Milton Keynes Core Strategy DPD Examination

Written Statement from Aylesbury Vale District Council

(representor reference 413791)

May 2012

Matter 4 – Economy and Town Centres (Policies CS3-4, 7, 16-17, Tables 5.3-5.7)

Issue 4.1 (i) is the proposed jobs per dwelling ratio properly justified?

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Milton Keynes Core Strategy Examination

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Matter 4 – Economy and Town Centres (Policies CS3-4, 7, 16-17, Tables 5.3-5.7)

1.1 There are a number of issues related to soundness which Aylesbury Vale District Council (AVDC) has raised and which remain unsatisfactorily resolved by Milton Keynes Council (MKC) in the Schedule of Responses or subsequent amendments and iterations of the Core Strategy that have been published since October 2010. These issues require further consideration as highlighted by the Inspector in the Revised Schedule of Matters and Issues (ID/2A).

1.2 To assist discussion at the Examination hearing sessions, AVDC has prepared the following statement in addition to the representations submitted throughout the preparation of the Core Strategy at the formal stages.

1.3 In particular this Statement provides further information about AVDC’s representations on the following documents:
   - Core Strategy Revised Proposed Submission Version, October 2010
   - Core Strategy Pre-Submission version, February 2010
   - Sustainability Appraisal of Reasonable Alternative Sites, June 2011
   - Core Strategy Post-Submission changes, September 2011

Issue 4.1 (i) Is the proposed jobs per dwelling ratio properly justified?

1.4 It is a priority of AVDC to promote sustainable economic growth within the district. This is important to better meet the needs of communities within district and to seek to redress the current imbalance of greater net out-commuting. A central aim of the emerging Vale of Aylesbury Plan is that the Plan will “Be led by economic growth – to deliver regeneration and economic growth, and through this increased employment within the district”.

1.5 Since the version of the Core Strategy that MKC submitted in 2010, the district housing numbers have been reduced. AVDC fully supports this (see Matter 1 submission for more information). However AVDC is very concerned that the corresponding provision for employment has not been reduced. This imbalance is likely to place increasing pressure on adjoining authorities to provide even higher numbers of housing and will undermine the locally-based strategies being developed for those areas.

1.6 AVDC remains concerned that the implications of MK growth on adjoining areas have not been fully assessed or justified in this regard. This is a general concern which is explained further under representations on Matter 1.

1.7 The 2001 Census indicated that Aylesbury Vale was a net exporter of labour to surrounding areas, with 33,000 residents commuting out of the District to work with 16,000 people commuting in (a net flow of 17,000). Evidence from NOMIS suggests that Milton Keynes has a jobs density of 0.98 in 2008 which is notably above the regional and national benchmarks (0.82 and 0.79 respectively). This in effect indicates that Milton Keynes’ workforce is larger than its resident labour force – and that net commuting into Milton Keynes is required to support the Milton Keynes economy.

1.8 AVDC is concerned that a jobs target out of balance with the homes provision would result in the undermining of the economy of the north of the Vale, increase commuting out of the district to MK, and undermine planned regeneration in our district. The response from MKC to the recent consultation on the Vale of Aylesbury Plan (the new local plan for the AVDC area) similarly identifies the potential for negative impacts on the local highway network and

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1 Report to AVDC Cabinet 15.05.2012 sets out the approach and Plan aims of the Vale of Aylesbury Plan
pressure on the MK job market if economic growth in Aylesbury Vale does not keep up with housing growth (para 1.4, see Annex A).

1.9 The jobs : homes ratio of 1.5:1 contained in the Core Strategy reflects the South East Plan approach of meeting the needs of the wider South East rather than local needs. Through the Localism Act, Ministerial Statements, and the NPPF it is clear that the principal driver for setting jobs and homes targets is from the local & district level upwards (set within the national context) and not the top down imposition of the past. Therefore the MKCS should be looking to meet its own identified employment needs and equally the Vale of Aylesbury Plan is seeking to meet local needs within the district.

1.10 AVDC, through the preparation of the Vale of Aylesbury Plan, has considered economic growth in the district and the relationship with economic growth in adjoining areas. The Growth Assessment published in 2011\(^2\) provides more up-to-date and more detailed evidence (than the South East Plan) about economic growth in Aylesbury Vale.

1.11 In the past the South East Plan proposed a one to one ratio of jobs to homes. Through the AVDC Growth Assessment there is a more detailed and refined understanding of this complex relationship which reflects the needs of both the economy and demographic change locally. In terms of the jobs to housing ratio, the report recognises that larger employment centres in adjoining areas are likely to continue to offer higher paid employment opportunities and an incentive to travel. However by encouraging employment growth within the Vale then over time this should increase the proportion of people who both live and work within the district so in proportional terms, out-commuting should reduce over time to support more sustainable communities.

1.12 AVDC considers that this locally-based approach is also realistic given proposed changes to national policy, with a shift away from the regional planning mechanisms towards individual local authorities meeting needs arising in their areas. The approach set out in the MKCS fails to do this.

1.13 If the MKCS retains the higher employment target then it is likely to further exacerbate the transport network capacity problems associated with out-commuting from Aylesbury Vale (and other surrounding areas) to MK, thus undermining economic growth and regeneration of Aylesbury and Buckingham in particular.

Summary

1.14 The implications on areas outside of MK have not been fully assessed or justified. On the basis of the most recent locally-based evidence, and to reflect the localism agenda, the employment target in the MKCS should be reduced from 1.5:1 to 1:1.

\(^2\) Aylesbury Vale Housing and Economic Growth Assessment, GL Hearn, September 2011
Annex A – Milton Keynes Council representation to consultation on Vale of Aylesbury Plan, 2012

John Byrne
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26 January 2012

Dear Mr Byrne

Re: Milton Keynes Council’s comments on the Vale of Aylesbury Plan consultation

Many thanks for the opportunity to comment on this early stage of work on the preparation of the new Vale of Aylesbury Plan (VAP). The attached comments were agreed by delegated decision of the Cabinet member for Planning, Cllr Andrew Moss, on 24 January.

We have made some detailed comments on the numbers in the consultation document and a particular concern is that some of the options suggest a considerable imbalance between the number of homes and jobs, which could lead to an increase in pressure from residents of Aylesbury Vale district seeking jobs in the Milton Keynes area. Myself and my colleague Mark Harris, would be very happy to meet and discuss our comments with you.

In terms of the duty to co-operate, we accept that the current proposals in the VAP do not have any cross-boundary implications for Milton Keynes. We have, however, made a comment in terms of one of the possible distribution scenarios, namely the new settlement option. Again, should a new settlement in the Northern Aylesbury Market Area be considered to be a feasible and likely way forward, we would welcome discussions with yourselves to allow any impact on Milton Keynes to be fully considered.

Also, whilst the emerging Milton Keynes Core Strategy does not propose any cross-boundary development, should proposals for development on or over the boundary arise, we would clearly want to discuss these with you.

If you have any questions with regard to the attached comments please contact me and I will do my best to help.

Yours sincerely,

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