SUBMISSION STATEMENT

MATTER 1

OVERVIEW (PROCESS AND JUSTIFICATION, LEGAL COMPLIANCE, NATIONAL POLICY, SUB-REGIONAL AND WIDER CONTEXT)

ON BEHALF OF
SOUTH WEST MILTON KEYNES CONSORTIUM
(273044)

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Contents

1.0 INTRODUCTION ........................................................................................................... 3

2.0 MATTER 1 – OVERVIEW (PROCESS AND JUSTIFICATION), LEGAL COMPLIANCE, NATIONAL POLICY, SUB-REGIONAL AND WIDER CONTEXT) .. 4
1.0 INTRODUCTION

1.1 This submission statement has been prepared by Januarys on behalf of the South West Milton Keynes (SWMK) Consortium. This Statement sets out our response to the questions identified by the Inspector appointed to examine the Milton Keynes Core Strategy for Matter 1. Appendix 1 explains the history and background to the proposed Strategic Development Area at South West Milton Keynes.

1.2 Two further submission statements have been prepared on behalf of the SWMK Consortium. One statement for Matter 3: Overall Housing provision and another addressing Matter 5: Transport, Matter 7: Other Areas of Change etc. and Matter 8: Delivering Infrastructure etc.

1.2 The SWMK Consortium comprises the following development companies; Hallam Land Management Ltd, William Davis Ltd, Taylor Wimpey Developments UK Ltd, Connolly Homes and Bellcross Homes. The Consortium control land to the south west of Milton Keynes, south of the A421 and north of the line of the proposed Oxford to Cambridge railway line.
2.0 MATTER 1 – OVERVIEW (PROCESS AND JUSTIFICATION), LEGAL COMPLIANCE, NATIONAL POLICY, SUB-REGIONAL AND WIDER CONTEXT

Issues

1.1 Has the overall spatial strategy emerged from a sound process of assessment including evaluation of alternatives and sustainability appraisal, and public involvement?

2.1 The main comments we have regarding the process is the change to the strategy during the preparation of the Core Strategy. The initial versions of the Core Strategy were based on a clear commitment to deliver growth, including development adjacent to Milton Keynes in neighbouring areas, which involved joint-working and the preparation of joint documents. This approach was in accordance with the strategy contained in the Milton Keynes & South Midlands Sub-Regional Strategy (MKSMSRS) and the South East Plan (SEP). This strategy was derived from numerous studies in the area, which concluded that development for Milton Keynes should take place beyond the administrative boundaries.

2.2 Aylesbury Vale District Council (AVDC) previously accepted strategic development to the south west of Milton Keynes, within Aylesbury Vale, and co-operated in joint-working arrangements and prepared development plan documents to deliver growth. However, effective joint-working arrangements stopped when AVDC decided to withdraw the Core Strategy in September 2010, following matters raised at the Core Strategy EiP in respect of growth at Aylesbury. Section 110 of the Localism Act places a ‘duty to cooperate’ on councils to work together to address planning issues that impact beyond local boundaries. Paragraph 178 of the National Planning Policy Framework (NPPF) also requires that public bodies cooperate on planning for strategic priorities such as housing, jobs, transport or infrastructure. The duty to cooperate and joint working requirements should ensure that development needs that
cannot be delivered within a Council’s administrative area can still be met sustainably.

2.3 There is a clear need for cooperation and joint working, between Milton Keynes Council (MKC) and AVDC, to deliver the housing, jobs, and transport infrastructure required for the growth of Milton Keynes. Policy CS6 provides a framework for joint working, which we support. We consider that the objectively assessed needs for the area would require development outside, but adjoining Milton Keynes and that SWMK is the most appropriate and sustainable location for that development. At this stage, the emerging Vale of Aylesbury Plan does not address those objectively assessed needs. In these circumstances, Policy CS6 would not be implemented. In the light of our submissions to Matter 3: Overall Housing Provision, MKC should commit to meeting the objectively assessed needs of the area, and to actively pursue those needs through joint working with AVDC. This approach would satisfy the duty to cooperate and joint working requirements contained in the Localism Act and the NPPF. It would also lead to a more sustainable pattern of development.

