During Day 1 of the Examination into the Core Strategy, a number of participants argued strongly that the Plan failed to achieve the legal requirement of conformity (or general conformity) with the South East Plan, which at the time of submission in March 2011 and of the Examination remained part of the Development Plan.

Although lack of general conformity is not accepted by the Council, the following text is put forward for consideration as a basis for a possible Main Modification that might be proposed by the Inspector in the event that she agrees with the participants’ arguments.

The following text has been prepared having regard to the Judgment of the Court of Appeal in the case of Persimmon Homes (Thames Valley) Ltd and others v Stevenage Borough Council.

In order to achieve the objective of overcoming the alleged lack of conformity, it is essential that the text to be inserted into the Plan makes direct reference to the policies and provisions of the South East Plan. Accordingly, the following changes are suggested:

**New Policy:**

The Council will undertake an early review of the Core Strategy to 2031, to be completed by 2015. This will take as its starting point the delivery of housing and employment requirements and the spatial approach of the South East Plan.

**Supporting text** (adapted from paragraph 5.14 of the submitted Core Strategy)

Projections of future changes to the population and economy are subject to significant uncertainties. Continued high levels of in-migration to Milton Keynes or a higher rate of economic growth which results in higher demand for housing may have negative social, economic and environmental consequences. Such consequences could include increasing commuting into the city, and increasing overcrowding, sharing and concealed households. There may be adverse implications for the wider housing market area if the homes required to support the workforce, or population pressures, exceed the supply of housing land delivered within the authority boundary or in planned extensions to Milton Keynes urban area in adjoining authorities as the South East Plan anticipates.

The Council also acknowledges that the SHMA suggests a substantial gap between forecast affordable housing need and potential affordable housing supply. The Council’s choice of the scale of overall housing to be accommodated inevitably limits the number of affordable homes that can be delivered. The likely gap between affordable housing need and provision will have negative socio-economic consequences.

The level of new housing required across the Borough during the period 2006 – 2026 in accordance with the South East Plan is 41,360 homes (an average of 2,068 per annum) and within the MK growth area overall is 52,350 (2,617.5 per annum). The Council has concerns about the deliverability of this number of homes and therefore proposes to make provision at this stage for the delivery of 1,750 homes per annum (28,000 in total by 2026) which represents an increase in the average housing completion rate over the last 5 (1,660) 10 (1,560) and 20 (1,610) years. An additional provision of [ ] homes will be allocated in Plan: MK at and adjoining the urban area to meet the requirements of the South East Plan (a further), subject to the objective assessment of needs to be produced in accordance with paragraph 47 of the National Planning Policy Framework.
In accordance with the duty to co-operate imposed upon it by virtue of the Localism Act 2011 and guidance in the NPPF, Milton Keynes Council will pursue appropriate action to secure delivery of the SDAs through joint working with the adjoining local planning authorities.

Consequential amendments may be required to Table 5.2 either to identify the “Overall Housing Target” as “interim” or to identify the additional amount to be allocated in Plan: MK, reflecting the full South East Plan housing target, subject to the objective assessment of needs.