

Parishes Liaison Group

Aspley Guise Parish Council, Aspley Heath Parish Council, CPRE Bedfordshire, Hulcote and Salford Parish Council, Husborne Crawley Parish Council, Wavendon Parish Council, Woburn Sands and District Society, Woburn Sands Town Council

Councillor Tricia Turner MBE
Leader
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

Councillor Sam Crooks
Leader
Milton Keynes Council
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

28th April 2010

Dear Councillor Turner and Councillor Crooks,

Milton Keynes South East Strategic Development Area Development Framework

I am writing on behalf of the Parishes Liaison Group following the presentation given by Bruce Stewart of Milton Keynes Council on March 25 regarding the proposals for the preparation of a Development Framework for the Milton Keynes South East Strategic Development Area (MKSESDA) being jointly developed by your two councils and Milton Keynes Partnership. The Parishes Liaison Group is a cross boundary group representing the Parish and Town Councils and affiliated groups listed at the foot of this letter that will be most affected by the proposed development of MKSESDA.

This letter sets out our concerns over the proposed process for producing a development framework for the area as outlined at the presentation. You are no doubt aware that the way previous proposals for the south east expansion of Milton Keynes have been developed has generated a great deal of concern and mistrust amongst local residents. The only way that the proposed development could be the success that we would all want it to be is if it wins the support of the affected communities. This can only be achieved through an open transparent process in which the views of local residents are listened to and not simply asked for and then ignored.

In particular we believe that it is essential that we and our residents are involved right from the start of any process rather than being presented with a draft document to give consultation responses to which is in effect a *fait accompli*. We firmly believe that any brief to consultants engaged to prepare a development framework needs to be part of this public engagement rather than being left to council officers to produce.

We remain of the view that preparation of a development framework at this time as set out during the presentation is premature and in any event will not be complete in time to be used as evidence at a public examination into the East of England (EE) Plan.

A more logical approach would appear to be for the two local authorities to address and seek to reach agreement on the key policy issues set out below (with appropriate public consultation), which cannot properly be decided by the consultants or council officers. Decisions on these key issues that are

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supported by both councils, local residents and other stakeholders will form a solid foundation on which the technical studies to be produced as part of the framework can be based.

Once these issues have been addressed a development framework could be produced which reflected the results of this work together with the outcome of the public examinations into the EE Plan and the MK Core Strategy.

Our concerns regarding the process as outlined during the presentation are as follows:

1. Timing of the Preparation of the Development Framework

We understand that the rationale for preparing a development framework at this time is to:

- Be part of the evidence base for submission to any future public examination into the review of the East of England Plan (EE Plan)
- Reduce the chances of having to defend an appeal against refusal of any major planning applications in the MKSESDA

There are a number of major uncertainties over any proposed development in MKSESDA at this time:

- The outcome of the general election and whether a new Conservative government if elected would, as it has suggested, dismantle the regional tier of government and devolve determination of housing numbers to local councils
- The outcome of the public examination of the EE Plan (if completed)
- Whether the public examination into the Milton Keynes Core Strategy will support, *as an addition*, the 2,500 homes designated as potential for the SRA's south of the A421 to the 4,800 specified in the SE Plan for the Milton Keynes part of MKSESDA
- Whether central government funding will be available for the delivery of the strategic infrastructure on which development within MKSESDA is dependent, including the dualling of the A421 from J13 to MK, EW rail and the building of new schools
- When development of MKSESDA will realistically begin in light of the ongoing shortfall in housing completions caused by the recession

We understand that the public examination into the new draft EE Plan is expected to be held at the end of this year and that the development framework is not expected to be complete until mid 2011 so will not be available to be submitted as evidence to the public examination.

We are not aware of any powers that could stop developers from submitting planning applications for sites in MKSESDA or from appealing any decision to refuse or not consider them so it is unclear how preparing a development framework would provide much mitigation from the potential costs of this risk.

In light of the above we are firmly of the view that the proposed timetable for the preparation of a development framework for MKSESDA should be amended so that work on planning the area is only started after the above uncertainties are resolved and the policy issues set out below are agreed.

The amended timetable should have a number of key gateways when decisions on how to proceed can be taken, the first being the outcome of the general election. If there is a change of government

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after the election, it will not make sense to perform further work in preparing the development framework until the new government has indicated its plans for any changes to the planning regime.

2. Process for Producing the Consultants Brief

We understand that it is your officers' intention to produce the consultants brief without reference to councillors and effected stakeholders. We believe that this approach is fundamentally wrong and that any consultants brief should be subject to prior review by both councillors and stakeholders.

It would appear that the consultants brief would need to be produced in a number of phases. The initial brief should include the usual commercial terms and an outline of the matters to be considered by the consultants in preparing the development framework. Following on from this the consultants will need to be briefed on the key policy issues set out below. These matters are fundamental to the outcome of the process and should not be left to the consultants or officers to determine without reference to councillors and local stakeholders. Agreement on these key issues is essential before the technical studies are prepared.

