

DRAFT SOUTH-EAST PLAN EXAMINATION IN PUBLIC

STATEMENT BY CPRE BUCKINGHAMSHIRE: PARTICIPANT 7625

SUB-MATTER 8Fi: MILTON KEYNES AND AYLESBURY VALE - STRATEGY AND IMPLEMENTATION

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

1. Many of CPRE's responses in the following paragraphs highlight the inconsistencies between the recommendations of the independent panel which conducted the EIP of the Milton Keynes and South Midlands (MKSM) Strategy in April 2004 and the guidance contained in the MKSM Strategy which was published by Government in March 2005. The independent panel reached its conclusions and made its recommendations after hearing extensive evidence supported by detailed technical information, but many of these recommendations appear to have been ignored by the authors of the March 2005 document. It is regrettable that the panel's recommendations appear to have been ignored, and hence we believe that it is important to highlight the inconsistencies in this submission.
2. The interrelationships between the various growth areas within the MKSM Strategy were discussed at some length at the 2004 Examination in Public (EIP) and in its report, the panel expressed the view that the draft Strategy (and the Growth Area Study which preceded the Strategy) "*lacks homogeneity or a common sense of place across the area*" [para 2.13 of the EIP Panel's report].
3. The lack of homogeneity and common of sense of space is also a feature of the March 2005 Strategy. All of the objectives detailed in para 14 of the 2005 Strategy are focussed on the housing, economic and infrastructure growth of the individual towns of the sub region and no reference is made to the interrelationships between them. The draft RSS merely reiterates the 2005 MKSM Strategy, and thus has once again failed to take the opportunity to respond to the 2004 EIP Panel's criticism and address the key interrelationships between Milton Keynes, Aylesbury and adjoining sub regions.
4. The 2004 EIP Panel also noted that "*in our view the growth related issues affecting Milton Keynes and Aylesbury are quite different*" [para 7.1 of the Panel's Report], and indeed Milton Keynes and Aylesbury are treated differently within Section E8 of the draft RSS. Whereas paragraph 3.1. of Section E8 indicates that Milton Keynes should become a centre of regional importance, Policy MKAV2 emphasises the importance of "*strengthening Aylesbury's role and heritage as a county town*", and adds to this emphasis by suggesting that a separate LDD should be produced on the issue.
5. The result is that the draft RSS is ambiguous about the relationship between Aylesbury Vale and Milton Keynes. On the one hand, the RSS seems to imply that Aylesbury Vale and Milton Keynes should be integrated together to form a sub regional growth area, with

Aylesbury Vale becoming part of the “centre of regional importance” and a part of the Oxford-Cambridge Arc. On the other hand the RSS seems to imply that Aylesbury should be strengthened as a focal point of Buckinghamshire, thereby developing independently of Milton Keynes. These are two very different roles which are incompatible with each other and which will have very different impacts on housing growth, employment growth, economic prospects and travel patterns. In particular, the economic prospects of Aylesbury and travel patterns to adjacent towns will be very different under the two different roles.

6. CPRE is therefore extremely concerned that the RSS has set detailed targets for housing, employment and transport growth within Aylesbury Vale before it has established a clear and unambiguous role for the District within the Region, and the District's interrelationships with adjoining areas of both South East and East of England Regions. This seems to be a classic case of putting the cart before the horse - a strategy which attempts to set out prescriptive housing and employment targets before clarifying the District's basic role, interrelationships, economic prospects and travel patterns clearly lacks credibility and will inevitably result in unsustainable development.
7. In conclusion, it is clear that the draft RSS fails to sufficiently recognise the concerns expressed by the 2004 EIP panel about the interrelationships between Milton Keynes and Aylesbury Vale and the adjoining sub regions. As a result, the prescriptive housing, employment, transport and other targets lack credibility, and will inevitably result in unsustainable development. It is essential that the roles and interrelationships of Milton Keynes and Aylesbury Vale are clearly defined in the Strategy *before* detailed targets are established.

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?

1. CPRE supports the general principle of monitoring new housing delivery against job gains in order to ensure that out commuting from the sub region is contained. We do, however, have two major concerns with the detail.
2. Our first concern is that, in practice, each new dwelling will house more than one job holder. Data from the 2001 census shows that, in Milton Keynes each dwelling supported 1.16 people in employment and within Aylesbury Vale the ratio was higher at 1.27. On this basis, every 100 new dwellings in Aylesbury Vale (where out commuting is particularly acute) will house 127 new job seekers - and 127 new jobs will need to be created to avoid a further increase in out commuting.
3. Para 5.2 of section E8 of the draft RSS is therefore contradictory - a 1:1 job:dwelling ratio is incompatible with a zero net change in out commuting. Either the job:dwelling ratio must be changed to reflect the fact that each dwelling supports more than one job seeker, or the objective of no net change of out commuting must be abandoned. Abandonment of the out commuting objective would, of course, be in conflict with the sustainability objectives of the MKSM Strategy, and hence the job:dwelling ratio needs to be changed. We suggest that a ratio of 100 new dwellings for every 125 new jobs created is appropriate.

