

Key Decision	No
Listed on Forward Plan	No
Within Policy	Yes
Policy Document	Aylesbury Vale Core Strategy

AYLESBURY VALE CORE STRATEGY CONSULTATION: DRAFT MKC RESPONSE

Accountable Cabinet Member: Councillor Mike Galloway

Contact Officer: Diane Webber, Senior Planning Officer

1. Purpose

- 1.1 This report gives members the opportunity to discuss the officers' comments on the Aylesbury Vale Core Strategy which are set out in the attached draft Cabinet report for 21 July, 2009.

2. Recommendations

- 2.1 That the Advisory Group reviews the comments on the Aylesbury Vale Core Strategy and provides feedback to Officers. The Advisory Group's comments will be reported to Cabinet on 21 July in an addendum to the main report as the final deadline for Cabinet reports is 6 July.

3. Issues

- 3.1 The Aylesbury Vale Core Strategy was published on 10 June for a 6 week consultation closing on 22 July. This is the final stage in the preparation of the Core Strategy.
- 3.2 The attached draft Cabinet report for 21 July 2009 sets out the background to the Aylesbury Vale Core Strategy preparation process together with the officers' recommended comments.
- 3.3 The officers' comments focus on the allocation of a Strategic Development Area of 5,390 homes on a site to the south west of Milton Keynes. The comments are set out in full in Appendix A to the attached draft Cabinet report, but in summary, the proposed response covers:

- (a) lack of weight given to the strategic context and identity of the SW SDA;
- (b) joint working arrangements;
- (c) Transport impacts
- (d) infrastructure requirements;
- (e) place-shaping principles;
- (f) infrastructure and delivery and
- (g) the site allocation process.

3.4 The Advisory Group is asked to review the comments set out in the attached draft Cabinet report and provide feedback.

4. Implications

4.1 Policy

Once adopted the Aylesbury Vale Core Strategy will become part of the statutory planning framework for Aylesbury Vale It will form the basis for subsequent DPDs and SPDs including the Master Plan and Delivery SPD for the SW SDA.

4.2 Resources and Risk

Financial: There may be costs in relation to us making our case at the examination into the Core Strategy. These may be met from the current Environment Budget.

Staffing: Commenting on the Aylesbury Vale Core Strategy and undertaking joint work on the SW SDA has involved and will continue to involve member and officer time. The Examination into the Core Strategy will involve officer time in preparing statements and in attending sessions. A Senior Planning Officer Joint Working post in the Spatial Planning division is funded by MKP for three years from June 2008.

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

4.3 Carbon and Energy Management

The Council will be encouraging AVDC to ensure that Master Plan and Delivery SPD and any subsequent planning applications support the development of sustainable buildings and patterns of development which will help to cut per capita carbon dioxide emissions.

4.4 Legal

The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Once adopted, the Aylesbury Vale Core Strategy will become part of the statutory planning framework for the district. It will form the basis for subsequent DPDs and SPDs including the Master Plan and Delivery SPD for the SW SDA.

4.5 Other Implications

- (a) *E-govt:* The Aylesbury Vale Core Strategy is available through the AVDC website at: www.aylesburyvaledc.gov.uk/ldf .
- (b) *Users, partners and stakeholders:* AVDC have consulted a wide range of stakeholders, parish and town councils and local interest and community groups on their Core Strategy.
- (c) *Sustainability:* the document has been subject to a sustainability appraisal.

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

Background Papers:

Background Papers:

- PPS12: Local Development Frameworks
- South East Plan, June 2009 . This can be viewed at: www.gos.gov.uk/gose
- Milton Keynes and South Midlands Sub-Regional Planning Guidance (March 2005)
- MK2031: draft Growth Strategy (June 2006).
- Documents relating to the MK2031 Growth Strategy are available at: <http://www.mkweb.co.uk/mk2031>

Annex A: Draft Cabinet report for 21 July 2009, setting out the detailed officers comments on the AVDC Core Strategy.

