

Response by Milton Keynes Partnership on Matter 10: Session on Implementation and Monitoring

Questions and Comments on Sub-matter 10 A - Implementation

Introduction

Milton Keynes Partnership welcomes the revised Draft Implementation Plan (DIP) as a recognition that it is an integral element of the RSS. With the Spatial Strategy and Monitoring Framework it forms a key part of the plan, implement, monitor and review cycle which is required at regional, sub-regional and district level to ensure that there is a pro-active, flexible and responsive process to deliver the RSS.

10A.1 Do the proposed implementation mechanisms and delivery agencies in draft RSS, as supplemented by the Implementation Plan, establish a clear means for translating RSS policies into action?

Introduction

The DIP clearly describes the four delivery mechanisms by which it will be delivered. The Policy Implementation Framework comprehensively lists the agencies through which the Plan will be delivered and their responsibilities. Nevertheless, we agree with the Environment Agency's view in their representations on the draft RSS that the DIP is still a framework rather than a plan.

MKP recognise that the detail of delivery will be at sub-regional or local authority level, and the role of the DIP is to set the regional context for local delivery plans and deal with those matters which require action at regional level. There are two areas which experience in Milton Keynes shows are particular priorities. The first is the issue of securing greater contributions from the private sector towards the costs of infrastructure (covered by IMPs 12 and 14 in the DIP). The second is the need for a comprehensive business planning approach to implementation. Part of the local component of this is covered by IMP 13, which should be widened to cover business plans rather than just infrastructure plans. The issues are closely linked since private sector contributions are a necessary component of funding the implementation of the business plans.

Securing Greater Private Sector Contributions

MKP will need to start planning for growth in the period post 2016 in the next few years. The current business plan was prepared, and tariff negotiated, on a very tight timescale and we can now see how, with more time for planning and negotiation, the Partnership might have been able to achieve a more comprehensive coverage of infrastructure requirements through the tariff. For the Partnership, infrastructure providers, and developers to be able to start preparing the business plan for growth post 2016, they need to be certain about how private sector contributions for infrastructure will be secured over that period. This infrastructure would need to be broad ranging and would include ongoing contributions to the establishment of a university within Milton Keynes and potentially to the expansion of other opportunities for higher education, such as a college of nursing. We therefore wish to stress that SEERA need to work with Government to ensure that IMP12 (production of a clear framework for introduction of locally-administered PGS or a local tariff) is carried out as soon as possible, as an essential precursor to local authorities and LDVs carrying out IMP14 (introduction of robust mechanisms for capturing planning gain). The Government's current commitment is to introduce PGS no earlier than 2009, if the next round of consultation is positive, but this open-ended commitment leaves open the possibility of drift into the next decade.

The Need for Comprehensive Business Planning from the DIP to Local Delivery Plans

In our representations on Sub-matter 1D Infrastructure and Implementation, we made specific recommendations for strengthening Policy CC5 and the DIP to cover:

- The role of co-ordinating agencies such as Local Delivery Vehicles (LDVs) preparing and using a business plan to plan, monitor and manage growth in the area for which they are responsible.
- The value of a tariff for delivering infrastructure in growth areas, and areas where growth is on a sufficiently large scale.

Rather than viewing the DIP as a stand alone plan, it should be seen as part of a larger whole with two dimensions.

- Horizontally, the DIP and the Monitoring Framework form an integral part of the RSS. In this dimension, it must have strong links with the RES and Sustainability Appraisal. That said, the DIP is dependent on the Spatial Strategy; it can only deliver the right outcomes if the latter is sound and well-founded
- Vertically, it forms part of a hierarchy of plans, from the national plans of the major delivery agencies, such as the HA and utilities, whose programmes must be aligned with the RSS; down to local housing and infrastructure delivery plans.
- The DIP has a key role in securing funding, including:
 - Working with major delivery agencies and Government to ensure that their investment programmes are aligned with the RSS. The need for alignment underlines the point that the DIP will only bring about the right outcomes if the Spatial Strategy is sound and able to provide the certainty needed by the private sector .
 - Co-ordinating the delivery of major items of infrastructure of intra-regional and inter-regional significance, such as East-West Rail, where delivery will require private sector investment to follow growth.
 - Setting up the Regional Infrastructure Fund.
 - Lobbying for revenue for: the implementation of behavioural change policies such as 'smart' transport measures; to meet the service demands of growing populations; and to provide resources for business planning as described below.

MKP would therefore support the identification of a clear link between the DIP and local business plans. These will provide living tools which set out the interdependencies between housing (and employment development) and infrastructure in a series of costed programmes with the timelines, agencies responsible for delivery and funding clearly described. This will also enable delivery to be managed by SEERA, LDVs and local authorities at the appropriate level.

