MILTON KEYNES CORE STRATEGY

MATTER 1 OVERVIEW (PROCESS AND JUSTIFICATION, LEGAL COMPLIANCE, NATIONAL POLICY, SUB-REGIONAL AND WIDER CONTEXT)

REPRESENTATIONS ON BEHALF OF PERSIMMON SPECIAL PROJECTS

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

1.1 Persimmon Homes consider that the Core Strategy as submitted to the Secretary of State is broadly sound, but it has a number of significant concerns about the content of the document. These are in respect of the housing distribution and the reliance on existing commitments from sites already allocated in the Adopted Local Plan or sites which already have planning permission to meet the housing provision. These changes have been made by the Council in view of the revocation of the Regional Spatial Strategy.

1.2 However, although the Localism Act was passed on 15th November 2011, the Regional Spatial Strategy, in this case the South East Plan remains part of the development plan.

1.3 The Localism Act has the effect via s109 of removing Part 5 of the Local Democracy, Economic Development and Construction Act 2009, which provides the architecture of the regional planning tier, including Leaders’ Boards whose responsibility it was to prepare the relevant RS. The first stage has effect immediately on Royal Assent of the Localism Bill.

1.4 The second stage is to abolish each existing Regional Strategies outside London and saved county structure plan policies by Order. It is the Government’s clear intention to lay orders in Parliament revoking the existing RSSs and saved structure plan policies as soon as possible, but this is subject to the outcome of the Environmental Assessments that DCLG has voluntarily undertaken. Decisions on the revocations will not be made until the Secretary of State and Parliament have had the opportunity to consider the outcome of the Environmental Assessment process.

1.5 The South East Plan remains part of the statutory development plan.

1.6 It is noted that the Inspector requested the Council to undertake the necessary Sustainability Appraisal of reasonable alternatives to the submission plan, Pegasus Planning Group responded on behalf of Persimmon Homes to this consultation in July 2011. The Sustainability Appraisal was considered to be flawed as it only focused on sites with a capacity of 2,500 dwellings rather than examining all sites from the Strategic Housing Land Availability Assessment which are considered available, suitable and deliverable. Smaller sites can contribute to the housing land supply and can come
forward providing a greater choice and assist in housing delivery, especially given the
evidence that indicates existing under performance against the former regional housing
target for 2006 – 2010 which have conveniently been lost as the starting point for the
Core Strategy is proposed as April 2010 rather than April 2006.

1.7 Persimmon Homes consider that the Sustainability Appraisal is unsatisfactory in so far
as not all the opportunities were appraised as those sites below a capacity of 2,500
dwellings were not considered.
1.2. Taken as a whole, is the Core Strategy consistent with the principles and policies set out in the National Planning Policy Framework (the Framework), including the presumption in favour of sustainable development? If it is not, how might any inconsistencies be rectified?

1.1 The NPPF was published on 27th March 2012 and introduced the presumption in favour of sustainable development.

1.2 The NPPF indicates that local plans should be based upon the presumption in favour of sustainable development and that they should contain clear policies to guide how the presumption in favour of sustainable development will be applied. The Planning Inspectorate has published model wording which it considers if incorporated into a draft Local Plan submitted for examination, will be an appropriate way of meeting this expectation for clear policies to guide how the presumption in favour of sustainable development will be applied. The PINs guidance states that:

“Planning authorities with adopted plans or plans in preparation will need to consider which, if any, parts of their plans need updating to reflect the presumption.”

1.3 The model policy produced by PINs, on the presumption in favour of sustainable development which is derived from paragraph 15 of the NPPF and should be included in Local Plans. The advice is that in order to be regarded as fully up-to-date and consistent with the NPPF a local plan should include a policy along the lines set out in the model. Unless there is such a policy other Inspectors have indicated that plans will not be found sound. The model policy is set out below.