1.2 Taken as a whole, is the Core Strategy consistent with the principles and policies set out in the National Planning Framework, including the presumption in favour of sustainable development? If it is not, how might any inconsistencies be rectified.

2.4 We identify below the relevant paragraphs of the NPPF that we consider the Core Strategy is not consistent with.

2.5 As stated in Paragraph 8 of the NPPF, “...The planning system should play an active role in guiding development to sustainable solutions”. In the case of the needs and growth of Milton Keynes, the sustainable solution is to direct development that cannot be accommodated within the City boundaries to areas immediately adjoining the urban area; numerous studies of the area
(see Appendix 1) have concluded that this is an appropriate approach and that SWMK represents a suitable and sustainable location for development. Core Strategy Policy CS6 sets out the Council’s approach to development outside the administrative boundaries of Milton Keynes, which we support. However, as set out in the Matter 3 Statement, we consider that the emerging Vale of Aylesbury Plan does not seek to meet the objectively assessed needs for the area. MKC should commit to meeting the objectively assessed needs of the area, including where it involves development outside its administrative boundary, and to actively pursue those needs through joint working with AVDC.

2.6 Paragraph 14 sets out what the presumption in favour of sustainable development means. For plan-making, local planning authorities are expected to positively seek opportunities to meet the development needs of an area, where these have been objectively assessed. We comment elsewhere on what the development needs of the area are, how those needs have been assessed, and the consequences of not meeting those needs. We consider that SWMK represents a sustainable location for development to meet the needs and growth aspirations of MKC.

2.7 Paragraph 17 sets out the twelve core land use planning principles that should underpin plan-making. The relevant principles for these representations are as follows: that plans should be based on joint working and cooperation to address larger than local issues (bullet point 1); effort should be made to identify objectively and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth (bullet point 3); and, to actively manage patterns of growth to increase the use of sustainable modes of transport (bullet point 11). Joint working between MKC and AVDC effectively stopped following the withdrawal of the Aylesbury Vale Core Strategy in September 2010. We
consider that the objectively assessed housing, employment and infrastructure needs for the area would require development outside but adjoining Milton Keynes. We request that those needs are met through a commitment to joint working arrangements with AVDC. The Core Strategy seeks to encourage non-car modes of transport, and supports new sustainable transport infrastructure such as East-West Rail, but these would not be implemented without a specific requirement for joint-working on these matters and a strategy to enable the delivery of public transport infrastructure via additional development. Development at SWMK could support these aims and objectives. The emerging Vale of Aylesbury Plan does not address these matters.

2.8 Paragraph 30 states that “encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion”. Local planning authorities are expected to support patterns of development which facilitate the use of sustainable modes of transport. The Matter 3 Statement identifies continued increases in commuting into Milton Keynes as one consequence of not providing additional housing within or adjacent to the urban area where employment opportunities and economic activity are focussed. As set out above, the Core Strategy aims to support sustainable modes of transport and to reduce congestion. Development at SWMK could support additional public transport services into Milton Keynes, including East-West Rail, which would encourage the use of non-car modes of transport and potentially tackle increases in commuting into Milton Keynes. The proposed strategies contained in the emerging Vale of Aylesbury Plan does not seek to direct residential development close to locations where people work, such as the edge of Milton Keynes, thus enabling people to choose sustainable modes of transport for work and other journeys. The Core Strategy, if amended to include a commitment to meet objectively assessed needs and joint-working, would support additional development on the edge
of Milton Keynes and the associated public transport and congestion reducing benefits it could deliver.

2.9 Paragraph 47 identifies the methods for delivering a wide choice of high quality homes. Overall, these methods aim to boost significantly the supply of housing and to meet in full the objectively assessed housing needs. These issues are dealt with in the Matter 3 Statement. In summary, the housing needs for the area would not be met. We consider that sustainable development for the growth of Milton Keynes should be directed to SWMK, outside but adjoining the administrative boundaries of the City.

