Written Statement from Central Bedfordshire Council
Representor Number 415052

May 2012

Matter 1 Overview (process and justification, legal compliance, national policy, sub regional and wider context) (Core Strategy vision, objectives and policies as a whole)

Issues 1.4 and 1.5

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Matter 1 Overview (process and justification, legal compliance, national policy, sub regional and wider context) (Core Strategy vision, objectives and policies as a whole)

1.1 This statement supplements the representations submitted previously throughout the preparation of the Core Strategy. It covers only the issues that we wish to comment further on under matter 1.

Issue 1.4 Does the Core Strategy take appropriate account of the sub regional and wider context, including cross boundary impacts.

1.2 Central Bedfordshire Council supports the approach in the Milton Keynes Core Strategy (MKCS) which limits growth to within the administrative boundaries of Milton Keynes Council.

1.3 The growth of Milton Keynes beyond its boundaries was driven by the South East Plan which identified that a balance of 5,600 homes could be found in Bedfordshire subject to assessment through a review of the East of England Plan (EEP). At the time Central Bedfordshire reluctantly identified provision of a site in the adopted Core Strategy for the North of Central Bedfordshire but never agreed with the figure of 5,600 and identified a much lower figure of 2100 together with an extension to the green belt around Aspley Guise. This was amended by the Inspector at the Core Strategy Examination, with the decision on the extent of development to be assessed through a review of the EEP. In the event, this review was dropped in its early stages and no formal documents were ever published. It is clear therefore, that there is no policy which requires Milton Keynes to identify any expansion into Central Bedfordshire in their Core Strategy and in this respect it fully complies with the sub regional context in relation to Central Bedfordshire.

1.4 In terms of cross boundary impacts Central Bedfordshire supports the approach to housing targets in the MKCS. That is to provide a more realistic level of housing in Milton Keynes in line with the localism agenda and removal of housing targets. The two Councils have discussed whether there are any additional requirements and agreed that each authorities own needs can be met internally with their own boundaries. It is now for Central Bedfordshire to assess the level of development required within its area and where that development should take place. It is doing this through the production of a new Development Strategy for the whole area; the first consultation draft will be published in June 2012. This first draft of the CBC Development
Strategy does not allocate any land within Central Bedfordshire to provide for Milton Keynes growth up to 2031.

**Issue 1.5 Does the Core Strategy provide clearly articulated and justified guidance about the way in which cross boundary issues and joint working will be addressed?**

1.5 There is a clear and agreed position between Central Bedfordshire and Milton Keynes that there is no need for cross border growth and Central Bedfordshire have identified that this is the case up to 2031 as part of their own population and household growth assessments. This supersedes the period of the MK strategy which expires in 2026.

1.6 Central Bedfordshire therefore objects to the inclusion of policy CS6 which sets out the principles for development in adjacent authorities up to 2026. This policy is now irrelevant and out of date and appears to contradict the commitment given by MKC that growth can be accommodated within their administrative boundary within the time period of the strategy. It also suggests to local communities living in this area that there is still potential for growth to come forward within the plan period which is not the case. CBC raised concerns about this policy in previous representations but is now even more of the view that it is not required because it has not identified growth in this area up to 2031.

1.7 The Council continues to have regular dialogue with MKC through Member and Officer working groups and more recently a through a Planners Forum, set up as part of the South East Midlands Local Enterprise Partnership. These groups are able to deal with strategic planning issues as and when they arise. CBC believes that this fulfils the requirements under the Duty to Cooperate and is the best vehicle for agreeing on issues of mutual interest. Central Bedfordshire has opposed the inclusion of Policy CS6 since Milton Keynes reduced its housing numbers. The policy was written without any regard to CBC and other neighbouring authority’s views and has therefore not complied with the spirit of cooperation now in the Localism Act and the NPPF.

1.8 It would be more appropriate to add supporting text which dealt separately with cross boundary working; this would bring the document up to date and in compliance with the new planning system.