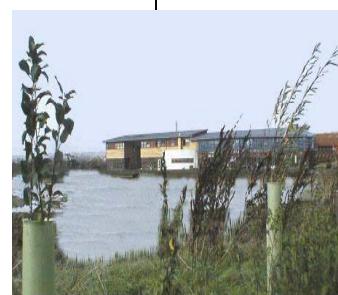


MILTON KEYNES AND SOUTH MIDLANDS SUB-REGIONAL STRATEGY

Public Examination
March/April 2004



Report of the Panel

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PREFACE

The Milton Keynes and South Midlands Sub-Regional Strategy has been prepared in response to the Government's request to the three Regional Planning Bodies whose areas cover parts of the sub-region to develop proposed Alterations to Regional Planning Guidance for the South East, East Midlands and East of England. Throughout this report we have used the abbreviation SRS to refer to the Strategy document.

The Strategy was produced by the three Regional Assemblies (RAs): East of England Regional Assembly (EERA); East Midlands Regional Assembly (EMRA) and South East England Regional Assembly (SEERA). Each of the three RAs was individually represented at the Public Examination.

The draft Strategy was placed on deposit for consultation purposes from 18 July to 13 October 2003. As a result, 1627 responses were received from individuals, bodies and groups comprising some 3,755 separate statements of support or objection.

We were appointed by the First Secretary of State [FSS] to conduct a Public Examination of selected matters arising out of the Strategy. Based on the objections and representations received we selected eighteen main issues for examination, in consultation with the Regional Assemblies. We also consulted on the choice of participants at the Examination. In total 130 participants were invited, with 104 taking up their invitations.

The Lists of Matters and Participants are reproduced as Appendix B and Appendix C to this report. All participants were given the opportunity to submit statements prior to the Examination and these were circulated in advance to all those participating in the relevant sessions. Statements prepared by the Regional Assemblies were likewise circulated. Written statements submitted by those who were invited but unable to attend and those to whom we were unable to issue an invitation have also been taken into account. A Library was available both prior to and during the Examination where copies of all statements and other relevant Examination Documents were available for inspection. A list of the Examination Documents is at Appendix E.

Two Preliminary Meetings took place on 6 January and 17 February 2004. The purpose of these Meetings was to explain the nature of the proceedings and to allow an opportunity for the Panel to address any questions on how the Examination would be run. The Examination was held over a period of five weeks, between 23 March and 29 April 2004 and at three venues, Northampton, Milton Keynes and Luton. The detailed programme is at Appendix D.

An important part of the policy context for the Strategy and for our report is provided by Regional Planning Guidance. RPG9, the Regional Planning Guidance for the South East (CORE12A) was published in March 2001. Several proposed alterations to RPG9, covering the Regional Transport Strategy (CORE12C), Energy Efficiency and Renewable Energy (CORE13A), Tourism, Sport and Recreation (CORE13E) and the Ashford Growth Area (CORE13G), are currently under consideration following Public Examinations. Alterations relating to the Regional Minerals Strategy (CORE13J) and Regional Waste Management Strategy (CORE13K) were published in March 2004. RPG8, the Regional Planning Guidance for the East Midlands (CORE9A) was published in January 2002. Draft revised RPG8 (CORE9D) was published in April 2003 and is under consideration following a Public Examination. New RPG14, the proposed Regional Planning Guidance for the East of England is in preparation, a draft (CORE14D) having been published in February 2004. Also relevant is RPG11, Regional Planning Guidance for the West Midlands, published in 1998, and the draft

revised RPG11 incorporating the Secretary of State's proposed changes, published in September 2003. The final revised RPG11 was published in June 2004. As this was after the Examination closed, we have not taken account of it.

The national policy context for the Alterations is provided by Planning Policy Guidance notes (PPG) a number of which are in the process of revision to form new Planning Policy Statements (PPS), and by other statements of Government policy including the Sustainable Communities Plan (STRAT7) published in February 2003.

The Panel spent two days prior to the Examination touring the Sub-Region, including visiting locations relevant to the matters being examined. Further visits took place during and after the Examination.

Structure and Content of the Report

The chapters in the rest of this report address the issues considered at the Examination. In each chapter the Panel has set the context by summarising the Strategy's provisions relevant to each matter and identifying the main issues arising. We have not sought to provide a full account of all the proceedings during the Examination, or to summarise all the representations and participants' statements. The report concentrates upon the main arguments we have considered and upon setting out the reasoning behind our conclusions and recommendations.

The report follows broadly the structure of the Public Examination, but does not necessarily deal with issues in the order that they arose in the Examination sessions, nor in the order of the SRS. The aim has been to cover all the ground in a logical and readable way. Chapter 1 presents an overview of the main issues and conclusions and draws out some points about the process. Although this does not give rise to specific recommendations, we would draw the attention of the Secretary of State and others to our conclusions about the lessons to be drawn for the Public Examination process and for future sub-regional strategies. Chapter 2 considers the basis and soundness of the SRS. This Chapter also does not contain specific recommendations, but the conclusions drawn there provide a basis for many of the recommendations contained in subsequent Chapters. In Chapters 3 to 10, the relevant recommendations are listed at the end of the Chapter, with appropriate references in the text. For convenience, Chapter 11 gives a full list of all our recommendations including the full text of Policies to which we are recommending changes.

A glossary of the abbreviations used in the report is at Appendix A.

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CHAPTER 1 - OVERVIEW

- 1.1 The Public Examination was an unusual exercise of its type, reflecting the unusual nature of the SRS itself. One question that was obviously in many people’s minds was whether it was necessary or justifiable to embark on such a strategy, with all the complications of trying to knit together three different regions which approach things differently, and involving thirteen different local planning authorities. This certainly made for difficulties, and the resulting strategy document was an uneasy compilation of proposals and policies relating to the different areas. One could not fail to see the joins. If the object of the exercise was to create a unified approach, or to address cross-boundary issues, the SRS can at best be said to be partially successful.
- 1.2 The area chosen for the Sub-Region was somewhat arbitrary, and perhaps this was inevitable when trying to define a growth area. We have taken the MKSM Sub-Region as it is, and consider that it remains a viable geographical basis for a strategy, although it was by no means the only option and there were various suggestions for locations that should be either put in or taken out. We have also concluded, in Chapter 2 below, that there is justification, and a necessity, for a strategy to provide for significant growth in the Sub-Region, and ensure that this is delivered in a sustainable way. Our conclusions and recommendations are intended to improve the SRS by clarifying its intentions, focusing the objectives more closely on sustainable development, and where necessary sharpening or moderating its proposals while reshaping them into genuinely strategic matters, leaving site specific local detail to be determined at the appropriate level. In this we have drawn copiously on the wealth of suggestions, views and information put forward by participants and many other people.
- 1.3 Although the proposal for a major growth area centred on Milton Keynes originated during the preparation of the existing Regional Planning Guidance for the South East (RPG9), the Government’s Sustainable Communities Plan emerged as the major driver of the MKSM strategy. As a result responsibility for the proposals appears to be divided, rather than shared, between the three Regional Assemblies and the Office of the Deputy Prime Minister [ODPM]. The RAs found themselves facing two ways – to Government as well as to their member local authorities. The speed at which the exercise had to be done meant that consultants played a major part in making the proposals. More time in the preparation would have enabled a better and more consistent document to be pulled together. It would also have enabled a more participatory process, and greater ownership of the strategy by the people and organisations who will have to implement it. To build upon the progress that has been made, we believe it is important for the SRS to be a continuing entity with future reviews done on a comprehensive basis so that the overall focus is maintained and the monitoring, reviewing and implementing bodies are bound together in a common joint endeavour.
- 1.4 In Chapter 2 we report on our testing of the rationale and soundness of the strategy overall. It is undeniable that the supply of homes has been failing to keep pace with the demand. Output of new housing in the South East has been at historically low levels from which it is only slowly beginning to recover. That this has been happening at a time of record low unemployment, sustained economic growth and continually rising house prices, suggests that somewhere the system has been failing to deliver. This is a fairly common analysis of the issue. We find that there is a need for a strategy, not just to provide additional growth, but also to put more concerted impetus into faster delivery of the substantial amount of development that has already been planned but is,

in some cases, proceeding slowly. We also accept the case that the MKSM Sub-Region is a suitable area for such a strategy.

- 1.5 As we found repeatedly, the growth strategy cannot be simply about building more houses. We support the SRS emphasis on the linkage between housing, economic growth and employment, and our recommendations make this more explicit. There is also an emphasis on balancing new development with regeneration priorities, on dealing with sustainable transport issues and positive environmental benefits as well as protection. On all these matters, the ingredients for a sound strategy are available but some aspects of the SRS need considerable improvement to make it so. Our recommendations address this, and are aimed at ensuring that the SRS truly will deliver Sustainable Communities.
- 1.6 In Chapter 3 we consider the sustainability of the strategy in all its aspects. The Sustainability Appraisal which was carried out is in many ways inconclusive, partly due to the non-comprehensive nature of the strategy. By focussing growth on urban areas, and saying many of the right things about public transport, and by relying on the sustainability principles underlying existing national and regional guidance, it can be argued that the SRS will provide for sustainable development. But the proof of its sustainability will be in how it is delivered, and in how it responds to the environmental and other conflicts which it raises.
- 1.7 It is a truism that sustainable development is development. As a growth area, MKSM will have a lot of development, and it is essential that this is taken as an opportunity for sustainability not a threat to it. It is another truism that Sustainable Communities are about more than just housing. They are about creating and improving places for people to live. The MKSM strategy will achieve its purpose if the places it creates are exemplary, and if the rate of change it brings about means a rate of improvement, solving problems rather than creating them. By relying on the “normal” operation of national and regional policy guidance to ensure that this happens, we consider the SRS has assumed too much. We are not alone in that view. For many environmental and other organisations, and a large number of other respondents, the fact that development will be sustainable does not go without saying. There is a strong feeling that protection and enhancement of environmental assets, more energy efficient buildings, more sustainable travel, social and green infrastructure provision will not happen unless the Strategy says they will. Even then, the words in the strategy will need to be followed through with commitment in implementation.
- 1.8 Our recommendations in Chapter 3 are designed to address these issues. We believe they will strengthen and improve the SRS, and help to ensure that sustainable development takes place. We do not consider that this involves going into great detail or repeating technical or policy guidance available elsewhere. What it needs is to make the connections that will ensure that sustainable development issues are not forgotten or overridden in the pursuit of growth. In most cases we have been able to suggest appropriate wording. In the case of affordable housing, however, we found no clear indication of what the strategy should be saying, although we agree with the view that it needs to be strengthened and clarified in relation to MKSM’s role in delivering affordable housing. Our recommendation leaves it to the Secretary of State to determine exactly how this is done.
- 1.9 In Chapter 4 we address ourselves to the issues raised by the SRS document itself and the arrangements for delivering it. Many of the suggestions for improving the presentation of the strategy are obvious. One of the key deficiencies was the failure to distinguish what the SRS is adding from what is already planned or expected. This has

- resulted, in our view, in a great deal of unnecessary alarm. That is not to say that the objections are unjustified, but that the strategy suffers from its lack of clarity on this.
- 1.10 Another important issue is the need for implementation to be effective, adaptable and inclusive. It is clear from many of the responses to consultation that there is a certain “community involvement deficit” in the way the strategy has evolved so far. This was perhaps inevitable, given the speed with which it had to be developed, and the fact that it was responding to a national and regional imperative. But in our view it is essential from here on that local communities, and the local planning authorities that represent them, are fully engaged in the process. They will need to become part of the driving force for new Sustainable Communities, and not be seen simply as a force of opposition or inertia to be overcome. We have noted a good deal of suspicion of the delivery arrangements on the grounds that they will make decisions remote from the area. It may pose a particular challenge for the Inter-Regional Board [IRB] and Local development Vehicles [LDVs], (or implementation partnerships or whatever term is chosen) to rectify this without losing their focus on delivering the strategy.
- 1.11 One aspect of our report which addresses this concerns the status of the MKSM Study and Growth Area Assessments and the role of new LDDs in implementing the strategy. Local people and communities were not the only ones who felt that decisions about development were being imposed by a process in which they had not been involved. The site specific nature of the assessments and the way they were, in part, reflected in the SRS caused developers and landowners to feel that matters which affected their interests had been determined without reference to them. They looked to the Public Examination to redress this, and submitted evidence to support their own interests and proposals, often in great detail. The Examination could have been like a huge local plan inquiry covering six growth locations, but this would have been a misuse of the process, and would still not have been fair. Instead we have tried to put the SRS firmly back on a strategic footing, leaving the site specific decisions to be made in the proper places.
- 1.12 We have therefore concluded that it should be made clear that the GAAs have not predetermined local spatial issues, and have no formal planning status. The counterpart to this is that we make various recommendations about the role of LDDs or other local planning initiatives in implementing the strategy. This will ensure local ownership and community involvement and proper representation of development interests in the detailed choices that have to be made about development.
- 1.13 Issues concerning the role and composition of LDVs and the resources available for implementation were beyond our remit. In Chapter 4, however, we draw some conclusions and recommendations which are designed to improve the clarity of the SRS on these matters. Resources for implementation were a recurrent concern among many participants. Assurances from Ministers about funding for transport, affordable housing and social infrastructure are welcome. But there remains scepticism in some quarters that the resources will be forthcoming in sufficient quantity to deliver all the investment required to make development sustainable. Another concern is that such resources will only be provided to the growth area at the expense of other areas which may have more pressing existing problems. A particular resources aspect to which we draw attention in Chapter 4 is the task facing local planning authorities in producing the LDDs and other policy guidance necessary to implement the strategy, on the urgent timescale required. Serious consideration will need to be given to the resources, both human and financial, needed to make this happen.
- 1.14 In the six growth area chapters we make recommendations for improving the SRS treatment of each of the six main growth locations and giving them all the same time

horizon. Common themes are breaking the housing figures down into five-year periods, including job growth targets to 2021 against which to monitor housing growth and giving broad planning assumptions for the longer term to 2031.

- 1.15 For the Northamptonshire sub-area, we find the SRS misguided in attempting to provide policy covering virtually the whole County (but not on all planning issues). This both risks diluting the strategy of concentrating on main urban areas and conveys the impression that the whole County is to become an urban growth area. Our recommendations seek to remedy this by focussing the proposals more closely on Northampton itself and on the three linked towns of Corby, Kettering and Wellingborough, doing away with the idea of a “Principal Urban Area” including numerous smaller settlements. We have, however, supported the strategy for growth and regeneration to transform Corby. Over Northamptonshire as a whole, while we broadly endorse the level of growth proposed up to 2021, our recommended longer term assumption implies a total level of growth up to 2031 at least 20,000 less than the 167,000 dwellings quoted in paragraph 1.1 (p9) of the draft SRS. Taken together we consider these recommendations should help to lift the spectre of uncontrolled and unsustainable growth overwhelming the County, raised in many of the objections.
- 1.16 At Milton Keynes and Aylesbury, we find two contrasting growth towns. Milton Keynes has a strong economic engine and a history of dynamic urban growth. Having “paused for breath” after its first 30 years of rapid growth, the town is gearing up for new challenges – of providing further housing to keep pace with its job growth, meeting second and third generation needs and transforming itself into a sustainable 21st Century city. The MKSM strategy provides a platform for achieving this. Our recommendations seek to assist in providing the clarity of policy guidance and longer term vision required, while addressing some of the environmental issues raised.
- 1.17 For Aylesbury, the context for the growth strategy is more opportunistic, and there is an element of doubt about whether it really belongs in the growth area. Although substantial growth is clearly in prospect for the short and medium term, we found an absence of a clear vision about the need for sustained growth or the role for Aylesbury as a much larger town. There are also serious infrastructure issues concerning wastewater treatment. Our recommendations somewhat reduce the rate of growth, while extending the provision to 2021. Aylesbury is the only growth town where we do not find it appropriate to make a planning assumption towards 2031.
- 1.18 Bedford and Luton/Dunstable/Houghton Regis are another contrasting pair of locations for growth. At Bedford the issue is to take forward regeneration and development potential which has already largely been identified. The strategy arguably adds nothing to what has already been planned. But by adding the impetus for economic development and helping to sort out infrastructure and other constraints, we consider that it will create the right conditions for the town to flourish. Clearly there is potential to do more in the medium and longer term. But realising what the strategy proposes will be a significant upturn in growth for Bedford, and we support it.
- 1.19 Luton, Dunstable and Houghton Regis have contended with a different set of planning problems, which were being tackled in a new draft Bedfordshire and Luton Structure Plan. The draft Structure Plan, which revised the previous strategy of diverting growth to the north of the County and responded to long standing recommendations for reviewing Green Belt boundaries was set aside when the Growth Area proposals came along, but the SRS proposes much the same remedy. It is pointless to say now that the Luton conurbation’s problems might have been better tackled by letting the new Structure Plan run its course. As it is, inclusion in the MKSM growth area, together with the realisation of major infrastructure improvements, provides an opportunity to

- address both regeneration and growth issues for the area with the vigour it requires. It has, however, also attracted vigorous local opposition, particularly in South Bedfordshire, not only to the volume of development proposed but also, we believe, because the strategy process appears to have taken these matters out of local hands. We find that the SRS has been both too prescriptive and too timid in its approach, making specific proposals for development but failing to deal explicitly with the Green Belt issue.
- 1.20 Our recommendations are designed to help bring about positive planning solutions, through a new joint LDD which will address the development needs and opportunities and tackle growth and regeneration issues head on. It is important that the Green Belt is approached, not by taking a “nibble” for some development now, only to have to take another nibble in a few years, but by designing a new Green Belt boundary which will endure and provide a sustainable future shape to the conurbation. This has to go hand in hand with a greatly enhanced public transport system to serve the whole conurbation. We have also included Leighton-Linslade in the strategy. Although its contribution to the overall MKSM Strategy may be relatively minor, we consider that its location between Luton and Milton Keynes, and its potential role in helping to meet the significant development needs and potential of the LDHR conurbation make it too important for the SRS to ignore.
- 1.21 We have commented above on the fact that this Public Examination was unusual. In fact the Examination process has been taxed to the limit by the demands made upon it by the SRS. The nature of the proposals and the area to which they apply meant that a large number of issues were raised and the consultation responses were numerous and weighty. An added dimension was the fact that, under the proposed changes to planning legislation which were going through Parliament at the time of the Examination, the SRS, as part of Regional Planning Guidance and, eventually RSS, would bear directly on local planning in lieu of structure plans. All this made for great difficulty in selecting matters and participants which everyone would find satisfactory and which would fit within the scope of a manageable Examination, and to do this within an extremely tight timetable. Our difficulties were compounded by the fact that, possibly due to the fragmented ownership of the SRS mentioned above, no arrangements had been made to process the consultation response.
- 1.22 With a County Structure Plan, it has been normal practice for the County Council to summarise and code the consultation responses so that the issues can be properly analysed before matters and participants are determined and the “countdown” to the Public Examination begins. In this case neither the Regional Assemblies nor the Government Offices assumed responsibility for this task, and no resources were made available for creating the necessary database. Eventually limited resources were forthcoming, and thanks to a major effort from the Panel Secretary, the database was finally completed on the eve of the opening of the Examination. This was of course far too late to be of any use to us in selecting Matters and Participants, or to potential participants and others in preparing for the Examination. We proceeded on the basis of our own reading of the more than 1600 original responses. One of the three Regional Assemblies also made a database of the representations relating to its area and published a summary on its website.
- 1.23 Apart from the stress put upon the process, one issue of concern is that the Government Offices appeared slow to recognise that it is incumbent on the Secretary of State, as the decision making authority, to consider all the representations made, including all those not relating directly to the matters selected for Examination which are the focus of this report. (In this his role is analogous to that of a County Council preparing to adopt its Structure Plan). No doubt this is now being done. For the future, whether it is seen as

a task for Government Offices or to be delegated to Regional Assemblies, we recommend that sufficient resources for processing the consultation response are identified at an early stage and programmed into the process in a timely way. We also consider that it would be highly desirable for outputs from the database, including summaries of the responses, to be made available to participants and the public. Given the increasing reliance being placed on electronic communication we believe this could be of immense help, particularly to small organisations, in preparing their case for the Examination. It could also be of help in improving transparency and public involvement.

- 1.24 While we consider the final Matters and Participants to have been the best that could be achieved, many people were inevitably disappointed not to have been selected. This is a reflection of the large number of interests affected, as well as the site specific issues and the concerns about representation of local communities. There is of course no “right to be heard”, and our aim was to achieve a balanced coverage of all the issues and views relevant to the Matters under discussion. It is worth noting that balance is not just a matter of “counting heads”. A single organisation with strong views on an issue is not necessarily outweighed because several participants with opposing views are at the table. Our aim is to listen to all the arguments and judge the issues on their merits. We have also had recourse to the wide range of views and information in the written submissions. Nevertheless, we are well aware of the difficulties there have been for almost all groups of participants in this Examination, due to pressure on numbers. Many of them responded very constructively, however, responding to the process by forming into alliances represented by a single spokesperson, through engaging in “hot seating”, and through opting to make written representations about the Matters.
- 1.25 At the Examination itself, we appreciated the way participants in the main kept their contributions to the appropriate strategic level for the debate. For our part, we listened and probed where necessary, and endeavoured to ensure that the right issues were debated thoroughly. No doubt with the enhanced role of RSS in future, more extensive and complex Examinations will become the norm. We believe there are important lessons to be learned from the MKSM Examination which may help to improve the effectiveness of the system. First, as noted in paragraph 1.3 above, giving a little more time to the preparatory process would allow better presented proposals, and greater understanding of their significance. Whilst we appreciate the urgency with which the growth areas needed to be approached, there really is a danger of more haste – less speed. Secondly, we have made suggestions for adequate resourcing of the process, and clear identification of responsibilities, not only in RSS strategy preparation, but also for the local implementation stages which must follow it. Thirdly, we consider that more needs to be done to cultivate participation in the process. Despite the controversial nature of the SRS, many of the Examination sessions were sparsely attended by the general public. A concerted effort needs to be made to ensure thorough community involvement in RSS, not only to meet new statutory requirements, but also to ensure that the decisions that are made have public confidence and support, without which they will prove difficult to implement.