2.10 Paragraph 156 requires local planning authorities to set out the strategic priorities for the area in the local plan. The Core Strategy attempts to do this. However, it is uncertain whether the strategic priorities, which require development outside the administrative boundaries of Milton Keynes, would actually be delivered taking the Core Strategy and the emerging Vale of Aylesbury Plan together. This is because local plans should be prepared in cooperation with neighbouring authorities, but this has not happened although it is a requirement as set out in Paragraph 157.

2.11 Section 110 of the Localism Act places a new ‘duty to cooperate’ on councils to work together to address planning issues that impact beyond local boundaries. Paragraph 178 of the NPPF requires cooperation on planning for strategic priorities. Paragraph 179 requires local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual local plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. Paragraph 181 expects local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-
boundary impacts when their Local Plans are submitted for examination. Joint working between MKC and AVDC to deliver growth effectively stopped following the withdrawal of the Aylesbury Vale Core Strategy in September 2010. In our opinion, it appears that there is little evidence of appropriate joint working between MKC and AVDC in planning for the strategic priorities of the area. The emerging Vale of Aylesbury Plan reflects little joint working with MKC, principally because the housing and employment targets have been set at a level that requires no development to be directed to the edge of Milton Keynes. The Matter 3 Statement provides detailed comments on the objectively assessed housing and employment needs and concludes that the targets should be higher than proposed. We consider that if the objectively assessed housing, employment and infrastructure needs for the area are to be met in full, then joint working arrangements and cooperation will be required to deliver growth. The Core Strategy should be amended so that MKC commits to meeting the objectively assessed needs of the area through joint-working.

2.12 Paragraph 182 identifies the criteria that will be used to determine whether a submitted plan is ‘sound’. To be ‘sound’ a plan needs to be positively prepared, amongst others. We comment on this below in response to Issue 1.8. In summary, Policy CS6 provides a framework for development that may take place outside the administrative boundary of Milton Keynes. However, there is no commitment to actively deliver the growth that we consider is needed through joint working arrangements with AVDC. As set out in the Matter 3 Statement, the emerging Vale of Aylesbury Plan would not meet objectively assessed development and infrastructure requirements for the area, even though locations on the edge of Milton Keynes would represent sustainable development. We believe that the Core Strategy should be amended so that MKC commits to meeting the objectively assessed needs of the area through joint-working.
2.13 We request that a specific requirement for joint working and a commitment to prepare a Joint LDD to deliver growth in south west Milton Keynes should be reinstated into the Core Strategy. This action would make the Core Strategy in general conformity and consistent with the NPPF, and the specific paragraphs referred to above.

**1.3 Does the Core Strategy make reasonable, appropriate provision for meeting the strategic priorities for the area?**

2.14 Paragraph 156 of the NPPF requires local planning authorities to set out the strategic priorities for the area in the local plan. The Core Strategy does this. However, it is uncertain whether the strategic priorities, which require development outside the administrative boundaries of Milton Keynes, would actually be delivered taking the Core Strategy and the emerging Vale of Aylesbury Plan together. This is because local plans should be prepared in cooperation with neighbouring authorities, but this has not happened although it is a requirement as set out in Paragraph 157.

2.15 Policy CS6 of the Core Strategy provides a framework for joint working and the delivery of strategic priorities that would take place outside the administrative boundaries for the area. The strategic priorities include objectively assessed housing needs, employment needs, and transport infrastructure such as East-West Rail. However, we consider that Policy CS6, and the strategic priorities for the area, would not be implemented unless MKC commits to meeting the objectively assessed needs of the area, including where it involves development outside its administrative boundary, and to actively pursue those needs through joint working with AVDC. At this stage, the emerging Vale of Aylesbury Plan makes no commitment to the growth of Milton Keynes into Aylesbury Vale.
2.16 We consider that the spatial strategy that is being pursued is likely to have two principal outcomes, increased in-commuting and associated congestion; and an unsustainable housing market and consequent reduced affordability. Ultimately, this may also lead to a failure to attract further employment or retain existing employers. On all counts this strategy will only serve to undermine the Council’s aspirations for Milton Keynes to develop as a sustainable City.

