2024 version rather than the 2026 version.
- 1.3 DLP Planning has also requested to appear at the Examination on behalf of Central Milton Keynes Town Council.

2.0 THE SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

Issue

Whether the Spatial Strategy and distribution of development are positively prepared, justified, effective and consistent with national planning policy.

Questions

Q4.1. Is the spatial distribution of development across the borough justified and what factors influenced the Spatial Strategy, for example physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?

- 2.1 The spatial distribution of development is not considered to be justified or effective as currently proposed. The concern is not that Central Milton Keynes ("CMK") is an inappropriate location for growth in principle *per se*. Rather, the Plan proposes a substantial concentration of development in CMK without sufficiently demonstrating that the transport, parking, servicing and wider infrastructure capacity required to support this quantum of development is available and deliverable and whether the proposed development types within CMK conflict with each other.
- 2.2 Paragraph 20 of the NPPF 2024 states that strategic policies should make sufficient provision for homes, employment, retail, leisure and other commercial development, as well as community facilities such as health, education and cultural infrastructure. Chapter 7 addresses the need to ensure the vitality of town centres and sets out the requirement for planning policies to support the role that town centres play at the heart of local communities. This includes allowing town centres to grow in a way that can respond to rapid changes in the retail and leisure industries and allowing a mix of uses (Paragraph 90). Importantly, Paragraph 90d states that meeting the anticipated needs for retail, leisure, office and other main town centre uses should not be compromised by limited site availability. Annex 2: Glossary confirms that residential development is not a main town centre use.
- 2.3 It is clear from national policy that the role of CMK as the town centre must be protected and supported. Residential development must therefore be planned alongside, rather than at the expense of, sufficient capacity for existing and future office, retail, leisure, cultural and other town centre uses. At the same time, a substantial residential population requires to access to day-to-day facilities and social infrastructure, including healthcare, education, open space and food provision. In summary, the Plan needs to demonstrate how CMK can function successfully as the town centre without residential development and associated uses undermining its role.
- 2.4 The Plan proposes approximately 16,000 homes within CMK and Campbell Park, which would represent a more than seven times increase in the current number of households (2,470), alongside significant employment, education, retail, leisure and cultural development. The Plan identifies CMK as a key location for intensification and seeks to make more intensive use of previously developed land, including existing surface-level car parking. However, the evidence base does not adequately demonstrate that existing infrastructure has sufficient capacity to accommodate this level of growth, nor does it fully take into account the implications of releasing land that currently performs important transport and servicing functions.
- 2.5 The proposed intensification of CMK will place additional demands on the highway network and existing parking and servicing arrangements. This is particularly important because the

Plan proposes development on areas of existing surface-level car parking such as the area between North Row and Portway and between South Row and Childs Way, as well as other areas.