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted.”
1.4 The Core Strategy refers to the preparation of the Site Allocations DPD which will allocate new sites for housing and other required facilities in the key settlements and the Selected villages. Reference is also made to the intention to prepare a Development Management DPD. Paragraph 153 of the NPPF clearly states that each LPA should prepare a Local Plan for its area. Any additional development plan documents should only be used where clearly justified. The NPPF is encouraging the preparation of one single document as opposed to several DPDs. It is noted\(^1\) that the Council now intend to merge the Site Allocations and the Development Management DPDs as a single Local Plan document. However, it is considered that as the Core Strategy is reliant on other DPDs it is not considered compliant with the NPPF.

1.5 The plan period has been raised in ID/6 in respect of the government guidance at the time being PPS12 and PPS3 which stated that core strategies need to make provision for at least a 15 year housing supply from the date of adoption.

1.6 The Core Strategy plan period has changed from 2006 - 2026 to 2010 – 2026. In accordance with the Plan Making Section of the NPPF in particular paragraph 157 states that:

“Crucially, Local Plans should:

- Be drawn up over an appropriate time scale, preferable a 15 year time horizon, take account of longer term requirements, and be kept up to date;”

1.7 It is considered that the Core Strategy is not compliant with the NPPF as the plan period is only for 16 years (2 of which have already passed) until 2026 and consequently if adopted this year it would not provide for 15 years post adoption. (paragraph 157 of the NPPF). The Council in responding to the Inspector’s note ID/6 have not changed the time period and consider that there is a need for flexibility in the interpretation of the requirement\(^2\).

1.8 Persimmon Homes consider that the Core Strategy does not take account of longer term requirements as indicated in the NPPF. The plan period should be rolled forward to at least 2028 and the appropriate housing provision made.

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\(^2\) MKC/3a Response to Inspector’s Note ID/6 para 2.1
1.9 It is considered that the Core Strategy is not compliant with the NPPF, as it does not make sufficient provision to meet the homes and jobs needed in the area paragraph 156). The Core Strategy has acknowledged that it cannot meet the housing needs in the SHMA, at least in the short term.

1.10 Paragraph 17 of the NPPF sets out a set of Core land use planning principles which should underpin both plan making and decision taking. A continuous theme running through the NPPF is the importance based on joint working and co-operation to address the larger than local issues. (paragraphs 17, 157, 178 – 182). Whilst there is evidence of joint working in the early stages of the preparation of the Core Strategy, since September 2010 it is not clear what discussions have taken place since the rationale for the changes to the Core Strategy was reported to Council on 14th September 2010. The report set out the principles by which it would review the emerging Core Strategy: ie that it was not saying no to growth, but that it would review the targets in the Core Strategy taking into account the revocation of the SEP; to refresh the Core Strategy and put forward a realistic and deliverable scenario for the development of the Borough over the “next 5 – 6 years”. The housing need identified in the SHMA was not considered to be deliverable in the short term but in the long term there would be a review of the Core Strategy to reflect a bottom up assessment of what the Borough and its residents need and the implication of changing economic conditions. The Core Strategy review would be prepared in the context of the emerging South Midlands Local Enterprise Partnership. There is no reference to the need for joint working and co-operation.

1.11 Housing – The Milton Keynes Strategic Housing Market Assessment 2008 (published in March 2009) has been produced for the LPA, as the whole of Milton Keynes falls within a single housing market area which the local authority consider is consistent with the DTZ Pieda study “Identifying Housing Markets of the South East of England” which was prepared for the South East Regional Assembly. The SHMA states that the housing market area extends beyond the boundaries of the Borough into Bedfordshire, Buckinghamshire and Northamptonshire and most notably contains the towns of Buckingham and Leighton Buzzard. However, SHMAs were commissioned and prepared along local authority boundary lines. The Milton Keynes was commissioned with reference to the administrative area of the borough but through the use of secondary data provided an appropriate context for the local data in relation to the surrounding area. However, it is clear that no joint SHMA was
produced as envisaged in PPS3 paragraphs 32 and 33 and more recently in paragraphs 158 and 159 of the NPPF.