CHAPTER 2 - BASIS FOR THE SUB REGIONAL SPATIAL STRATEGY

Origins and rationale

- 2.1 Existing Regional Planning Guidance for the South East identifies Milton Keynes as a potential growth area, and calls for a study to define the extent of the sub-region, establish a vision for long term potential growth, identify options and make proposals for the distribution of dwellings in the sub-region and mechanisms for planning and implementation (RPG9, 2001, paragraph 12.62). The Growth Study is also referred to in Regional Planning Guidance for the East Midlands (RPG8). The resulting study, finally published in September 2002, covered the administrative areas of Northamptonshire, Milton Keynes, Aylesbury Vale, Bedford, Mid-Bedfordshire, Luton and South Bedfordshire. It proposed a “preferred option” for growth centred on the major urban areas of Northampton, Corby/Kettering/Wellingborough, Milton Keynes, Bedford and Luton/Dunstable/Houghton Regis, and identified potential for the area to grow at a rate which would generate 230-300,000 jobs (300-360,000 households) in the period to 2031 (MKSM Study Final Report, paragraph 8.3).
- 2.2 The Government’s Sustainable Communities Plan calls for a step change in the supply of new housing in London and the South East by 2016 and states that London and the growth areas have the potential to accommodate an additional 200,000 homes above levels currently planned in regional planning guidance (Sustainable Communities: Building for the Future, February 2003). The draft SRS is the three Regional Assemblies’ response to this policy context of existing RPG and the Government’s Communities Plan. The strategy is based on the Growth Study “preferred option”, with the inclusion of Aylesbury as one of six growth locations. It proposes growth to 2016 (Aylesbury and Milton Keynes) and 2021 (Northamptonshire, Bedford and Luton), equivalent to some 44,475 additional dwellings above what is provided in current RPG up to 2016. This equates to 22% of the additional 200,000 homes referred to in the Communities Plan. (see Joint GO note on Basic Housing Numbers, Ref “The Lemon Tables”).
- 2.3 Against this background a number of broad issues arose in submissions and at the Public Examination, concerning the justification for the SRS. In support of the Strategy, it was argued that there was a clear need for more housing to be provided for the South East, and that this need was urgent. In addition to statements in the Communities Plan about the imbalance between housing demand and supply in the south, participants referred to the Barker Review of Housing Supply, the final report of which (Delivering Stability: Securing our Future Housing Needs) appeared the week before the opening of the Examination. Developers argued that the level of housing increase provided for in existing RPG9 (39,000 homes per annum in the South East together with 23,000 in London) was insufficient to meet the projected level of household growth. Moreover, annual completions were running below the levels provided for in RPG, adding to the shortfall.
- 2.4 Against the SRS, The Campaign to Protect Rural England [CPRE] and others claimed that the growth area strategy is unnecessary and conflicts with priorities for regeneration and urban renaissance. Reference was made to CPRE’s critique of the Barker Report arguing that the Census shows a surplus of dwellings over households. A widespread view in the written objections to the draft SRS is that instead of

providing for more growth in the MKSM area, development should be directed to regions further north where it is wanted, particularly northern cities with a surplus of housing and a need for economic regeneration.

- 2.5 It was beyond the scope of the Public Examination to review Government policy in the form of the Sustainable Communities Plan, to suggest what national policy should be on inter-regional issues, or to appraise the Barker Report. However, in testing the basis and soundness of the SRS it is pertinent to address questions which have been raised about the underlying approach, even though it largely derives from Government policy and existing RPG. On the inter-regional issues, we note that policies to address regional disparities have been in place for many years, but there is nothing to support suppressing economic growth in the south in the hope of benefiting more northerly regions. RPG and Regional Economic Strategies for those regions strongly prioritise economic regeneration and urban renaissance. We find that this agenda is also being pursued through the Sustainable Communities Plan, which includes action to regenerate urban areas and revitalise housing markets in the north, as reported in the “Northern Way” document that was published during the Examination. We conclude that, while development of more northerly regions should continue to be promoted with all vigour, there is an element of wishful thinking in the idea that this will somehow relieve the south of the need to cope with its own growth.
- 2.6 The justification for the SRS must rest on whether it is needed in meeting the development needs of the area and the wider South East region. Existing guidance in RPG9 of 2001 makes provision for an annual average housing increase of 39,000 dwellings, considerably below that indicated by household projections as assessed by the Panel that conducted the Public Examination in 1999. Policy H1 of RPG9 says that this provision is subject to review before 2006 in the light of *inter alia* studies of potential growth areas. The RPG also proposed that the studies should assume that Milton Keynes will continue to expand and perform a major role in accommodating and stimulating regional growth over the next 20-30 years. We conclude that existing RPG recognises a need for growth above and beyond the provision currently made in Policy H1, and that the Milton Keynes growth area should contribute to this.
- 2.7 Since the 1996-based household projections, there has been no more recent assessment of the overall regional household requirement, as new projections based on the 2001 Census are still awaited. Detailed reappraisal of regional requirements was not advanced either in support of or against the SRS. We see little room for doubt, however, that in the light of the continued economic trends and indicators of likely future national and international migration, future assessments of additional dwelling requirements in the wider South East are liable to be of at least the same order as those underlying the RPG and the Growth Areas strategy. While the Barker Report may be taken as adding to the arguments for increasing housing provision, we do not consider that the justification for the SRS rests on the Barker conclusions. The report provides interesting background on pressures in the housing market, and we note that the Government is considering what changes it should make in the light of its conclusions.
- 2.8 A further housing market issue which is important for the growth area is affordable housing. This was considered under the Part B matters, but certain issues also arose which are relevant to the basis of the SRS as a whole. A number of participants made the point that affordable housing would be a key element if the SRS is to address housing needs in the wider South East. As Milton Keynes Council [MKC] and others pointed out, a marked drop in the quantity of social housing being provided is a major component in the fall in housing production. One argument was that the SRS should give a firmer overall steer making growth conditional upon providing a high level of affordable housing. Some questioned how the Sub-Region could fulfil this role when

the greatest affordability problems were in higher priced parts of the region to the south and in London. For those in low paid jobs in those areas, it was suggested that long distance commuting from MKSM would be neither affordable nor sustainable. Other concerns were expressed about the growth area skewing the distribution of available finance for affordable housing away from other areas where the problems are greater.

- 2.9 We consider that at the level of the Sub-Region affordability needs to be seen in terms of the wider meaning of the word, rather than purely in terms of its specialised meaning as a euphemism for subsidised housing. The housing market in the MKSM area, while including some areas of considerable housing need, is more affordable i.e. within reach of a higher proportion of households, than in the very high priced areas in London and more pressured parts of the South-East. This may be argued to make it a good place to provide market housing, and also for business to expand. Although affordable housing need is greater in other areas, expanding the housing market in MKSM could help to reduce the numbers needing affordable housing. Moreover, the SRS, as discussed in the next chapter, is based on providing economic and job growth as a basis for the housing growth. The three RAs are clearly determined that the strategy should provide balanced growth and not merely a reservoir of additional housing.
- 2.10 We conclude that the overall case for a growth area strategy for the MKSM area is soundly based in existing RPG and subsequent policy developments, and that the SRS forms an essential component in meeting the development needs of the wider South-East. The Sustainable Communities Plan does not specify how much development the SRS should provide for, however, and there has been no process at a regional level to decide what proportion of the additional 200,000 homes called for by Government is appropriate for the MKSM area. It is implicit that the amount of development should be determined through the assessment of the potential and capacity of the Sub-Region. The proposed level of growth arises from the MKSM Study and Growth Area Assessments and through testing of the SRS at the Public Examination. That testing has involved looking in more depth at the growth locations making up the strategy. Therefore, rather than seeking a “top down” figure, we have built up our conclusion as to the overall level of growth that the SRS should provide on the basis of our assessments of the growth locations in Chapter 5 to 10 of this report. The result is reflected in our recommendation for revising Strategic Policy 1 in Chapter 4 below.

The MKSM Sub-Region

- 2.11 Having established the need for a growth strategy, we consider the nature and definition of the Sub-Region. The growth study area is stated in RPG9 to include Milton Keynes and large parts of Buckinghamshire, Bedfordshire and Northamptonshire. The conception of the area appears to have evolved at an early stage from a Milton Keynes – Bedford – Northampton triangle, through the addition of the Luton conurbation, all the main towns of Northamptonshire, and finally Aylesbury. The RPG states at paragraph 12.60 that the Sub-Region is not defined by administrative boundaries. In practice, however, such boundaries have determined both the extent of the area studied and subsequently covered by the SRS and the division of the Sub-Region into sub-areas, as set out in Figure 1 and paragraph 10 (p10) of the SRS. While there is a certain practicality in this, it has also attracted a number of criticisms.
- 2.12 A general criticism, shared for example by some developers, CPRE and local authorities such as South Bedfordshire District Council [SBDC], is that the Sub-Region lacks cohesion in functional and spatial terms. Submissions point to the relatively weak economic linkages between some of the main urban areas within MKSM. David Lock

Associates [DLA] and others also point to the sub-area divisions within MKSM as having prevented thorough cross-boundary consideration of issues such as the eastward expansion of Milton Keynes, or the effects of Milton Keynes' growth on neighbouring parts of south Northamptonshire. Some argued that Aylesbury was not appropriate for inclusion, and cross boundary issues are raised about the relationship of growth at Aylesbury with Wycombe outside the area to the south. SBDC also questioned the appropriateness of including Luton Dunstable and Houghton Regis in the growth area, as it was tightly constrained by the Green Belt and designated as a Priority Area for Economic Regeneration [PAER] in RPG. An acute cross-boundary issue is that the SRS includes a proposal for a location outside the formally defined area, in North Hertfordshire adjacent to Luton. We consider these particular issues in the relevant sub-area Chapters of this report.

- 2.13 On the general definition of the growth area, we note that the Growth Area Study, in paragraphs 1.24 to 1.28 acknowledges the lack of homogeneity or a common sense of place across the area. It is stated to have been defined on the pragmatic basis that none of the administrative areas initially suggested wished to be excluded, and no good reason was given for excluding any of them. Nor, apparently, were there other areas pressing to be included at the time. As the South East England Development Agency [SEEDA] representative noted at the discussion on the Aylesbury sub-area, where else do you draw the line? Paragraph 1.28 of the Growth Study appears to admit there is no real answer to this. There does not appear to have been any evaluation to seek a more rational or functional area definition. Unsatisfactory as this may be, we conclude that the only practical approach is to accept the Sub-Region as it is for present purposes, and to deal with the issues arising within it, ensuring that local cross-boundary issues are addressed at the local level.
- 2.14 There is, however, one regional cross boundary issue which falls to be considered here, concerning the relationship of MKSM to the neighbouring parts of the West Midlands and East Midlands regions, which was discussed in Matter 1C of the Examination. The West Midlands Regional Assembly [WMRA] objected to the SRS on the grounds that it conflicts with the West Midlands regional strategy, as set out in RPG11. The West Midlands has adopted a “re-urbanising” strategy which strongly prioritises urban brownfield development and regeneration in the major urban areas, and an emphasis away from greenfield development in smaller settlements in Warwickshire. The essence of WMRA's complaint is that the level of growth provided for in MKSM, and Northamptonshire in particular, could undermine the West Midlands strategy by providing economic opportunities and greenfield development which would divert growth from the West Midlands urban areas, and distort the housing market in Warwickshire. Similar arguments were also advanced about the effect of MKSM growth in Northamptonshire on urban development opportunities elsewhere in the East Midlands. A further argument was that the growth area would tend to skew the allocation of public funds away from areas in need of regeneration. We note the commitment to ensure the necessary funding for the growth areas, and it will be for the Government to convince other areas that this will not be at their expense. We consider issues of funding and delivery more fully in Chapter 4 below.
- 2.15 In answer to the concerns about the SRS affecting growth elsewhere, it was argued that the growth in MKSM was required to meet regional needs stemming from the South East. The economic potential of Milton Keynes and Northampton was felt to be indigenous and not to depend on diverting growth from neighbouring regions. The East Midlands Assembly pointed out that the West Midlands had not raised these issues at earlier stages during the Growth Study process. We also note that the Regional Development Agencies [RDA] of the two regions consider their respective Regional

Economic Strategies to be consistent, and are actively working together to ensure complementarity of their activities. RPG 11, as proposed to be modified by the Secretary of State, calls for the relationship between the south eastern part of the WM region and the MKSM growth area to be investigated and its implications identified to inform the [next] review of that RPG (RPG 11 Public Consultation draft, September 2003, paragraph 1.30).

- 2.16 In our view there is no inherent conflict between the two strategies. The MKSM strategy, which focuses on six urban areas, may be seen as complementing the polycentric framework for the West Midlands. The scale of growth proposed, requiring urban extensions involving greenfield land, is presented as a response to existing South East growth pressures rather than a bid to lure footloose development away from other regions. The future economic implications of the MKSM strategy and general relationships between the regions are not sufficiently well worked out to enable conclusions to be drawn about what effect, if any, the growth proposed in the SRS will have on adjoining areas. The concerns of WMRA would appear to be best addressed by the approach to further investigation put forward in draft RPG11. This will inevitably involve cross boundary cooperation between the RAs as well as the RDAs. Part of the focus for such cooperation should be monitoring of the implementation of the respective strategies. At a more local level, the relevant local planning authorities should also exchange information across the regional boundary, so that local housing and development linkages can be better understood. This will be particularly relevant for the area around Daventry, which is considered further in Chapter 5 below.
- 2.17 One aspect which raises issues not only of the MKSM boundary but also of the effects of regional boundaries on planning policy is the area adjacent to Rugby which straddles the boundary between the East and West Midlands and which contains the site of the Radio Station. While it is not appropriate for us to examine a site specific proposal, we note the case put forward by DLA about this area and its potential, given its strategic scale and highly accessible location. Because it is peripheral to both regions, this appears to have been dismissed by both RPGs and the SRS. It does not appear to have any relevance to Rugby's role as a sub-regional focus and strategic centre in RPG11. Nor was it considered in the Growth Area Assessments for MKSM as it does not relate to any of the settlements within the Sub-Region which form the focus of the strategy. We do not dispute either of those decisions in their own terms. We would observe, however, that despite the name of the MKSM Sub-Region, issues of growth and development across the East/West Midlands boundary have not been addressed at a sub-regional level, at least not in any published policy document. In relation to the cross-boundary area of land near Rugby, which has no future in its former use, until some positive decision is taken about it the issue is not likely to go away. We therefore suggest that it is one of the cross boundary matters that should be addressed in future joint investigations between the two RAs.

The Sub-Regional Spatial Strategy

- 2.18 The draft SRS does not present a comprehensive spatial strategy for the area, and does not purport to do so. The approach of the MKSM Study was to assess the potential of the area to support additional growth, looking at economic and employment forecasts and considering the implications of broad spatial options and the infrastructure that would be required. In taking the analysis further, the GAAs were, in effect, prospecting exercises to identify and evaluate land to accommodate the growth proposed. The draft SRS sets out the resulting proposals in terms of the scale of development, broad

locations and infrastructure proposals. Although the RAs state that environmental considerations were embodied in the study approach, policies and proposals regarding them are not included in the draft SRS. They also stress that general policies for sustainable development, environmental and other issues contained in national and regional guidance continue to apply in the MKSM without needing to be repeated in the SRS.

- 2.19 The Regional Assemblies' stance is logical but it leads to the paradox that, while the growth proposals are presented at a level of detail that is far greater than is usual in RPG, or even in a structure plan (with even more detail able to be inferred from the Growth Study and GAAs), they do not form part of a fully worked out planning strategy covering all the issues to the same level of detail. This has contributed to widespread concerns about a lack of balance, and a feeling that growth has been given priority over other considerations. We consider these issues, and measures to address them, under Sustainability in Chapter 3 below.
- 2.20 The spatial distribution of growth in the SRS derives from the evaluation of options in the MKSM Study. As reported in paragraphs 5.34 *et seq.* of the study, options were assessed for accommodating future growth in a "Metropolitan" two centre strategy centred on Milton Keynes and Northampton, concentration on four centres including Luton and Bedford, and a "Corridor" option based on east-west and Midland Mainline transport corridors, which brings in Wellingborough, Kettering and Corby. A preferred option, combining elements of the four centre concentration and corridor options was then proposed. The advantages of this option, noted at paragraph 6.63 of the MKSM Study, are stated to be:
- the scale of economic growth it delivers
 - the focus on growth in the main urban centres and prospects for their improvement
 - a better balance (than other options) between the location of jobs and workers
 - the potential for regeneration of key centres which are struggling
 - the ability to deliver significant improvements to public transport, with real opportunities for achieving a shift away from car borne journeys.
- 2.21 The draft SRS adopts a variant of this preferred option which also identifies Aylesbury as a growth location. By regarding the three north Northamptonshire towns as one urban area, this is expressed as a focus on six growth locations which in effect comprise all the more substantial towns in the Sub-Region. This approach can be seen as reflecting the SRS aims of concentrating growth at the main urban areas, where urban renaissance can be achieved and regeneration needs tackled. It is also arguably in line with guidance in PPGs and RPG and, by treating the locations separately in the Part B statements, it enables the issues and priorities for each of them to be addressed. This is important, because their circumstances are very different.
- 2.22 In addition to the arguments about the level of growth proposed for each of the six locations, which are considered below in the growth area chapters, a number of criticisms were made of the spatial strategy. Development industry views criticise the fact that by concentrating on existing urban areas and extensions to them, other options for providing for growth which may be more sustainable were excluded from consideration. Given the strategic scale of growth being sought, radical solutions could, it was argued, have a role rather than looking for the "next field" where each town might extend. For example, a new settlement option, particularly one using

previously developed land, may be more sustainable than a greenfield “sustainable urban extension” which may over-burden an existing town.

- 2.23 We take the view that one of the strengths of the SRS is that it builds on existing plans, seeking to begin by early delivery of what is already planned and developing medium and longer term options around established locations. While we appreciate the frustration of some participants that there has not been more adventurous thinking “outside the box”, we are not satisfied that any of the alternative suggestions made are obviously superior to the spatial pattern in the SRS. To introduce further proposals at this stage would, in our view, risk losing focus, and cause delay while such options are evaluated. As to the sustainability of the urban extensions, this must be assessed in relation to the circumstances of each of the growth locations. Our conclusions in the growth area Chapters below suggest that a satisfactory level of growth can be provided in the first phases of the SRS period. The growth area has a long time horizon, however, and proposals for the period beyond 2021 have, rightly, not been settled with precision. We conclude that it is important that the strategy now proposed, while soundly based in its own right, is not taken to preclude consideration of further options for delivering planned growth to 2031.

The SRS Time Horizon

- 2.24 From the outset the Growth Area study was approached as a long term exercise to consider growth up to 2031. The SRS, in paragraph 1.1 (p9) refers in general terms to the levels of housing growth seen as realisable to 2031. The strategy is, however, mostly concerned with how to move during the first two decades towards the proposed step change in levels of growth. Thus it focuses in greater detail, rightly in our view, on the periods for which Local Development Frameworks [LDFs] will now have to be prepared, and over which the challenges of delivery have to be tackled. There are concerns, however, that the SRS devotes too little attention to what is proposed for the longer term. These concerns come not only from developers seeking broader options, but also from MKC who feel the long term strategy needs greater certainty, and from a number of environmental organisations and others worried about the increasing growth proposed beyond 2021 and its implications for the environment, including water supply, drainage and flooding issues.
- 2.25 We take the view that the SRS needs to address the longer term period with sufficient clarity to ensure that the whole strategy is soundly based and deliverable. For example, some of the infrastructure priorities, such as for improving East West links, or developing intensive urban transit systems, depend on having reasonable certainty that the growth to support them will occur, before the necessary long term commitment of resources can be made. Locational choices made in the short or medium term need to have regard to what is intended to happen subsequently. Many of the issues, for example infrastructure requirements, economic regeneration prospects and environmental constraints, are particular to the different growth locations. These are addressed in the growth area chapters below, where we make recommendations for what the SRS should say about each location for the final decade of the MKSM time horizon, even though the relevant Part B statements currently deal only with the earlier period.
- 2.26 There are, however, also issues about the approach of the SRS to growth over different time periods. The first of these is the way the projected growth is assumed to be distributed over the 30 year study period. Many respondents, particularly developers, are critical of the so called “30:30:40” split of the percentage of growth between the

three decades to 2031. As indicated in the written submissions of the three Regional Assemblies, this assumption was made to provide a consistent basis for the detailed assessments undertaken by the GAAs of the outputs of the Growth Study. It reflects the judgement by the RAs and RDAs of the time it would take for growth to respond to the interventions necessary to take forward the knowledge based economy in the Sub-Region, and for some of the key infrastructure to become available. The Assemblies indicated that this assumption was to be applied flexibly and, as explained in their supplementary document EXAM59, the 30:30:40 split was actually departed from in two of the GAAs – for Bedford (30:33:37) and Milton Keynes (34:31:35).

