

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

Bruce Stewart
Senior Planning Officer/Joint Working
Milton Keynes Council
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

28th April 2010

Dear Bruce,

Milton Keynes South East Strategic Development Area Development Framework

I am writing on behalf of the Parishes Liaison Group following your presentation regarding the proposals for the preparation of a Development Framework for the Milton Keynes South East Strategic Development Area (MKSESDA) being jointly developed by Milton Keynes Council, Central Beds Council and Milton Keynes Partnership. On behalf of the Group I would like to thank you for the time you gave to speak to us and for your consideration to our responses to the questions raised during your presentation.

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. In addition to our answers to the questions you posed at the meeting we have a number of concerns regarding the proposals for the preparation of the development framework which we have set out in the attached letter to the leaders of the two Councils.

I have set out below the answers to the questions that you raised during the presentation:

1. Do you support the preparation of a joint Development Framework for the whole of the identified SE SDA?

We would certainly agree that it would be wholly inappropriate for any of the three authorities to undertake the preparation of a development framework for MKSESDA as currently defined independently.

Rather than being seen as a process involving principally the officers of each authority and an outside firm of consultants we believe that this should be seen very much as a partnership between the councils and stakeholders in which all are actively involved and in which all can have an influence.

During this period of joint working it would also in our view be quite wrong for MK Council to seek to progress its unilateral attempt to expand its area to include part of Central Beds and we would urge MK Council to inform the Boundary Committee that it wishes to defer its application for a boundary review.

2. Do you support the appointment of external consultants to undertake the joint Development Framework?

We have no detailed knowledge of the available resources within the three authorities to give an informed response to this question but would assume that in complying with their duty to obtain

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value for money, the framework would be prepared in the most cost efficient way possible, minimising the use of external consultants where possible.

We cannot see how it could be cost effective to have consultants undertake any significant work on a development framework until after the general election, the completion of the public examinations into the EE Plan and MK Core Strategy and agreement has been reached on the key policy issues outlined above.

3. Do you support the establishment of a joint SE SDA Officer Steering Group to co-ordinate and manage the preparation of the joint Development Framework, with the support and assistance of land/stakeholders and other local interest groups.

No we do not believe that this matter should be dealt with principally by council officers. It is essential in our view that councillors and stakeholders are fully involved in the process from the beginning.

Further it is essential in our view that appropriate terms of reference are drawn up for whatever body oversees the preparation of a development framework and that these include an appropriate means for the body to reach decisions which doesn't simply give control of the process to MKP as was the case with the preparation of the MK2031 strategy.

4. Do you agree with the identified strategic evidence base studies, or are other strategic evidence base studies necessary? (The five identified strategic evidence base studies are: consultation, site capacity, transport, water and flooding, infrastructure and viability testing.)

We believe that before detailed technical studies are prepared agreement needs to be reached on the key issues that we have identified in the attached letter, which cannot be decided by consultants but should be properly determined by elected councillors after full public consultation.

What further studies would be required would we assume be part of the process of preparing a consultants brief and we would expect to be included in that process.

5. Do you agree that decision making for the joint Development Framework rest with the relevant local authorities – MKC and CBC? (The intention is that the joint Development Framework will be jointly adopted by MKC and CBC, at separate meetings but both held at the same time and on the same day.)

Yes it is essential that elected councillors decide whether to adopt the Development Framework for their part of the MKSESDA. We firmly believe that elected councillors should take all major planning decisions.

For the Central Beds part of the MKSESDA this means Central Beds Council. In the MK part the planning responsibilities are currently split between MKC and MKP with MKC being responsible for the development framework and MKP responsible for determining planning applications in accordance with the framework.

The introduction of the new planning levy that has many of the features of the MKP tariff provides a timely opportunity to reconsider the role of MKP and whether a more cost effective solution would be for its planning powers to be absorbed by MKC.

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There may be occasions when some minor decisions regarding the preparation of a development framework can be delegated to the body which oversees its preparation. If any such decisions are delegated they should be clearly set out in that body's terms of reference and as noted above a decision making process established which doesn't simply hand control to the MK representatives.

6. Do you agree that no planning application for major development in the SE SDA will be accepted or considered by MKC and/or CBC until joint adoption of the joint Development Framework?

While we would firmly support this concept in principle we are uncertain that it would be effective in practise. We are not aware of any powers that could stop a developer from submitting a planning application or from appealing any decision to refuse or not consider it. This is partly why we believe that the timetable for preparation of a development framework should be amended as set out in the attached letter.

However we are strongly of the view, for development of the MKSEDA to be sustainable that any such application should only be considered if it is part of a jointly agreed Local Development Framework that has had full community and stakeholder consultation.

I hope that the above comments are helpful and look forward to hearing how you plan to take the preparation of a Development Framework forward.

Yours sincerely,

Ian Pickering
Chairman
Aspley Guise Parish Council

For and on behalf of The Parishes Liaison Group representing:

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CPRE Bedfordshire
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