1.4 Does it take appropriate account of the sub-regional and wider context, including cross-boundary impacts?

2.17 The sub-regional context was set out in MKSMSRS and SEP. These strategies resulted from a numerous studies which concluded that development for Milton Keynes should take place beyond the administrative boundaries. The Core Strategy and the emerging Vale of Aylesbury Plan seek to ignore the previous sub-regional strategies and the evidence that supported them. The strategic priorities for the area, and whether they would be delivered, are dealt with in Issue 1.3 above.

2.18 As set out above, Section 110 of the Localism Act places a new ‘duty to cooperate’ on councils to work together to address planning issues that impact beyond local boundaries. Paragraph 178 of the NPPF requires cooperation on planning for strategic priorities. In our opinion, it appears that there is little evidence of appropriate joint working between MKC and AVDC in planning for the strategic priorities of the area which have cross-boundary impacts. Joint working, in our view, effectively stopped following the withdrawal of the Aylesbury Vale Core Strategy in September 2010.

2.19 By not appropriately taking into account cross-boundary impacts for Milton Keynes, there is a real risk of an increase in in-commuting and associated congestion, leading to an unsustainable housing market and consequent
reduced affordability; it may also lead to a failure to attract further employment or retain existing employers.

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?

2.20 We agree with the development strategy set out in Policy CS1 of the Milton Keynes Core Strategy, which supports major development proposals adjoining the city. We also welcome the place-shaping principles set out in Policy CS6 which acknowledges the need for joint-working if development takes place on the edge of Milton Keynes. AVDC previously accepted strategic development to the south west of Milton Keynes, within Aylesbury Vale. The previous joint working arrangements to deliver growth effectively stopped when the Aylesbury Vale Core Strategy was withdrawn in September 2010.

2.21 The emerging Vale of Aylesbury Plan does not propose to direct development to the edge of Milton Keynes or to land at SWMK. In our opinion, the Vale of Aylesbury Plan would not meet the objectively assessed housing, employment and infrastructure needs of the area – as set out in the Matter 3 Statement. Joint-working arrangements to deliver growth and strategic priorities are required under Section 110 of the Localism Act and Paragraphs 179 to 181 of the NPPF. In our opinion, the Core Strategy should include a commitment to joint working to deliver strategic policies in the future.

2.22 We consider that SWMK supports the growth aspirations for Milton Keynes and represents a sustainable location for development – and this has been acknowledged in a variety of studies during the last twenty years or so. There needs to be a specific commitment to joint working arrangements, from both MKC and AVDC, to deliver the additional development required in the area.
1.6 On the basis that the South East Plan (RS) remains part of the development plan, is the Core Strategy in general conformity with it? If it is not, what are the specific elements of the strategy that lead to non-conformity? How might these be rectified?

2.23 We assume that the South East Plan (SEP), and all other regional strategies, will be revoked as proposed in the Localism Act. If this is not the case, then the Core Strategy would need to be amended to be in conformity with it.

2.24 In Document MKC/1 the Council admits that the Core Strategy policies relating to housing land supply and strategic development areas (Policy CS1, 2, 5 and 6) do not fully comply with SEP Policies MKAV1 and MKAV2. The Core Strategy proposes a lower level of housing growth up to 2026 than set out in the SEP. In summary, the Council explain the basis for not complying with the SEP is because delivery rates are unachievable. The Matter 3 Statement deals with the housing targets in more detail.

2.25 Section 24 of the Planning & Compulsory Purchase Act 2004 requires local development documents to generally conform to the regional strategy. The Core Strategy cannot be held to generally conform and no justification is provided within the document or its associated evidence base for not doing so. It is not, therefore, legally compliant.

2.26 We suggest that, if the SEP remains part of the development plan, the Core Strategy must be amended to accord with it in terms of the level of housing to be provided over the plan period.

1.7 If RS is abolished as currently proposed, are there any specific policy deficits that would ensue and how should these be addressed in the Core Strategy?
2.27 If, as expected, the SEP is revoked the policies for joint working to deliver strategic priorities contained in the NPPF must be implemented through the Core Strategy. There needs to be a specific commitment to joint working arrangements, from both MKC and AVDC, to deliver the additional development required in the area.