- 2.27 The developers' argument was that the 30:30:40 split sought to push back into the final decade a substantial proportion of the growth that was projected to occur earlier. It would mean that the SRS, far from achieving the step change in provision sought, provided a gradual slide up to the higher level, which would not be fully achieved until after 2021. The 30:30:40 split was felt to be unrealistic and to result in lower growth overall. Development Land and Planning Consultants [DLP] claimed that projections for long and short term trends in the South East show a split of 35:40:25 to be more realistic, and accordingly asked for the SRS provision for each area to be increased by 20% for the period up to 2021. Environmental groups and local people also raised concerns about the implications of the proposed growth profile. Beyond concerns about the level of development envisaged for the two decades up to 2021, there was considerable unease about proposing an even greater amount in the decade beyond 2021, the consequences of which had not been investigated in any depth.
- 2.28 We take the view that it is reasonable to consider the rate of development at any given location in terms of the speed with which the necessary conditions for the growth can be brought about. Clearly some locations have early opportunities, while others may have considerable inertia, infrastructure or other constraints to overcome before growth can be realised. In effect, however, the SRS assumes that the sub-region would realise only 60% of its 30 year potential over the first two decades, when 75% of the region's 30 year growth is projected to arise. For the final decade, the sub-region would then accelerate to realise the remaining 40% of its potential, against the background of regional growth slowing down rapidly. The question is whether this is realistic.
- 2.29 To exemplify the issue in terms of households, would households which do not form or locate in MKSM in the 20 years to 2021 (because it realises 60% rather than 75% of its growth potential in that period) be there to fill homes in MKSM when more become available from 2021 to 2031? They would have gone elsewhere, or not have formed, or met their needs in other ways. The same would apply to businesses. It seems more likely that the performance of the sub-region as a whole would tend to mirror the wider trend of demand. Thus if MKSM realises no more than 30% of its growth potential in each of the first two decades, it would be quite likely to realise much less than 40% in the final one.
- 2.30 The available forecasting information does not shed sufficient light to enable definitive conclusions to be reached about these matters. The "TEMPRO" growth projections which informed the work of Roger Tym & Partners on the Growth Study may themselves be questioned. There are also differing views about housing requirements. Official published household projections do not go beyond 2021. They do, however, show growth for England and all regions rising steadily to 2016 and then starting to tail off. New projections reflecting the 2001 Census and the latest assumptions about international migration are still awaited. In the meantime, we think the broad conclusion can reasonably be drawn that household and job growth requirements will remain strong through the current decade and from 2011–21, but it may not be realistic

- to assume growth continuing to increase throughout a 30 year period in the whole Sub-Region.
- 2.31 As a result of this conclusion, we take the view that the SRS should seek to maximise the proportion of the sub-regional growth potential that is achieved in the early periods – i.e. “front load” the provision as far as possible. This must be done, however, with reference to local capacity, infrastructure and other requirements in each of the growth locations. We have therefore had regard to these matters in the growth area Chapters 5 to 10, where we have set out our conclusions for the level of growth that should be assumed in each location to 2021. We further conclude that growth for the period 2021 – 31 should generally be assumed to be no higher than in the previous period 2011 – 2021. The resulting housing numbers, set out in our recommended revised Strategic Policy 1 at **R4.5** show some increases up to 2021 compared with the draft SRS, but a reduction for 2021–2031. The resulting overall level of growth is somewhat less than the 30 year potential of the growth area as assessed in the MKSM study. This maintains an element of caution in the event that environmental or other factors curtail the extent of growth that can be realised. Or the remaining potential could be assumed to remain available for the period beyond 2031. There will of course be more than one opportunity to review and if necessary revise the proposals to 2031 in the light of monitoring before they are taken forward in detailed planning.
- 2.32 The second main issue concerning time frames is that the provision for the different sub-areas is related to different time periods. For Northamptonshire and Luton and Bedfordshire housing provision and phasing of key infrastructure provision are set out in two ten-year periods, 2001-2011 and 2011-2021. For Milton Keynes and Aylesbury housing provision is given for the ten-year period 2001 – 2011 and the five years 2011 – 2016, although key infrastructure phasing is given in three five-year periods to 2016, with an implicit additional phase “post 2016”. These differences are widely criticised for making comparisons extremely difficult. Also in the case of Aylesbury and Milton Keynes, the relatively short period to 2016 is felt by MKC and others to hamper the strategic planning needed to provide for the major expansion of the city.
- 2.33 The RAs explained that the differences stemmed from the fact that the three sub-areas are covered by existing RPGs with differing time horizons: Northamptonshire by RPG8 which runs to 2021 and is proposed be amended by the SRS, Luton by RPG9 but also by the emerging RPG/RSS14 which will run to 2021, and Milton Keynes and Aylesbury by RPG9 which runs only to 2016 and will be amended by the SRS, although it will be replaced in due course by a review up to 2026. We appreciate that this is the explanation, but question whether it is really necessary to make the SRS growth area provision conform to the existing RPG framework in this way. In the case of Milton Keynes and Aylesbury it is clear that the quantity of additional growth up to 2016 will in any case alter the figures for Buckinghamshire (as well as Bedfordshire) contained in Policy H2 of RPG9. We cannot think of any administrative obstacle preventing the alteration from including provisions not only to 2016 but, for the growth area parts of Buckinghamshire, going forward to 2021. Given that the MKSM Study and the SRS have addressed the period beyond 2016, there should be no technical reason for not setting out the scale of development to 2021. Clearly, however, the non-MKSM parts of Buckinghamshire would not be included in any provision given for 2016-2021. We conclude that the final SRS should include provision for Milton Keynes and Aylesbury up to 2021, in line with the other growth locations. This is reflected in our recommendations in Chapters 7 and 8.
- 2.34 In this Chapter we have considered key aspects of the SRS and drawn some conclusions about the soundness of the strategy. Soundness is, however, closely connected with questions of sustainability, with economic issues and the relationship of housing to job

growth, and with infrastructure issues. Those matters are considered at the level of the whole MKSM strategy in the next Chapter, and in more detail in the individual growth area Chapters.

CHAPTER 3: SUSTAINABLE DEVELOPMENT

Introduction

- 3.1 In this Chapter we consider the sustainability of the proposals in the draft SRS, in the context of national and regional guidance, and with reference to the Sustainability Appraisal [SA] conducted by Baker Associates. These matters were discussed primarily in Matters 2A to 2D of the Public Examination. Here we consider them in relation to the generality of the SRS and the Part A policies in particular. Issues more relevant to the particular growth locations, although they may have been raised in Matter 2, are considered in Chapters 5-10. Sustainable development is firmly embedded in all aspects of planning policy, and so the scope of this Chapter is necessarily broad. It looks first at the context and balance of the SRS and the Sustainability Appraisal, and the general approach to providing for sustainable development. Then, in order to give some structure to the wide range of topics, we have sought to group them under the Government's four objectives for sustainable development as set out in paragraph 1.13 of draft PPS1 and elsewhere, viz:
- i. maintenance of high and stable levels of economic growth and employment;
 - ii. social progress which recognises the needs of everyone;
 - iii. effective protection of the environment;
 - iv. prudent use of natural resources.
- 3.2 This is not an easy fit, however, due to the integrated nature of sustainable development. Transport raises issues under all the headings, particularly economic, environment and resource issues. We have therefore dealt with it under a separate heading before moving to cover the other topics under the four generic headings. Under the environmental heading, the issues go beyond "effective protection", into positive promotion of environmental gains through change.

Sustainability Appraisal

- 3.3 As noted in paragraph 2.18 above, the three RAs rely upon existing guidance in PPGs and RPGs to provide the context for sustainable development through the SRS, rather than repeating such guidance or setting out a comprehensive strategy. They have also relied on the methodology of the MKSM Study and the GAAs to ensure that sustainability and environmental issues were considered in arriving at the SRS proposals. Baker Associates appear to be among many who have found some difficulty with this approach. Their appraisal was conducted on the basis of the draft SRS, but did not include the background studies or, as indicated at paragraph 1.3 of their report, the SRS spatial diagrams. Thus the SA does not include or review those elements of sustainability assessment that were included in the Growth Study and GAAs.
- 3.4 Baker Associates were careful to limit themselves to appraising what the draft SRS does, rather than what it does not do, but even so SA section 6 on Scoping identifies many areas where the partial (i.e. non-comprehensive) nature of the SRS prevents an assessment of whether the proposed growth will be accommodated in a sustainable manner. Also, possibly due to the lack of feedback noted at SA paragraph 1.3, they appear to have been under some misapprehensions as to the status of the SRS, and

possibly other aspects of their remit, which may limit the usefulness of the SA. Further, the basis of some of the judgements they have made is opaque, perhaps because of a lack of background information. For example, at SA paragraph 7.8 food processing and freight distribution are characterised as inherently unsustainable economic sectors. While some operations in these sectors may not fit with sustainable development, it is difficult to see how modern life would be sustained if food were not processed and freight not distributed. A better target for Baker Associates' strictures might have been the high performance automotive sector.

- 3.5 Altogether, as many respondents and participants pointed out, the SA has been a rather unsatisfactory exercise, but one which raises many issues concerning the contribution of the SRS to sustainable development. In explaining and defending the SRS on various aspects of sustainability, the three RAs made frequent reference to the Growth Study and GAAs. Although these were not formally part of the consultation draft of the SRS, many of the representations made reference to them, and participants drew upon the material in them in making their points about sustainable development. Thus the Public Examination was in a position not only to address issues raised by the SA, but in some matters to go considerably beyond the conclusions Baker Associates were able to draw. This is reflected in our conclusions and recommendations below.

Providing for Sustainable Development

- 3.6 We appreciate the wish to avoid repeating existing national and regional guidance or usurping of local decision making. As a result the draft SRS is commendably brief, although as we bring out in the next Chapter its form and content need radical improvement. The overwhelming reaction, however, has been that people are unpersuaded that the proposals will result in sustainable development. This may be because they consider them to be inherently unsustainable, that issues of sustainable development have not been considered, or that the SRS lacks the policy guidance necessary at this level. We have no doubt that the intention of the RAs, and the local planning authorities, has been and will be to ensure that sustainable development principles are fully applied in the way the SRS is developed and implemented. We conclude, however, that a more complete and balanced approach needs to be reflected on the face of the SRS itself, rather than relying on supporting documents and guidance elsewhere. The SA (e.g. at paragraphs 5.9 and 6.6) supports this conclusion, and the RAs appear also to accept this view to the extent of welcoming some of the suggested amendments that have been put forward.
- 3.7 In implementing this conclusion, we make recommendations below for improving the way the strategy deals with various specific issues. Beyond this, however, we consider that there is an over-arching issue about the objectives of the SRS. A number of participants pointed to aspects of the Sustainable Communities Plan that were not fully reflected. CPRE, Friends of the Earth [FOE] and others called for more stringent tests of sustainability to be applied in implementing the SRS. DLA and others argued that it was unfair to expect this of a growth area, for example through looking for zero emissions or carbon neutral development, in the context of a wider region which was unsustainable. Whilst we understand this point, there is a converse point which is of over-riding importance in our view. As a growth area, MKSM will undergo more change and development than other areas. Change is key to all aspects of sustainable development. It follows that the growth areas should be seen as drivers of sustainable development, not as a regrettable but necessary departure from it.

- 3.8 It is apparent from much of the discussion at the Examination that MKSM does provide major opportunities to promote sustainable development. The overall spatial strategy, as noted elsewhere, arguably achieves this by concentration on urban areas and linking growth to regeneration objectives particularly at Corby, Bedford and Luton, Dunstable and Houghton Regis. Other aspects which the growth strategy can help to facilitate include: energy efficient construction and renewable energy, waste behaviour and recycling, protecting and enhancing biodiversity, promoting environmental assets and creating new ones of regional importance, creating healthy and pleasant places to live and mixed and balanced communities. While developers make positive statements about such matters, it is important that the SRS sets the tone for this approach, so that in implementing individual developments it does not come down to “business as usual”.
- 3.9 The Objectives set out on page 7 do not fully embrace this. Some of the ingredients are included in Objective 4 and other parts of the SRS, such as section 2 on Sustainable Communities. Others arise elsewhere. For example opportunities provided by the growth areas for energy efficiency in design, local CHP and renewable energy are referred to in the current proposed alterations to RPG9, and supported by the Panel Report on those alterations. We also heard about English Partnerships’ [EP] requirements for Eco-Homes standards to be met in development on their land. While there is no need to repeat such policies in detail, we consider it important that the linkage between them and the SRS is cemented at both ends by sufficient reference in the SRS. Our recommendation for recasting the Objectives **R4.5** gives greater prominence to creating sustainable development in all its aspects. Section 2 of the Part A Statement should also give greater emphasis to the importance of the growth area as a driver of sustainable development, and should be expanded to address all the aspects of sustainability. Our recommendation **R3.1** below reflects these conclusions.

TRANSPORT

Sustainable Transport

- 3.10 An over-arching issue raised in the context of transport was a general lack of confidence in the Government’s long-term commitment to funding necessary transport infrastructure in step with the housing and economic growth that it is intended to facilitate. It was a widespread view that the Sub-Region already suffers substantial ‘transport deficits’ as a result of transport investment failing to keep pace with development in recent decades. Without this commitment many fear that current unsustainable travel patterns will simply worsen.
- 3.11 Many participants consider that the main principles of the SRS (such as urban concentration, more mixed use, and some of the individual transport proposals) **could** reduce travel needs and dependence on the private car **if** the existing deficits are addressed and appropriate new infrastructure is provided in tandem with development. On the other hand, the CPRE, FOE and others are concerned that the proposed scale and patterns of development will not permit the sustainable aims of the SRS to be satisfied. In their view unduly high priority is given to overcoming inter-urban congestion, as noted in the SA. Not enough emphasis is placed on achieving high quality urban public transport systems and too often such schemes are only listed as ‘under investigation’ or ‘proposed for investigation’.

- 3.12 We note that the new Regional Transport Strategies set out in RPG9 (as modified by the Secretary of State, published March 2004) and RPG8 (draft revised RPG8, April 2003, Panel Report February 2004) both emphasise policies to influence modal choice and reduce dependence on road traffic. We consider it essential that the SRS reinforces the point that the Sub-Region's growth must be based on applying those principles and not regarded as justifying any weakening of them. While it is important for the SRS to deal with increases in strategic communications infrastructure, we consider that the focus of paragraphs 1.6 to 1.8 solely on that aspect, together with the brief treatment of public transport in Section 2 on Sustainable Communities, does little to convey the right emphasis.
- 3.13 Section 2 of SRS could give considerably more emphasis to the provision of better-quality public transport systems within the main urban areas of the MKSM growth area. There are some references to this, for example in the 'Objectives for sustainable communities' (p13) which states that "...growth should go hand in hand with ...a step change in both affordable housing and in public transport provision" and in paragraph 2.2, bullet point 5. However, we would like to see more prominence given to this as an essential element of the SRS so that it stands out as a central requirement to be taken into account in the preparation of Local Development Documents [LDDs] and Local Transport Plans [LTPs] and acted upon by all the implementing parties from the Inter-Regional Board downwards. Considering the scale of growth proposed at some of the main urban centres over the next 30 years, it will require more than a slightly-enhanced 'business as usual' approach to public transport provision to make the required 'sustainable' urban extensions come near to fully meriting that description.
- 3.14 At the Examination we probed the extent of present progress towards the provision of better public transport systems. It became evident to us that, despite the laudable efforts being made in some places, there is still a long way to go before the MKSM towns will have comprehensive town-wide public transport systems that are sufficiently attractive and frequent to encourage a significant modal shift. The realities of the current commercial and institutional framework for bus operations are clearly something of a constraint. Yet there needs to be significant progress towards this aim at an early stage in the strategy. It is not a matter that can be left to catch up later. As many participants recognised, travel patterns become established early after the occupation of new development. This will require determination and commitment over a long term, but of the various 'step changes' sought in the SRS this will be one of the biggest and most necessary if truly sustainable communities are to be achieved. We conclude that there needs to be some further reference to this in SRS section 2. In addition we call for more prominence to public transport aims in the Part B sections on the individual growth towns.
- 3.15 A complementary recurring theme pursued in particular by the CPRE and FOE was the support given in the SRS, including Figure 3, for strategic improvements to the road network. These organisations pointed to the comments at paragraph 7.8 of the SA that "meeting commercial demands and overcoming congestion (follows) a very limited part of the sustainability agenda and (that) adding to road capacity is an inherently terminal strategy." The schemes referred to in the SRS do not arise specifically from it. They are already planned in any event. Nonetheless, the Highways Agency [HA] carried out a review of the operational assessment of the main MKSM highway network of motorways, trunk roads and certain non-trunk roads (PART30), using the London-South Midlands Multi-Modal Study (LSMMMS) as a starting point. The review indicates that the proposed quantum of additional development arising from the SRS to 2016 and 2021 would have an impact on the sub-regional network as a whole that would be equivalent to adding about 2-3 years of trend-based background traffic

- growth. This additional growth would be added into a situation where peak hour spread and rising levels of congestion will be occurring already, despite the benefits gained from the new road infrastructure.
- 3.16 The review concludes that demand management measures will increasingly need to be introduced in future, reflecting the content of the Secretary of State’s response to the London to South Midlands Multi-Modal Study. It would therefore be logical if the SRS were to reflect the thinking behind the Secretary of State’s response, setting the strategy more clearly in the context of the triple aspects of enhancements to the road network, measures to improve public transport and initiatives to manage future growth of travel demand. The fact that development in the MKSM area over the longer term (2021-31) is likely to raise further controversial and challenging movement issues reinforces the need to set the transport elements and implications of the SRS more firmly in the broader context.
- 3.17 Our recommendations **R3.2** and **R3.3** propose amendments to the “Strategic Communications Infrastructure” and “Sustainable Communities” sections of the SRS Part A statement, reflecting the conclusions we have drawn in the above paragraphs.

Specific rail issues

- 3.18 The Strategic Rail Authority [SRA] made clear that they had not seen any material to indicate how the set of rail transport projects identified within Figure 3 (p12) of the SRS would aid development of the area, nor any prioritisation of them. They also indicated on a number of occasions that unless there is a step change in funding allocated to rail projects in future none is likely to be affordable to 2021, apart from completion of projects such as the West Coast Main Line, due for completion in 2008, the measures resulting from the Midland Mainline Route Utilisation Strategy, Thameslink 2000 and possibly the first part of East-West Rail. We therefore recommend that the rail items on lines 5-7 of Figure 3 be redrafted to better reflect the factual position and timing of these items. The project at line 8 seems linked to the Part B issues for Corby, Kettering and Wellingborough and would be better relocated there. The project at line 13 appears to be so far off the SRA’s radar that the strategy for it seems meaningless, unless the RAs themselves can devise a convincing mechanism for its delivery. We discuss this in the context of Wellingborough at paragraph 6.32 below.
- 3.19 The rail projects at lines 1 and 10 of Figure 3 relate to East-West Rail. This was discussed on a number of occasions in different contexts during the Examination. Many saw the project as an essential part of improving east-west transport links through the Sub-Region. We note the symbolic value this appears to have, especially for the local authorities and organisations concerned with economic development. A particular part of the strategic context for this is the Oxford to Cambridge Arc concept. One benefit of creating better links with Oxford and Cambridge is said to be to improve the attractiveness of some of the urban centres (Aylesbury, Milton Keynes and Bedford) as growth points for the knowledge-based economy. Potentially the line could also form part of a longer cross-country route between the east coast and Bristol.
- 3.20 The Oxford-Cambridge rail connection has two elements. The western section is recognised as being relatively easy to implement within 3-4 years of a decision being taken since it involves only the works necessary to re-open the Bicester-Bletchley line, thus linking existing operating lines at both ends. This project is part of the emerging Regional Transport Strategy for the South East (start date 2006-10) and is being promoted by the East West Rail Consortium who have been engaging with SRA in working up a business case and investigating various funding mechanisms. The section

east of Bedford is much more long-term since it involves costly works to construct a new railway. While the promoters and supporters of the Oxford-Cambridge link pressed for the SRS to give more priority to this section, the response of the Secretary of State to the LSMMS gives scant encouragement that this will be within the timeframe of Figure 3 (p12) of the SRS (2021).