- 2.6 These areas currently contribute to the operation and accessibility of existing development through parking, access and servicing. Their loss could therefore increase pressure on the wider highway and parking network and affect the ability of existing and proposed uses to operate effectively. The evidence should consider parking capacity at a sufficiently local level, including the relationship between individual developments and blocks. There is currently insufficient evidence demonstrating how the loss of service roads and access arrangements would be replaced.
- 2.7 The Spatial Strategy is also dependent upon the delivery of significant transport infrastructure, particularly the proposed Mass Rapid Transit (MRT) system. The Plan states that growth should be aligned with the establishment of the MRT and identifies the Midsummer Boulevard Greenway as the key route for the MRT through CMK. In order to establish the route, access would need to be created through Midsummer Place in accordance with the Walkway Agreement. This includes a 20-metre strip on the centre line of Midsummer Boulevard for 80 years from the grant of permission for a potential public transport system.
- 2.8 However, there is currently no secured funding or confirmed delivery mechanism for the MRT, and its viability, timing and implementation remain wholly uncertain. In these circumstances, it cannot be relied upon as a committed infrastructure intervention capable of supporting the proposed level of intensification.
- 2.9 This is particularly significant because the Plan proposes development on existing parking and other transport-related land while relying on future public transport infrastructure to facilitate modal shift. If the MRT is delayed or does not come forward as anticipated, the additional development could place greater pressure on the existing highway and parking networks.
- 2.10 There are additional infrastructure capacity constraints relating to health and education provision. At present, there are no early years, primary, secondary or SEND facilities at all operating for the 2,470 households situated within the area. All of the identified provision for early years, primary, secondary and SEND is proposed to be delivered in Phases 2 and 3 of the Plan. This means there will be no provision until at least 2032 to meet the needs of potentially hundreds of additional school-age students. Furthermore, there are no GPs located within CMK. This raises a fundamental question as to the extent to which existing and future infrastructure capacity has informed the Spatial Strategy and the scale of development directed to CMK.
- 2.11 Overall, the proposed spatial distribution, and particularly the scale of development directed to CMK, is not considered to be sufficiently justified. Whilst CMK is an appropriate location for growth in principle, the Plan has not adequately demonstrated (as required by national policy) that the scale and type of development proposed can be accommodated whilst maintaining its primary role as a town centre and providing sufficient capacity for existing and future town centre uses. It has not demonstrated that the necessary highway, parking, servicing, health, education and other supporting infrastructure is available, or can be delivered in line with development.
- 2.12 The concerns are compounded by the loss of existing parking and servicing land, the uncertainty surrounding the funding and delivery of the MRT and the lack of planned

education provision in the early phases of the Plan despite the scale of residential growth proposed. This leads us to question the extent to which infrastructure capacity and delivery has informed the Spatial Strategy. In these circumstances, the proposed scale of development has not been shown to be supported by a robust evidence base or deliverable infrastructure and so it is not justified. Further evidence is required to demonstrate how the proposed scale of residential development can be accommodated, phased and supported without undermining CMK's town centre function or placing pressure on existing infrastructure.

Q4.2. What alternative options for the spatial strategy were considered?

- 2.13 The Sustainability Appraisal (SA) (CD12) considered a range of reasonable alternatives for the spatial strategy through alternative growth scenarios. These were intended to represent different packages of growth locations, rather than individual site options. The SA explains that this approach reflects the purpose of a Local Plan, which is to establish a spatial strategy and allocate a package of sites to meet development needs.
- 2.14 The Plan's approach is based on a substantial level of growth being accommodated within the existing built-up area of Milton Keynes, alongside a number of Strategic City Extensions. The Plan identifies approximately 20,500 homes within the existing built-up area, with a particularly significant role for Central Milton Keynes (CMK), together with growth at Central Bletchley and other locations. The Plan states that directing growth within the existing city will assist with climate change objectives and sustainable transport, including by aligning growth with the proposed MRT system.
- 2.15 The SA alternatives principally varied the greenfield strategic allocations, rather than testing fundamentally different levels of intensification within CMK. The SA considered six growth scenarios with Scenario 5 selected as the Preferred Option (PO):
- Scenario 1: PO excluding South Bow Brickhill, Levante Gate, and Shenley Dens
 - Scenario 2: PO excluding East Wavendon
 - Scenario 3: PO excluding South Bow Brickhill, Levante Gate, and Shenley Dens including West Olney
 - Scenario 4: PO excluding East Wavendon including West Olney
 - Scenario 5: PO (Eastern Strategic City Extension, East of Wavendon, South Bow Brickhill, Levante Gate and Shenley Dens)
 - Scenario 6: PO including West Olney
- 2.16 Therefore, the plan is unsound because this high residential growth scenario has not been adequately tested, and the quantum of greenfield growth is consequently not based on solid assumptions. Paragraph 33 of the NPPF requires plans to be informed throughout their preparation by the SA process and, wherever possible, alternative options which reduce or eliminate significant adverse impacts to be pursued. Fundamentally, it is not known to any degree of certainty whether 16,000 homes can be delivered within CMK without considering the other uses required of a town centre and infrastructure requirements.