10A.2 Will draft RSS help to promote a climate that is conducive to high investment confidence (for both public and private investors)?

The factors which create confidence in investors are opportunity and certainty. The RSS will be a framework which will help identify opportunity (within the constraints of the state of the economy over the period of the plan); provide a considerable degree of certainty as to the spatial framework within which developers and public agencies operate; and provide certainty that key infrastructure of inter- and intra-regional significance will be delivered .

In practice the effects of the RSS will largely be indirect although it will be specific in providing the district apportionment for the overall housing needs. Developers and (in most cases) the public sector will be investing in Broadstairs or Didcot or Milton Keynes rather than the South East, and they will look to:

- The LDF for confidence as to the scale of opportunity; and
- The LDV and / or local authority and its business plan for certainty that the infrastructure required for their development will be in place when needed.

The RSS will help provide high investment confidence both by setting the spatial planning and infrastructure context; and by supporting a business planning approach to managing delivery at all levels from the region downwards.

MKP supports SEERA's statement, during discussion of Sub-matter 1D, that local authorities and LDVs need resourcing to prepare and manage business plans for delivery of development proposals, particularly where these are on a large scale, as is the case in Milton Keynes.

10A.3 Is there a role for the Regional Assembly to co-ordinate strategic reviews of land holdings policy (Policy CC6)?

From the point of view of the Regional Assembly, the purpose of the strategic reviews is for public landowners to identify land holdings whose release will help realise the RSS. CC6 provides for implementation at local level which is appropriate since the means by which land release will contribute to the RSS is by meeting local targets within it.

MKP accepts CC6 as drafted, with its requirement for Government Departments and public land-owners to agree a disposal and implementation strategy with SEERA. SEERA may need to take a pro-active role to ensure that this takes place.

10A.4 To what extent are the Investment Schedules in the Implementation Plan affordable and realistic?

Affordability

Certainty on affordability increases as projects' implementation dates move towards the present. The 2007 Comprehensive Spending Review (CSR) will provide more information on the affordability of projects scheduled for the period 2008/9-2010/11. For infrastructure scheduled for 2011/12 onwards there can be little certainty as to the availability of funding at present, but it should also be noted that requirements may well have changed by then for a range of reasons from changes in population trends to climate change. In addition, there may be new funding mechanisms that improve affordability.

Realism

As they stand the DIP's Investment Schedules are realistic in the context of current knowledge and forecasts. However, they are not yet complete in respect of major areas of infrastructure; and the DIP should recognise that infrastructure requirements will change over time. This incompleteness is clearly shown by the varying amounts of information available for each sub-region in the Schedules, and means that the Schedules are not yet realistic in terms of identifying strategic infrastructure requirements across the South East. For example, the schedules for Milton Keynes and Aylesbury Vale in Annexe 3 of the DIP list only transport infrastructure for Milton Keynes.

Completeness

Where there are known projects to fill gaps in the DIP these should be included in Annexes 2 or 3. In the latter parts of the plan period (2016-21 and 2021-26) these will include projects which have been identified, but where costs are not yet firmed up; and projects which have not yet been fully defined. Where studies are required to determine what infrastructure is required, these should also be referred to in the DIP, either as part of Annexes 2 and 3, or in a new one. For example, the Environment Agency (EA), in their representations on Sub Matter 8F, Milton Keynes and Aylesbury Vale, both identify works which are required to secure water supplies for Milton Keynes over the plan period; and support the proposal to carry out a Water Cycle Strategy (WCS) for Milton Keynes to provide a high level integrated assessment of water infrastructure concerning water resources and supply, flood risk mitigation and sewage treatment.

The EA also refers to the Milton Keynes and South Midland Green Infrastructure Guide as a source of good practice which should also be referred to in the DIP as a tool to determine requirements. As studies are carried out and their findings translated into infrastructure projects, these should therefore be added to the Investment Schedules. There may also be opportunities to achieve benefits across more than one area of delivery, for example by linking strategic investment in green infrastructure to the learning and skills agenda.

Changes over Time

The NHS has already indicated that their pattern of service delivery will change to a much more community-based approach over the period of the RSS. While these changes have been factored into the RSS, there are other possible changes in technology, relative costs - energy being a likely example - and the level of economic activity which mean that the Schedules will alter substantially over the period of the RSS as the requirements for other types of infrastructure change. More fundamentally, the scale and directions of population growth will almost certainly differ from the forecasts on which the RSS is based, and the DIP will be a tool for managing the changes to the RSS which will ensue.

This re-emphasises the need for the DIP to be flexible and capable of responding to changing circumstances as part of a robust business planning framework for managing implementation of the Plan.