- 3.21 As for positive linkage between East-West Rail and the development proposals of the SRS, some felt that development at Aylesbury, Milton Keynes, Marston Vale and Bedford (either at the proposed levels or higher ones) would enhance the business case for the new link. One view expressed was that completion of the link should be a pre-condition for acceptance of development in these areas and that new development should help to fund it. However, the SRS does not appear to identify any individual ‘direction of growth’ as having such a close degree of dependency on East-West Rail and does not draw these kinds of connections. Re-instatement of the Bicester-Bletchley link would give some assistance to the sustainability of the strategy, although this would probably be very limited since present forecast service and usage levels suggest that it would not have a significant effect on modal shift. It could also add to the impetus for regeneration in Bletchley. Moreover, it makes sense for directions of growth to relate to the Oxford-Bedford route where other factors also point to development in those areas. Overall, however, it is difficult to conclude that the completion of East-West Rail from Oxford to Cambridge is essential as a catalyst for development in MKSM since the phases of development to 2021 would be well on the way to completion before there is likely to be any certainty of a route linking these two cities.
- 3.22 We find that there is a considerable gap between the perceptions of the importance of East West Rail by the local authorities and its other supporters, and the degree of commitment to its realisation so far achieved through the SRA and Government, particularly for the eastern section. We appreciate that a sound business case needs to be based on traffic levels and an economic return. The case for East-West Rail, however, has also to rest on wider strategic considerations of longer term development and change over a wide inter-regional area, and on the significance of an expanding cross-country network in the national transport strategy. We conclude that these issues need to be addressed further at national, regional and local levels.
- 3.23 In the meantime, we conclude that Figure 3 should refer to the two separate sections of East-West Rail, dealing with their descriptions and timings separately. We consider that the SRS should take a more practical and focused view of East-West Rail, indicating support for completion of the Oxford-Bedford route in the 5-year period to 2011 but limiting reference to the section beyond Bedford to its possible implementation post-2021. This is reflected in our recommendation **R3.4** below.
- 3.24 It is also relevant to comment here on general rail issues mentioned in the Part B statements, mainly the construction of new stations on existing rail lines to act as development and/or transport nodes serving new areas of development. The SRA made clear that they are generally supportive of new stations where they comply with certain criteria, particularly that they generate sufficient new traffic on the network, do not require significant subsidy, and do not have a negative impact on the performance of existing services. While the SRA’s stance should help in moving towards more sustainable travel patterns, it is clear that each proposal will need full evaluation before its future role can be determined.
- 3.25 We were also made aware (in the context of the proposed new station at The Wixams) of the practical impediments to the provision of new stations caused by the ‘Shared Value’ practice arising from the Stokes v Cambridge judgement. This is not a matter

for us but we observe that unless some way is found of resolving the type of impasse that has occurred in that case, possibly through the Inter-Regional Board, other proposals in the SRS for growth directions centred on new stations may be seriously delayed or thwarted.

Specific road schemes

- 3.26 Turning to the strategic road schemes listed in Figure 3, we have little specific comment to make except that the descriptions and timings of schemes seem to depart considerably from the terms used by the HA in their original representation and in subsequent statements. This makes the information in the table less useful than it otherwise could be for those seeking to understand and use it. For instance, the A14 (line 2) is known to the HA as three separate schemes and the A45 (line 3) as two, while the A421/A428 and M1 (lines 4 and 9) are both known as four schemes. As with the rail projects, some would wish the SRS to make specific linkage(s) between an individual scheme or set of schemes and a particular part of the MKSM growth area. However, establishing the necessary degree of connection between a piece of infrastructure (whether strategic or more local) and development is a complex and highly detailed process that can only be tested during the LDD process. We recommend at **R3.5** that the SRS is brought into line with the latest position on the status and timing of projects as set out in the HA's submissions.

Proposed Bedford to Milton Keynes Canal

- 3.27 The Spatial Strategy Diagram for Milton Keynes includes an indicative route for this proposed canal, whereas that for Bedford/Marston Vale does not, and there is no mention of the proposal in the text. We were told that the waterway would form a link between the Grand Union and the Great Ouse which could be of considerable value for a number of purposes. However, it appears that the canal has no strong planning status; it is merely a concept being studied by the Environment Agency [EA], British Waterways and others. In our view the proposal is not sufficiently firm to include in the SRS diagrams, as this would cause uncertainty. We recommend at **R3.6** that it be deleted from any SRS diagram(s). However, this would not prevent it from being advanced through appropriate LDDs in future if its status were to become firmer.

ECONOMIC GROWTH AND EMPLOYMENT

A “jobs led” or “housing led” strategy

- 3.28 Throughout the Examination there was dispute about whether the SRS is, or should be, housing-led or jobs-led. The RAs, pointing to the methodology of the MKSM Study, argued that the strategy is jobs-led. The local authorities generally stressed that provision of employment must be a key factor because that principle (together with the provision of the appropriate infrastructure) was one of the essential pre-conditions for their acceptance of the SRS. Representatives of the RDAs, and the conservation, community and service-providing bodies also generally looked for a firmer expression of the employment-based nature of the strategy. On the other hand, those representing the house-building industry stated firmly that the strategy had to be housing-led

because its whole existence derived from the Government's concern to supply more housing to meet needs in the wider south-east. In their view trying to link housing to specified numbers of new jobs would jeopardise the primary task of delivering a step change in housing. Moreover, it was argued, house building was itself a generator of economic growth, both directly and in service industries to meet the needs of the new population. Housing growth would also make the locality more attractive as a labour market to new employers.

- 3.29 The SRS makes many references to economic issues, but jobs numbers are mentioned only once (in paragraph 1.1) and then only as estimates in the context of the very long term perspective to 2031. There are no jobs-targets that could be cross-referenced to the housing provision made in the proposed growth locations or the three county sub-areas in the period to 2016/21. Some sought the insertion of such figures, suggesting that effective monitoring of the SRS by RAs, local authorities, the LDVs, and the Inter-Regional Board would be impossible without their inclusion. Others felt that the SRS should include mechanisms to make a conditional link between the achievement of specific employment targets at certain stages and the release of further phases of housing land. Although rejecting the notion of such a close link, the RAs responded to some of these criticisms by putting forward a proposed amendment in the form of a preface to Strategic Policy 1 stating that:

“The levels of development proposed for the sub-region are based on the need to plan for the following levels of job growth:

Northamptonshire	81,000 (2001-2021)
Luton and Bedfordshire	29,400 (2001-2021)
Aylesbury Vale and Milton Keynes	44,550 (2001-2016)”

(This is set out in the paper PART103)

- 3.30 We conclude that the SRS does need to establish more clearly the link between employment and housing, and that the RAs' proposed amendment is generally the right approach. It is important, however, to emphasise the limitations of this. We understand that these overall figures, which relate to whole Districts, comprise net job growth of all kinds, including new and expanding, large and small businesses, jobs in commercial buildings and other places or based at home. They cannot be used to try to manage the rate of housing development on a case by case or short term basis. Their use should be as reference values for monitoring, on an annual and quinquennial basis, the achievement of the strategy for MKSM and the growth towns. If such monitoring showed housing or workforce and employment growth to be getting out of kilter, appropriate policy adjustments would then need to be considered as part of the review process.
- 3.31 We support the RAs' proposal, but with the figures broken down to relate better to the growth towns, and going to 2021 in all cases rather than only to 2016 in the case of Milton Keynes and Aylesbury. This is in line with our conclusions in the growth town chapters. Our recommendation **R4.5** in Chapter 4 below sets out the employment figures in an amended version of Strategic Policy 1 which also includes wording to emphasise the status and purpose of the figures.
- 3.32 Background work to the SRS considered employment land and floorspace needs in coming to a view of overall development land requirements. We do not consider, however, that it would be helpful to include quantified floorspace or employment land provision in the SRS, as this would be too inflexible to meet the variability of local circumstances. The rate at which existing employment land is used or recycled for

employment or other uses is one of the key variables which need to be addressed at the local level. Local planning authorities, in MKSM as elsewhere, may see a need in some situations for housing and employment related development to go in step, for example in mixed use, urban regeneration or other situations where the phasing of different elements may be important. We consider that to be a matter to be determined and justified in LDDs in the light of local circumstances.

The economic assumptions behind the SRS

- 3.33 Looking at the way in which the SRS was developed, the MKSM Study took a view on three different future employment growth scenarios by using the TEMPRO 4.1 forecasts used for the 22 national multi-modal studies. The approach is explained in paragraphs 5.5 to 5.8 and Appendix 7 to the MKSM Study. The three scenarios were (a) wholly trend-based, (b) based on current policy (i.e. with rolling forward current RPG levels of provision to 2031) and (c) higher-growth. The high growth scenario assumed a higher rate of growth across the study area as a whole with some shift in activity towards higher value knowledge-based sectors of the economy. Regeneration policies at Luton, Bedford and Corby are assumed to produce a greater than proportionate share of growth for these areas, such that while the trend and current policy scenarios show negative growth for Luton and Bedford to 2031, under this scenario their employment increases by 18% and 13% respectively and Corby goes from small growth to 24% growth. For MKSM as a whole the forecast pace of growth in the trend and higher growth scenarios is not significantly greater than that achieved in recent years.
- 3.34 DLP took issue with the approach, arguing that it artificially suppresses growth at some locations in order to favour others. This, it is claimed, runs the risk of insufficient housing being achieved in the buoyant locations, but with an imbalance of homes to jobs at others. The result would be less economic growth overall. DLP made the point that at Northampton for example the basic “trend” employment projections, from MKSM Study Table 5.1, show an increase of over 53,000 jobs by 2031, whereas the “high growth” figure in the preferred option, from Table 6.2, is only 46,000 jobs. For Milton Keynes the corresponding figures are 85,000 and 71,000.
- 3.35 We appreciate the problems over the realism of any methodology which seeks to redistribute jobs, whether over time, spatially or between sectors. The MKSM assumptions do all three of these things, through the “30:30:40” split, in the preferred spatial option, and by increasing the role of regeneration areas and adding 0.5% (2011 to 2021) and 1% (2021-31) to the TEMPRO projected rate of office services growth to make the “high” growth scenario. We do not consider any of these assumptions to be invalid, however, nor are the basic TEMPRO forecasts necessarily superior as a portrayal of reality, as they are merely the result of another set of assumptions. The important point is that in using any assumptions as a basis for policy their significance must be clearly understood. In a supplementary paper by Roger Tym and Partners, they say the intention was not to suppress growth below forecast levels (PART155, paragraph 9).
- 3.36 The assumptions in the MKSM Study appear to us to be a reasonable attempt to reflect not only the projected levels of growth but also the policy choices that would be made in seeking to realise the Sub-Region’s growth potential. It is clearly logical, for example, that addressing regeneration issues and historic under-performance at Corby, Bedford and particularly Luton should result in higher employment growth in those locations than unmodified projections would imply. If this did not happen the strategy

would be failing. At this level, however, the modelling exercise is relatively unsophisticated. More detailed work on the growth sectors and the interventions needed to bring about the strategy's proposals needs to involve the three RDAs. This needs to look not only at land use and infrastructure but also skills and business development. We note, however, that RDAs were involved in steering the MKSM study and have not disputed the outcome. Clearly effort will need to focus on co-ordinating implementation of the SRS with the three Regional Economic Strategies.

Growth sectors

- 3.37 As noted above, the economic growth assumptions depend on a significant move towards high-value knowledge based sectors which are currently under-represented in parts of the Sub-Region. The three RDAs strongly support this as the way forward, and we note that there is already a high degree of co-operation between them inter-regionally, and with the MKSM strategy process. This clearly needs to be maintained throughout the implementation of the SRS. Exactly what action will be required in each of the growth locations is a matter for more local consideration. Even at the level of the growth town chapters it is not possible for the SRS to make very specific proposals. Attempting to do so may create inflexibility which would hamper rather than assist delivery of the strategy. One of the key messages from business representatives to the Examination was the need for policy to be adaptable and responsive to changing market needs over time.
- 3.38 Not all of the Sub-Region's growth will be related to the knowledge-based sectors, and we consider the strategy needs to take a balanced and realistic view of what will be achieved. SRS paragraphs 2.6 and 2.7 list the Sub-Region's growth sectors and sectors in transition. Whether these sectors will continue to be the important ones throughout the strategy period will need to be the subject of monitoring. Service industries meeting the needs of an expanding population and economy will have an important role to play. One other aspect which was mentioned is the importance of the sectors involved in delivering the strategy itself – design, construction and environmental technologies for example. These skills and resources will be an essential part of achieving growth, and the Sub-Region would clearly benefit from developing rather than importing them.
- 3.39 Overall, although the RDAs need to be closely involved in the further development and delivery of the strategy through LDDs, the arguments they put forward do not suggest any particular need for amendment of the SRS itself.

Worker/job balance and commuting

- 3.40 Worker/job balance was one of the issues considered in the appraisal of options in the MKSM Study, in paragraphs 6.12 to 6.20, and 6.42. The significance of this is that any imbalance indicates people travelling outside their area to work. At the level of the whole Sub-Region, there is a broad balance between workers and jobs, both at 2001 and in the projections. The available District based figures have limitations. Imbalances reflect short distance trips across a District boundary to workplaces in a town centre, for example at Luton, as well as longer distance commuting. All the options reflect a continuation of the existing basic relationships within the Sub Region. The dominant centres are Milton Keynes and Northampton, with an excess of jobs over resident workforce, while Bedfordshire is generally a net exporter of labour.

- 3.41 According to the MKSM Study, worker/job balance was one issue which led to the choice of the preferred option as performing better than the other spatial options of concentration, two centre or corridor. Figure 6.2 of the MKSM Study shows the balance between number of workers and jobs at District level in the preferred option. SBDC raised concerns about the level of out-commuting implied for the District and for Bedfordshire generally. Many other representations expressed the same concerns, fearing an increasing “dormitory” role for the area. In response to these issues, the three RAs submitted additional information on population, employment and dwelling projections for Bedfordshire (document PART 143).
- 3.42 We take the view that the SRS should aim not to increase, and preferably to reduce the extent of travelling to work within and out of the Sub-Region, particularly by road. The extent of existing out-commuting, particularly from Bedfordshire and Luton, reflects the area’s good access to London, especially by train. These opportunities contribute to the prosperity of South Beds and other residents. The increase in train capacity by 40% between Bedford and London from the end of 2005 under the Midland Mainline improvements will add to the area’s attractiveness. Under these circumstances, it will not be surprising if commuting to London continues to play an important part in the Bedfordshire economy. What is also important, however, is that growth should not result in the area becoming increasingly “in debt” to London or to other parts of the Sub-Region.
- 3.43 Turning to the figures attached to PART 143, which are drawn from the MKSM study, Table 1 shows very small changes in the net out-commuting balance of Bedfordshire (38,300 in 2001 rising to 39,300 in 2031) and districts within it. Net out-commuting represents 13.7% of the workforce at 2001 reducing to 11.8% at 2031. Table 2, which updates the figures in the light of the 2001 census, reduces the net out-commuting balances (to 15,000 at 2001 and 19,000 at 2031), again with marginal changes at District level. Assuming these figures are soundly based they suggest that the strategy will not increase commuting pressures for Bedfordshire. More generally, comparison of MKSM Study figure 5.2 and figure 6.2 shows that the preferred option reduces all the major net in- and out-commuting balances compared with the trend projection. The by-and-large nature of such calculations, however, underlines the importance of consistent and regular monitoring to establish what is actually happening as the strategy is taken forward.

SOCIAL PROGRESS

Community cohesion and infrastructure

- 3.44 The social and community dimensions of the growth area were discussed in Matter 2B, although the same issues also arose elsewhere. Many representations, particularly from individuals and local councils, expressed fears about the impact of new development and the incoming population on existing local communities. A key concern was the pressure of increased numbers on existing often over- stretched facilities. A number of participants also stressed the importance of early provision of social infrastructure. The involvement of the voluntary and community sector at the earliest stage was seen as essential in order to build communities and ensure that local services addressed the needs of local people. A particular concern of the Countryside Agency, supported by CPRE and others, was the impact of major urban growth on the neighbouring rural communities.

- 3.45 While the references to social infrastructure and community facilities in the draft SRS were welcomed, there was a lack of confidence in the funding and delivery arrangements, or in the opportunities for local community and voluntary sector involvement. This appeared to stem in part from dissatisfaction with the way the strategy had evolved so far, and there was an implied need to “do better” in future. Several participants called for more detail or greater clarity in the SRS on these matters. Assurances were sought about funding for social infrastructure by the relevant agencies and through developer contributions.
- 3.46 Development industry representatives generally welcomed the approach of the draft SRS. It was accepted that development should fund new infrastructure requirements provided they are in proportion. Where there are existing deficits, developers clearly have concerns about excessive funding being sought from development. There was, however, acceptance that development could make a reasonable contribution, and broad support for a “community chest” approach for distributing such contributions. Local authorities, developers and others agreed that the Sub-Region had had good and bad experiences in assimilating past growth. Good examples included early provision of social infrastructure, including “community houses” or other measures to provide a social focus for an area, even if only on a temporary basis in advance of full scale facilities being provided as development proceeds.
- 3.47 The three RAs, while accepting many of the points made, argued that more detail on community development and social infrastructure issues would be inappropriate for the SRS as a strategic document. These matters were essentially ones to be followed through at the local level, by the LDVs and in LDDs, Community Strategies and other programmes. They pointed to SRS paragraphs 2.11 to 2.17 on Community Infrastructure, together with the relevant Part B sections as setting out a strong framework at an appropriate strategic level. On the question of funding, attention was drawn to the announcement by the Minister Lord Rooker “Taking Forward the Growth Areas” (Document STRAT18) and other statements reflecting a commitment by Government to ensuring that provision of infrastructure and services takes place in step with growth.
- 3.48 We generally accept the approach of the three RAs on the provision of community infrastructure. Clearly the local authorities and Local Strategic Partnerships will have a vital role to play in ensuring community development and the provision of infrastructure and services. So also will the participation of local people and an active voluntary and community sector, as noted in the penultimate bullet point of paragraph 2.2 of the draft SRS. It is clear, however, that many are unconvinced about whether this will come about. We comment on the delivery issues in the next Chapter. We consider, however, that the SRS could give greater prominence to the issue of community involvement and the role of the voluntary sector. These are nowhere mentioned in the section on Community Infrastructure or Strategic Policy 3 on Sustainable Communities. This leaves the impression of a “top down” approach.
- 3.49 To remedy this our recommendation **R4.5** for recasting the SRS objectives gives greater prominence to the community dimension. Carrying this forward, our recommended revision of Strategic Policy 3 (**R3.12**) adds a bullet point bringing out the involvement of the voluntary and community sector in developing communities.

Education

- 3.50 A criticism of the SRS is that its coverage of education issues is unbalanced. The references vary greatly from the general to the highly specific. Examples of the former include “Workforce skills levels need raising” at Part A, paragraph 16 (p7), while Strategic Policy 3 also refers in general terms to the need to improve skills and provide social infrastructure, including education. By contrast paragraph 2.14 Part A states that “A world class and internationally renowned university should be developed in the sub-region.....linked witha major new teaching hospital”, while the Part B section on Northamptonshire gives very specific information (p30 and 33) about various items of social infrastructure including education. The other Part B sections, however, have much less specific coverage.
- 3.51 Dealing first with primary and secondary education, operational planning for pupil numbers by local educational authorities is a complex and dynamic process, requiring constant monitoring of demographic changes at the local level. We concur with those who argued that it is unnecessary and misleadingly precise for a sub-regional strategy document to list the number of schools required over a long time-scale. While it is important for the SRS to identify the need for timely and proper provision, LDDs and the development control process are the proper vehicles for effecting the detailed links between town planning and schools planning. The RAs appeared to accept this. We recommend appropriate modifications in the Northamptonshire Chapters 5 and 6.
- 3.52 Turning to further and higher education, as suggested by some participants the SRS does not always distinguish sufficiently clearly between these two sectors. Further education receives relatively little coverage in the SRS except by implication in the context of skills raising, and (p30) in a reference to tertiary education in Northamptonshire. We do not recommend extensive reference to this matter but a strengthened reference to it is included in our recommended revision to paragraph 2.14 **R 3.7**.
- 3.53 As for higher education, the RAs accepted that the language in paragraph 2.14 is ‘too purple’ in terms of what can really be achieved over the time-scale of the strategy. As the higher education sector participants argued, this excessively bullish approach obscures and may underestimate the difficulties of building up the higher education resources of the MKSM area to achieve the strategy’s underlying aims of increasing the sub-regional educational and skills base to support sustainable growth. There are four existing higher education institutions in the MKSM area. Two, the Open University and Cranfield University, have highly specialist roles and are not necessarily linked to regional needs, albeit that they could probably already be described as ‘world class and internationally renowned’, in their own particular fields. The other two, Luton University and University College Northampton [UCN], are as described by the latter as being “at the very beginning of their development as universities”.
- 3.54 UCN pointed out that the Higher Education Funding Council [HEFC] distributes funds to institutions via national criteria (student recruitment and research output). The MKSM area’s higher education infrastructure will not be automatically strengthened as a result of the proposed housing and employment growth unless the Department for Education and Skills and the HEFC connect with the SRS and work with the delivery vehicles to secure regionally focused higher education resources via a different distribution system. These are matters for the SRS delivery arrangements which are considered further in the next Chapter (recommendation **R4.6** refers)..

- 3.55 We conclude that, as many participants noted, the university sector has a key part to play in the Sub-Region’s growth, in the context of the aim of increasing its knowledge based economy and in providing the facilities required to serve an area of this size. Equally, the further education resources of the Sub-Region need to be developed in order to help provide skills and qualifications the Sub-Region’s workforce will need. We recommend at **R3.7** that paragraph 2.14 of the Part A statement is amended to reflect these conclusions and take a more circumspect approach to specific university developments.

Health and social care

- 3.56 The issues raised on health and social care bore some parallels with those on education. Generally the draft SRS sets out an appropriate approach, but some of the references to specific proposals are not grounded in the reality of health service planning. We heard that patterns of delivery for primary and secondary healthcare are in the process of changing. In principle, new development provides opportunities for these changes to be brought forward as new facilities are provided. If this is to happen in practice, the detailed planning of development and healthcare provision needs to be co-ordinated. As with education, involvement of the relevant agencies in delivering the strategy will be important.
- 3.57 We were impressed by the contribution of the MKSM Health and Social Care Group to the process so far, as reflected in the Public Examination. They have stressed a holistic approach, whereby an increasingly healthy population is brought about not only by care provision, but by creation of a clean, safe and attractive environment with opportunities for recreation and exercise. This accords with the issues raised by Sport England and other participants. On these overall health issues, we consider that the SRS, with the amendments we recommend below on green infrastructure and other environmental issues, provides an appropriate framework at the strategic level.
- 3.58 The Health and Social Care Sub-Group proposed a number of amendments to improve the accuracy of the SRS in relation to health and social care issues. We recommend **R3.8** that Part A be amended on the lines proposed. The suggested changes proposed to Part B Statements are covered below in Chapters 5-10.