1.8 Overall, does the Core Strategy satisfy the test of ‘positive preparation’ (Paragraph 182 of the NPPF)? If not, how might any deficiencies be resolved?

2.28 As set out in Paragraph 182 of the NPPF, a ‘sound’ plan must be positively prepared, justified, effective and consistent with national policy. Positively prepared means that “the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”. We acknowledge that Policy CS6 of the Core Strategy endeavours to provide a framework for joint working and the delivery of strategic priorities that would take place outside the administrative boundaries for the area.

2.29 The emerging Vale of Aylesbury Plan proposes significantly lower housing and employment targets than those contained in the SEP. We consider this approach to be flawed – see Matter 3 Statement. There is a lack of effective joint-working between the neighbouring authorities on strategic planning matters, which does not meet the duty to cooperate requirements. The consequences for the growth of Milton Keynes of not providing sufficient housing and employment levels outside its administrative boundaries are ignored or misunderstood, particularly in terms of meeting local housing need and the impact of future migration and commuting patterns.
2.30 We request that, to meet the test of ‘positive preparation’ a specific commitment to joint working and a Joint LDD to deliver growth at South West Milton Keynes should be reinstated into the Core Strategy.

2.31 In conclusion we support Policy CS6 and the associated place shaping principles. However, the proposed approach may not be implemented without a clearer commitment to joint-working with Aylesbury Vale District Council to deliver the objectively assessed needs for the area. The Statement for Matter 3 deals with the housing and employment needs for the area. In our view the emerging Vale of Aylesbury Plan does not seek to meet those objectively assessed needs for the area. We request that the Core Strategy is amended so that Milton Keynes Council commits to meeting the objectively assessed development needs of the area and to actively pursue those needs through joint working with Aylesbury Vale District Council. In light of the above we would request that paragraphs 6.9 & 6.10 of the Core Strategy are replaced with the following text:

Proposed Replacement of Paragraphs 6.9 & 6.10

‘The adopted South East Plan (SEP) makes provision for Strategic Development Areas both to the south west and the south east of the City in areas outside of the administrative boundaries of Milton Keynes, in recognition of the need to ensure the sustainable growth of the City in the longer term. Joint working with Aylesbury Vale District Council led to provision being made in its emerging Core Strategy for the SWMK SDA; a draft Masterplan & Delivery SPD (January 2010) was also prepared and was subject to public consultation and a planning application for the delivery of the SDA was submitted in April 2010.

Subsequently, in response to the Government’s pronouncements with regard to the future of Regional Spatial Strategies, Aylesbury Vale District Council withdrew the Core Strategy from examination in September 2010, both the
Core Strategy and the SPD were abandoned and the application was withdrawn at the request of the District Council.

However, there remains a need to plan for the long term sustainable growth of the City and there is no suggestion that the body of evidence that led to the identification of the SWMK SDA as a sustainable location for growth is flawed. Consequently, in accordance with the duty to co-operate imposed upon it by virtue of the Localism Act 2011 and guidance in the National Planning Policy Framework, Milton Keynes Council will pursue appropriate action to secure the delivery of the SWMK SDA through joint working with Aylesbury Vale District Council and Buckinghamshire County Council.’

2.32 We consider that SWMK supports the growth aspirations for Milton Keynes and represents a sustainable location for development – and this has been acknowledged in a variety of studies during the last twenty years or so. There is a need for the growth of Milton Keynes to be accommodated sustainably within the plan period to 2026. It must be recognised that growth beyond the administrative boundaries of the District will be necessary to accommodate growth and that to the SW of the City is the most sustainable location for that to take place.
Appendix 1

Background to South West Milton Keynes Strategic Development Area
Background

The South East Plan (SEP) identifies Strategic Development Areas (SDA) to the SW and SE of MK in reflection of the need to provide growth in sustainable locations. The SDA to the SW of MK has been identified as a sustainable location for the growth of MK over many years.

