Milton Keynes Core Strategy - Response to Inspector’s main matters and questions on behalf of O&H Properties Ltd

2.1 Clarity of spatial strategy

Our client remains concerned about the contradictory objectives of the Core Strategy, which fails to follow the requirements of the NPPF. Whilst the Core Strategy emphasises the importance of housing delivery and acknowledges the overwhelming housing need, the key housing policies (CS1 Milton Keynes Development Strategy, CS2 Housing Land Supply and CS5 Strategic Reserve Areas) act to restrict the amount of housing that can be delivered over the plan period. This is clearly contrary to the fundamental objectives of the NPPF to ‘positively plan’ and ‘boost the supply of housing’. In this way the overriding strategy of the plan is confused and conflicts with current government advice.

It is also believed that the plan is inward looking and fails to address the impact of potential development or non-development on its boundaries. It is believed that the plan should be providing clearer guidance on how it will react if housing development does not come forward in the South West Strategic Development Area (SWSDA) within Aylesbury Vale and Aspley Triangle in Central Bedfordshire.

It is believed that the evidence base has sought to post rationalise the strategy, which has had the effect of creating an illogical plan, with a highly questionable rationale.

2.2 Is settlement hierarchy justified?

Our client continues to raise concerns over the process that Milton Keynes Council has followed in the preparation of their Core Strategy. In particular the housing target that underpins the spatial strategy and the key policies CS1 (Milton Keynes Development Strategy), CS2 (Housing Land Supply) and CS5 (Strategic Reserve Areas). Paragraph 182 of the National Planning Policy Framework (NPPF) requires local authorities to submit a plan, which is “sound”, to achieve this the spatial strategy and housing targets must be ‘justified’. It remains our view that the Milton Keynes strategy is not based on a robust and credible evidence base and that the council has not been through the correct preparation process to inform their plan.

Paragraph 1.1 of the Council’s Housing Technical Paper 2011 confirms that the lower housing target of 28,000 to 2026 was set following the Government’s announcement of its intention to revoke the regional spatial strategies. This announcement was made in July 2010, and the new housing target (15% below the South East Plan target and excluding the South East Strategic Development Area (SESDA)) consulted upon in the Revised Proposed Submission Consultation Core Strategy in October the same year.

It is contended that during this period of up to three months, the council did not have sufficient time to properly reconsider their housing projections in order to formulate a robust housing target of to fully justify the removal of the SESDA. Furthermore, in the period since this decision was made, it is clear that the council have sought to retrospectively justify this target and in particular the reduced allocation of 2,500 new
This approach remains contrary to national guidance, now set out in the NPPF and in particular paragraph 47, which states ‘…local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for the market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework...’ Furthermore, paragraph 52 encourages local authorities to allocate ‘larger scale development’ in order to increase housing supply in areas of defined need.

Ever since the council promoted their lower housing target, the Inspector and a large number of Core Strategy participants have sought clarification as to why this figure deviates from the South East Plan and the extensive evidence that supported it, and how this lower number is justified. Although the council has made repeated attempts to respond to these fundamental questions, through further written submissions, additional studies and even quite significant changes to the plan (e.g. the inclusion of Wavendon Golf Club as a housing allocation) it remains the case that the process they have followed including assessment, evaluation of alternatives, sustainability appraisal and public involvement is flawed. We therefore continue to assert the view that the plan is unsound, as the spatial strategy is based on a subjective housing target, which is not supported by a robust evidence base or an appropriate plan making process. Furthermore the deletion of the SEESDA is actually contrary to the latest government guidance in the NPPF and is likely to be counter productive in achieving the council’s overarching aim of boosting housing supply in order to meet identified need.

2.3 Rural areas policy framework

Our client has no comments to make on this point.

2.4 Balance between area-based policies and tables

Our client has no comments to make on this point.