Q4.3. Why was the submitted approach chosen and is it an appropriate strategy having regard to reasonable alternatives?

- 2.17 The Council's preferred approach was selected following consideration of the growth options

through the Sustainability Appraisal. The Plan states that the strategy seeks to maximise growth in the most sustainable locations, with around 20,500 homes within the existing built-up area (including CMK), alongside five Strategic City Extensions. The approach is intended to support sustainable transport, reduce carbon emissions, maximise affordable housing delivery and provide for the Council's identified housing needs. This reflects the NPPF's emphasis on positively prepared plans (Paragraph 36a) and the aims of Chapter 5, 9 and 14.

- 2.18 Scenario 5 was identified as the Preferred Option within the SA. The Council therefore considers the submitted strategy to represent the most appropriate balance between meeting housing and growth requirements and the environmental, infrastructure and sustainability considerations identified throughout the appraisal.
- 2.19 However, whether the submitted strategy is appropriate having regard to the reasonable alternatives depends not only on the comparative performance of the six scenarios, but also on whether the underlying assumptions supporting the preferred strategy are justified and deliverable.
- 2.20 In particular, the alternatives primarily tested different combinations of strategic greenfield allocations. They did not test a different level of intensification within CMK. The choice of Scenario 5 therefore does not, in itself, demonstrate that the proposed scale of CMK intensification is the most appropriate distribution of growth, particularly given the reliance on future transport infrastructure and the need to demonstrate sufficient highway, parking, servicing and wider infrastructure capacity. Paragraph 33 of the NPPF is also relevant here, which requires the SA to consider alternative options which could reduce or eliminate significant adverse impacts.
- 2.21 It is not understood why a different level of intensification within CMK was not tested in the SA when the SHLAA 2025 considers a range of growth scenario based on varied densities on Rows and Gates as shown below. These scenarios demonstrate that CMK has a range of potential capacities depending on the density and land-use assumptions applied, ranging from 13,681 to 18,550 dwellings. There is no reason why a level of growth lower than 16,000 dwellings would render the Plan unsound and so a scenario involving a lower level of CMK intensification should therefore have been tested, with the resulting homes distributed to other sustainable locations rather than treating the 16,000 figure as a fixed assumption underlying the preferred strategy.

	Total Capacity
Density Scenario 1 - Reg 18 Policy & Growth Study Densities	18,550
Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph	16,115
Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph	15,726
Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential	15,166
Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph	13,681

- 2.22 Testing a lower level of CMK intensification through the SA would have allowed the Council to properly assess the relative sustainability, infrastructure and deliverability implications of concentrating 16,000 homes in CMK compared with distributing a greater proportion of growth to other suitable locations. A lower level of growth than 16,000 homes specifically would not undermine the Plan's ability to meet its overall housing requirements. The failure to test this reasonable alternative is inconsistent with the requirement in Paragraph 33 that the SA should pursue, wherever possible, alternatives which reduce or eliminate significant adverse impacts. The failure to test this reasonable alternative means that the SA does not demonstrate that the scale of growth proposed in CMK represents the most appropriate strategy, and further justification is therefore required.

Q4.4. How has the settlement hierarchy been derived? Is it justified and supported by evidence?