Three studies were commissioned from Llewellyn Davies (1992, 1996 & 1998) by a consortium of public sector bodies comprising Buckinghamshire, Bedfordshire and Northamptonshire County Councils, Milton Keynes Borough Council, Aylesbury Vale, Mid Bedfordshire and South Northamptonshire District Councils, the then Commission for New Towns and the Government Office for the South East. The studies consistently identified the SWMK area as a ‘development area without major problems’. Llewellyn Davis concluded that no overriding constraints stood in the way of the site and that the juxtaposition of road and rail created opportunities for public transport options, constituting significant advantages in the site’s favour.

A study was commissioned from David Lock Associates (1999) by Milton Keynes Chamber of Commerce that addressed the potential for development in and around the City. The report recommended that the City’s future growth should be concentrated on the A421 axis, reinforced by east-west rail. The report concluded that an east-west axis of growth complemented the existing development form and created opportunities for public transport enhancement.

In July 2001 Roger Tym & Partners were commissioned by the Government and Regional Assemblies and Regional Development Agencies for the South East, East of England and East Midlands to study the growth potential of the Milton Keynes & South Midlands area. The study report was published in September 2002 and recommended a preferred spatial strategy for Milton Keynes with the SWMK development area being identified as a site with potential for development by 2016.
Subsequently a further study was commissioned from Roger Tym & Partners. The Milton Keynes Growth Area Assessment, published in 2003, was prepared to inform the then pending Examination in Public of the draft Milton Keynes & South Midlands Sub-Regional Strategy. The final study report identified the SWMK area as one of only three locations to meet development requirements to 2016.

The Faber Maunsell (2003) Milton Keynes Public Transport Long Term Vision further reinforced the importance of an east-west growth corridor embracing the A421, together with development of SWMK, involving public transport and the provision of a park and ride interchange.

The Milton Keynes and South Midlands Sub-Regional Strategy was prepared in response to the Government’s request to the three Regional Planning Bodies, whose areas covered parts of the sub-region, to develop proposed Alterations to Regional Planning Guidance for the South East, East Midlands and East of England. The Strategy was produced by the three Regional Assemblies: the East of England Regional Assembly; the East Midlands Regional Assembly and the South East England Regional Assembly.

In August 2004 the Panel Report for the Examination in Public of the draft Strategy was published. Paragraph 7.39 noted that the sub-regional strategy proposals included the four expansion areas from the then draft Milton Keynes Local Plan 2011, together with the three proposals for growth to 2016 identified in the Growth Area Assessment for Milton Keynes and Aylesbury undertaken by Roger Tym & Partners. It went on to say that these three locations were:-

- to the west, immediately north of the Local Plan’s ‘Western Expansion Area’;
- to the south west, between the A421 and the railway line to Oxford; and
to the east, north of the Bletchley to Bedford railway line and flanking Wavendon.

Subsequently, the Panel recommended at R7.2 (page 98 of the report) that paragraph 2.5 of the draft Strategy should be revised to read as follows:-

‘The majority of urban development will be provided within the existing urban area of Milton Keynes in conjunction with development of the City Centre, selective urban intensification and the completion of developments already planned as part of the new town programme. These sources are expected to provide some 19,000 additional homes up to 2016 and more in the period beyond. The remaining requirement of 14,600 up to 2016 will be provided through sustainable urban extensions to Milton Keynes City to the west, south west and the east. Beyond 2016 a balanced programme of urban extensions and opportunities within the urban area should continue.’

The Secretary of State published his proposed Schedule of Changes to the draft Strategy in October 2004. He accepted the Panel’s recommendation at R7.2 of their Report and revised paragraphs 2.4 and 2.5 of the draft Strategy accordingly (renumbered as paragraphs 97 and 98). Following further consultation, the Secretary of State then published the finalised Sub-Regional Strategy in March 2005.

As such, the MK&SM Sub-Regional Strategy was embodied in the statutory development plan by virtue of the Secretary of State’s prescription of RPG9 as RSS9 and subsequent formal amendment by the replacement of paragraphs 12.60 to 12.62 with the finalised Sub-Regional Strategy.

