



Buckinghamshire Council
Shadow Executive
County Hall
Walton Street
Aylesbury
Buckinghamshire
HP20 1UA
www.buckinghamshire.gov.uk

Peter Marland
Leader of Milton Keynes Council
Milton Keynes Council
Civic Offices, 1 Saxon Gate East
Central Milton Keynes
MK9 3EJ
Email: MKFutures@milton-keynes.gov.uk

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Dear Mr Marland

MK Futures 2050 engagement on draft Milton Keynes Strategy for 2050

Buckinghamshire Council Shadow Executive welcomes the opportunity to respond to the engagement draft of the Milton Keynes Strategy for 2050. As a neighbouring authority to Milton Keynes (MK) from 1 April following the integration of the existing local councils of Aylesbury Vale District Council, Buckinghamshire County Council, Chiltern District Council, South Bucks District Council and Wycombe District Council, Buckinghamshire Council Shadow Executive would like to submit a position response to the Strategy 2050 document. The Shadow Executive of Buckinghamshire Council will represent the residents and businesses of Buckinghamshire and we will not be supporting the proposals set out in this strategy due to our concerns on the strategy content and the engagement process undertaken by MK Council.

Our key points and concerns outlined in detail in Appendix 1 include:

- Concerns regarding identified options for housing growth within Buckinghamshire's border
- Issues with MK's approach to Duty to Cooperate including lack of engagement and cross border discussion with neighbouring authorities with regards to the evidence base outcomes and their influence on the draft strategy.
- It will be for the new Local Plan for Buckinghamshire to produce and draw on evidence to inform the patterns and nature of future housing and economic growth across the county, alongside the emerging role of the Buckinghamshire Growth Board.
- Clarification required on the status of the Strategy if adopted by MK Council.

These concerns reflect those outlined in the joint Aylesbury Vale District Council and Buckinghamshire County Council response submitted on 20 March 2020. If Milton Keynes Council would like to discuss these matters further, please do not hesitate to contact us.

Yours sincerely

Buckinghamshire Council Shadow Executive

Cc: **Buckinghamshire MPs**

Rob Butler
Joy Morrissey
Greg Smith
Cheryl Gillan
Steve Baker

Milton Keynes MPs

Ben Everitt
Iain Stewart

DRAFT

Appendix 1 -Detailed response

Strategy development

It is noted that the Strategy has been prepared using evidence and data collected from a variety of sources, one of which is the MK2050 Milton Keynes Strategic Growth Study, prepared by David Lock Associates (August 2019). This is referred to as background evidence and we welcome the clear statement in the Strategy that the DLA Study does not represent the views, policy or approach of AVDC or BCC. It is also noted that the housing numbers and details of growth proposed by DLA have not been replicated into the MK Strategy 2050.

AVDC were involved in commissioning that evidence study at a time (early 2018) when the Council had committed to an early review of the Local Plan to reflect the context of new east-west connections and NIC growth ambitions and ahead of the decision being made for there to be single unitary council for Buckinghamshire from April 2020.

AVDC confirmed in September 2019 the withdrawal of their involvement from the Study but had not been actively involved since November 2018. Therefore, AVDC had no involvement in the recommendations or conclusions of the DLA Study and the Councils have confirmed in their response to the MK Strategy for 2050 that these proposals are not supported.

Buckinghamshire Council Shadow Executive also welcome the clear statement made on the status of the 2050 Strategy document confirming that it is not a formal planning policy document and therefore, has no weight in the planning process, and is not a material consideration in the determination of planning applications at this stage.

The Strategy has been prepared on a 'boundary blind' basis and includes recommendations for growth options outside of Milton Keynes Council's control. The document is right to state that this in no way commits these local planning authorities to bring forward growth in that way and this statement cannot be underplayed.

It will be for the new Local Plan for Buckinghamshire to produce and draw on evidence to inform the patterns and nature of long term future housing and economic growth across its local planning authority area.