1.12 By limiting provision to rely on the level of existing commitments\(^3\) this does not meet the objectives of the NPPF to significantly boost the supply of housing or support the fact that Milton Keynes is the largest growth area in the South East of England.

1.13 The Core Strategy should be consistent with the objectives, principles and policies set out in the NPPF and this includes making provision for adequate levels of growth not only to meet basic needs but also to invigorate the local and national economy, particularly as Milton Keynes is a growth point.

1.14 Paragraphs 178 - 181 set out how Councils should work collaboratively on planning issues that cross administrative boundaries, particularly those that relate to the strategic priorities set out in paragraph 156 of the NPPF.

\(^3\) Revised Proposed submission October 2010 Changes to the Core Strategy, Introduction paragraph 1.8 and Table 4.1
1.3. **Does the Core Strategy make reasonable, appropriate provision for meeting the strategic priorities for the area?**

1.1 Pegasus Planning Group have made representations on behalf of Persimmon Homes to the effect that the Core Strategy does not make reasonable, appropriate provision for meeting the strategic priorities for the area.

1.2 The Revised Proposed Submission Core Strategy reduces both the plan period and the housing provision. The plan period is reduced as the start of the plan period is 2010 instead of 2006 and the housing provision is reduced from 41,360 dwellings in the period 2006 – 2026 to 28,000 dwellings for the plan period 2010 - 2026. This reduction amounts to a 15% per annum in what is a growth area.

1.3 The Core Strategy relies on existing Local Plan sites and land with planning permission, this accounts for 86% of the total provision for the plan period. The Core Strategy in paragraph 1.8 acknowledges that it is heavily reliant on existing local plan sites.

1.4 It is considered that by concentrating development at the Strategic Reserve Sites to meet the housing requirement, the land supply is going to be heavily concentrated in a few large sites with long lead in times for infrastructure and focussed on the east of Milton Keynes. This does not provide the range and choice of sites as required to significantly boost the supply of housing and widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

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4 Paragraphs 47 and 50 of the NPPF March 2012
1.4. **Does it take appropriate account of the sub-regional and wider context, including cross boundary impacts?**

1.1 Persimmon Homes consider that the strategy does not take account of the wider context as it reduces the overall housing provision for the plan period.

1.2 The Strategy is considered to be inappropriate for one of the fastest growing sub-regions in Europe, especially given the established role of Milton Keynes which is set out in the SEP and was originally identified in RPG9 (i.e. that Milton Keynes and adjoining parts of Buckinghamshire, Bedfordshire and Northamptonshire as having considerable growth potential and recommended an interregional study to consider this.) A study was duly prepared and informed the sub-regional Milton Keynes South Midlands (MKSM) which was published in 2005 as a partial revision to the Regional spatial Strategies for the East of England, East Midland and South East England.

1.3 Milton Keynes was identified as one of nine sub-regional areas where the focus is for growth and regeneration. The policies in the Core Strategy reduce the amount of growth to 1,750 dwellings per annum compared with 2,068 dwellings in the South East Plan, this amounts to a reduction of 15% per year.

1.4 The Core Strategy in reducing the overall housing provision during the plan period fails to meet housing needs in what is a recognised growth area. The borough sits at the centre of the south East Midlands LEP. The consequences of this strategy do not seem to have been fully addressed in the Revised Submission or addressed collectively by the local authorities in the area, each local authority is seeking to reduce is housing provision based on the current economic climate and the concerns about deliverability.

1.5 Table 4.1 Core Strategy Objectives refers to working jointly with neighbouring authorities and other key organisations on the planning of any development located on the edge of Milton Keynes (but outside the current MK boundary) so that these areas are integrated with the city and contribute to its role and character. However, whilst there is a Memorandum of Understanding with Aylesbury Vale DC and Central Beds DC\(^5\), there is no substantive evidence joint working taking place.