RSS9 subsequently was the subject of review. In part in order to inform that review the Milton Keynes Partnership commissioned an ‘Options for Growth’ study from GVA Grimley. Looking at potential for the growth of Milton Keynes to 2031 a
‘Strategy for Growth’ was published in June 2006. The Strategy proposed the provision of growth in two phases of development at Newton Longville to the south west of Milton Keynes in Aylesbury Vale District, the first providing some 7,500 new dwellings in the period 2021 to 2026 and the second, providing for the same scale of development in the period 2026 to 2031. The first phase in the vicinity of Newton Longville was described as Growth Area 2 in the Strategy and broadly equates to the land situated between the A421 and the line of the Oxford to Cambridge railway.

The draft South East Plan was submitted to Government in March 2006 and an Examination in Public was held between November 2006 and March 2007. The Panel Report was published in August 2007, they recommended to the Secretary of State (R23.6) that in the light of the more sensitive landscape to the south west, the greater uncertainty over future access to rail services and the need to create better defensible boundaries, that it would be appropriate to reduce the amount of housing allocated within the south west urban extension to below that in MK2031. The Panel recommended an allocation of 5,390 dwellings.

The Secretary of State published Proposed Changes in July 2008. The Proposed Changes reflected the Panel’s recommendations insofar as they related to the identification of an urban extension of Milton Keynes to the south west in Aylesbury Vale District. The South East Plan was subsequently adopted in May 2009 and made specific provision for the provision of 5,390 dwellings in a Strategic Development Area to the south west of Milton Keynes in Aylesbury Vale District.

The Submission Draft Aylesbury Vale Core Strategy, published for consultation in June 2009, sought to deliver strategic growth to the south west of Milton Keynes. Draft Policy CS4 (North East Aylesbury Vale SDA) supported the allocation of 5,390 dwellings plus infrastructure to the south of the A421 and north of the railway line to the west of Far Bletchley and to the north of Newton Longville.
At more or less the same time, Aylesbury Vale District Council prepared a draft SPD for the Masterplanning & Delivery North East Aylesbury Vale SDA. The draft SPD was published for consultation in April 2009, and effectively sought to deliver Policy CS4 of the draft Core Strategy. A further round of public consultation was undertaken in January 2010.

In April 2010 an outline planning application was submitted for development to the south west of Milton Keynes. The full description of the development was as follows:

“Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension for up to 5,311 mixed tenure homes (C3) to the south west of Milton Keynes, with the following:

• an employment area of 7.4ha including:
  o up to 31,200m² of employment floorspace (Classes B1a, B1b, B1c and B2);
  o utilities and renewable energy infrastructure (sui generis);
  o the relocation of a commercial recycling centre on a site of up to 1 ha (sui generis); and
  o a site for a household recycling centre on a site of up to 1 ha (sui generis);

• a neighbourhood centre of 5.25 ha including:
  o a reserve site for a railway station (sui generis);
  o up to a 5,500m² food retailing supermarket (Class A1);
  o up to 2,000m² (A1 retail, A2 financial and professional services, A3 restaurants / cafes, A4 drinking establishments and A5 hot food takeaways);
  o up to 2,000m² small scale commercial (B1a and B1b) uses;
  o up to 274 of the mixed tenure residential units (C3);
  o utilities and renewable energy infrastructure (sui generis);
  o up to a 220m² Thames Valley Police one stop facility (sui generis); and
o up to 11,250m² a community library (D1), private crèche (D1), community / religious worship / instruction facility (D1) and health (D1), leisure (D2);

- two local centres and a small mixed use centre on a total of 1.78 ha including:
  - up to 2,435m² (A1 retail, A2 financial and professional services, A3 restaurants / cafes, A4 drinking establishments and A5 hot food takeaways);
  - up to 2,420m² community facilities (D1), private crèches (D1) and health (D1), leisure (D2), an emergency / ambulance call point (sui generis);
  - utilities and renewable energy infrastructure (sui generis);
  - up to 90 of the mixed tenure residential units (C3);
  - up to 2,000m² small scale commercial (B1a and B1b) uses; and
  - up to 700m² veterinary practice (sui generis);

