

Response by Milton Keynes Partnership on Matter 8F: Sub-Regional Session on Milton Keynes and Aylesbury Vale

Questions and Comments on Matter 8Fi - Strategy and Implementation

8Fi.1 Are the inter-relationships between Milton Keynes and Aylesbury Vale and the adjoining sub-regions and regions, particularly in terms of economic prospects and travel patterns, sufficiently recognised in the draft RSS?

The views of the Milton Keynes Partnership (MKP) expressed in this Statement should be read in conjunction with the Joint Statement of Common Ground (JSOCG) produced by SEERA in consultation with the principal authorities and other signatories in response to this Matter.

Our representation to Matter 2A noted the importance of not only considering the relationship of Milton Keynes with other parts of the South East region, but also of Milton Keynes' position as part of the wider Milton Keynes South Midlands Sub-Region- a sustainable growth area incorporating parts of South East, East of England and East Midlands regions.

The draft South East RSS recognise that the Part A Statement will continue to provide the strategic sub-regional framework for the entire MKSM Growth Area. MKP supports the emphasis within the plan on the Milton Keynes South Midlands Sub-Regional Strategy Part A Statement of this document as this provides the '*overarching objectives and strategic policies for the MKSM area as a whole*' (paragraph 1.1, pg 323). It is this part of the Strategy document which takes into account the complex political geography of MKSM- spanning three regions, three county councils and numerous unitary and district boundaries. MKP supports the intention of the South East Plan to continue to refer to the Part A Statement as providing the '*strategic sub-regional framework for the entire Growth Area*' (paragraph 1.2, pg 323). The policy framework for the Milton Keynes and Aylesbury Vale element of MKSM needs to be considered in this context.

MKP recommends that the draft South East RSS give greater emphasis to and guidance on important cross-regional initiatives, particularly where these underpin the strategic spatial logic and deliverability of elements of the plan. The RSS can provide greater certainty for such projects which in turn is an essential pre-requisite for financing, particularly via land value capture mechanisms. An example of this is the approach to East West Rail within the draft RSS. In its current form, East West Rail is primarily treated as part of a growth area strategy- focusing on MKSM- rather than being firmly 'locked in' to the South East Plan. In practice the route of much of the western part of East West Rail, spanning Oxford, Bicester, Aylesbury and Milton Keynes (Bletchley) extends beyond MKSM, yet the Plan does not refer to the scheme in its entirety. Currently, it is only in the Implementation Plan where the delivery and implementation of East-West rail is clearly identified (Annexes 1 and 2). Nowhere in the draft RSS is the Western extension of East-West Rail treated as a single cross-regional scheme. This omission could give rise to uncertainty about the route's future, potentially undermining would-be investor confidence in it. On this last point, no reference is made to the recent feasibility work which has been led by the East-West rail Consortium which includes Network Rail. The progress which has been made in testing and refining feasibility and costs should be mentioned in section 6 of the Implementation Plan which deals with Ongoing Work.

8Fi.2 How workable is the concept of monitoring new housing delivery against district-wide job gains at the rate of one for one, and how would this be applied? (section E8, para 5.2)

The MKP supports the concept of monitoring new housing delivery against district-wide job gains as a good one.

However, in the case of Milton Keynes, MKP strongly urge against the use of an exact ratio. Instead the ratio suggested for Milton Keynes sets new housing delivery against district-wide job gains at a **minimum** rate of one job to one house. This approach is not intended in any way as a policy of constraint; there is no express or implied limit on job numbers as any such limit would inevitably have a detrimental impact on inward investment and employment retention, both of which are imperatives for sustainable growth and economic success. There is therefore the expectation that over time there will potentially be more than 1 new job per new household in Milton Keynes.

This reflects the economic aspirations of Milton Keynes over the South East Plan period; where it is expected to grow as a regional hub with a commensurate increase in higher skilled jobs, the retention of higher skilled workers in the workforce and improved levels of attainment locally. In this context, its economy is expected to grow faster than historically and also faster than in surrounding market towns, by virtue of its functioning as a regional economic centre rather than a local or market town.

MKP is mindful of the overall sustainability of Milton Keynes relative to its surrounding districts and towns. It actively support efforts to monitor job growth across all sectors alongside housing growth, in order to understand the nature of the relationship and any emerging imbalances. Only if this information is known will it be possible to actively manage the effects of any imbalance; for example increasing investment in public transport facilities and encouraging the identification and fostering of distinct qualitative economic roles for different areas.