An obvious example of this is secondary education. Where secondary schools will be sited, in Milton Keynes or Central Beds, and which of the two local authorities' education systems should be followed can only be determined by councillors after appropriate consultation with all affected stakeholders.

3. Role of Landowners and Developers

We are concerned over the apparent priority given to landowners and developers in this process to date and note that the meeting on 25 March was held some six weeks after the equivalent meeting for landowners and was only arranged at the suggestion of the local councils. We believe that it is essential that in future equal opportunity is given to all stakeholders to be part of the process. This will include the submission by members of this Group of material for the evidence base to the consultants engaged to prepare a Development Framework

4. Housing Numbers, Densities and Green Spaces

We understand that it is officers' current intention to instruct consultants to prepare two versions of the development framework. Both would have 7,300 homes (rather than the 4,800 homes as per the final SE Plan) in the MK part of the area but with different assumptions for the Central Beds part. One would reflect the proposals set out in the Submission Version of the Mid Beds Core Strategy ie 2,000 homes and an extension of the green belt north of the Bedford to Bletchley railway line, the second based on MK officers' proposals for 3,500 homes and no extension of the green belt.

We believe that this approach is fundamentally flawed and that an alternative method should be adopted. Instead of giving the consultants definitive housing targets land areas should be identified for key uses ie green space (including land protected by an expanded green belt and land needed as green buffers to protect the existing settlements of Wavendon and Woburn Sands), housing, employment, services etc and target housing densities should be set for each housing area reflecting the nature of the various locations. The consultants can then establish for the first time a meaningful number for the housing capacity of the area.

The most significant factor on the housing capacity of the Central Beds portion of MKSESDA is whether the extension of the green belt is approved; there is more or less unanimous agreement (including from the developers) that with the green belt extension the maximum number of homes

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that could be developed at acceptable densities is no more than 2,000. Delaying the preparation of the development framework as we have suggested will remove the uncertainty over the green belt extension.

The locations for key land uses and housing densities should be determined through a proper process involving councillors, stakeholders and public consultation. This will also hopefully take into account the strategic importance of the area as the southern gateway to Milton Keynes and produce an appropriate form of development rather than just a canyon flanked by massive warehouses along the A421.

5. Issues to be Subject to Prior Consultation in Preparing the Consultants Brief

We believe that it is essential that before consultants start preparing the development framework and the supporting technical studies, the key policy issues set out below are agreed through a proper due process involving councillors, stakeholders and public consultation.

Education

The location of schools, whether they will be in the MK or Central Beds parts of the area and which of the two local authorities education systems will be followed?

We were told at the meeting on 25 March that the local authorities had started work on this issue but we are not aware of any public involvement in or consultation on this important issue to date.

Consideration also needs to be given to the impact on any future plans on existing schools in the neighbouring areas and to the current deficit in education provision.

Transport

What form of road system will be adopted, the MK grid road system?

Whether there will be a MK southern bypass running through the area?

What form of public transport will be provided in light of the recognition that the traditional bus system adopted in MK is failing to achieve the desired move away from reliance on the private car?

Employment

What target for the number of jobs per household will be set? Where will employment sites be located to meet the target? Will employment sites be included in the Central Beds part of the area? What type of jobs will be provided for and how will they be created?

Other Key Services

Where will other key services be located eg health, police, fire, waste and which local authority will provide them?

Local Government

Will new parishes be created? Where will parish boundaries be? What local parish facilities will be provided?

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6. Impact of Adoption of a Development Framework on Existing Core Strategies

We are unclear on what the effect of the adoption of a development framework will have on the planning processes of each authority. Will there be changes required to either Core Strategy and if so will they require further public examination?

At the meeting Bruce also posed a number of questions, which there was insufficient time to reply to and we have set out our responses in a letter to Bruce a copy of which is attached hereto.

The importance of a development framework to the success of a proposed development has been made clear to us while participating in the MK Eastern Expansion Area Stakeholder Group for the developments at Broughton and Brooklands. Meetings of this group have shown that the importance of the development frameworks was not made clear to people during their preparation or through the consultation process. It would appear that similar problems exist with the western expansion area. We are very keen for these mistakes not to be repeated.

We firmly believe that it is essential that local stakeholders are involved in the preparation of a development framework for the area from the outset and that their views are listened to and acted on. The changes to the timetable outlined above are also essential for the preparation to be carried out in a cost effective manner. Only in this way can you achieve effective community involvement and secure value for money, two of the key duties of any public body.

We look forward to hearing how you propose to act upon our concerns.

Yours sincerely,

Ian Pickering
Chairman
Aspley Guise Parish Council

For and on behalf of The Parishes Liaison Group representing:

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Aspley Heath Parish Council
CPRE Bedfordshire
Hulcote and Salford Parish Council
Husborne Crawley Parish Council
Wavendon Parish Council
Woburn Sands and District Society
Woburn Sands Town Council

cc via email

John Lewis – Chief Executive Milton Keynes Partnership