- provision of 19 ha of land to provide education facilities (sites for four primary schools with ancillary early years provision and one secondary school with a post 16 facility);
- ground remodelling;
- 94.41 ha of multi-functional green infrastructure including: parkland, sports and recreational facilities; play areas, wildlife areas, a range of strategic open spaces including new landscaping, a wildlife area, woodland, allotments; foul and surface water drainage networks (including SUDS and lakes);
- associated highway infrastructure (including two spur roads, primary streets, residential streets, pedestrian footpaths and cycle routes); and
- public transport infrastructure (including a community reserve site of up to 2 ha for a Park and Ride site for up to 500 vehicles) and car parking for all uses.”

The application was accompanied by the following documents
- Planning Statement;
- Statement of Community Involvement;
• Environmental Impact Assessment;
• Flood Risk Assessment;
• Arboriculture Report;
• Design and Access Statement
• Health Impact Assessment
• Employment Land Study
• Retail Impact Study
• Transport Assessment
• Draft Travel Plan
• Energy Strategy; and
• Draft Heads of Terms.

It is clear that Aylesbury Vale District Council accepted strategic development to the south west of Milton Keynes, within Aylesbury Vale; and it was in this context that an outline planning application was prepared and submitted.

However, following receipt of the Inspector’s Interim Report in June 2010 which dealt solely with growth at Aylesbury, the District Council resolved at its meeting on the 8th September 2010 to formally seek from the Secretary of State’s his determination that the Core Strategy be withdrawn from examination. On 5th October 2010, the Core Strategy was withdrawn from examination. The draft Masterplanning & Delivery North East Aylesbury Vale SDA SPD was withdrawn at the same time as the Core Strategy.

Aylesbury Vale District Council has now started to prepare ‘The Vale of Aylesbury Plan’. Public consultation took place between December 2011 and January 2012 on the proposed housing and employment targets and the distribution of development for the Vale of Aylesbury Plan. In summary, the emerging Vale of Aylesbury Plan proposes significantly lower housing and employment targets than those contained in the South East Plan, and seeks to direct strategic scale development to Aylesbury
and Buckingham only, but not to the edge of Milton Keynes. We have submitted representations to this consultation on behalf of the SWMK Consortium.

We raised the following concerns in the representations. Firstly, the inadequacy of the modelling used to determine future employment and housing levels. Secondly, whether the different options for housing and employment levels were appropriate and justified by the evidence. Thirdly, the lack of effective joint-working between neighbouring authorities on strategic planning matters, which does not meet the duty to cooperate requirements. Fourthly, the consequences for the growth of Milton Keynes of not providing sufficient housing and employment levels outside its administrative boundaries are ignored or misunderstood, particularly in terms of meeting local housing need and the impact of future migration and commuting patterns.

The consultation responses were reported to Aylesbury Vale District Council’s Cabinet Meeting on 15th May 2012, alongside the timetable for the next stages of the Vale of Aylesbury Plan and potential amendments to the housing and employment targets.

The Council now intends to divide the Vale of Aylesbury Plan into three parts: the Strategy - to include housing and jobs targets, the distribution of development, and the principles of development; the Delivery – to contain development management policies; and, Allocations – to identify specific sites for development. The Council expects the Strategy part to be adopted by Spring 2013, and the Delivery to be completed by late 2013/early 2014. It is intended that the Allocations document will only allocate land at Aylesbury, Buckingham, Haddenham and Winslow; and is to be prepared as and when required with no timetable set at this stage. The emerging Vale of Aylesbury Plan does not propose to allocate land at SWMK.
Milton Keynes Council’s response to the Vale of Aylesbury Plan was prepared as a delegated officer report, rather than as a report for approval by committee. It requested amendments to the housing target because of the need arising from employment growth. It acknowledged the strategy contained in the Vale of Aylesbury Plan which proposes no cross boundary growth adjacent to Milton Keynes. However, the response does state in part that: ‘... it is important to acknowledge that opportunities for cross-boundary development might arise in the future.’