

Abstract:

To advise on the proposed changes to the Submission Core Strategy Development Plan Document for consideration at Cabinet on 24 November.

Provenance:

At the last meeting of the Local Development Framework Advisory Group (which reconvened on 3 September), Members completed their comments on the draft Core Strategy subject to receiving the revised document. An independent review of the document was undertaken during October and the outcome of that review is brought before the LDFAG for consideration at this meeting.

This is a key decision listed on the Forward Plan.

The Core Strategy will help to deliver Council priorities 1 to 4 from the Council Plan 2008. It will affect all wards within the Borough as it will help influence strategic planning decisions in the future.

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY: SUBMISSION DOCUMENT

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1. Issues

- 1.1 The Local Development Framework Advisory Group has considered members comments on the Draft Submission Core Strategy in a series of meetings this year. At the last meeting of 3 September, the Advisory Group agreed the changes to the document before sending it to the Planning Officers Society Enterprises (POSe) for an independent review. The review was for:
- i) An assessment of how the work undertaken to date stands against the tests of soundness;
 - ii) Observations on the clarity and internal consistency of the document in planning policy terms and its readability as Plain English;
 - iii) Recommendations on actions considered necessary to deal with any areas of weakness or where clarification is desirable; and
 - iv) Advice on finalising the Core Strategy to make it likely that it will be declared sound at examination.
- 1.2 The Submission Core Strategy considered by the POSe was the version of the document (dated 7 October), revised after consideration by the LDFAG at their meeting in September. It was sent to the LDFAG on 4 October.
- 1.3 In response POSe has provided the Council with a 'concise report' which sets out the background and the process undertaken in the review. This report is

attached as **Appendix 1**. The penultimate paragraph of the concise report explains that a marked-up version of the draft submission document (7 October) has been supplied which recommends a considerable amount of editing. That marked-up version is attached as **Appendix 2**.

1.4 Appendix 2 is printed in colour to show the changes suggested by POSe and where the editing changes has been suggested by officers. The colour coding is as follows:

- (a) Blue normal font represents the POSe changes to the document.
- (b) The red font shows the questions, comments or suggestions for further work made by POSe.
- (c) The blue italic font shows the revisions and editing proposed by the officers in response to the recommendations by POSe.

1.5 As the concise report from POSe explains, the Council has a tight timetable for publication of the Submission Core Strategy and the aim is to report the views of this Group to Cabinet on 24 November. Subject to consideration by the Cabinet the final decision on the Submission Core Strategy will be made by full Council on 8 December.

1.6 The key messages in the report from POSe are:

- (a) The scale and complexity of development covered in the Milton Keynes Core Strategy dwarfs most other local development frameworks in the country.
- (b) The Development Plans staff are commended for impressive progress in preparing this plan.
- (c) The PINS (Planning Inspectorate) advisory visit revealed no significant flaws in the soundness of the plan's preparation and this was confirmed in the strategic research by POSe.
- (d) However, more work was recommended prior to the publication of the submission document, including self-assessment tests, checking the delivery of development and infrastructure, and rigorous editing of the submission document.

2 Alternative Options

2.1 Should the Council decide to defer or not approve the Submission Core Strategy the implications would be far-reaching:

- (a) Some of the background work (the evidence base) will become out of date and it will take more time and more money to update

- (b) The Council's performance in producing the Core Strategy is monitored through national indicators, with good performance rewarded through HPDG
- (c) Other statutory planning policy documents would be delayed - for example, the update of Development Control policies which will address (amongst other things) the need for a new policy on Houses in Multiple Occupation
- (d) The development industry may decide to progress sites by planning application and appeal; these sites may not be consistent with the Council's strategy for the Borough.

3 Implications

3.1 Policy

The Core Strategy will help meet the following Council priorities by including policies which address:

1. Delivering development that will make better places and places better through good design and planning;
2. Creating conditions for increasing the commercial potential for the public transport network;
3. Providing a planning framework for the regeneration of priority estates and neighbourhoods and
4. Ensuring the provision of affordable housing.

3.2 Resources and Risk

The preparation of the Core Strategy will be funded largely from the existing Development Plans budget. Further consultants' studies may need to be commissioned as part of the evidence base to support the Core Strategy in the run up to examination. Housing and Planning Delivery Grant (HPDG) has been used to fund some of these studies in the past. Some studies have also been jointly funded with Milton Keynes Partnership (MKP) and opportunities will continue to be explored. The 2008 study on the Strategic Development Areas (SDAs) was jointly funded by all of the affected local authorities (Bucks and Beds county councils, Aylesbury Vale and Mid Beds district councils, MKC and MKP). Joint working on the SDAs is ongoing and may result in jointly funded technical work to support the preparation of more detailed planning for these areas.