4. Our second concern is that merely monitoring new housing delivery against job gains will not achieve anything - the essential requirement is to subsequently manage the new housing provision in the light of the information resulting from the monitoring exercise.
5. We therefore suggest that Policies MKAV1 and MKAV2, together with para 5.2. of Section E8 should be revised to reflect both of our concerns, viz:
 - The targets of 48,850 jobs in Policy MKAV1 and 21,200 jobs in Policy MKAV2 should both be revised to reflect the ratio of 125 new jobs for each 100 new dwellings
 - The text of para 5.2. should be revised to read: *“In both Aylesbury Vale and Milton Keynes the delivery of housing should be monitored against the achievement of district wide job gains at the rate of 125 new jobs for each 100 new dwellings. If this rate is not achieved, the local planning authority should reduce the supply of new permissions for new housing until the supply of housing and jobs has been brought back into balance . This balanced growth*”

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

1. Section D4 contains the Regional Policy Framework for transport, and in particular Policies T1 and T3 both emphasise the need to rebalance transport systems in favour of non car modes.
2. The need to rebalance the existing emphasis on the car within Milton Keynes was discussed at some length at the EIP of the MKSM Strategy in April 2004, following which the Panel made a number of recommendations, principally 7.5 and 7.7 of the Panel’s report. Although many of the transport elements of recommendation 7.5 have been reproduced in Policy MKAV1 and Annex 3 of the Implementation Plan, there are some notable changes, including (italics and bold type are CPRE’s to emphasise the changes):
 - the Panel’s recommendation to develop “east/west and north/south *mass transit corridors*” has been changed to “*high quality public transport serving* east/west and north/south corridors”
 - the Panel’s paragraph “new and upgraded strategic transport links will be vital in underpinning *sustainable* growth of Milton Keynes, including *east-west rail* and possible new parkway stations” has been changed to “new and upgraded strategic transport links will be vital in underpinning *the* growth of Milton Keynes, including *enhanced east-west public transport* and possible new parkway stations”
 - Annex 3 of the Implementation Plan includes reference to the Milton Keynes southern bypass, which the Panel recommended should be removed from the Strategy
3. The overall impact of the changes has been a shift of emphasis away from a sustainable transport infrastructure for Milton Keynes towards a predominately road based infrastructure, with the inevitable consequence that there will be little or no rebalancing in favour of non car modes. CPRE therefore believes that the transport strategy for Milton Keynes as set out in Policy MKAV1 and Annex 3 cannot be considered as realistic when viewed against the sustainability requirements of Section C of the RSS. We therefore suggest that the text contained in recommendation 7.5. of the 2004 MKSM EIP Panel,

which represents a much more realistic overall view, should be reinstated in Policy MKAV1.

4. We also believe that the focus of transport investment onto the “spokes” of the Regional Transport Strategy (Policy T3 and map T2 of Section D4) is an unrealistic oversimplification. Although we recognise the importance of providing high quality transport links between Aylesbury and adjacent Regional hubs, it is equally important that Aylesbury should have improved transport links with all of the other towns and villages within Buckinghamshire - particularly if it is to “strengthen its traditional role and heritage as a County town” (Policy MKAV2).
5. We draw attention to the conclusion of a study¹ commissioned into the strategic planning for Milton Keynes growth which highlights weaknesses in the transport assumptions underling the MK Growth Strategy.
6. We therefore conclude that the transport infrastructure investment programme as it currently stands is unrealistic, and needs be revisited to shift the emphasis away from road construction towards investment programmes which actively encourage non car modes of transport. As a first step, we suggest that the wording of the 2004 EIP Panel’s recommendations be reinserted into Policies MKAV1 and MKAV2 in place of the “watered down” versions which currently exist in the draft RSS. As a second step, we suggest that more emphasis needs to be placed on strengthening the local transport infrastructure and services within both Aylesbury Vale and Milton Keynes, with particular emphasis on Aylesbury Vale.
7. In terms of the wider infrastructure provision, we note that para 5.6. of Section E8 draws attention to the need to upgrade electricity and water utilities, but we note that the October 2006 version of Annex 3 of the Implementation Plan shows the cost estimates of utilities as “t.b.c.” There has been widespread local concern about the funding of the infrastructure needed to support the proposed growth of Milton Keynes and Aylesbury Vale, and in particular, water supply and waste water disposal, and the lack of any cost estimates in the draft RSS demonstrates that this concern is well founded. Put simply, a Regional Strategy which fails to include quantified and credible cost estimates of the basic infrastructure required to support the proposed growth is unrealistic and completely lacks credibility.

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¹ Document Ay24 (MK2031 – Long Term Growth Strategy Review – Colin Buchanan & Partners for Buckinghamshire County Council and Aylesbury Vale District Council)