- 2.23 The settlement hierarchy is established through Policy GS1 of the MK City Plan 2050. It identifies two tiers: Tier 1 – the City of Milton Keynes, where the majority of development to meet identified needs will be provided, and Tier 2 – Olney and the villages beyond the City, where development should focus on meeting local needs, including through relevant Neighbourhood Plans.
- 2.24 The hierarchy reflects the Council's spatial strategy of directing the majority of growth towards the City of Milton Keynes, whilst protecting the character of rural settlements and allowing those communities to identify appropriate local growth. The Plan considers the City to be the most sustainable location for growth, with opportunities to maximise the use of previously developed land and support sustainable transport.
- 2.25 The hierarchy is therefore closely linked to the wider evidence base underpinning the Spatial Strategy, including the assessment of housing and employment needs, the availability of land, sustainability appraisal, transport considerations and infrastructure planning. The Plan states that its growth strategy has been tested through its evidence base and is supported by the Sustainability Appraisal and Infrastructure Delivery Plan (IDP).
- 2.26 The approach is broadly justified in principle as it directs strategic growth to the City's existing urban area and limits strategic development in rural settlements. However, the justification for the hierarchy is dependent upon the evidence demonstrating that the City can accommodate the scale of development directed to it, including the associated transport and infrastructure requirements. In particular, the hierarchy's preference for the City should not be taken to demonstrate, in itself, that all of the proposed urban capacity is available or deliverable.
- 2.27 The two-tier hierarchy is clear and supported by the Plan's stated objectives and evidence base, but the extent to which it concentrates growth within the City is not justified given the lack of evidence surrounding the MRT and parking, as outlined in our response to Q4.1. The Policy therefore does not adhere to the principles of sustainability development as set out in the NPPF and it fails to reference the infrastructure requirements. As such, it is not consistent with Paragraphs 109 and 111 of the NPPF.

Q4.5. Is there evidence of the need for any phasing of strategic allocations having regard to infrastructure improvements?

- 2.28 Yes. The Plan's evidence identifies infrastructure capacity and delivery constraints which support the need for development to be phased alongside infrastructure improvements. This includes highways, education, healthcare and community infrastructure.
- 2.29 The issue is particularly evident in CMK, which should effectively be treated as a city-centre-wide strategic allocation, given the scale of growth proposed. For example, the IDP identifies a need for 3,232 early-years places, 12 forms of entry of primary school provision, 12 forms of entry of secondary school provision and 100 SEND places to support the proposed growth. However, much of this infrastructure is identified for delivery in Phases 2 and 3 from 2032 onwards, while around 3,232 dwellings are proposed to be delivered between 2024 and 2030. This indicates a potential mismatch between the timing of housing delivery and the provision of infrastructure required to support the growing population.
- 2.30 There is also a specific need for phasing in CMK having regard to the proposed MRT. The Plan's strategy relies on the MRT to support the level of intensification proposed, while development of areas such as the Rows and Gates could affect existing parking, access and servicing arrangements. Development should therefore be phased to ensure that the necessary transport infrastructure is secured and delivered before development which depends upon it, rather than assuming that the MRT will be delivered at a later date.
- 2.31 The Plan should therefore establish a clear and consistent compliance, masterplanning and phasing framework for CMK as a whole which should require individual proposals to demonstrate how they contribute to the wider CMK strategy. It should also include a clear compliance test to ensure that individual schemes do not result in an imbalance of uses across CMK, particularly through the cumulative delivery of residential development at the expense of town centre uses including employment, retail and leisure. This would result in the Plan being inconsistent with Paragraph 90 of the NPPF and Chapter 7.
- 2.32 The evidence therefore supports an infrastructure-led approach to phasing in line with the Plan's 'infrastructure first' approach and NPPF Paragraph 109, ensuring through clear phasing triggers that critical infrastructure is delivered before or alongside development.

Q4.6. How has the amount of development in each location been derived?

- 2.33 The amount of development proposed in each location has principally been derived through the 2025 Strategic Housing Land Availability Assessment (SHLAA). The SHLAA identifies potential development sites and assesses their capacity having regard to site size, existing and proposed land uses, planning status, indicative densities and deliverability.
- 2.34 The approach varies between locations to reflect their different characteristics. In Central Milton Keynes (CMK), for example, the 2025 SHLAA identifies specific sites and applies indicative residential densities to calculate capacity. These assumptions are informed in part by recently permitted and delivered schemes, with alternative scenarios testing the effect of different densities and assumptions about the amount of land that may come forward for residential development.