ANNEX A: Draft Cabinet report for 21 July 2009

ITEM
CABINET
21 July 2009

Key Decision	Yes
Listed on Forward Plan	Yes
Within Policy	No

AYLESBURY VALE CORE STRATEGY

Accountable Cabinet Member: Cllr. Mike Galloway

Contact Officer: Diane Webber (Senior Planning Officer – 252668)

5. Purpose

- 5.1 To agree the Council's response to the consultation on Aylesbury Vale District Council's Core Strategy

6. Recommendations

- 6.1 That the officer comments set out in Appendix A to this report, be approved as the Council's response.

7. Issues and Choices

- 7.1 The Aylesbury Vale Core Strategy was published on 10 June 2009 for a 6 week consultation closing on 22 July. This is the final stage in the preparation of the Core Strategy.

- 7.2 Following this consultation, the next stages in the Core Strategy process are:

- The Core Strategy will be formally submitted to the Secretary of State and all comments received will be forwarded to an independent planning inspector for his/her consideration. AVDC anticipate that this will take place this autumn.

- An examination into the Core Strategy will follow, likely to be early in 2010. The purpose of the examination is to consider whether the Core Strategy complies with the legal requirements for the preparation of a development plan document and is 'sound'. The Inspector will invite a range of organisations and individuals to attend the examination.
- The Inspector's report is likely to follow some 3-4 months after the close of the examination, after which time AVDC will be in a position to adopt the Core Strategy.

Commenting on the submission Core Strategy

- 7.3 As explained above, the purpose of the examination is to consider the soundness of the Core Strategy. As a result, if it is considered that the Core Strategy (or part of it) should be amended, then an objection will need to be made, explaining in what way the document is not sound and to suggest how it should be changed to respond to this.
- 7.4 The tests of soundness are that the Core Strategy should be:
- Legally Compliant (meeting the requirements of the Planning and Compulsory Purchase Act 2004) and be:
 - Justified – the Strategy needs to show evidence of the participation of the local community and stakeholders; it need to be backed up with a robust evidence base and needs to represent the most appropriate strategy when considered against other reasonable alternatives.
 - Effective – the Strategy needs to be deliverable, be consistent with the strategies of neighbouring authorities, be flexible and able to be monitored; and be.
 - Consistent with national policy.
- 7.5 The Aylesbury Vale Core Strategy allocates a site for a Strategic Development Area (SDA) of 5,390 homes to the south west of Milton Keynes. This allocation reflects the final South East Plan (SEP), published in June 2009, which identifies two SDAs serving Milton Keynes – one to the south east and one to the south west of the city, Although the SDA to the south west is located within Aylesbury Vale, it is conceived as a sustainable urban extension to Milton Keynes.
- 7.6 Officer comments on the Core Strategy are set out in full in Appendix A, but in summary, our proposed response covers:
- (h) lack of weight given to the strategic context and identity of the SW SDA;
 - (i) joint working arrangements;
 - (j) Transport impacts
 - (k) infrastructure requirements;
 - (l) place-shaping principles;
 - (m) infrastructure and delivery and

(n) the site allocation process.

- 7.7 The draft Cabinet report was considered by the Local Development Framework Advisory Group (LDF AG) on 8 July 2009. Comments arising from discussions at the LDF AG are set out in the addendum to this report.
- 7.8 It is important to note that in all cases where officers are recommending that an objection should be made to the Core Strategy, alternative or additional wording has been suggested to meet the concern. In that sense therefore, the Aylesbury Vale Core Strategy does not raise any fundamental issues of principle that cannot be addressed at this stage.
- 7.9 Whilst the allocation of the SDA itself and its general location is supported, there is concern that the Strategy fails to adequately convey the strategic context for this growth area. The emphasis throughout is that this is primarily a development within Aylesbury Vale, with the functional relationship with Milton Keynes being under-stated.
- 7.10 We also support AVDC's intention to prepare a Masterplan and Delivery Supplementary Planning Document (SPD) to ensure the effective delivery of this site but consider that there should be more mention of how the SDA will deliver some of the sub-regional and strategic growth requirements of the wider Milton Keynes area as well as a greater commitment to public engagement in the SPD preparation process. Additionally, due to the timing of the publication of the final SEP, the Core Strategy does not fully reflect some of the requirements for the SDA. These will need to be addressed in the Masterplan SPD.