The timetable for producing the Core Strategy is set out in the revised Local Development Scheme (LDS) approved by Cabinet on 17 March 2009. In terms of future grant settlements HPDG will be based on (amongst other things) the delivery of new housing rather than just related to performance against the LDS.

The new examination process will involve more frequent Public Examinations but they should be shorter and more focussed. An annual Planning Inquiries budget is in place to fund Public Inquiries / Examinations. This position will be kept under review.

The preparation of the Core Strategy involves considerable officer and member time. It is the key service priority of the Development Plans team. Internal promotions, secondments and staff departures meant that the Development Plans team was short staffed between September 2007 and summer 2008. This had an inevitable impact on the original timetable for the Core Strategy.

Risk is set out under the alternative options heading above.

N	Capital	Y	Revenue	N	Accommodation
N	IT	N	Medium Term Plan	N	Asset Management

3.3 Carbon and Energy Management

In order to minimise the impact of new development, the Core Strategy includes a chapter and policies for Building Sustainable Communities. It sets high standards for sustainable construction, the use of renewable energy and sustainable design.

3.4 Legal

The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. The Milton Keynes Local Plan and associated Supplementary Planning Guidance will eventually be replaced by the Core Strategy and other Local Development Documents.

3.5 Other Implications

Equality: Consultation on the Core Strategy has been and will be in line with the Council's Statement of Community Involvement, including an Equalities Audit to help target under-represented or hard-to-reach groups. Equality issues have been considered through the Sustainability Appraisal that accompanies the Core Strategy and also in preparing policies in the document itself.

E-Govt: The Core Strategy will be available via the Council's website. People will be able to comment online and read other people's comments using the Limehouse system. The documents that make up the evidence base, including the MK Growth Strategy documents (including the report on consultation) are available on the Council's website.

Sustainability: The Core Strategy is subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under statutory regulations. SA and SEA are iterative processes that run throughout all stages of Core Strategy production. The work is combined into one Sustainability Appraisal report which assesses the environmental, social and economic impacts of the policies and proposals developed for the Core Strategy. A Sustainability Report

encompassing all of the work to date will be published alongside the submission document. It is not a formal consultation document but its scope has been agreed with the relevant statutory consultees.

Users, partners and stakeholders: The Local Strategic Partnership and other key MK stakeholders have been involved throughout the stages for the preparation of the Core Strategy. MKP and the neighbouring local authorities have also been involved in shaping the submission document.

Y	Equalities / Diversity	Y	Sustainability	N	Human Rights
Y	E-Government	Y	Stakeholders	N	Crime and Disorder
Y	Carbon and Energy Policy				

Background Papers:

- The Town and Country Planning (Local Development) (England) Regulations 2004, as amended.
- PPS12: Local Spatial Planning (CLG, 2008).
- Regional Planning Guidance for the South East (RPG9) (March 2001).
- Milton Keynes and South Midlands Sub-Regional Planning Guidance (March 2005)
- MK2031: draft Growth Strategy (June 2006).
- Milton Keynes Local Development Scheme (2009 – 2012) (as amended March 2009).
- Report on the consultation on the Growth Strategy for Milton Keynes (Ubiquis, December 2006).
- Delegated Decision report - 10 November 2006. MK Local Development Framework Core Strategy: Issues and Options consultation paper.
- Cabinet report – 16 January 2007. Regional Spatial Strategy 9: Consultation on the MK Growth strategy and further statements to the South East Plan Examination in Public.
- Cabinet report – 07 November 2006. Regional Spatial Strategy 9: The South East Plan Examination in Public & the response to consultation on the MK Growth Strategy.
- Cabinet report - 27 June 2006. Regional Spatial Strategy 9: The South East Plan – Response to the consultation on the submission plan.
- Cabinet report – 7 October 2008 the South East Plan: the Government’s Proposed Changes to the Regional Spatial Strategy
- Technical Background Papers: Housing Land Supply and Delivery (Milton Keynes City); Rural Area Spatial Options; Landscape Character.

- The full South East Plan is available to view through the South East England Regional Assembly website at: www.southeast-ra.gov.uk/southeastplan
- Documents relating to the MK2031: draft Growth Strategy are available at: <http://www.mkweb.co.uk/mk2031>
- LDF Advisory Group minutes available at: <http://www.milton-keynes.gov.uk/CmisWebPublic/CommitteeDetails.aspx?committeeID=2139>
- The Core Strategy evidence base available at: <http://www.milton-keynes.gov.uk/planning%2Dpolicy/DisplayArticle.asp?ID=61306>