Affordable housing

- 3.59 A key aim of the Sustainable Communities Plan is to address immediate and urgent needs for more affordable housing (“Building the Future”, p30). This is reflected in the SRS by a reference in Objective 4 (p7) to a step change in affordable housing, a bullet point in Strategic Policy 3 about a step change in the quality of affordable housing and a reference in the “Effective Delivery” section to affordable housing as one of the matters for which targets are to be developed to monitor progress.
- 3.60 The Part B sections take this a little further. The Bedfordshire/Luton section (paragraph 3.4) indicates that housing provided in the Growth Areas should “... meet the needs of local people and of people moving to the area to take up employment. This is true of both affordable housing and market housing”. It goes on to state that as a minimum the adopted District/Borough affordable housing targets will need to be met. The Northamptonshire section seeks through Northamptonshire Policies 2 and 4 that “The provision of high quality affordable housing should be significantly increased across the whole (of the growth towns in the county).” The Milton Keynes and

- Aylesbury Vale section (Policy 3) seeks “significant increases in provision, mix and choice,” and gives targets for affordable housing of 30% in Milton Keynes and 40% in Aylesbury.
- 3.61 Many participants and others urged the case for the strategy to address affordable housing needs more fully. One argument is that major additional housing will only be justified if it helps in meeting affordable housing needs. From a local perspective, some respondents would accept the need for more development, if it could be guaranteed to meet the affordable housing needs of local people. Many doubted whether this would happen, indeed one common view was that more growth would raise land values and bring more people into the area, further disadvantaging local people in the housing market. Others expressed concern about the effect of bringing large amounts of social housing into the area. Some considered it unclear how far the SRS intended affordable housing provided in the growth area to play a role in the Strategy’s broader aim of contributing to the wider housing needs of the South-East (as opposed to meeting only locally generated needs).
- 3.62 We have commented in paragraph 2.9 above that the Sub-Region’s comparatively more ‘affordable’ market than in the more highly pressurised parts of the South-East makes it a good place to provide market housing and for business to expand. That in itself will, however, do nothing to meet the specific housing needs of people in public or private sector ‘key worker’ posts in the more pressurised areas elsewhere in the region. Quite apart from the question of whether it is desirable to plan for people to commute from the MKSM area to, for example, hospital jobs in London or Surrey, it is difficult to see how affordable housing provided in the MKSM area would actually be targeted at this need. In the rented sector the kind of connection envisaged in the Bedfordshire/Luton chapter (see above) could only occur if there was an agreed way of assessing needs from outside the area, and a mechanism by which would-be movers from the wider South-East could register their need for social housing within the SRS area.
- 3.63 A second main area of concern was how far the SRS should prescribe affordable housing targets. Many were concerned that the Strategy is not sufficiently explicit on this point. Service providers (such as the health sector representatives), economy-related bodies (such as the RDAs) and others stressed that achieving growth in the economy and the social and other structures necessary to sustain communities is dependent on provision of the right amount of affordable housing. In the case of Aylesbury and Milton Keynes there were some suggestions that the percentage targets should be different from those included in the SRS, while in the other sub-areas a range of specific targets were put forward for inclusion, sometimes based on work done on the issue in the GAAs. Other participants (in many cases developers or local authorities) considered that no targets should be included on the grounds that the assessment of need and the setting of targets is a matter for local determination through area-based assessments. The three RAs took a similar line, pointing to the fact that at a regional level RPG8 and RPG9 already give overall guidance.
- 3.64 The background work to the SRS does not appear to have included any assessment of what wider regional affordable housing role the MKSM growth area should play, and in particular of what measure of need, if any should be “transferred” from other areas. In the absence of that there appears to be no rationale for a distinctively Sub-Regional as opposed to local affordable housing target in the SRS. We conclude that if it is indeed intended that the growth area should provide affordable housing to meet needs arising elsewhere, the SRS should make clear the rationale and mechanisms for this. Otherwise, we concur with the view that affordable housing targets should be based on local assessments of need. Generally, what is said in the Part B Statements is a reflection of this, but we consider that the 30% and 40% targets for Milton Keynes and

Aylesbury should be deleted (**R3.9**). These targets are locally derived, and we do not necessarily disagree with them, but as matters for local determination (and review) they do not need to be enshrined in the SRS.

- 3.65 A third area of concern was the question of resources for the provision of affordable housing. The issues were (a) would sufficient resources be available to achieve affordable housing requirements flowing from the SRS, and (b) would the MKSM area be given preference for funding at the expense of other areas elsewhere where existing needs may be greater?
- 3.66 On point (a) this must be a priority matter for the funding and implementing bodies through the Regional Housing Strategies. It seems to us that the desired ‘step-change’ in provision will also require a step-change in funding, even allowing for the fact that the phrase ‘affordable housing’ can encompass quite a wide range of tenure and funding arrangements. Without this the aspirations of the SRS are unlikely to be fulfilled. This is evidently a key concern for Milton Keynes, and the Part B Statement says at paragraph 3.2 that “Improving performance in the delivery of affordable housing will require an agreed definition of what is meant by affordable, and a substantial injection of public funding, accompanied by more robust mechanisms for delivery in the absence of public funding”.
- 3.67 In the discussion of Matter 5A, MKC pointed to figures (Tables attached to document PART125) which provide a compelling argument that the large reduction of housing completion rates in Milton Keynes in recent years was largely attributable to a drop in affordable housing provision. Whereas under the Development Corporation high levels of public housing had been achieved, planning obligations would tend to be looked to in future to provide affordable housing. Adequate funding for Registered Social Landlords will also be a key factor. The scale of the problem is illustrated by the figures in PART125, which show that in 2001/2 and 2002/3 85% and 89% of all completions were owner occupied. Even assuming all the rest were affordable, this amounts to only 15% and 11% of completions, compared with the local target of 30% which is itself well below the implied regional proportion expected in RPG9¹. Overall housing output at Milton Keynes will need to double to achieve the SRS requirements, and for 30% of this to be affordable would mean something like a quadrupling of current affordable housing completions.
- 3.68 While this is raised as a crucial issue for Milton Keynes, it is also to some degree relevant to all the growth towns, hence our considering it here. It is clear that increasing provision of affordable housing will be a key component in raising housing output overall. The SRS as drafted, for example in paragraph 3.2 (p42), leaves ambiguity about whether the Strategy depends on a substantial additional injection of public funding for affordable housing or not. We consider that to be a matter that should be resolved in the final SRS. Otherwise there will be continuing uncertainty for local authorities, housing providers and developers alike over what is expected.
- 3.69 This leads to the related point (b) about where the additional resources for affordable housing in MKSM are to come from. A number of neighbouring areas, including cities in the East Midlands and Wycombe District in Buckinghamshire feared that resources for affordable housing would only be directed in sufficient quantity to the growth areas by siphoning off funds from other areas, which would then be less able to meet their own needs.

¹ RPG9, Policy H4, paragraph c, gives a provisional monitoring indicator of 18,000-19,000 affordable homes a year, which would equate to 46-48% of the provision of 39,000 additional homes per annum, or 42-44% of the higher expectation in Policy H3, paragraph b, which includes new urban capacity.

- 3.70 It would be ironic if Milton Keynes and Aylesbury, which have some of the most ‘affordable’ housing in the South-East Region (see map appended to the South East England Regional Assembly [SEERA] statement for Matter 5B) were to take an increasingly large share of the Regional Housing Board’s resources at the expense of those Districts clustered around the west and south of the Greater London area where household mortgage shortfalls are at their most acute. This poses a challenge, recognised by SEERA, which seeks to gain increased regional resources in order to be able to tackle needs throughout the region. The same issue arises for the other two regions.
- 3.71 Most of the above are not matters upon which we can make firm recommendations since they bear more upon funding matters than the Strategy itself, yet they may be crucial to whether the Strategy can be delivered. It will be for ODPM, the Inter-Regional Board, and the RAs and Regional Housing Boards of the three regions to tackle these issues head on in working out how to deliver the housing increase, and particularly the level of affordable housing required. Meanwhile we recommend at **R3.10** that more clarity be introduced to Part A of the SRS by including a section on these issues in section 2. Strategic Policy 3 on Sustainable Communities already includes a bullet point about a step change in quality of affordable housing, and our recommendation **R3.12** proposes expanding this to give the issue greater prominence.

THE ENVIRONMENT

Environmental assets and green infrastructure

- 3.72 We have already concluded in paragraph 3.6 above that the SRS needs to provide a more complete and better balanced approach to sustainable development. This stems in large measure from the lack of environmental content of the present draft, and the consternation this has caused, not only among the wider public but also among the responsible statutory agencies. Whatever the good intentions of the RAs and local authorities, too much has been assumed by relying totally on guidance elsewhere for dealing with environmental issues.
- 3.73 The word “environment” first occurs in the draft SRS at the final bullet point of paragraph 14, and many organisations bridled at what it says. The statement that “at a strategic level the Sub-Region is not highly environmentally-constrained” has conveyed the impression that environmental concerns have been overruled or disregarded. We accept that this is not what was intended. The fact is that the environment is a constraint everywhere. What we believe paragraph 14 was trying to reflect is that the Sub-Region has substantial opportunities for growth, more than some other places, without running up against strategic environmental constraints. Various suggestions have been made, by the EA and others, for modifying paragraph 14. As part of the introductory section the paragraph does not have major policy significance, but as the reaction to it shows it is important to get it right. Instead of simply modifying the final bullet point, our recommendation **R4.4** in Chapter 4 below proposes two bullet points, one emphasising the environmental assets of the Sub-Region and the other referring to its opportunities to provide for major growth.
- 3.74 Following on from this, environmental organisations and others were concerned that the SRS does not give sufficient importance to environmental assets and the need for green infrastructure. As a result of work done by four statutory agencies (English

Nature, English Heritage [EH], Countryside Agency and the EA) and a range of other bodies, two joint statements were prepared on the need for “green infrastructure” in the MKSM growth area (Documents PART3 and PART4). The second of these papers includes specific proposals for amending the Objectives, section 2 and Strategic Policy 3 of the draft SRS. This in turn led to a paper from the MKSM Steering Group endorsing these amendments (EXAM34), and the RAs indicated that they would support such a change to the SRS.

- 3.75 The concept of green infrastructure, and the need for the SRS to address it, was almost universally supported at the Examination. Developers generally accept not only that important environmental assets should be protected, but also that new development needs new green infrastructure. There was a readiness to make a fair contribution to its provision, as to other infrastructure, as part of the programme for achieving the MKSM growth. There were some concerns about the wording of the proposed amendment, particularly the word “protection” which could be interpreted inflexibly and used to prevent development. Although there was a certain consensus around the idea that development and green infrastructure should provide mutual benefits, it is not surprising that differences of view remained.
- 3.76 A number of further issues were raised in connection with environmental assets. The RAs argued that the study approach adopted by consultants in the studies leading to the draft SRS took full account of environmental assets and constraints. This is not universally accepted, however, and some representations dispute detailed judgements made in the GAAs. Others do not accept the choices made in the strategy, for example SBDC argue that the share of growth allocated to Luton Dunstable and Houghton Regis is inconsistent with the degree of environmental constraint there.
- 3.77 EH put forward the argument, supported by a number of other participants, that a local character assessment approach should be used in assessing the impact of proposals. An example offered was EH’s Historic Environment Assessment for Milton Keynes (document PART5). Again for the development industry there were concerns that such an approach could simply support resistance to change. There could be no doubt that new development in MKSM would change the character of places where it happens. Local authorities argued that character assessment was a useful tool which could be used in positive ways, not just preventing inappropriate development but also allowing management of change and design of development to secure gains or mitigate losses.
- 3.78 The RAs were at pains to point out that the detailed assessments in the GAAs were not intended to pre-empt local decisions but were done as background to strategic proposals for the general level and direction of growth. We share this understanding, and that is one reason why the detail of the GAAs was not discussed at the Examination, and nor is it addressed in this report. Nor do we consider it appropriate to build into the SRS the detailed approach to be adopted at the local level, whether for LDDs, master planning or planning briefs. Character assessment and other tools are available for use as appropriate, as part of the process. However, in Chapters 5-10, we draw some conclusions about environmental issues bearing on the content of the Part B Statements.
- 3.79 The consequence of the approach we recommend in paragraph 3.9 above is that section 2 of the Part A Statement in the SRS needs to be expanded to deal with environmental assets and the other environmental issues currently left to be covered elsewhere. This does not need to be done in great detail. Clearly where international, national or regional designations exist, then the appropriate protection and will apply through the normal operation of planning and other mechanisms. As the RAs and GOs pointed out, policy guidance for these matters is given generally by PPG7, in the process of being

revised by draft PPS7, and regionally in RPG8 and RPG9. What is needed is to make sufficient connections to identify how the SRS relates to other guidance, and to provide the context for addressing environmental issues in LDDs and other actions to implement the SRS. As an example, EMRA referred to the fact that RPG8 contains a strong set of biodiversity targets, and argued that these did not need repeating in the SRS. That is so but, for the avoidance of doubt, the SRS needs to make clear that biodiversity objectives are not set aside in MKSM because it is a growth area. On the contrary, it can provide opportunities for helping to achieve them.

- 3.80 We conclude that the amendments put forward in the joint submission and in EXAM 34, whilst they address the issue, do not cover the ground adequately. This is addressed in our recasting of the SRS Objectives at **R4.5** in Chapter 4 below. In order to balance up the Sustainable Communities section of the document, rather more is required than an additional paragraph under “Community Infrastructure” after 2.17, as proposed in EXAM34. We recommend instead at **R3.11** a new heading “Environment and Green Infrastructure” with appropriate supporting text. We also recommend at **R3.12** a differently worded additional bullet point in Strategic Policy 3. These will in our view provide a fuller reflection of the principles of the Sustainable Communities Plan.

NATURAL RESOURCES

Previously Developed Land

- 3.81 A widespread criticism of the draft SRS is the preponderance of new development to be provided on greenfield sites, in the face of national priorities for the use of brownfield or previously developed land [PDL]. By contrast with the national target for 60% of development to be on PDL (replicated at regional level in RPG8 and RPG9) the draft SRS contains no target level, but will clearly result in less than 60% PDL. SBDC suggested the split overall would be more like 27% PDL. The three RAs, in Table 1 of their submission for Matter 2A, show figures representing a range from 11% PDL at Luton/Dunstable/Houghton Regis to 62% at Northampton, and averaging 33.6% PDL overall. Critics of the SRS argued that these low figures show the SRS to be out of accord with national and regional planning policy.
- 3.82 As the GOs and others made clear, the 60% overall target is a national one which recognises that some areas will achieve substantially higher or lower percentages. It is not expected to be applied as a blanket standard to all areas. For example, predominantly rural areas with little PDL would be able to achieve much less than 60%, while London and other major cities will achieve much more, over 90% in some cases. As a growth area, MKSM is in an unusual position, in that it may be seen as providing for growth that will not be accommodated in other places. Those other places will in many cases be achieving more than 60% of development on PDL. The judgement to be made is not whether the SRS will provide for 60% of brownfield development within MKSM, but whether it will undermine the national priority for maximising the recycling of land, as reflected in the 60% target.
- 3.83 As developers and others pointed out, the 60% target has been achieved so far only in the context of record low levels of housing completions. MKSM and the other growth areas are intended to help remedy the under achievement of housing output. Moreover, MKSM is being taken forward in parallel with efforts through the London Plan to maximise London’s housing output, and to develop the Thames Gateway, both of

which will involve major use of PDL. Against this background, there is nothing to suggest that a significant element of greenfield development in MKSM will necessarily undermine the national policy objective.

- 3.84 Two considerations temper this conclusion: first that greenfield development in MKSM should be provided in a sustainable manner, and secondly that it should not militate against maximising the re-use of PDL within the MKSM area. The first of these raises broader environmental and other issues considered elsewhere, and in more depth in Chapters 5-10 on the individual growth towns. For the second, there should be no inherent conflict between providing for new growth and recycling previously developed land. Indeed the RAs argue that this is at the heart of the spatial strategy, in that growth is focused on the main urban areas where urban renaissance can be achieved and regeneration needs can be tackled. It is implicit in this that recycling of urban PDL is a priority. That priority is already reflected in RPG and structure and local plan policies, and will no doubt be carried forward in future LDDs. It is important, however, that the SRS reinforces it, rather than detracting from it through the emphasis given to new growth locations. “Sustainable urban extensions” will not be sustainable unless the urban areas to which they relate also maximise their potential. The two elements need to be planned and managed in a complementary way.
- 3.85 We have no doubt that this is the intention behind the SRS. It is also clear that the guidance in PPG3 over the prioritisation of land for development should apply within the growth area as elsewhere. This does not mean, as some participants appear to argue, that all previously developed sites must be developed before any greenfield sites are considered: brownfield opportunities, like those on greenfield land, arise at different times and may take time to bring forward, because of infrastructure or other constraints. The obvious conclusion is that plans need to establish a synergy between greenfield and PDL sites and ensure that development is managed accordingly. Obvious as it may be, the principle is perhaps not clearly enough reflected in the draft SRS, although there is a reference in paragraph 1.3 to the more effective use of previously developed sites, and similar references in the Part B statements. Our recommendation **R3.12** includes a bullet point in Strategic Policy 3 for maximising the contribution of previously developed land to achieving the growth strategy of the SRS.
- 3.86 SBDC and others argued that the SRS should go further and include its own targets for development on PDL. In this way it would be possible to monitor the contribution of the area to achieving the national target. Ideally this would be useful either for the SRS as a whole or, preferably, for each of the growth locations within it. In practice we note that the urban capacity at some locations, such as Luton Dunstable and Houghton Regis, is subject to widely differing assessments. These were not available in detail to the Examination, and there was no in depth discussion of them. At present, therefore, it is impossible to come up with robust values for such targets. Moreover, application of arbitrary targets would, if too low, fail to optimise development of PDL or, if too high, risk failing to achieve the level of growth sought. It will be for the LDDs for each of the growth towns to identify the role to be played by PDL in meeting the development requirements of the area.

Water and flooding

- 3.87 The discussion of Matter 2 included issues of water supply and sewage treatment, which a number of submissions cited as significant issues for sustainable development of the growth area. The Environment Agency and water industry representatives indicated that water supply and sewage treatment were not critical issues for the SRS at

- a strategic level, but that the strategy would have consequences for water industry development which would need to be planned on a long term basis. It became apparent, however, that at Aylesbury water treatment is a strategic constraint to development in the medium term, at least until infrastructure issues have been sorted out. We consider this matter further in Chapter 8 relating to Aylesbury.
- 3.88 At the overall level of the Sub-Region, while water and sewage treatment may not be seen as strategic for the SRS, the growth area proposals are likely to have implications for water industry development of a strategic scale going beyond the MKSM area. These implications cannot be approached in isolation from the demands of other growth areas, particularly London/Stansted/Cambridge/Peterborough, Thames Gateway, and of the greater South-East generally. Resource development to meet these needs is likely to involve Rutland Water and linkage to the River Trent.
- 3.89 It is clearly not possible at this stage to assess these implications in any depth, partly because of the iterative nature of the planning process. The scale and rate of growth needs to be established before water resource planning can be taken forward. Nevertheless, we conclude that they are important enough to merit a mention in the SRS document for three broad reasons: first, the long term water resource provision needs to be kept in view as progress with it may affect the rate of growth that can be realised at MKSM, and its environmental impact will in turn reflect on the strategy; secondly, as the EA stressed, demand management to achieve savings of some 25 – 30% on current water usage will be an essential part of the strategy and thirdly, water industry funding to provide the necessary resources may be a concern to Government in delivery of the growth area strategy.
- 3.90 Our recommendations at **R3.11** and **R4.6** reflect these conclusions.
- 3.91 In relation to surface drainage and flooding issues, again the measures required to address these issues are not seen as a strategic issue for the MKSM strategy as a whole. They are, however, important considerations which need to be addressed in detailed planning for the growth towns. It is an essential part of sustainable development that flood risk and the necessary protection measures are addressed at a sufficiently early stage, and on a sufficiently broad level. Guidance on the approach is set out in PPG25, and we do not see a need for the SRS to amplify or repeat it.

Recommendations

R3.1

Revise paragraphs 2.1 to 2.3 as follows:

- 2.1 As a growth area, the Sub-Region will undergo more change and development than many other areas. Change is key to all aspects of sustainable development. It is important, therefore, that the growth area acts as a driver of sustainable development, rather than running counter to it. The Strategy provides many opportunities to do this, through the way development is planned and carried out, and through the resources and activity it will bring into the area.

- 2.2 Revise bullet points as follows:

Add a fourth bullet point:

- Urban areas that relate well to the surrounding landscape and contribute to maintaining and enhancing environmental assets as a cultural and recreational resource, and to resources for biodiversity;

Revise the existing 6th bullet point to read:

- An urban fabric and individual buildings which can meet different needs over time, which minimise the use of energy and natural resources, facilitate the reduction, recycling and sustainable management of waste and contribute to improved air and water quality.

2.3 These requirements are largely dealt with in national and regional guidance. However, it is important that every aspect of the growth area strategy is focused on delivering them. The following subsections show how this will be approached.