Q4.7. Does the spatial strategy provide sufficient clarity on housing numbers for those preparing or updating Neighbourhood Plans in the area?

No Response

Q4.8. Does the plan's Spatial Strategy strike an appropriate balance between the identification of land for new homes and employment? Will there be sufficient jobs to meet the population growth associated with the housing proposed?

- 2.35 No. Whilst the Plan makes provision for substantial employment growth alongside new housing, it has not demonstrated that the proposed spatial distribution achieves an appropriate balance between the two, particularly within Central Milton Keynes (CMK), which is required by Paragraph 90 of the NPPF. The Plan proposes approximately 16,000 homes within CMK and Campbell Park, alongside significant employment, retail, leisure and cultural development in line with its role of the principal town centre. CMK is also expected to accommodate around 26,900 additional jobs during the Plan period.
- 2.36 The Plan proposes different roles for the CMK quarters, including significant residential development alongside the continued concentration of employment uses. However, it is not sufficiently clear how the proposed residential intensification will interact with and support existing and future employment uses, or how potential conflicts between residential and employment uses will be managed.
- 2.37 There is also a risk that the scale and form of residential development could displace the town centre uses that help make CMK a genuinely mixed-use centre. The lack of ground floor leisure, retail and cultural units proposed as part of residential developments furthers this risk.
- 2.38 This would have wider implications for commuting and the relationship between homes and jobs. If residents are increasingly living in CMK but the town centre no longer provides a sufficient range of leisure, retail, cultural and other services, whilst employment opportunities remain concentrated elsewhere or fail to keep pace with population growth, a greater proportion of the resident population may need to commute out of CMK for work and other activities. This risks creating an 'out-commuting' town centre, where CMK effectively becomes a residential suburb in its own right rather than a sustainable mixed-use centre. This is inconsistent with Chapter 7 of the NPPF on ensuring the vitality of town centres.
- 2.39 Whilst 80% of forecast future office and research and development floorspace is expected to be located in CMK, access is a particular concern. The Plan proposes development on existing areas of surface-level parking and changes to the existing road and servicing arrangements, whilst relying on future investment in sustainable transport, including the proposed MRT. There is currently insufficient certainty regarding the funding, timing and delivery of the MRT to demonstrate that it will provide an effective alternative to the parking and access arrangements that would be lost. If development proceeds ahead of or without the delivery of the MRT this could place additional pressure on the highway network and affect accessibility for employees, businesses and visitors to CMK. This could further weaken CMK's role as a sustainable centre.
- 2.40 We therefore propose a Main Modification introducing a clear and consistent compliance test for development proposals within CMK, requiring them to demonstrate that they will contribute to maintaining an appropriate balance of residential, employment, retail, leisure, cultural and other town centre uses across the quarter and CMK as a whole. This should

operate alongside a coordinated masterplanning and phasing framework so that the cumulative impact of individual schemes is considered and residential development does not come forward at the expense of employment and town centre uses. This would provide greater certainty that the Spatial Strategy will deliver a mixed centre which is consistent with national policy.

Q4.9. Is the Plan sufficiently clear how the requirements for strategic logistics and distribution will be addressed? Is the plan positively prepared as a result?

No Response

Q4.10. Is the Plan's overall strategy for the rural area sufficiently clear? Is it justified and will it be effective?

No Response

Q4.11. How will the Plan respond to any cumulative effects arising from the Universal Studios UK Resort which has been approved via a Special Development Order?

No Response

Q4.12. How would the Plan respond to the proposed new town within the Milton Keynes administrative area?

No Response

Q4.13. Taking into account the Council's response to question 1 of our Initial Questions (MKC1), how has the Plan's overall strategy taken into account any cumulative effects on the Strategic Highway Network? Is this justified and will it be effective?