\(^5\) MKC/3b
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?*

1.1 It is not clear what is intended in the future. From the text in the Revised Proposed Submission October 2010 paragraph 6.9 – 6.10, cross boundary issues appear to be postponed until a review of this Core Strategy takes place.

“Any options for the future growth of the city after 2026 need to be tested within a future review of this Core Strategy” para 6.9

1.2 The SEP, which is still part of the development plan proposed Strategic Development areas both to the south west and south east of the city in areas outside the administrative boundaries of Milton Keynes. Both Aylesbury Vale and Central Bedfordshire are not progressing with these areas in their Core Strategies therefore any cross boundary issues are not addressed in the Milton Keynes Core Strategy.

1.3 The only “guidance” that is now included in the Core Strategy is in paragraphs 6.10 and 6.11 where seems to be included as a matter of precaution as the Council acknowledges that strategic development proposals in adjacent local authorities will have a considerable effect upon services and infrastructure in the city and will require joint working arrangements with adjacent authorities. The Core Strategy then proceeds to set out a list of matters which would need to be taken into account which is included in Policy CS6 “Place Shaping Principles for Sustainable Urban Extensions in Adjacent Local Authorities”. These are detailed issues in respect of any development being proposed. However, no development is anticipated on Milton Keynes boundary by either Aylesbury Vale or Central Bedfordshire as there are no allocations in their Core Strategies that relate to the boundary.

1.4 Milton Keynes Core Strategy fails to address the issues of the consideration of housing need and suitable locations etc which would need to be considered through the process of joint working to satisfy the test in terms of the Duty to Co-operate.

1.5 Since the abolition of the RSS there is no evidence (that would satisfy paragraphs 179 -181 of the NPPF) that the local planning authorities have collectively looked at the implications for their areas in terms of housing provision and meeting housing needs.
1.6 Persimmon Homes consider that the plan is not “positively prepared” as set out in paragraph 182 of the NPPF, i.e. the strategy does not seek to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities. It is clear that each local planning authority has sought to reduce its housing requirement at the first opportunity based on the economic circumstances and the slowdown in house building and that there is no evidence of joint working on areas of common interest this is to be undertaken “diligently” for the mutual benefit of neighbouring authorities.
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?

1.1 The Council have acknowledged in MKC/3a that there are areas where the Core Strategy differs to the South East Plan, these being the level of housing growth and the housing/jobs ratio. However, the Council then dismisses these differences and concludes that the differences do not mean that the Core Strategy is not in general conformity with the South East Plan.

1.2 Persimmon Homes consider that these differences are fundamental to the Core Strategy are the specific elements of the strategy that lead to non-conformity. Consequently the Core Strategy is not in general conformity with the South East Plan (SEP), which remains part of the development plan until such time as the Orders are published following the Localism Act. The evidence base of the SEP is also still relevant to the preparation of Core Strategies.

1.3 It is noted that the Revised Proposed Submission October 2010 was “refreshed to reflect the changing agenda of the Coalition Government, which includes the revocation of the Regional Spatial Strategies and the return of local planning and plan making powers to local councils.”

1.4 The Coalition Government announced on 27th May 2010 their intention to abolish the Regional Strategies and return decision making powers on housing and planning to local councils. The Secretary of State announced the revocation of Regional Strategies with immediate effect on 6th July 2010. However, a High Court challenge was made by Cala Homes. The judgement considered that the powers set out in Section 78(6) of the Local Democracy, Economic Development and Construction Act 2009 could not be used to revoke all Regional Strategies in their entirety. The effect of the decision was to re-establish Regional Strategies as part of the development plan at least for the time being.

1.5 In 2011 the Secretary of State succeeded in establishing that his proposed revocation of the RSS represents a material consideration in determining planning applications, although this High Court decision was subject to further challenge. In May 2011 the Court of Appeal dismissed Cala Homes claim that the Government’s intention to revoke regional strategies could never be a lawful consideration in planning decisions.
It was accepted that at the moment, the Government’s intention may only be worthy of being given weight in “very few” of the cases in which the proposed abolition of regional strategies will be relevant.