8. Implications

8.1 Policy

Once adopted, the Aylesbury Vale Core Strategy will become part of the statutory planning framework for Aylesbury Vale. It will form the basis for subsequent DPDs and SPDs including the Master Plan and Delivery SPD for the SW SDA.

8.2 Resources and Risk

Financial: There may be costs in relation to us making our case at the examination into the Core Strategy. These may be met from the current Environment Budget.

Staffing: Commenting on the Aylesbury Vale Core Strategy and undertaking joint work on the SW SDA has involved and will continue to involve member and officer time. The Examination into the Core Strategy will involve officer time in preparing statements and in attending sessions. A Senior Planning Officer Joint Working post in the Spatial Planning division is funded by MKP for three years from June 2008.

8.3 Legal

Once adopted, the Aylesbury Vale Core Strategy will become part of the statutory planning framework for the district. It will form the basis for subsequent DPDs and SPDs including the Master Plan and Delivery SPD for the SW SDA.

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

8.4 Other Implications

- (a) *E-govt:* The Aylesbury Vale Core Strategy is available through the AVDC website at: www.aylesburyvaledc.gov.uk/ldf .
- (b) *Users, partners and stakeholders:* AVDC have consulted a wide range of stakeholders, parish and town councils and local interest and community groups on their Core Strategy.

N	Capital	N	Revenue	N	Accommodation
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Background Papers:

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APPENDIX A – Proposed comments on the Aylesbury Vale Core Strategy

Officer comments

In line with the requirements for commenting on a Core Strategy explained in paragraphs 3.3 and 3.4 above, the comments below are categorised as support, objection or comment. Where an objection is being suggested the report indicates which of the tests of soundness have not been met and what needs to be done to address this.

Issue 1: Lack of weight given to the strategic context and identity of the SW SDA and its significance regionally as one of only 7 SDAs identified in the SEP

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Tests of soundness failed		Justified Effective	

Need for a Vision for the SDA: There are various references to the SDA throughout the Core Strategy which under play its sub-regional and regional role. This could be addressed through the inclusion of a Vision for the SDA in Section 2.7 of the Core Strategy. This would be consistent with the approach adopted for the spatial strategy for both Aylesbury Town and the Rest of the District. A Vision would enable the Core Strategy to set out the identity and regional significance of this site, its relationship to Milton Keynes and aspirations for the creation of a high quality sustainable new community, which has addresses effectively the challenges presented by cross-boundary growth.

Suggested change: Include a Vision for the SW SDA in Section 2.7.eg : “By 2026, the SW SDA will have established a new sustainable urban extension to Milton Keynes. Residents of the development will benefit from high quality environment, served by green infrastructure and effective transport links integrating the development with the city as a whole, Bletchley as the nearest town centre and westwards into Aylesbury Vale. The development will provide new residents with a range of quality services provided by the local authorities working in partnership with one another.....”

Name of the SDA: A key cross cutting issue is the name given to the SDA throughout the Core Strategy. By referring to this area as the ‘North East Aylesbury Vale SDA’, the Core Strategy does not reflect the planned role of this area as an extension to the city in line with guidance in the SEP and creates potential confusion for local residents and stakeholders in their understanding of the relationship of the site to Milton Keynes.

Suggested change: Change the name of the SDA to “South West Milton Keynes SDA” in line with the SEP

Para 1.3.1:Regional Guidance: Whilst it is the case that the 5,390 homes planned for the SW SDA in the South East Plan do not represent as large a quantum of development as that being delivered around Aylesbury Town, the reference to the SDA in para 1.3.1 considerably underplays the regional and sub-regional significance of this development and its impact on the city of Milton Keynes. The SW SDA is one of only seven SDAs in the South East Plan and is identified in SEP as a new sustainable urban extension to Milton Keynes. The Core Strategy fails to set out clearly the strategic context of the SDA.