- 2.41 The Plan has not yet demonstrated that the cumulative effects of its proposed growth on the Strategic Highway Network have been adequately assessed. This directly conflicts with Paragraph 109 of the NPPF which states that transport issues should be considered from the earliest stages of plan-making. The Council's response to MKC1 confirms that further transport modelling is being commissioned to update the MK Multi-Modal Model, test highway interventions and assess the effects of the Universal UK Resort consent. The indicative programme is for the modelling outputs to be published in January 2027.
- 2.42 This further work is particularly important given the scale and distribution of growth proposed across the Plan area and the potential cumulative effects on strategic routes, including the A5 corridor and M1 Junction 14. There is already an active indication of the pressure that development may place on the strategic network. The current application for Campbell Park Northside has attracted a National Highways holding objection in relation to the impact on M1 Junction 14 and the A5 Portway Roundabout, whilst the proposals also include a reduction in the number of lanes. This demonstrates that the relationship between the scale of development and available highway capacity is already a current issue for CMK in

particular.

- 2.43 The Council's intention to undertake further modelling is noted, but the necessary evidence is not currently available in line with the NPPF to demonstrate that the Plan's overall strategy can be accommodated without unacceptable cumulative effects on the Strategic Highway Network. The National Highways holding objection to the Campbell Park Northside proposals reinforces the need for the cumulative impacts of the Plan's proposed growth to be properly understood, including the implications of reducing the number of lanes at the M1 Junction 14 and the A5 Portway Roundabout. Until this work has been completed, it has not been demonstrated that the Strategic Highway Network has sufficient capacity to accommodate the proposed level of growth or that the necessary mitigation can be delivered. The approach is therefore not currently justified or effective.

Q4.14. Noting the Council's response to Question 2 of our Initial Questions (Document MKC1), what certainty is there that the Metro (mass rapid transit) will be delivered and what are the implications for the plan if the Metro is not delivered or is delayed?

- 2.44 There is currently insufficient certainty that the proposed MRT system will be delivered in the form and timescale required to support the Plan's Spatial Strategy. The Council's response to MKC1 confirms that the MRT is currently at Outline Business Case stage and has been costed, but does not identify secured funding, a confirmed delivery programme or a mechanism that would ensure its delivery in step with the development proposed in CMK. This is not consistent with Paragraph 109 of the NPPF which states that transport issues should be considered from the earliest stages of plan-making.
- 2.45 This creates a particular concern because the Plan proposes development on existing surface-level parking and other areas which currently perform important access and servicing functions, while relying on the MRT to support sustainable movement and modal shift. There is no clear trigger requiring the MRT to be delivered before these parking areas can be developed. Even if the MRT is ultimately delivered to the anticipated timelines, development and the loss of existing parking and transport infrastructure is happening now and in the near future in advance of the MRT delivery. For example, application 24/00036/FUL at Milton Keynes Theatre involving the demolition of the existing multi-storey car park and the construction of a 285-unit build-to-rent residential development was permitted in 2025.
- 2.46 Therefore, even if the MRT is delivered, for which it is not certain, there are potentially significant consequences. CMK would have to accommodate the additional trips generated by the proposed development through the existing highway, parking and public transport networks, at a time when existing parking and servicing capacity is also being reduced. Given the scale of growth proposed in CMK and the Council's own acknowledgement that transport infrastructure requirements remain subject to further assessment and potential re-categorisation, the Plan has not demonstrated that its strategy would remain effective in the absence of timely MRT delivery, or even if delivery occurs in line with anticipated timescales. The Plan is therefore not consistent with Paragraph 109c of the NPPF which requires the potential impacts of development on transport networks to be understood and addressed.
- 2.47 The strategy should therefore provide greater certainty that development, including that planned on surface-level parking, will be appropriately phased against the delivery of the MRT and other necessary transport infrastructure. There also needs to be a clear strategy on how the servicing which is currently under the surface car parking will be re-provided.