R3.2

Amend the section “Strategic Communications Infrastructure” under a new heading as follows:

Strategy for Movement

1.6 The growth area gives rise to substantial movement needs which will increase strongly in future, against a background of existing shortcomings in capacity and quality of the transport system. Consistent with the priorities in the Regional Transport Strategies, the strategy for the growth area will involve:

- encouraging modal shift towards the more sustainable modes,
- taking advantage of major improvements to the capacity, quality and accessibility of key public transport facilities
- increasingly applying demand management approaches to influence travel behaviour and protect the capacity of the strategic highway network,
- investing in highway improvements to ensure that strategically important movements are carried efficiently.

1.7 Notwithstanding the priority for reducing the Sub-Region’s dependence on increasing road traffic, and for moving to more sustainable travel patterns, the growth area aspirations will require significant infrastructure investment. If these requirements are not met, the Sub-Region will not be able to achieve the levels of housing and economic growth envisaged.

1.8 (as existing draft SRS paragraph 1.6)

1.9 (as existing draft SRS paragraph 1.8).

R3.3

Add a new subsection in Section 2 “Sustainable Communities” under a new sub-heading to come after paragraph 2.10, as follows:

Sustainable Movement

[New] 2.11 As part of the strategy for improving sustainable transport in the Sub-Region, a priority for each of the six main growth locations will be to develop high-quality, comprehensive public transport systems. Such systems should connect homes and workplaces, town centres, schools and other key attractors, and interchanges to improve access to the inter-urban rail network. These developments should be accompanied by improvements in pedestrian circulation and facilities for cycle use, together with appropriate traffic management measures, in order to achieve a significant modal shift away from car use.

2.12 Where sustainable urban extensions or other major developments are planned, measures will need to be incorporated from the outset to promote sustainable travel patterns. In particular strong public transport connections to town centres and employment areas will need to be provided.

R3.4

Figure 3 on page 12 should be amended to provide separate descriptions, status and timing for the Oxford - Bletchley and Bedford – Stansted sections of the East-West Rail project. Other amendments to the table should be made to reflect the Strategic Rail Authority’s latest information on the status and timing of schemes.

R3.5

Information on the highway schemes in Figure 3 on page 12 should be updated to reflect the Highways Agency’s latest information on the status and timing of schemes.

R3.6

The proposed Milton Keynes – Bedford canal should not be shown in any of the SRS diagrams.

R3.7

Amend paragraph 2.14 (Part A) to read:

Further education resources need to be expanded to serve the increasing education and training needs of the Sub-Region’s population, and to provide the increase in skills and qualifications the workforce will need. Such provision must be in easily accessible locations. The higher education sector also has a key part to play in the Sub-Region’s growth, in the context of the aim of increasing its knowledge based economy, and providing properly resourced university facilities of a scale and excellence befitting a major growth area.

R3.8

In paragraphs 2.2, 2.6, Strategic Policy 3 and paragraph 3.15, replace the words “health care” or “health” with “health and social care”.

Replace paragraphs 2.15 and 2.16 with the following:

2.15 NHS service delivery is through primary care (GP surgeries, health centres), intermediate care (community hospitals), secondary care (general hospitals and

mental health facilities) and tertiary care (regional specialist centres). In the Sub-Region, capacity is stretched across all these areas.

2.16 The trend in health and social care is to deliver services as near to the patient's home as possible, reducing time spent in hospital and promoting independence. Over the next thirty years this will require significant changes in the configuration of services. In particular, while secondary and tertiary care will expand, provision should be focused on new and expanded primary and community health and social care facilities, delivered by a range of sectors.

[new 2.17] In order to ensure the availability of the trained and specialist staff required, a major expansion of health related training and education will be needed, whether through new institutions or increased provision by existing ones.

R3.9

Remove references to 30% and 40% targets for affordable housing from the Part B Statement for Milton Keynes and Aylesbury.

R3.10

Add a new sub-section “**Affordable Housing**” to Part A section 2. This sub-section should clarify:

- a) the role of the growth area, if any, in meeting wider affordable housing needs arising from areas outside the MKSM sub-region;
- b) the degree to which the strategy is dependent on additional funding for affordable housing, and whether funding will be in proportion to locally identified needs or on some other basis.

R3.11

Add a new heading and paragraphs after the “Community Infrastructure” sub-section to read as follows:

Environment and Green Infrastructure

Advantage needs to be taken of the opportunities of the Sub-Region's growth to create advances in sustainability. This will involve promoting the highest standards of environmental performance, not only in the design of new buildings but also in masterplanning and managing development. An integrated approach is required in which resource efficiency, including water use, opportunities for renewables, waste reduction, emissions, protecting and promoting biodiversity and creating attractive, healthy and safe places to live are considered at the earliest stage. What is achievable at any given location will depend on local circumstances and the scale of development taking place, but innovative solutions need to be encouraged at every level.

The Sub-Region's important environmental and cultural assets, some of which are of national or regional significance, need not only to be protected but also, where appropriate, enhanced. The growth area provides opportunities for this, and for access and management for the benefit of an increased population, which needs to be achieved without damage to the assets themselves.

The provision of green infrastructure needs to be addressed in the planning of development throughout the Sub-Region so as to ensure a net gain to meet the needs generated by growth and, where relevant, help to address existing deficiencies. This may take the form of protection of existing resources, enhancement, extension or the provision of new or replacement facilities. Green infrastructure includes recreational and sports facilities, pathways and routes, natural and historic sites and water spaces, as well as accessible countryside. A network of multi-function green spaces in urban areas, urban fringe and the wider countryside needs to be established.

Water use will be a significant environmental impact of the Sub-Region's growth and demand management to achieve savings of some 25–30% on current water usage will be an essential part of the strategy. Meeting the demand for water, as part of wider regional needs is likely to entail major development outside the Sub-Region, the impacts of which will need to be assessed. Progress with such provision needs to be kept in view as it may affect the rate of growth that can be realised within the Sub-Region.

R3.12

Revise Strategic Policy 3 to read as follows:

Sustainable Communities will be achieved in the Sub-Region through the implementation of development in accordance with the following principles:

- Designing attractive cities, towns and public places and promoting the highest standards of environmental performance;
- Providing better public transport and facilitating safe and convenient movement on foot;
- Maximising the opportunities afforded by growth to facilitate the regeneration of deprived communities;
- Maintaining and increasing the Sub-Region's stock of strategic environmental and cultural assets;
- Providing green infrastructure for existing and expanding communities, including access to green space that promotes healthy lifestyles and can be used for formal and informal recreation and educational purposes;
- Improving skills levels and enterprise support;
- Ensuring a supply of housing of the right types, sizes and tenure, and providing a step change in both the quantity and quality of affordable housing to meet the needs of the Sub-Region;
- Providing the social (e.g. primary, secondary, further and higher education, health and social care) and environmental (e.g. water supply and treatment) infrastructure to meet current deficits and additional demands;
- Providing high quality employment land and premises which meets the needs of growing industries;

- Maximising the contribution of previously developed land to the Sub-Region's growth;
- Promoting and facilitating community development through the active involvement of the voluntary and community sectors.

CHAPTER 4: Form, content, delivery & implementation

Form and content

General editing issues

- 4.1 The SRS was criticised for a number of aspects of its presentation. Some criticisms resulted from the obvious failure of the editing process to bring together the individual work of the three RAs into a unified format. Consequently, rather than working sequentially through the document, the Part A section and the three Part B sections all have numbered paragraphs starting at 1.1. Similarly the policy numbers, figure numbers and table numbers follow different, often repetitive, patterns. All this was needlessly unhelpful and confusing to users and needs to be addressed by much more rigorous editing (see **R4.1**).
- 4.2 Figure 1 was criticised for its incorrect key, which transposes the colouring for Bedfordshire/Luton and Northamptonshire and for the fact that the mapped information may not be complete (e.g. in relation to trunk roads). Again, editing and corrections are required (see **R4.2**).

The spatial diagrams

- 4.3 The various diagrams in the SRS were frequently referred to at the Examination. Firstly, there was comment on the differences in their form and content, with opinions varying considerably as to which form of representation should be preferred – the ‘mini-structure plan’ approach in Northamptonshire, or the ‘urban spatial strategy’ approaches elsewhere. Secondly, some sought the replacement of map-based background detail with a more generalised representation. Thirdly, views differed considerably about the most appropriate way of showing growth directions, e.g. by way of arrows, arcs or generalised circles. Parish Councils and residents’ bodies tended to suggest that the combination of a map base and directional arrows made the diagrams too site-specific. On the other hand developers sometimes considered that such ‘certainty’ would make it quicker and easier to deliver the higher housing output required by the SRS. Finally, and not surprisingly, participants often urged us to recommend the omission or inclusion of a wide range of specific items from individual diagrams. For example developers often suggested that the diagrams failed to indicate particular growth directions with potential to contribute to the aims of the SRS.
- 4.4 In our view there are considerable difficulties with the spatial diagrams included in the SRS. Ideally they should follow a common diagrammatic format not too closely based on a map but indicating a consistent set of matters such as generalised directions for growth, a transport network including a comprehensive set of public transport corridors and any key features such as park and ride schemes and firmly proposed new stations, and key environmental infrastructure. The spatial diagrams in the SRS do not achieve this. To give examples, some of which are touched upon in Chapters 5-10, the diagram for Luton/Dunstable/Houghton Regis includes some potential ‘directions of growth’ but not necessarily all those worthy of investigation and a road which does not appear to be part of the strategy (the airport link). While it indicates part of a public transport

system (the Translink core route and possible extensions) the diagram does not communicate any intended spatial strategy for public transport that would integrate these routes into a comprehensive public transport system serving the whole of the conurbation. Although a new rail station is indicated (North Luton Parkway) it is not clear what its function would be or whether it is achievable.

- 4.5 Turning to the diagram for Bedford, there is again only a partial indication of what may or may not be an intention to develop a comprehensive public transport system serving all parts of the town, while one of the general park and ride locations is omitted and the status of the proposed station at The Wixams is misrepresented. The ‘areas of growth’ are presumably mainly intended to cover existing commitments yet they are differently portrayed from areas with similar committed status at Milton Keynes and Aylesbury.
- 4.6 At Milton Keynes, the diagram indicates a southern bypass which we have recommended for deletion and corridors for ‘transit’ and ‘urban intensification’ that were by no means generally accepted as desirable and/or achievable, especially in the particular form and locations readable from the base detail of the diagram. As for the future growth directions, our recommendations in Chapter 7 place these in a rather different context and timescale. In the case of Aylesbury there is a reasonably clear indication of the intended public transport system for the town, but we are not convinced that the cases for the spread of future growth areas and the southern distributor road in this form have yet been made, while the linear park is misleadingly depicted.
- 4.7 Our recommendations in Chapters 5-10 clearly identify specific issues that need to be tackled and resolved through appropriate LDDs, so that the strategic provisions of the SRS can be taken forward and implemented. Many of these matters are referred to in paragraphs 4.4 to 4.6 above. In view of this we recommend it as more profitable at this time to develop a single spatial diagram for the MKSM area based upon Figure 2 at p8-9 of the SRS (**R4.3**). This would identify the main growth towns in diagrammatic form (say by means of circles proportionate to their population size). A figure for the proposed housing growth would be included within the circle, as would our recommended reference values for monitoring employment provision, based on the appropriate District or combination of Districts. Candidate directions or arcs of future growth would be identified in accordance with our recommendations in Chapters 5-10 and indicated beyond the edge of the relevant circles in the form of a penumbra. The diagram would also include the main elements of the existing/proposed inter-urban transport networks. In the case of the rail network there should be a distinction between lengths that have been/are to be the subject of major improvements, and those which are either proposed to be opened/re-opened, provided that there is reasonable programming certainty to 2021. In the case of roads the genuinely strategic network should be indicated, again distinguishing between existing roads and those with reasonable programming certainty of construction/improvement by 2021. Other features to be indicated would be the Green Belt and the main green infrastructure constraints and opportunities such as the Chilterns Area of Outstanding Natural Beauty [AONB] and the community forests/regional parks.
- 4.8 Referring to Northamptonshire, we accept in Chapters 5 and 6 that it is difficult at this stage, and with the information available to us, to recommend abandonment of the mini-structure plan approach that has been followed in the diagram at p38. When the SRS is reviewed we suggest that it would be appropriate to dispense with a whole-county diagram and focus only on the main growth towns. However, for the present we recommend at **R4.3** that Northampton, Corby, Kettering and Wellingborough be indicated on the re-drawn MKSM-wide spatial diagram in the same way as the other main SRS growth towns and that the Northamptonshire diagram on p38 be retained as a

form of inset to the MKSM diagram. The information in the two boxes on p38 would be deleted as it has little relevance in the light of our overall recommendations in Chapter 5 and 6. In addition, the red growth arrows should be deleted as this information would (in appropriate cases) be included in modified form and content on the main SRS key diagram.

Presentational issues

- 4.9 In our view the SRS is subject to four important presentational deficiencies. Firstly, the document disappointingly fails to distinguish between the growth that is already ‘committed’ through existing planning permissions, allocations in local plans and assumptions about windfalls and the ‘additional growth’ that would be released as a result of the proposals in the SRS. Hardly surprisingly, this has led to very widespread misunderstanding amongst respondents to the SRS about the scale of additional growth that would flow from it. For example, comparing the figures in Strategic Policy 1 as it stands with the information at Table 1 of PART103 it is clear that the ‘additional’ provision made through the SRS in its current form amounts to:
- About 2,900 of the 10,600 dwellings to 2016 at Aylesbury
 - No new net provision in the case of the 19,000 dwellings to 2021 at Bedford-Kempston-northern Marston Vale
 - About 25,100 of the 40,000 dwellings to 2021 at Corby/Kettering/Wellingborough
 - About 15,800 of the 20,600 dwellings to 2021 at Luton/Dunstable/Houghton Regis
 - About 8,000 of the 33,900 dwellings to 2016 at Milton Keynes
 - About 1,300 of the 29,400 dwellings to 2021 at Northampton
- 4.10 In other words the ‘additional’ housing provision resulting from the SRS amounts to about one-third of the total of the 153,000 dwellings to 2016/2021 referred to in Strategic Policy 1. The principal additions are at Corby/Kettering/Wellingborough and Luton/Dunstable/Houghton Regis. In our experience it is highly unusual for a planning strategy document to be so opaque about such an important matter. We therefore recommend that the above information is brought together in summary form in a modified Strategic Policy 1 in Part A (**R4.5**). We also recommend that revised Strategic Policy 1 should state the employment monitoring targets to 2021 based on PART 103, as discussed earlier in this report at Chapter 3 (paragraphs 3.28 – 3.31).
- 4.11 A second presentational issue is that the document fails to give any explanation of the way in which the SRS evolved through the MKSM study and the various GAAs. It also provides no justification for the MKSM study’s ‘preferred strategy’. Its silence on these matters has not helped readers to understand what the SRS is trying to achieve. For example, the Objectives at paragraph 16 (p7) and the six-centre growth focus at paragraph 1.2 (p9) appear to emerge from nowhere. In our view respondents to the SRS and other users of the document would have been assisted by the inclusion of some brief coverage of these matters. This need not make the document longer overall, since there is material in the introductory paragraphs and Part A that could be omitted or expressed more concisely, as reflected in our recommendations **R4.4 and R4.5**.
- 4.12 Thirdly, it is clear from the representations and from many written and oral contributions to the Examination that people are uncertain about the nature and status of the ‘long-term spatial vision for the sub-region towards the year 2031’ (paragraph 8, p6) that the SRS seeks to provide. Although paragraph 1.1 (p9) refers to levels of

housing and economic growth said to be ‘seen as realisable in the MKSM study over the 30 year period to 2031’ the SRS makes no further reference to the period 2016/21-31, leaving the reader in some doubt as to the status of the figures in paragraph 1.1. Those who had read the MKSM study and the GAAs were uncertain about whether the SRS was supposed to represent any degree of commitment to the paragraph 1.1 figures. Supporters of the more substantial growth usually included in the longer-term periods tended to want to place considerable weight on them. On the other hand those who opposed them were fearful that these documents represented something in the nature of unofficial ‘bottom drawer plans’ that were not up for discussion now but could lead on inexorably to an expectation that this level of growth would eventually occur.

- 4.13 In our view the SRS needs to be much clearer on this issue as it currently leaves too much hanging in the air. In our various recommendations for the individual growth towns we make it clear that we see the MKSM growth figures for 2021-31 (as modified by our recommendations) as uncommitted planning assumptions which give an indication of the level of growth that may continue after 2021 but are subject to review at a later date. In some cases we see them as providing a degree of certainty for long-term infrastructure planning exercises (e.g. Milton Keynes and Corby) while in others (e.g. Bedford and Aylesbury) less certainty can be attached to them. However, in addition to our recommendations for Chapters 5-10 we suggest inclusion of comments to this effect as a footnote to our recommended revisions to Strategic Policy 1 (see **R4.5**).
- 4.14 As for the GAAs, we have not felt able to endorse or reject much specific material within these documents. In our view they have served their purpose and we would favour a specific comment in the introductory paragraphs to the SRS that they do not have any status as planning documents beyond being one among many inputs that may need to be considered in the process of preparing the necessary future LDDs (see **R4.4**).
- 4.15 Finally, we consider the presentation of the Objectives of the SRS to be deficient. In various parts of our report we have highlighted Objectives which need to be strengthened or made more explicit. We also consider that they should form part of the Part A Statement of the Strategy itself, rather than the introductory paragraphs. All the Objectives are relevant to each part of the Strategy, and so it is unnecessary to repeat them selectively at the head of each section. We therefore recommend at **R4.5** that the Objectives be recast as part of the first section of the strategy, and that the blue text boxes repeating certain of them at the head of sections 1, 2 and 3 be omitted.

Delivery mechanisms

- 4.16 At the preliminary meetings and in our response to the ODPM’s consultation letter on the Milton Keynes Urban Development Area and the West Northamptonshire Urban Development Corporation we stressed that we did not see it as part of our remit to comment on the details of the emerging “Local Delivery Vehicles” for these and the other geographical sub-areas of the SRS. However, we consider these partnerships (and their relationships with the Inter-Regional Board and the other principal implementing agencies in each area) to be key elements in the successful delivery of the Strategy.
- 4.17 The information under the sub-headings ‘Mechanisms for implementation’ and ‘Local Delivery Vehicles’ in Part A, section 3 of the SRS is now substantially out of date and needs to be amended to summarise the respective roles of the Board and the local bodies now finalised or nearing finalisation. Our recommendation within **R4.6** (see also **R10.4**) is that the general MKSM-wide arrangements are set out here with those

- for the local implementation partnerships being outlined in the individual chapters for the growth towns. We also suggest the use of a less mechanical, more human and plain-English term than ‘local delivery vehicle’ (e.g. an example could be ‘growth town implementation partnership’). We found that many participants were not comfortable with the use of the term LDV and not surprisingly tended to confuse it with LDDs. Although it could be said that those who have come up against the term are beginning to get used to it we would expect that members of the public will understandably not find its meaning self-explanatory.
- 4.18 With regard to paragraphs 3.8 to 3.10, our recommendation at **R4.6** describes the essential task that we consider needs to be undertaken to provide a clear planning framework for action to implement the SRS proposals in all the growth towns, not just those where inter-authority action is required. The opportunities presented by the development plan system introduced by the Planning and Compulsory Purchase Act 2004 need to be grasped, with Local Development Schemes [LDS] for all the growth towns being formulated at an early date, providing a clear route map and timetable for the completion of the set of LDDs judged necessary to implement the SRS proposals. The timetable for this action will be challenging, considering the magnitude, complexity and no doubt controversial nature of some of the LDDs that will need to be prepared. We therefore strongly recommend that the ODPM and the Inter-Regional Board consider ways of supporting and supplementing the resources of the relevant local planning authorities to enable them to achieve the necessary high quality of output in the limited time that will be available.
- 4.19 In our view Chapter 3 of the SRS should ideally include an appropriate target date or dates for completing LDDs within the agreed LDSs. The date for completing core strategies currently included in paragraph 3.10 (early 2005) may well be over-optimistic, and it may be that the requirement for early preparation of such documents is not equally applicable throughout the area. Moreover, we heard no evidence to enable us to recommend any particular alternative. In our recommendation **R4.6** we suggest that a suitable date or dates be inserted by the FSS in consultation with the RAs and the Local Planning Authorities [LPAs]. It may be that some LDDs could be progressed more quickly than others, in which case this could be reflected in Chapter 3 or in the content of the relevant Chapters relating to individual growth towns.
- 4.20 Turning to paragraphs 3.11 to 3.13, we generally support these statements, but with two reservations. In the first bullet point we are not convinced that the reference to ‘tariffs’ is altogether consistent with existing legislation and policy or developing Government thinking on these matters. However, there was considerable support from many participants for the concept of a community chest to which contributions could be made. We do not believe it will be easy to develop an all-embracing clear-cut ‘strategy and guidance’ of the type referred to but there may be situations in which this could be demonstrated to be beneficial to a wide range of parties involved in a particular area such as a sustainable urban extension.
- 4.21 Our second reservation concerns the third bullet point. On a number of occasions during the Examination participants urged us to recommend that the SRS should contain a requirement that all new houses be built to more sustainable standards e.g. maximising efficiency in energy consumption, water use and use of new building materials and minimising waste generation. This was not generally opposed and English Partnerships and some developers said that their developments already commonly meet aspects of the BREEAM “EcoHomes” standards. However, we are concerned that the RAs should not try to re-invent the wheel by drafting new technical advice.