Suggested change: make clearer reference to the SEP and the requirement for the SW SDA in para 1.3.1 eg: “The majority of these dwellings will be at Aylesbury.....in Rest of District. Additionally, 5,390 dwellings are to be provided in a Strategic Development Area to the south west of Milton Keynes, creating a sustainable urban extension to the city.”

Section 1.7: Critical Issues, Problems and Challenges facing Aylesbury Vale: the section on Growth and Economy should include reference to the challenge of delivering cross-boundary services to the SW SDA and to creating a genuine sustainable urban extension to Milton Keynes, with all of the issues of connectivity and integration that this will involve.

Suggested change: Para 1.7.1: Include a new bullet point in the section on Growth and Economy: “The need to manage cross-boundary challenges of development service delivery in the SW SDA to provide effective and high quality services to new residents”

Section 2.7: Managing Growth across Boundaries: North East Aylesbury Vale SDA: Paras 2.7.1 and 2.7.2; we support the reference to the SEP requirement for 5,390 dwellings but the description of the location of the SDA (“in an area to the north-east of Aylesbury Vale”), falls short of providing a clear context for the development in line with the wording of the SEP and does not convey the cross-boundary implications of what is in reality an urban extension to Milton Keynes. These introductory paragraphs therefore fail to establish clearly the relevance of the site to meeting the regional housing requirement for the Milton Keynes Growth Area.

Suggested change: Amend para 2.7.1 to align the text more closely with the wording of the SEP especially Policy MKAV2: eg “The SEP states a requirement for 5,390 dwellings to be accommodated in a sustainable urban extension to the south west of Milton Keynes, within Aylesbury Vale. These dwellings form part of the regional housing requirement for Aylesbury Vale of 26,890 dwellings, but also contribute to the Milton Keynes Growth Area housing requirement of 44,350 dwellings.”

Amend para 2.7.2 “This development will take place on a greenfield site within Aylesbury Vale but immediately adjacent to the western edge of the city of Milton Keynes. “

Issue 2: Joint working arrangements for the delivery of the SDA

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		Effective	

We support the reference in para 2.7.3 to joint working between the local authorities and the local delivery vehicles.

We do, however, consider that the statement with regard to joint working on the delivery of the SDA could go further. The existing arrangements for joint working are informal and do not extend to joint decision making. It would be helpful if reference could be made to the SEP and its recognition at para 23.12 that the two Milton Keynes SDAs cross administrative boundaries and that joint working will facilitate their delivery.

Suggested change: amend para 2.7.3 and Policy CS4 to make a clear commitment that AVDC will work jointly with Milton Keynes Council on the preparation of the Master Plan and Delivery SPD.

Issue 3: Transport Impacts of the SW SDA

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		Effective	

Para 2.7.4 of the Core Strategy sets out a number of requirements that the SDA will need to deliver. We support these requirements which will meet the local needs of the new residents on site. We also welcome the reference in para 2.7.4 (e) and policy CS4 ii (c) to the need for the development to not preclude a future link road between the A421 and the A4146.

This section of the Core Strategy would, however, benefit, from reference to the SEP and the more strategic requirements that flow from the SDA's role and function as an urban extension which is an important part of the Milton Keynes growth area.

Milton Keynes Council supports the principle of extending grid roads to serve the SDAs. The assessment of options for addressing the transport impacts of the development should include consideration of the grid road principles.

Suggested change: Expand the scope of the requirements of the SDA in para 2.7.4 to refer to the SEP Policy MKAV2, notably, the need for early development and enhancement of local transport infrastructure and water services infrastructure to facilitate growth up to 2026.