Cross border engagement

It is noted that comments received on this Strategy engagement will be used to draw up a draft Local Plan for a full Regulation 18 consultation for the purposes of plan making. However we consider that MK Council should have already been undertaking positive cross boundary discussions with neighbouring authorities on the conclusions of their evidence base work, ahead of publication. MK Council should be working collaboratively and respectfully on any growth proposals and development sites which cross its border into its neighbouring authority areas. The Strategy's proposed encroachment of development over the borough boundary of MK should be for the future Local Plan for Buckinghamshire to decide, working in conjunction with residents and communities. Buckinghamshire Council will be undertaking discussions with neighbouring authorities as part of its own preparation of the new Local Plan as part of the duty to cooperate. It is also noted that MK intend to invite neighbouring local authorities to participate in new delivery arrangements to improve coordination and delivery of growth across boundaries. However, future working would

need to be truly collaborative and not based on growth proposals set down by MK but developed at the right time and in accordance with the level of growth aspirations of each individual area.

Strategy content

The Strategy 2050 uses the term 'metropolitan MK' to refer to the borough plus adjacent settlements. The Shadow Executive would like to object to the use of this term. Each of the settlements outside of the MK boundaries has its own character and identity and whilst some may relate more than others to the city of MK and its economy; settlements predominantly relate to and within rural Buckinghamshire particularly locations such as Winslow which is a settlement of a considerable size and which does not see itself as part of 'metropolitan Milton Keynes' This local distinctiveness needs to be properly recognised in any future planning scenarios and not termed simply as extensions to MK.

Any future strategy for MK and Buckinghamshire needs a collaborative and agreed understanding of the future demands and aspirations in terms of economic growth across our authorities. Buckinghamshire Council will be using its emerging Growth Board to deliver the economic growth aspirations within its own jurisdiction as a priority for ensuring we provide for the needs of our residents and businesses, and we consider that MK should do the same as part of its own role within the Central Growth Board.

In terms of the high level content of the Strategy, it sets out six Big Ambitions for growth to 2050 for the people living in MK and which are endorsed by these Councils as positive ambitions. The benefits of strategic long-term planning and taking an active and well-managed approach to growth are also recognised. Buckinghamshire Council also want to take a pro-active approach to planning for its own growth through its development of its own future Local Plan for Buckinghamshire and long term strategy; work on which will commence in partnership with local communities following the creation of the single unitary Buckinghamshire Council on 1st April 2020. It is for this reason that the Shadow Executive is very concerned at the decision of MKC to begin its engagement on the MK Strategy 2050 at this time. The content of the strategy appears to ignore the importance of Growth Board structures set out along the Arc and the role they have to play in setting out visions and ambitions for growth and future investment.

It is unclear to the Buckinghamshire Council Shadow Executive how the job growth calculations have been derived across the Metropolitan area of MK, and how these relate to the needs and aspirations within Buckinghamshire, and the sites identified for potential future growth within Bucks. This part of the strategy appears quite light touch in terms of the economy, raising further questions around proposed figures, aspirations, and the need for further meaningful discussion with neighbouring authorities across the Arc.

Neighbouring authority planning policy frameworks

AVDC already has its own ambitious plans for substantial housing growth allocating over 30,000 new homes to 2033 in the Vale of Aylesbury Local Plan (VALP). This has been carefully planned after detailed consultation and engagement with residents and other stakeholders. The VALP is at the final stages of the examination process and as part of its spatial strategy, allocates some land for development to the north east of the District adjacent to MK in the form of Shenley Park (1,150 new homes, 110 bed care home, new schools) and Salden Chase (1,855 new homes, employment area, neighbourhood centre and new schools (application submitted with a resolution to grant made in 2017).

The MK Strategy 2050 acknowledges that the recommended framework includes growth propositions within neighbouring council areas and that it will be for the relevant local authority to take these growth options forward, which maybe through a joint local plan across boundaries. It states that MKC would like to work closely with partners as they wish to embed new principles such as transit oriented development into proposals coming forward.

The two sites proposed by VALP are small elements of the development growth options contained in the recommended Spatial Strategy (p47 of MK Strategy) and yet MKC, in the case of Shenley Park, have objected to the proposed allocation in VALP and have recently refused an application for the access arrangements into Salden Chase development. The actions of MKC above directly contradict the approach advocated in the Strategy and it is unhelpful to the Council trying to plan for growth within its own boundaries to 2033.

The recommended MK Strategy has three strands to it looking within and beyond existing MK for growth opportunities. The Shadow Executive considers that MK growth aspirations could, and should first look to be accommodated within the existing MK borough boundaries. It is also noted that the Growth Options Assessment at the Annex provided as an evidence document, contains a high level assessment undertaken by MKC of 14 spatial options for potential directions of growth. BCC and AVDC were not party to any of this assessment and we are also uncomfortable with the conclusions set out in this report.