- 4.22 We recognise that Government is already considering these issues in various ways and have noted the report of the Sustainable Buildings Task Group. This recommends that a unified Code of Sustainable Building be developed based on a modified version of the EcoHomes standards. We also understand that the Sustainable and Secure Buildings Bill intends to bring sustainability within the Building Regulations. Since the Regulations are mandatory they would be the primary means of enforcing better standards. The more dynamic Code would sit above the Regulations, encouraging developers to aspire to a number of tiers of best practice above the minimum benchmark.
- 4.23 In our view these important issues need to be addressed, co-ordinated and decided at national level to ensure countrywide consistency of approach. They are not unique to the SRS or to the three regions contributing to it. Draft PPS1 already makes general reference to them, as does Sustainable Communities: Building for the Future. More detailed advice on these matters also appears in the relevant RPGs, for example RPG9 at paragraph 5.9 and Chapter 10. We have recommended strengthening the SRS on this point by an added reference in Strategic Policy 3 (see **R3.12**) and through our recast objectives (see **R4.5**). However, we do not consider it necessary or helpful to add to the technical or policy advice that is already available or becoming available from other sources.
- 4.24 Turning briefly to paragraph 3.14, we support the general aim here but recommend reference to the broader and more dynamic concept of a master-planning approach which could originate from many sources – developers, local authorities, or a combination of both (**R4.6**).
- 4.25 On paragraph 3.16 we recommend use of another term to replace ‘LDV’ (**R4.6**).
- 4.26 On the issue of funding (paragraph 3.17) the fifth sentence should be deleted as the information here is only of temporary (and largely historic) interest. In our view the sixth sentence should be strengthened to provide the critical assurance sought by very many of the participants in return for their acceptance of the Strategy that resources will be made available to meet the Government’s stated commitment to “no infrastructure, no growth”. Our recommendation **R4.6** reflects this point.
- 4.27 In place of the subheading “Implementation Schedules” (above paragraphs 3.18 to 3.21) we recommend the term “Implementation and Monitoring” followed by a simplified text based on the content of our Part B recommendations (**R4.6**).
- 4.28 On the issue of the “Review timetable and approach” (above paragraph 3.22) we consider that there are some vital issues about the perceived interrelationship between the SRS and the ‘parent’ RPGs/RSSs and whether or not the SRS should continue to have a life of its own. It seems to us that there can be two possible approaches. In the first the SRS has only this initial existence as a self-contained entity and is then torn into three pieces and progressively absorbed back into the parent regional documents as they are all reviewed. Thereafter it has only a “virtual existence”. In the second approach the SRS is regularly reviewed in its own right and its content reflected in the three RSSs.
- 4.29 In our view the second approach is by far the more effective. As an unusually long-term inter-regional strategy the SRS needs to have a clear focus which can be pursued with commitment and persistence by the various bodies set up to implement it. This is not likely to be achieved unless it is contained within a single, unified and regularly reviewed format. It is most unlikely to be able to retain the necessary clarity and focus if it is spread among (and forms a minor part of) three differently formulated documents that are subject to review at different timescales and in a potentially

piecemeal and uncoordinated fashion. Under this approach any sense of commonality would very soon be dissipated and there would be little chance of improving sub-regional cohesion (as the SRS seeks to do). The Inter-Regional Board would have increasingly severe difficulty in keeping track of what it was responsible for owning and implementing and any wider public understanding of what the overall strategy amounted to would quickly be rendered almost impossible.

- 4.30 We acknowledge that this approach is not without its own difficulties for the RAs in presenting and reviewing their individual RSSs and sharing the responsibility for policy in part of their territories. In effect their position is analogous to that of the local authorities within the SRS area given the role of preparing joint LDDs. However, we are strongly of the view that it needs to be clearly understood that the content of the SRS (and any future reviews of it) must be regarded as a ‘given’ input to the individual RSSs. This should not create irresolvable difficulties and would be made simpler if, as we have recommended in this report, the content of the SRS is confined only to matters that are central to the defined ‘growth towns’ and not allowed to trespass into wider matters that are more appropriate for coverage at RSS level. For example, we would expect that at the first review of the SRS the mini-structure plan approach to Northamptonshire would be replaced by a more concerted attention to the actual growth points within the county. The content of our recommendation **R4.6** is based upon the above views. It is also clear that implementing and reviewing the SRS needs the full participation and commitment of the planning authorities and communities that will be involved.
- 4.31 Finally, we also recommend at **R4.6** that Strategic Policy 4 be updated and revised to reflect all of our other recommendations relating to this chapter.

Recommendations

R4.1

Thoroughly edit the SRS to ensure that the paragraph numbers run sequentially through the entire document, and that policies, figures and tables are numbered consistently and in a single sequence.

R4.2

Review Figure 1 to correct the key and ensure that all relevant features are included.

R4.3

Modify the spatial diagrams to form a single SRS-wide diagram with a Northamptonshire inset as indicated in paragraphs 4.3 to 4.8 above.

R4.4

Replace paragraphs 1-16 as follows:

The origin of the Sub-Regional Strategy (SRS)

1. [Retain paragraph 1, but include reference to Peterborough after Cambridge.]
2. The wider context for the SRS is set by the Government’s Sustainable Communities Plan. This seeks to accommodate the economic success of London and the wider

South-East and ensure that the international competitiveness of the region is sustained for the benefit of the region and the whole country. Specifically, the policy statement ‘Sustainable Communities in the South East (2003)’ seeks (p4-16) to address a number of strategic challenges facing the South East:

- to increase housing supply by providing for the region’s growing population, turning around the trend in house completions, improving the match between housing needs and provision, and making better use of land;
- to make home ownership more affordable;
- to tackle transport issues;
- to address issues concerning skills and the labour market; and
- to tackle deprivation and the need for urban renewal

3. The Sustainable Communities Plan makes clear that where it is necessary to expand communities to meet these ends this should be achieved through the creation of places that are sustainable, well-designed, high-quality and attractive where people will positively choose to live and work.

The evolution of the SRS

4. The SRS has been prepared in response to the Government’s request to the three Regional Planning Bodies whose areas cover parts of the sub-region to develop proposed Alterations to Regional Planning Guidance for the South East, East Midlands and East of England.
5. In July 2001 consultants were commissioned by the Government and the Regional Assemblies and Regional Development Agencies for the South East, East of England and the East Midlands. The final report (The Milton Keynes and South Midlands Study) was published in September 2002. The report concluded that the area had considerable potential for sustainable economic growth over the next 30 years which would be of benefit both locally and nationally. Having examined the possible outcome of a number of economic growth scenarios it concluded that the area could grow at the “high growth” scenario. This would generate from 230-300,000 jobs (300-360,000 households) by 2031 compared with some 150,000 jobs (210,000 households) if current planning policies continued. Without a change in current policy there would be a worsening imbalance between jobs and resident workers in most parts of the MKSM area, leading to increased commuting by private transport. However, at a strategic level, the extent of growth identified in the study is not exceptional in relation to past trends.
6. The study evaluated four options for distributing growth: dispersed growth on the current model; urban concentration based on four centres (Milton Keynes, Northampton, Bedford and Luton/Dunstable/Houghton Regis); a corridor option based on the Midland Mainline and the West Coast Main Line; and a metropolitan double centre focussed on Northampton and Milton Keynes. The latter two were perceived to be most in line with sustainable development principles, but could have caused an unacceptable degree of coalescence. A ‘preferred option’ was therefore developed, focussing on Northampton, Milton Keynes, Bedford, Luton/Dunstable/Houghton Regis,

and Kettering/Wellingborough/Corby. Growth is also identified for Aylesbury Vale. The advantages of this option, as noted at paragraph 6.63 of the MKSM Study, are:

- the scale of economic growth it delivers
- the focus on growth in the main urban centres and prospects for their improvement
- a better balance (than other options) between the location of jobs and workers
- the potential for regeneration of key centres which are struggling
- the ability to deliver significant improvements to public transport, with real opportunities for achieving a shift away from car borne journeys.

7. Following on from the MKSM Study, consultants were appointed to carry out individual ‘Growth Area Assessments’ (GAAs) of the main growth points. The purposes of these assessments were to test the feasibility and timing of growth that would be appropriate for future strategic planning to 2021 (2016 in the cases of Milton Keynes and Aylesbury); to provide confirmation of a recommended broad pattern, timing and phasing of development; to determine how much growth is capable of being accommodated in the urban areas; and to provide guidance on how the area could be developed in the most sustainable way. All of the GAAs recommended a preferred spatial development scenario for their area to 2016/2021 and looked further ahead to 2031 to ensure that there would be potential for the longer term to 2031. The collection of individual development scenarios to 2016/2021 then formed the basis for the SRS. *[The FSS to insert here a brief explanation of, and justification for, the way in which any of the development scenarios for any of the growth towns in the approved SRS depart from the MKSM study’s “high growth” option.]*

8. While the initial outputs from the GAAs were shared with a certain number of stakeholders the techniques and methods employed in the studies were not subject to public consultation at the time and could not be validated by the Public Examination process. Nonetheless the overall effect of the GAAs has been to demonstrate that there is strategic capacity for growth on the scale indicated by the MKSM study, with certain minor exceptions. While the GAAs remain as background information their detail should not be taken as having any policy significance. The site specific issues now need to be thoroughly re-examined against other possible site specific options through the more transparent process of preparing LDDs to take forward the strategic policies of the SRS.

Purposes of the SRS

9. Accordingly, the purposes of the SRS are:

- to provide strategic guidance on the scale, location and timing of development and associated employment, transport, and other infrastructure to 2021 and the necessary delivery mechanisms; and

- to provide a longer-term perspective for the sub-region to 2031 in the form of uncommitted planning assumptions subject to later review.

The SRS will also:

- provide the necessary strategic guidance for Local Planning Authorities in preparing Local Development Documents (LDDs) which, together, will provide a clear planning framework for implementing the proposals of the SRS in all the main growth towns;
- inform the preparation of Community Strategies, the Regional Economic Strategies, the Regional Housing Strategies and other operational plans and policies of bodies responsible for undertaking investment in the public, private and voluntary sectors, including the delivery bodies.

Format and content of the SRS

10. The SRS comprises an overarching strategy and key spatial diagram for the whole of the Sub-Region (Part A) and a set of separate statements providing more specific guidance for all of the growth towns (Part B).
11. The SRS is focussed on these growth towns and does not seek to duplicate other topics covered in national or regional guidance.

Key characteristics of the Sub-Region

12. [Retain paragraph 13]
13. Some of the key characteristics of the Sub-Region are:
 - * There is no dominant focus or urban centre.

- Economic growth rates have been high but uneven, with Milton Keynes and Northampton developing more balanced economies while difficulties in achieving structural changes have held back growth in other centres, particularly Bedford, Corby and Luton.
- There is a deficit in terms of transport and community infrastructure: for example, the transport network has weak east-west links, public transport is in need of substantial improvement and there is a need for strengthening of acute healthcare facilities and higher and further education provision.
- There is a need to diversify the sub-region's local economies and attract new economic sectors including higher value knowledge based activities while also raising the skills of the local workforce to face these challenges.
- The sub-region contains some environmental assets of national importance (e.g. the Chilterns AONB) and regional significance (e.g. the Nene and Great Ouse Valleys and the Marston Vale and Rockingham Forests) as well as features of more local interest, and its countryside and rural settlements have a rich and varied character.
- Notwithstanding its environmental qualities the sub-region provides substantial opportunities for growth and development, particularly at the major towns.

R4.5

Replace the Part A Statement, Chapter 1 as follows:

Objectives of the SRS

The objectives of the SRS are:

- To achieve a major increase in the number of new homes provided in the area, meeting needs for affordable housing and a range of types and sizes of market housing.
- To provide for economic growth, particularly in the high value, knowledge-based sectors, increasing jobs in line with housing growth and developing skills in the workforce.
- To locate development in the main urban areas to support urban renaissance, regeneration of deprived areas, recycling of land and sustainable patterns of travel.
- To ensure that development contributes to better urban environment, providing green infrastructure to meet the needs of an increasing population, protecting environmental assets and respecting/contributing to landscape, biodiversity, sustainable construction, flood protection and water supply.
- To meet existing transport infrastructure deficits and provide for needs generated by new development, by investment in new and improved infrastructure, planning to reduce the need to travel and creating a shift to more sustainable modes of travel.
- To deliver the resources necessary to bring about growth by creating effective delivery arrangements, and to create sustainable communities by ensuring that social infrastructure needs are met in step with growth and by involving the community and voluntary sectors in planning and delivery.

Locations for growth

To help achieve the above objectives the majority of development in the sub-region will be focussed at the following towns:

- Milton Keynes, which will embrace its potential to mature as a major regional city, particularly through the substantial development of its central area supported by a significantly enhanced public transport system to facilitate and support growth in major development areas.
- Northampton, which will continue to grow in stature as an important regional centre with a key emphasis on renaissance of the town centre and major enhancement of the public transport network.
- Corby, Kettering and Wellingborough, which will grow as linked growth towns, working in a complementary way. At Corby the emphasis will be on regeneration of the town, renewal of its urban fabric, and redevelopment of the town centre. At Kettering and Wellingborough the emphasis will be on managing growth and job creation in a sustainable way that realises their potential.

- Bedford/Kempston/northern Marston Vale, where the emphasis should be on strengthening the role of this key centre through economic regeneration and growth. Priorities will be urban renaissance, improved economic performance and selective harnessing of the potential of appropriate areas in the north of Marston Vale.
- Luton/Dunstable/Houghton Regis (LDHR), where the effort should be on building the towns into a vibrant, culturally diversified conurbation with a major improvement in the local economy and skills base. This should be achieved through economic regeneration across the urban area, making the most of its location close to London and other parts of the South-East and its good transport links. Leighton-Linslade will absorb a limited amount of the growth allocated to LDHR in order to contribute to the aims of the SRS and make the most of its location between LDHR and Milton Keynes.
- Aylesbury, which should grow through strengthening and extending its traditional role as a county and market town, including urban renaissance of the centre that will allow it to meet the demands of a larger population.

At all of these towns growth and development will be underpinned by the more effective use of previously-developed land; the building of high-quality and affordable housing in sustainable locations; the attraction and provision of a range of good quality jobs; the provision of necessary services in the fields of education and training, health and social care, recreation, and other community activities; and the provision of high quality green infrastructure of all kinds. Underpinning all these will be an integrated approach to accessibility, aiming at reduction in dependence on private car use through the provision of a step change in public transport (including movement within and between the main centres), walking and cycling.

Other locations in the sub-region

Although growth will be focused at the above towns there will continue to be some development in other parts of the sub-region. Some limited reference is made to this within the strategy under the Part B Statements (e.g. in relation to Daventry and Leighton-Linslade), but most will be a matter for local determination through LDDs within overall District allocations made by Regional Spatial Strategies.

Strategic Policy 1

The majority of development in the sub-region will be focused at the following growth towns, including sustainable urban extensions well served by public transport. The figures stated beneath are for new homes in the main towns only, not to housing growth in the whole of the administrative area(s) in which they are located, and give an indication of the ‘additional’ provision made through the SRS as compared with that already committed through current plans and policies. [These existing commitments consist of outstanding planning permissions, allocations in current plans, and an allowance for homes presently expected to be derived from future permissions within the urban area. However, the SRS encourages further provision to be made from the latter source].

	Current policies	SRS additions	Total to 2021
Aylesbury	7,750	6,350	14,100
Bedford	19,500	Nil	19,500
Corby, Kettering & Wellingborough	14,900	[22,900]	[37,800]
Luton/Dunstable & Houghton Regis (with Leighton-Linslade)	[4,750]	[19,550]	24,300
Milton Keynes	27,150	17,750	44,900
Northampton	28,100	3,400	31,500
MKSM AREA TOTAL	[102,150]	[69,950]	[172,100]
All figures are rounded to the nearest 50			
<i>[In the case of Luton/Dunstable/Houghton Regis the FSS is recommended to add to the number of homes in the 'current policies' column and make a corresponding reduction in the number in the 'SRS additions' column to reflect current commitments at Leighton-Linslade.</i>			
<i>[In the case of Corby, Kettering and Wellingborough the FSS is recommended to reduce the amounts in the 'SRS additions' and 'Total to 2021' columns to indicate more precisely the quantum of development to take place at the three growth towns themselves rather than in the other smaller towns in these Districts.]</i>			
Housing growth at the six main towns to 2021 will be monitored against progress in moving towards achieving the following overall net levels of employment growth by the same date:			
Aylesbury Vale District (for Aylesbury growth town)			12,690.
Bedford Borough and Mid Beds District (for Bedford growth town)			14,000
Corby, Kettering, Wellingborough Boroughs, and East Northants Districts (for CKW linked growth towns)			43,800
Luton Borough and South Beds District (for LDHR growth towns)			12,600
Milton Keynes Borough (for Milton Keynes growth town)			44,900
Northampton Borough and South Northants and Daventry Districts (for Northampton Growth Town)			37,200
The above figures are reference values to be used only for monitoring and reviewing the SRS as a whole, not as targets specifically related to individual areas or phases of housing development.			

The SRS includes provisional planning assumptions about further levels of housing growth at the above towns in the period 2021-31, as set out beneath. These are intended to provide a longer term perspective for infrastructure planning but are without commitment at this stage and will be subject to future review.

Aylesbury	[subject to future review]
Bedford/Kempston/Northern Marston Vale	10,000
Corby/Kettering/Wellingborough	28,000
Luton/Dunstable/Houghton Regis (with Leighton-Linslade)	15,400
Milton Keynes	23,700
Northampton	17,500

The above levels of growth will require the commitment of substantial levels of resources to deliver many kinds of necessary strategic infrastructure, both to serve the new developments and to make good a number of existing deficiencies. Appropriate contributions will be required from many sources, both in the private and public sectors. Unless these needs are met it will not be possible to provide the levels of housing and economic growth set out in the SRS. This will be an important matter for review by the Regional Assemblies and the delivery bodies.

[Our recommendations for the remainder of this chapter, concerning paragraphs 1.6 to 1.8, Strategic Policy 2 and Figure 3, are to be found at **R3.1**, **R3.2** and **R3.4**]

Omit the text boxes containing objectives above paragraphs 1.1, 2.1 and 3.1

R4.6

Part A, Chapter 3 (Effective Delivery)

“Objectives” box Delete

Mechanisms for implementation

Paragraph 3.1 Retain

Paragraphs 3.2-3.4 Replace with updated content describing the role of the Inter-Regional Board and its structure of supporting groups (the Growth Implementation Group and the inter-agency working groups).

Paragraphs 3.5-3.7 Replace with an updated general description of the purposes of the ‘Local Delivery Vehicles’, but consider the use of a more human, less mechanical title such as ‘local delivery partnerships’.

[Part B sub-area sections: Northamptonshire paragraphs 3.1-3.4/Bedfordshire and Luton paragraphs 4.1-4.4/Milton Keynes and Aylesbury paragraph 4.4. Replace these paragraphs with a more detailed description of the composition and functions of the six local bodies in the relevant Part B sub-area sections, including in each case a sentence as follows: “The (local implementation partnerships) will work within the statutory plan-led system, implementing

strategies adopted by the local planning authorities after thorough processes of public consultation.”

Paragraphs 3.8 – 310 Replace with revised paragraphs reflecting decisions made in response to our discussion of these issues at paragraphs 4.18-4.19 above, and include a commitment by the Inter-Regional Board and the RAs to support and supplement the resources of the LPAs, where necessary, to enable them to achieve the necessary high quality output in the limited timescales available.

Paragraph 3.11 Retain.
Paragraphs 3.12 and 3.13 Retain first sentence of paragraph 3.12; amend second sentence as follows: “The following Sub-Regional implementation and guidance documents will seek to address this issue and will be prepared under the auspices of the Inter-Regional Board;

- Strategy and guidance for a community chest approach to collecting and allocating contributions to infrastructure needs at sub-area level;
- Co-ordinated parking standards for new development;
- Guidance for consistent application of available best practice standards on the creation of sustainable communities”

Paragraph 3.14 Replace with an amended heading and text as follows: “Master Plans/Strategic Development Briefs. A master-planning approach will be required for all the sustainable urban extensions and for other major urban developments, sufficient to (a) demonstrate how the overall development will meet the aims of the SRS and (b) provide a coherent framework into which any individual phases of development will fit.”

Paragraph 3.15 Amend the third bullet point to read “Regeneration, the economy and enterprise”. Amend the fourth bullet point to read “Social infrastructure including the emergency services, primary and secondary education, health and social care facilities, and provision for leisure.” Add a further bullet point to read “Higher and further education and the development of employment skills”.

Paragraph 3.16 Amend as follows: “Agencies involved in the delivery of the above aspects will be expected to make appropriate contributions to the preparation of LDDs and to the strategic plans of the (local implementation partnerships). Some may be represented on the partnerships.”

Paragraph 3.17 Retain the first four sentences. Delete the fifth sentence. Replace the sixth sentence as follows: “Government will work, through the Inter-Regional Board and other available avenues, to secure commitment to the funding for key infrastructure and other investment essential to delivering this Growth Area Strategy in a sustainable fashion.”

Paragraphs 3.18-3.21 Replace the heading “Implementation Schedules” with “Implementation and Monitoring”. Replace paragraphs as follows:

“The Part B Statements for the six growth towns provide guidance on the housing and jobs targets and the key infrastructure proposals that need to be developed in more detail in appropriate Local Development Documents for all the growth towns and taken forward in the strategic plans of the Growth Town Implementation Partnerships.

The phasing of the development in the Part B Statements is based on the objective of bringing forward the delivery of housing as fast as possible tempered by judgements about what are balanced and achievable development trajectories in terms of factors such as infrastructure provision and the housing market.