Add to the end of para 2.7.4 a requirement for further transport modelling to establish:

- If or when the link road will be required
- What other transport improvements are required
- How the grid road principles can be applied to the area

NB further work to be done on this section

Issue 4: Infrastructure requirements of the SW SDA

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		Effective	

Para 2.7.4 of the Core Strategy sets out a number of requirements that the SDA will need to deliver. We support these requirements which will meet the local needs of the new residents on site. We also welcome the reference in para 2.7.4 (e) and policy CS4 ii (c) to the need for the development to not preclude a future link road between the A421 and the A4146.

This section of the Core Strategy would, however, benefit, from reference to the SEP and the more strategic requirements that flow from the SDA's role and function as an urban extension which is an important part of the Milton Keynes growth area. SEP Policy TSR3 for example seeks opportunities to protect, upgrade and develop new regionally significant sports facilities in the growth areas, including the Milton Keynes/Aylesbury Vale area.

Suggested change: Expand the scope of the requirements of the SDA in para 2.7.4 to refer to the SEP Policy MKAV2 and Policy TSR3, notably, the provision of regional sporting facilities.

Issue 5: Place-shaping principles for the SDA

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		Effective	

NB work in progress on this section

The principle of providing a long term defensible boundary to the western edge of Milton Keynes at para 2.7.5 (1) would create difficulties by pre-determining the outward growth of Milton Keynes. The SEP states that further testing of development east of the M1 and alternatives for additional SDAs should be undertaken to inform a future RSS review.

Also issue relating to minimising land take – not explicit in the principles now, but could be a consequence of the twin objectives of the longer term boundary and the need to minimise impacts on villages, especially Newton Longville. Effect of this approach may be that there is insufficient land available within the allocated site to meet the local and strategic development requirements arising from the SDA and to push up residential densities to a level unsympathetic to the adjoining areas.

Principle 3) deals with the protection of existing settlements from the adverse impacts of growth. In line with Policy MKAV2 in SEP, there should, additionally, be reference to the need to ensure that the delivery of the SDA does not undermine the regeneration of Bletchley.

Principle (4) Speed of delivery: whilst it will be important to develop the SDA in a timely and effective way, it is also important that time should be allowed in the Master Plan preparation process for full engagement with local communities especially given that there have been very limited opportunities for local people to comment in detail on this allocation at earlier stages of the Core Strategy.

Suggested change: Delete para 2.7.5 (1) and replace with: “Create an identity for the development that reflects both its location and function as an urban extension to the city of Milton Keynes, and the surrounding rural landscape.”