1.6 The passage of the Bill through both Houses of Parliament was completed and the Localism Act 2011 received Royal Assent on 15 November 2011. This has the effect (via s109) of removing Part 5 of the Local Democracy, Economic Development and Construction Act 2009, which provides the framework of the regional planning tier, including Leaders’ Boards whose responsibility it was to prepare the relevant RS. The first stage has effect immediately on Royal Assent of the Localism Bill (17 November 2011)

1.7 The second stage will be to abolish each existing RS outside London and each “saved” County Structure Plan by Order. It is the Government’s clear intention to lay orders in Parliament revoking the existing RSSs and “saved” structure plan policies as soon as possible, but this is subject to the outcome of the Environmental Assessments that DCLG has voluntarily undertaken. Decisions on the revocations will not be made until the Secretary of State and Parliament have had the opportunity to consider the outcome of the Environmental Assessment process. Therefore the South East Plan remains part of the development plan.

1.8 The Council state that they have taken the opportunity to review and revise its emerging policies; this includes the removal of the regional housing targets, although Milton Keynes is still accommodating some growth, but not to the extent it was in the SEP. The Core Strategy proposes an overall housing target of 28,000 dwellings for the period 2010 – 2026. When compared with what was envisaged for same period in the SEP (i.e. 2,068 per annum), over 16 years this equates to 33,088 dwellings for the same period) this is a reduction of 15% when comparing the same period, which is considered to be a significant reduction in a growth area.

1.9 However, this approach ignores the position in the period to 2006 – 2010 as the plan period is now 2010 – 2026 and therefore the early years of the Core Strategy are now “written off”. During this time 8,510 dwellings were completed (AMR December 2011) compared to 10,340 dwellings that was envisaged in the South East Plan. The
shortfall in completions is not taken into account as the plan period in the revised proposed submission is from 2010 – 2026.

1.10 This is a substantial reduction on the housing figures in the SEP in what is identified as a growth area. Milton Keynes was identified as one of the seven Strategic Development Areas (SDAs) in the SEP. The rationale for this is set out in the SEP paragraphs 4.13 – 4.16 and also in the sub-regional section of the plan: Milton Keynes and Aylesbury Vale

1.11 Milton Keynes was also identified in the Sustainable Communities Plan as a Growth Area.

1.12 It is not clear how Milton Keynes can still be promoted as a growth area, serving the wider Milton Keynes/Aylesbury Vale Sub- Region as required by the SEP and Part A of the Milton Keynes and South Midlands Sub Regional Study when it is not in general conformity with the development plan. The Council’s justification for reducing the housing target is that:

“*It would not be in the interests of good planning to ignore the significant changes in circumstances (social, economic and political) which have occurred over since the South East Plan was prepared.*"

1.13 It is considered if the Council anticipate lower levels of growth then it becomes a self fulfilling prophecy and only lower growth will be achieved as there will not be the sites available to bring forward and support economic growth.

1.14 The Council acknowledges in paragraph 1.14 of MKC3/a that the Core Strategy does not adequately address the growth in neighbouring authorities as set out in Policy MKAV2.

1.15 The implications of the Core Strategy not being in conformity with the SEP is that the Core Strategy will be reliant on past commitments to fulfil a significantly reduced housing target, which will not meet the housing need or the actual requirements of the development plan. The evidence from the Strategic Housing Market Assessment shows that more new homes each year than the SEP are required i.e. 3,280 homes compared with the SEP of 2,068. The Core Strategy proposes only 28,000 for the period 2010 – 2026 which is 1,750 dwellings per annum and dismisses its own

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8 MKc//3a paragraph 1.12
evidence base of the SHMA as a housing requirement which is considered not to be deliverable, at least in the short term\(^9\).