There are emerging monitoring arrangements in place within MKP. A robust system has been developed to monitor housing growth; data and forecasts for new dwellings are captured by MKP via the Joint Housing Delivery Team, and reported to the Inter-Regional Board on a six monthly basis. While there is some aggregate job monitoring taking place, which is also reported alongside dwellings to the Inter-Regional Board, MKP recognises the need to improve the qualitative aspects of their employment monitoring- in order to capture the changing skill profiles of the jobs.

8Fi.3 Have realistic assumptions been made about transport and infrastructure provision in the proposed strategy?

Assumptions about transport and infrastructure provision are embedded within not only the draft RSS but also the MKSM Sub-Regional Strategy document. These explicitly link transport and infrastructure provision with housing and job growth, in order to create truly sustainable communities. MKP are committed to this principle.

As a strategic plan, the draft RSS should provide guidance on the intended relationship between transport and infrastructure provision and other aspects of sustainable community provision. As currently drafted, useful high level statements are made in draft RSS in both the cross cutting policy section, which sets out the relationship between transport and infrastructure and other aspects of spatial strategy (Policy CC5), and also in Section D4 where general policies on Communications and Transport are outlined. However, these are generally poorly interlinked with the sub-regional sections of the Plan and those proposals set out in the Implementation Plan. Comments earlier in this statement have highlighted this specifically in the context of East-West Rail.

MKP notes that draft RSS does not explicitly refer to the funding for and delivery of **green** infrastructure either at a regional or sub-regional scale, with the possible exception of references to costing of green infrastructure in Aylesbury in Annex 3 of the Implementation Plan. MKP considers that the RSS must more explicitly refer to green infrastructure in its sub-regional policy, and in the implementation plan, to secure the necessary funding commitments to support sustainable growth and maintain current quality of life standards. In this context, MKP notes that the Environment Agency intend to comment on this matter in their statement on Matter 8Fi.3.

The question of the importance of the actual financing and delivery of that infrastructure is something that is dealt with primarily elsewhere in the draft RSS - notably in the Implementation Plan- and more explicit cross-linkages between these statements and sub-regional sections of the plan would be beneficial if only to reiterate their importance for the delivery of sustainable communities. We provide further comment on this in our representations on Matters 1D and 10A.

Specific questions for Matter 8Fii - Milton Keynes

8Fii.1- Does the level of housing provision proposed for Milton Keynes post 2021 take appropriate account of its growth area status, local constraints and opportunities and current build rates?

The level of housing provision proposed for Milton Keynes post 2021 does take account of its growth area status, local constraints and opportunities and current build rates. As our answer to Matter 2A states, while MKP endorses Milton Keynes's position as a location for major growth over the South East Plan period, including but not exclusive to 2021-2026, it notes that Milton Keynes is by no means 'constraint free' in that it is vulnerable 'to flood risk, water resource availability and biodiversity' (Executive Summary, paragraph 57, RTP for GOSE (2006), Augmenting the Evidence Base). The Environment Agency recommend that a Water Cycle Strategy be undertaken to assess water supply, surface water drainage, flood risk and waste water treatment capacity having regard to the proposed level of growth in the Milton Keynes sub area; MKP would support the need for this work to be undertaken. This strategy is likely to confirm that Milton Keynes is a constrained location which will need additional infrastructure construction and investment to accommodate the proposed levels of growth. Making provision for this infrastructure will then enable delivery of the proposed growth in accordance with the agreed timescale.

Furthermore, representations for Matter 2A note that the growth proposed already requires build rates significantly in excess of those achieved in recent years. The scale of growth already planned for in draft RSS necessitates a doubling of completions in the period 2006/7 to 2010/11 to levels close to 3,000 dwellings per annum when compared with levels for 2001-2006 (MKP/Joint Housing Delivery Team forecasts).

It is noted that the levels of housing provision suggested in Policy MKAV1 for between 2006-2026 endorse the original figures identified as part of the sub-regional planning process. These figures also formed the basis for the technical work behind the Strategy for Growth to 2031. It would therefore be consistent to retain the housing numbers as currently proposed in the draft South East Plan.

8Fii.2- To what extent should the RSS incorporate the findings of the Strategy for Growth to 2031 by the Milton Keynes Partnership, including the implied apportionment by district post 2016 (Policy MKAV1)?

MKP recognises that the Strategy for Growth (2031) document is part of the evidence base for the future local development documents. As such, it offers essential detail on the possible rates and locations of future growth both in Milton Keynes and in identified urban extensions.

MKP has no doubt of the value of the Strategy for Growth (2031) document, and strongly encourage its recognition as a policy-influencing document for Milton Keynes in the South East Plan. In its entirety it provides a viable strategy for sustainable growth in Milton Keynes. MKP is keen that the South East Plan provides high level support in principle to the Strategy.