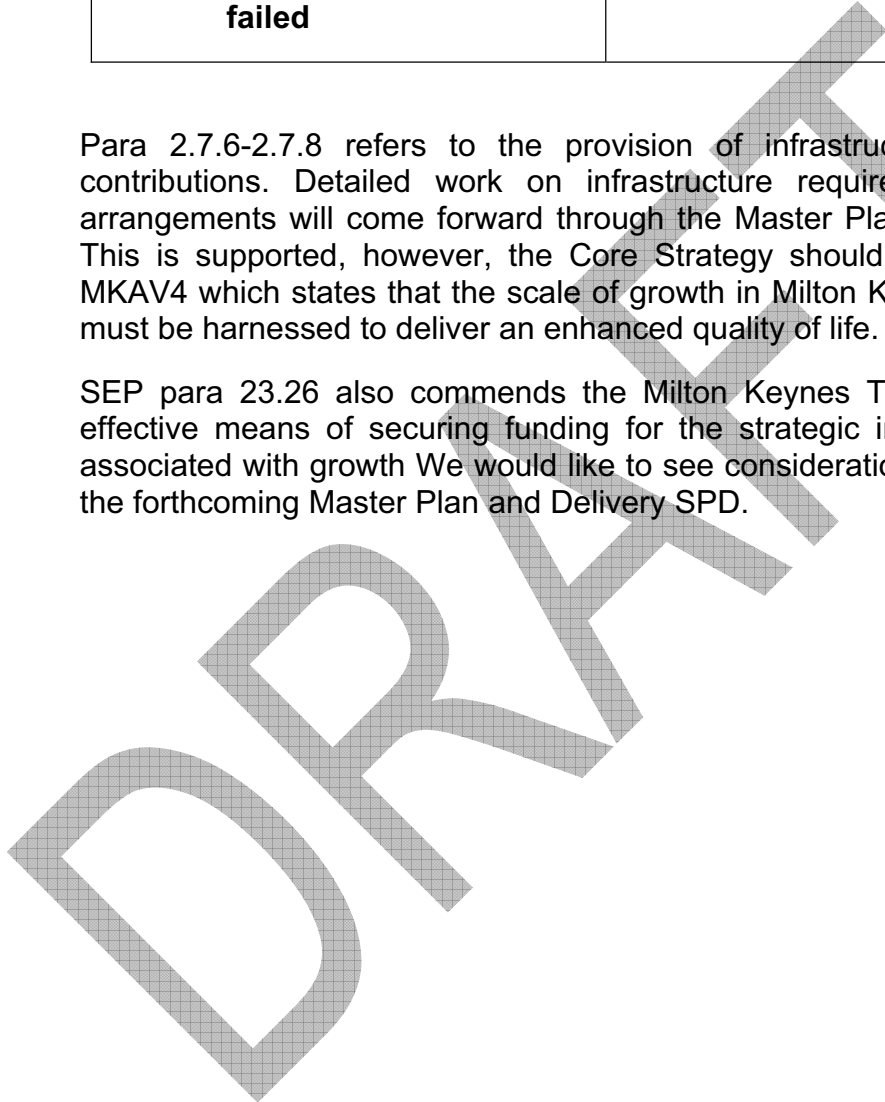
Amend para 2.7.5 (3) to add at the end: “Ensure that the programme for the delivery of the SDA complements and supports the regeneration of Bletchley.”

Issue 6: Infrastructure and delivery

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		n/a	

Para 2.7.6-2.7.8 refers to the provision of infrastructure and developer contributions. Detailed work on infrastructure requirements and funding arrangements will come forward through the Master Plan and Delivery SPD. This is supported, however, the Core Strategy should refer to SEP Policy MKAV4 which states that the scale of growth in Milton Keynes and Aylesbury must be harnessed to deliver an enhanced quality of life.

SEP para 23.26 also commends the Milton Keynes Tariff approach as an effective means of securing funding for the strategic infrastructure projects associated with growth We would like to see consideration of this approach in the forthcoming Master Plan and Delivery SPD.



Issue 7: Site allocation process

Support	Objection	Comment	
Legally Compliant?		Yes	No
Sound?		Yes	No
Test of soundness failed		Justified Effective	

We support the allocation of a site for the SDA, as shown on the Key diagram and the Proposals Map. We agree that the general location of the site represents the best possible option, in line with the MK2031 growth strategy and the principle of the SDAs supporting the development of the East-West rail route.

However, the process for selecting the extent of the SDA boundaries has involved limited engagement with city residents unlike the selection of the growth areas around Aylesbury Town where a supplementary round of public consultation was carried out between the preferred options and submission stages. The timescale for the preparation of the Master Plan and Delivery SPD will therefore need to include a process to engage with both the existing community and potential new residents.

A further concern with the site as allocated, is that it may not be large enough to accommodate all of the infrastructure needs and the required housing numbers at a density that is consistent with the development's location both on the edge of Milton Keynes.

The GVA Grimley Study (para 7.24) suggested that an average residential density of 50 dwellings per hectare would be required to provide 5,390 dwellings on this site, together with a reduction in the amount of land available for other uses, such as green buffers or open space, for example.. Further work needs to be undertaken to establish the full land use requirements of all of the local and strategic infrastructure serving the SDA and to consider whether additional land might be required. If additional land were to be required, this could be allocated in a subsequent Site Allocation DPD.

Suggested change: Amend para 2.7.9 to include a commitment to a programme of engagement with local communities in the preparation of the draft Master Plan and Delivery SPD.

NB further work required on this section