1.16 By reducing the overall housing provision to Milton Keynes this is inconsistent with the growth agenda and also fails to meet housing needs in the plan period. It reduces the flexibility in the approach to housing delivery, especially given the complicated tariff funding situation present within Milton Keynes. Some additional and/or different provision is needed to ensure effective provision of housing is deliver and also to ensure that the Tariff payments for funding infrastructure improvements area delivered in a timely manner, it is essential that additional sites are allocated. If housing is reduced significantly as currently proposed, then the contribution towards the Tariff which will fund essential infrastructure will also be reduced. This will substantially frustrate the aspirations of Milton Keynes to become a 21st Century city. (as stated in the Spatial Vision for Milton Keynes in Section 4 of the Revised Proposed Core Strategy Submission October 2010)

1.17 The Core Strategy and its general conformity with the SEP might be rectified if the plan period were extended to 2031 and a more long term view of the directions of growth were considered, increasing the overall provision in accordance with the latest ONS projections.

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\(^9\) Revised Proposed Submission October 2010 Changes to the Core Strategy (d) principles guiding the review.
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?**

1.1 The specific policy deficits that would ensue are related to cross boundary issues. The key risks are that without such policies in place local planning authorities will not co-operate on cross boundary issues or plan for the growth needed without the framework of regional spatial strategies. This specifically relates to the Vision and objectives in the Core Strategy to develop Milton Keynes as a major 21st century city, to become a sub – regional city and be among the UK’s twenty biggest cites, with an international profile and a reputation as a modern forward thinking place to live.

1.2 There has been no analysis of the implications for providing less housing both in Milton Keynes and its neighbouring authorities in terms of the impact on the growth strategy in the SEP and in terms of the provision of affordable.

1.3 Whilst there is a policy included CS6 “Place-Shaping for Sustainable Urban Extensions in Adjacent Local Authorities” – this is not positively planning for urban extensions in this plan period. It appears as a precautionary policy, almost safeguarding Milton Keynes rather than positively embracing growth.

1.4 The duty to co-operate was included in the Localism Act in recognition of the need for joint working between authorities on strategic issues.

1.5 An associated risk is that the local planning authorities will not the have the skills and capacity or effective strategic planning with a consequential risk to the delivery of sustainable development patterns of development and economic growth. It is the Government’s intention to mitigate the risks by the Duty to Co-operate as set out in Section 110 of the Localism Act 2011.

1.6 The new duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
- Requires that councils set out planning policies to address such issues;
- Requires that councils and public bodies to “engage constructively, actively and on an ongoing basis” to develop strategic policies, and
Requires councils to consider joint approaches to plan making

1.7 The Duty to Co-operate was included in the Localism Bill as it was recognised that there is a need for coordination at spatial level higher than individual local planning authorities. The purpose of the duty is to ensure that local authorities and public bodies that are critical to plan making cooperate with each other and that they are involved in constructive and active engagement as part of continual process of engagement in the planning process. The duty is centred on a continual proves of constructive engagements, as much of this is supposed to take place already it is accepted that under the requirements of the duty, this activity will increase.\(^{10}\)

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

1.1 Persimmon Homes consider that the Core Strategy does not satisfy the test of “positive preparation” as set out in paragraph 182 of the NPPF.

1.2 Whilst MCK/4 lists the ongoing co-operation/joint working initiatives, Persimmon Homes consider that in order to address the policy deficits in terms of strategic priorities (paragraph 156 and paragraph 178 of the NPPF) work should have been undertaken to examine the implications of the reductions of the housing requirements across the local authorities. This is a fundamental issue which means the plan does not fulfil the requirements of being “positively prepared” as set out in paragraph 182 of the NPPF and is therefore unsound.

1.3 The Core Strategy is not compliant with the NPPF for the reasons set out earlier in this Statement.

1.4 The deficiencies should be resolved by the local planning authorities jointly examining the implications of reducing the housing requirement, ( to satisfy paragraph 179 of the NPPF) prepare an updated SHMA ( in accordance with paragraph 159), the Core Strategy should meet the Core Planning Principles (paragraph 17) in particular proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local place that the country needs.