MKP has submitted the Strategy to provide a substantial body of technical evidence which represents the outcome of a robust joint working process with the local authorities affected by the growth of MK in both the SE and the Eastern region. It was subject to extensive consultation and independent Peer Review. This work will assist the Panel and others by informing the Sub-regional debate at the EIP and will provide robust evidence for the subsequent preparation of

Local Development Frameworks for those areas in which growth is located. MKP recognises that some of the Growth Strategy findings and recommendations are too detailed for regional debate. Over time the content of the Strategy will be the subject of further consultation before it is refined and incorporated into future local planning policy in Milton Keynes and neighbouring authorities. It may therefore be potentially premature for the South East Plan to provide finite commitment to all of its content, since there are some aspects of the Strategy that will require further more detailed investigation. Two such aspects are transportation impacts and strategic flood risk, both of which are the subject of ongoing review and will require further joint work with the local authorities and other stakeholders.

MKP notes the views expressed in the JSOCG about the district apportionment of growth post 2016 in Policy MKAV1. The Growth Strategy provides a basis for the district apportionment of housing in Milton Keynes and Aylesbury Vale beyond 2016; further work will be needed to refine the phasing and determine precise locations for growth. This latter work should be done as part of joint working through the LDD process, or processes. For the purposes of the EIP, the information provided in the Strategy for Growth should be taken as the basis for future joint working and should be referred to in the RSS in that context.

The SOCG also reflects the fact that alternative scenarios have been submitted to the EIP since the completion of the Growth Strategy. In this context MKP supports the need for the Panel to make clear recommendations on the broad locations to be incorporated into the spatial strategy for Milton Keynes, with the implication that additional time may be required to enable this matter to be resolved before the EIP closes.

8Fii.3- Are the mechanisms for joint working across local authority boundaries to deliver the expansion of Milton Keynes adequately addressed in draft RSS? What, if any, tools are needed to manage the impact of Milton Keynes expansion on surrounding towns and villages?

MKP was set up under Statutory Instrument 932 in June 2004 to ensure effective joint working among a wide range of partnership organisations delivering the expansion of Milton Keynes and reports to a Partnership Committee. It has a statutory development control function within a designated Urban Development Area (UDA). The voting members of the Partnership Committee comprise three representatives from Milton Keynes Council, three representatives from the Local Strategic Partnership, two members from English Partnerships (one of whom is a Board Member) and two independents, including the Chairman. There are 5 non-voting members including representatives from each of Buckinghamshire County Council and Aylesbury Vale District Council, as well as SEEDA, GOSE and the Housing Corporation. In its capacity as a local delivery vehicle, MKP offers a wide range of experience and is feeding this into the draft RSS via the EIP process. In short, while MKP commend the draft South East Plan's commitment to delivery and implementation, they do have comments about how that delivery and implementation will occur within growth areas in the South East generally and within Milton Keynes specifically. For further information we refer you to our representations on Matter 1D- Demand Management and Implementation, and Matter 10A- Delivery.

One specific tool that could be used for the delivery of a sustainable planning strategy in Milton Keynes and the surrounding area up to 2026 are Joint Local Development Documents (as part of individual authority Local Development Frameworks) produced by Milton Keynes, Aylesbury Vale and Mid Bedfordshire District authorities. This offers the potential for establishing joint plan making across the part of the Milton Keynes South Midlands Growth area; and maximising the chance of achieving genuinely sustainable growth at the projected rates.

MKP is aware of the work undertaken by Colin Buchanan & Partners on behalf of Buckinghamshire County Council and Aylesbury Vale District Council to review the Milton Keynes Long Term Growth Strategy. MKP notes that the decision to commission such a review was taken independently by Buckinghamshire County Council and Aylesbury Vale District Council following submission of the Growth Strategy to the SE Plan Panel in June 2006. It sits outside the partnership approach which underpinned the Growth Strategy project and for this reason the Partnership considers that it does not provide evidence which could form the basis for future joint working.

The Growth Strategy identified a range of tools to manage the impact of Milton Keynes expansion on surrounding towns and villages; and MKP generally supports the principle of using these where appropriate. Examples include measures to safeguard long term development boundaries of the city, including those for the existing city and those on the edge of new extensions. The Growth Strategy recommends that local authorities consider the use of policy mechanisms to do this and MKP supports the clarification of these through the LDF process.

8Fiii.4- What level of housing provision should be made for those parts of Milton Keynes unitary authority area which lie beyond Milton Keynes city and its planned and proposed urban extensions?

MKP have no comments under this sub-question at this point in time.