Q4.15. Are the proposed metro corridors justified and evidence based?

- 2.48 The proposed Metro corridors are supported by the Council's transport evidence base and the 2025 SHLAA. The SHLAA assesses housing potential within the Metro corridors using higher-density assumptions. However, it makes clear that the resulting capacity is indicative and that further site-specific assessment is required to establish actual deliverable capacity.
- 2.49 It is therefore not clear from the published evidence how the specific 2,500-home figure in Policy GS2 has been derived, including how individual site capacities, constraints, availability and deliverability have been taken into account.
- 2.50 Paragraph 111c of the NPPF outlines the requirement for Plans to identify and protect sites and routes which could be critical in development infrastructure to widen transport choice, however, it requires robust evidence to be in place to support this. The Council should therefore provide the site-level evidence and calculation supporting the 2,500 homes and demonstrate that this capacity is realistic and deliverable.

Q4.16. Does the plan provide sufficient detail on the future Mass Rapid Transport network? Will it be effective in safeguarding the metro corridors?

- 2.51 No. Whilst the Plan identifies the proposed Mass Rapid Transport (MRT) as a key component of its transport strategy and identifies the broad route through CMK, there is insufficient detail and certainty regarding the network to demonstrate how it will operate and support the scale of development proposed. In particular, the Plan does not provide sufficient certainty regarding the route, phasing, delivery programme, funding and infrastructure requirements associated with the MRT. This is not consistent with Paragraph 109 of the NPPF which requires transport issues to be considered from the earliest stages of plan-making.
- 2.52 This is significant because the Spatial Strategy relies upon the MRT to support the substantial growth proposed in CMK and to facilitate a shift towards sustainable modes of transport. The Council's response to MKC1 confirms that the MRT remains at Outline Business Case stage and does not identify secured funding or a confirmed delivery programme. The Council is also undertaking further transport modelling, meaning that the transport infrastructure requirements associated with the Plan remain subject to further assessment.
- 2.53 The Plan therefore identifies the MRT as an important part of the future transport strategy without providing sufficient certainty that the network will be delivered, when it will be delivered, or how it will accommodate the development proposed. This is particularly problematic where development is proposed on existing parking and transport-related land in CMK in advance of the MRT. The Plan should provide greater detail and certainty on the MRT network and its delivery before relying upon it as a key component of the Spatial Strategy.

Q4.17. Are the settlement boundaries as defined by Policy GS6 justified and based on proportionate evidence?

No Response

Q4.18. Should Policy GS6 allow a greater range of development types within the Open Countryside?

No Response

Q4.19. Are the references to other policies in the plan in paragraph 3 of Policy GS6 correct, comprehensive and effective? Are there any other policies which should be referred to?

No Response

Q4.20. There are a small number of settlements which do not have a settlement boundary. Given that paragraph 125 of the Framework gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, is the policy's restriction on development in these settlements consistent with national planning policy?

No Response

Q4.21. Is the requirement in Policy GS6 for new development in the Open Countryside to maintain openness justified and consistent with national planning policy?

No Response

Q4.22. Are the requirements for replacement dwellings with regard to size and quality as set out in paragraph 7 of Policy GS6 justified and consistent with national planning policy?

No Response

Q4.23. Are the Council's suggested modifications to the policy as set out in Document CD28 necessary for soundness?

No Response

Q4.24. Is Policy GS9 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

a) Are the distance and density thresholds in GS9(B) justified? Will they be effective?

No Response

b) Are the interchange hubs clearly identified? Are they justified and supported by clear evidence?

No Response

Q4.25. Is Policy GS11 justified? Will it be effective? Does it accord with paragraph 17 of the Framework insofar as it is a policy for the development and use of land in its area?

No Response

Q4.26. Is Policy GS11 necessary for soundness?

No Response

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