An annual sub-regional monitoring statement will be prepared under the auspices of the Inter-Regional Board. This will monitor progress in achieving the main elements of the SRS, as developed in more detail by the LDDs, and as revealed by a range of appropriate indicators, including the following:

Housing completions, including affordable housing

Net change in jobs totals, including those in defined key sectors

Commencement/completion of key infrastructure

Development on previously-developed/green field land

Changes in skills levels

Higher and further education delivery indicators

Health and social care delivery indicators

Environmental indicators

Resolution of strategic water resource issues, particularly where these involve development outside the MKSM area

Paragraph 3.22 Replace as follows: “In order to maintain the clarity of focus necessary to increase the cohesion of the sub-region and implement these unusually long-term policies the SRS will be formally reviewed as a single entity five years after its adoption, and every five years thereafter. It will be expected that the strategy’s policies for the six growth towns (as they exist after the completion of every review) will be included in the relevant rolled-forward Regional Spatial Strategies without alteration.”

Strategic Policy 4

Update and revise to reflect all the above recommendations.

CHAPTER 5: West Northamptonshire

Introduction

- 5.1 Unlike the Part B sections relating to growth towns outside Northamptonshire, the SRS coverage of the county is somewhat akin to a mini-structure plan approach in that District-wide housing figures are given for all the local authority areas and there is a deeper level of policy for centres away from the main SRS growth towns, some of which is mainly concerned with establishing a settlement hierarchy. The manner of presentation makes it difficult to ascertain how much growth is to be directed to the main growth towns of Northampton, Corby, Kettering and Wellingborough and how much may be devolved to other places. This is not particularly helpful to public understanding of the SRS or to maintaining the necessary focus for future LDDs or the LDVs.
- 5.2 In our view the SRS should focus more clearly on the Growth Towns. We therefore recommend (**R5.1**) deleting paragraphs 1.1-1.6 and paragraphs 2.1-2.4, since much of this covers matters set out elsewhere in our recommended revisions to the SRS, is purely descriptive, or relates to the settlement hierarchy issues. However, it would be appropriate to introduce some brief revised paragraphs under the heading “The spatial framework for Northamptonshire” to describe the issues covered in the introductory sentences of our recommended modification of Northamptonshire Policy 1. We have considered whether or not it is appropriate to retain paragraphs 2.9-2.17, which deal with the sub-regional centre, the rural service centres, and the local service centres. Some of this content (especially that concerning the rural and local service centres) sits uncomfortably in the context of a strategy focussing on major growth towns. We recommend deletion of paragraphs 2.16 and 2.17 and some simplification and amendment of the other paragraphs (**R5.5**, **R5.6** and **R5.7**).

Northampton

Scale and directions of growth

- 5.3 Reflecting the high growth scenario in the MKSM study the SRS proposes housing growth of 15,550 in the decade 2001-11 and 13,850 in 2011-2021, leaving a further 19,600 in the background for the decade 2021-31 to complete Northampton’s ‘share’ of the overall Northamptonshire growth. This is a 32:28:40% split between the three decades.
- 5.4 The Northampton Implementation Area [NIA] has substantial current commitments in terms of extant unimplemented permissions and allocations and windfalls likely to arise from underused urban capacity. According to the consultant’s assessment for the GAA these sources can provide 28,113 dwellings. On that basis the strategy itself would require only the provision of an additional balance of 1,287.
- 5.5 A number of participants found it unsatisfactory that the SRS proposes such a limited amount of additional development, considering the target insufficiently challenging for a town that has been performing so well. We were urged by some to recognise that the high growth scenario is based upon lower employment growth in future than

Northampton has been enjoying in the recent past and to acknowledge the town's economic potential for making a greater employment-led contribution to the required step-change in housing provision. It was also pointed out that the high growth scenario for the NIA provides only 2000 dwellings more than the MKSM trend growth figure for Northampton Borough.

- 5.6 In paragraphs 3.28 to 3.43 above we consider the theoretical basis adopted in the MKSM study and our conclusions broadly supported that approach. We also support the view expressed by EMRA and East Midlands Development Agency [EMDA] that long-term future job growth expectations, based on projections rather than extrapolations, should not be departed from in response to experiences in the recent past, especially in a town with a considerable proportion of employment based on manufacturing.
- 5.7 We were also urged to reduce the extent to which development is 'back-loaded' into the third decade (2121-31). We support this suggestion and find it inappropriate for the development momentum behind the strategy to fall back in the decade 2011-21 (to 28%), only to have to be cranked up to a much higher level (40%) in 2021-31 if future reviews of the SRS continue to endorse its longer-term perspective. In our view a smoother development trajectory would be more practicable and desirable. Recognising that (a) about three years of the first decade have already elapsed and (b) as we were told, completions in NIA in recent years have averaged fewer than 1000 pa, we consider that a three-decade split of 28:35:35 would be more appropriate and that the provision to 2021 should be split into four five-year periods. Overall, this would require a total of 2100 dwellings to be brought forward from the decade 2021-31, reducing the outstanding aspirational balance for 2021-31 to 17,500.
- 5.8 Turning to the way in which provision on this scale could be made, there was considerable disagreement about the GAA's estimate that more than 19,000 dwellings would be achieved from 'urban capacity' by 2021. The Borough Council considered that 15,000 would be a more reliable estimate, while others felt that even this could be over-optimistic. In the most pessimistic scenario posed by Redrow Homes there could be fewer than 11,000 dwellings gained from this source. In our view the Urban Development Corporation [UDC] and Borough Council will need to take steps to ensure that previously developed urban land in the NIA is recycled for new residential and other uses as efficiently as possible. However, no matter how great the eventual yield from this source it is evident that there will have to be a significant amount of green field development to 2021 to make it possible to achieve our recommended slightly enhanced total of 31,500 completions.
- 5.9 Northamptonshire Policy 2 identifies four 'growth locations' where such development should occur. Representations were made that we should comment both positively and negatively on all of these areas (a number of which are commitments in the current local plan), as well as some others not identified in the SRS. For example, for the 'south west' growth location we were invited to consider Upton; for the 'north west', Kings Heath/Dallington and the Buckton Fields area; for the 'south east', further growth in the Wootton and Grange Park areas; and for the 'south' Collingtree and areas south of the M1 in the Blisworth, Milton Malsor and Rothersthorpe areas. In addition, endorsement was sought for development towards the north in the Moulton area. However, the SRS gives no specific explanation for the selection of any of its chosen growth directions. As for the GAA, in our view this does not provide a sufficiently clear or transparent basis for concluding on growth directions, except in the general sense of satisfying us that the NIA could grow by 2021 to the extent indicated in our recommendations without coming up against over-riding strategic constraints. This is not to say that there are no constraints. Clearly there are a number. But their

- significance needs to be carefully assessed and weighed in an appropriate process. In this respect we do not consider that the Examination provided an appropriate procedural context for fair and thorough public consideration of the specific merits of these rival areas.
- 5.10 Although we recognise that it may be disappointing to some, especially those with interests of one kind or another in particular geographical areas, our firm view is that the SRS should not impose growth directions in the form presently set out in Northamptonshire Policy 2. Instead, it should require a framework for growth within the NIA to be created through a focused set of LDDs prepared jointly where relevant by the relevant local planning authorities. These will provide the necessary clear vision and policy context for the operations of the UDC and its partners. In preparing the LDDs all the available options for expansion of the urban area will need to be considered positively and open-mindedly without reference to the arbitrary physical limits of Northampton's administrative area which have little relevance to important planning factors such as topography, landscape and transport. We are confident that the provisions and requirements of the SRS will not place unreasonable demands on the local authorities and that there are sufficient development options without having to choose ones which will be severely harmful (**R5.2**).
- 5.11 We reject any notion that preparation of the necessary LDDs will delay housing delivery in Northampton on the scale sought by the SRS. There will be nothing to prevent the UDC and others getting on immediately with any necessary positive actions to unlock more of the potential within the urban area and secure its earlier release. Indeed, we would see this as one of the UDC's primary tasks, especially in the early years. However, the LDDs will need to obtain a balanced release of brownfield and greenfield land as there may be long lead-times necessary to get infrastructure in place in some places. A balanced approach will also ensure the availability of a wide market choice of sites and locations at all times which in itself should help to speed the build-rate. This may require some reappraisal of the Borough Council's present policy not to release further allocated greenfield sites until 2008.

Employment issues

- 5.12 There was a fairly widely-held view that employment-related matters are given insufficient coverage in the SRS in terms of quantification, qualitative issues and the spatial dimension. The RA's concession on inclusion of county job targets overcame some of the issues related to quantification. However, some participants considered that more guidance should be included on key locations and land requirements, drawing on the economic aspirations expressed in the SRS itself, the Regional Economic Strategy and the emerging studies of the local industrial and commercial property market. There were suggestions that land supply will need to be augmented before 2016. Reference was also made to the targets set out in the Northamptonshire Structure Plan including employment provision at the main growth locations. Redrow Homes observed that while the MKSM studies include a lot of analysis of employment matters, the SRS gives only generalised comments on the actions that arise from it.
- 5.13 In our view a very long-term strategy covering such a wide area can only provide some brief pointers on these matters. The RAs' suggested inclusion of the employment targets derived from the MKSM study provides the vital perspective needed for monitoring the SRS and shaping more detailed plans prepared by the LPAs, the RDAs and other relevant agencies. The latter would be the sources of more detailed guidance on employment matters. However, in our view it would be helpful to break down the

county-wide employment totals proposed by the RAs into a greater degree of local detail. Although the MKSM study built up the employment targets from District-specific figures it would perhaps be misleading to apply them at that level in the SRS. We suggest that a combined ‘West Northamptonshire’ target should be provided for Northampton Borough and the Daventry & South Northants Districts since this would allow for cross-boundary movement in the NIA and include all the administrative areas with portions within the UDC area. Figures given in PART103 suggest a total of some 37,200 additional jobs in West Northamptonshire over the period 2001 to 2021.

- 5.14 The employment content of Northamptonshire Policy 2 was criticised by some for being too detailed while others felt that its span should be wider. As explained previously our recommendation for this policy (**R5.3**) turns it into a more explicit strategic brief for LDDs for the NIA. This includes a bullet point requiring the provision of sufficient employment land for identified key sectors. In our view this is all that is required at the SRS level. It is only in the context of the LDDs that matters at the level of an individual town (such as those raised by RELPS and COPELA) can be engaged with in a fully meaningful way. The participants seeking the development of more detailed policies will be able to work with the planning authorities to ensure that their wishes are reflected in the relevant LDD where appropriate.

Northampton Central Area

- 5.15 There was some criticism that this part of the policy is too detailed for inclusion in an SRS and even makes reference to a few individual buildings and sites. While we understand the County and Borough Councils’ viewpoints that the policy aims at creating a rounded vibrant town centre we are not convinced that this level of detail is appropriate for inclusion in an SRS, albeit that much of the content of this part of Policy 2 may be laudable in principle. Nevertheless we strongly support the policy’s proposal for an LDD for the town centre. In our view this is an essential complement to the wider framework for the urban area as a whole that will be created by the LDDs within the LDS for the NIA as recommended at **R5.3** below. A town centre LDD, carefully devised and consulted upon, has the potential to set out an inspiring long term vision which can be signed up to by all the relevant parties and provide an important reference point for implementing agencies, including the UDC. Our **R5.4** therefore supports this part of Policy 2 in a modified form, providing all the specification that we consider necessary at SRS level in terms of town centre employment-related matters.

Urban Hubs

- 5.16 The concept of urban hubs is not altogether clearly identified in the SRS. As explained at the Examination the urban hubs in the NIA appear to be akin to what would normally be known as a District Centre, ie a suburban focus with certain nodal qualities which is a centre for shopping (mainly convenience shopping) and the delivery of local commercial and social service functions. On the other hand urban hubs in North Northamptonshire are detached smaller towns where the policy objective seems to be the protection of their retail and service functions from erosion by the stronger influences of the main towns. We consider this issue further in relation to North Northamptonshire in paragraphs 6.3-6.6 below.
- 5.17 Some participants suggested various changes to this part of the policy, particularly in relation to individually named hubs. However, in our view this is placing the emphasis

at the wrong level since these hubs are not central to the concept of a sub-regional growth area. Our **R5.3** therefore makes the identification of District Centres in the NIA a matter to be settled through the LDF for that area.

Social Infrastructure

- 5.18 We have already stated at paragraph 3.51 above that we consider the comments on primary and secondary education on p30 to be too detailed. However, our recommendation **R5.3** brings in reference to Strategic Policy 3 which we have expanded to cover these matters.
- 5.19 On ‘tertiary education’ we have recommended distinguishing more clearly between further and higher education (see paragraph 3.52 and **R3.7**) and, again, our recommended change to Strategic Policy 3 refers to these sectors. Referring to higher education, UCN has the potential to make a substantial contribution to the aims of the SRS: we have commented on funding issues raised by UCN at Chapter 3, paragraph 3.54, which itself cross-refers to **R4.6**.
- 5.20 Referring briefly to health issues, the Health and Social Care Partnership [H&SCP] are currently developing new models of care and do not welcome the reference to a new District General Hospital in Northamptonshire Policy 2. They also fear a lack of funding and claim to be 2% under-weighted in terms of capitation. The H&SCP suggest an alternative form of wording for Northamptonshire Policy 2 which better reflects the Health Service Planning approach. We agree with this, and it is reflected in our recommendation **R5.3** for revising Northamptonshire Policy 2.
- 5.21 As for the references to ‘public transport’ and ‘utilities’, as explained below our recommendations **R3.2** and **R3.3** make a stronger reference to the former, as this is such a vital element of sustainability. The reference to ‘utilities’ does not suggest that there are major issues here for future LDDs in West Northamptonshire.

Transport issues relating to Northamptonshire Policy 6

- 5.22 The LTP (p31) recognises that two of the key transport issues for the town are inadequate bus services and excessive traffic. Against that background truly sustainable development in Northampton will require not only the provision of attractive public transport options to residents in the new urban extensions, but the achievement of an effective town-wide network offering services as near as possible to a ‘turn-up-and-go’ standard. This will be a major operational and resource challenge for all participating bodies from the Inter-Regional Board downwards. Although it appears that the guided bus proposals are not proceeding, we were told of the intention to create quality radial and orbital bus corridors complemented by improved interchanges, park-and-ride schemes and demand management. In our view the scale of growth that is to be addressed to 2021, together with the existing transport deficits, makes it essential for the LDF for the NIA to establish a clear long-term framework for a convincing step-change in public transport attraction and accessibility that can be steadily implemented by the UDC, the transport authority and their partners. We build this into our recommendations at **R5.3**.
- 5.23 Another transport issue raised by participants was the “multi modal interchange, including a rail station, on the Northampton Loop Line to the south of Northampton” referred to in the Northamptonshire Structure Plan 1996-2016. The original Structure Plan policies related the interchange to a ‘Strategic Development Area’ south of

Northampton but although those policies have been quashed the interchange itself remains supported by policy T2. It is also referred to in policy 12 of RPG8 and Northamptonshire Policy 6 of the SRS. The interchange was claimed by its supporters to be an important means of achieving modal switch between cars, trains and buses south of the town in the vicinity of the M1 but others doubted its ability to achieve that purpose. In any event it is most unlikely to be funded by the SRA or anyone else without a significant amount of enabling development. In our view the function of the interchange (and its deliverability if found to be an important element to the future planning of the town) is another factor that needs to be investigated through the LDF for the NIA (see **R5.3**) when all the possible expansion options are examined in detail. This course of action would seem to satisfy EMDA's view of this proposal.

- 5.24 A further issue touched on at the Examination was the somewhat uncertain status of the orbital roads referred to in Northamptonshire Policy 6, some of which appear to be quite long term. In our view the need for these roads should be reviewed through the LDF for the expansion of the NIA. If such roads are a necessary part of the network to serve the enlarged urban area, clarification should be given to their status and timing and their role (if applicable) as pre-requisites of any areas of development.
- 5.25 For a number of the schemes listed in Northamptonshire Policy 6 and Policy 8, the Table is at variance with information from the SRA and HA. We recommend at **R5.9** that these Tables are revised to reflect the latest position regarding their status and timing, and to remove proposals already completed.

Environment

- 5.26 As in other geographical areas of the SRS we consider it appropriate to recognise concerns about the omission of specific reference to the need to retain and enhance green infrastructure. Our recommendation **R5.3** covers this point.

Daventry

- 5.27 The SRS defines Daventry as a Sub-Regional Centre (SRC) presumably in recognition of its growth potential, although we note that RPG8 does not include it as a SRC. Daventry District Council seeks to boost the town's role as a sub-regional centre and is working with the Civic Trust to put in place a vision for development and revitalisation of the town centre which is currently under-performing. To support this it wishes to increase the town's rate of growth to achieve a more sustainable population level of about 40,000 and thus seeks to increase the District-wide housing provision to 2021 (in Northamptonshire Policy 1) by 1,500. In their view the increase should be loaded into the period 2011-16 to correlate with the time required to bring the development on stream. Charles Planning generally supported this approach, although the representation by Danetree Consortium requests a greater increase of 2600, all loaded into the first decade. Representations from Daventry Town Council also support the District Council's approach, but Daventry Villages Together have concerns about the scale of growth including its possible impact on Daventry Country Park and Borough Hill.
- 5.28 From the information provided the town has reasonably good sustainability credentials and in our view these could usefully be reinforced in the way sought by the Council (i.e. the creation of a greater critical mass, a somewhat stronger retail offer and the provision of some more varied, higher-quality employment opportunities). We

consider that the modest increase in District-wide housing provision sought by the Council should be supported through a modification of Policy 1. This change would have two components. Firstly, the 1,500 dwellings allocated to Daventry in 2001-11 as part of the NIA provision would be removed from Northamptonshire Policy 2 and regarded as related to the non-NIA provision for Daventry. Any Daventry contributions to the NIA resulting from our recommendation **R5.1** would be additional to the District figure. Secondly, a further 1,500 dwellings would be brought forward from the decade 2021-31 into the 2011-21 period. We do not consider that this minor rearrangement would have any significant effect on the general quantity and distribution of growth in the SRS. It seems that it would do no more than guarantee a continuation of the past build-rate in the District (540pa in 1991-2001 according to figures in the MKSM final report at Appendix 4, Table 2), although local planning policies may need to channel this provision more positively into the intended focus in and around Daventry town. Overall, the split of non-NIA related growth would change from 30:30:40 in the SRS to 41.5:41.5:17%, which seems consistent with completing the town's growth by 2021 or before. Our recommended revision to Northamptonshire Policy 1 (**R5.1**) reflects this conclusion.

- 5.29 Daventry is within the operational area of the West Northamptonshire UDC and there was concern from a number of quarters about the UDC boundary drawn around the town which embraces the Country Park and Borough Hill. This raised a number of concerns among participants (eg Daventry Villages Together, FOE) including whether or not development would threaten important local green areas, the capacity of the area within the boundary to provide for the amount of growth proposed, and the possibility of the UDC imposing development encroaching into the rural area around the town. We did not receive any clear explanation of the rationale for the UDC boundary and whether or not these issues had been considered in defining it, and it seemed that the Council was not content with the line in the UDC consultation draft. However, our considerations are not site specific and the extent of green field development around the town will clearly be dependent on the amount of development that can be achieved over the next 20 years on previously developed land within the town. In that context we would expect the UDC to participate in actively recycling urban land as much as possible. We take some reassurance from the ODPM's letter of 16 March 2004, responding to our letter of 3 March 2004 (both at EXAM36) in which we raised some concerns about the implications of the boundaries. The ODPM indicated that the RPG process (through the Public Examination) would define the spatial strategy, that implementation by the UDC would remain driven by normal section 54A presumptions giving primacy to the development plan, and that the UDC boundaries would be reviewed in the light of final revisions to the RPG. However, since RPG is not site-specific we consider that both the planning-led strategy and the boundaries under which the UDC will operate should derive from the LDDs prepared to guide the growth of the urban area of Daventry to 2021, which will need to be completed as soon as possible by the District Council. We recommend amendment to paragraph 2.12 to that effect (**R5.7**).
- 5.30 Opinions differed as to whether the SRS should contain a spatial diagram for Daventry or provide more guidance about infrastructure requirements (such as the possible need for a better link with Northampton) and employment issues affecting the town. However, we have recommended a single SRS key diagram (**R4.3**) and, in any case, we consider that these matters can be left to the Council to determine through the LDDs and then implemented with the assistance of the UDC.

Towcester and the other Rural Service Centres

- 5.31 Brackley and Towcester (like Thrapston and Oundle in North Northamptonshire) are identified in paragraph 2.13 as Rural Service Centres where the priority will be the accommodation of local growth in the population. A number of representations were made that the SRS should cater for more growth at these centres in terms of either specific quantities or more encouraging general references than found at paragraphs 2.13-14. In some cases these proposals were put forward as substitutes for other locations where growth was suggested to be less appropriate or less likely to materialise. In others they would represent additional growth.
- 5.32 These centres range in population between just over 13,100 (Brackley) and less than 5,000 (Thrapston). In our view they fall outside the range of settlements with which the SRS should be primarily concerned. They are small isolated settlements in sub-regional strategic terms having no real relationship with the MKSM study's hybrid 'preferred option' based mainly on the 'urban concentration' and 'corridor options'. Any growth in these locations is purely a matter for local determination through LDDs.
- 5.33 Although some sought more reference to employment and infrastructure issues in paragraphs 2.13-14 we also consider these to be non-strategic matters appropriate for LDDs. We comment only on one matter. South Northamptonshire DC considered that completion of the Towcester bypass (by means of a leg to the south-west) is essential for the delivery of growth and the implementation of town centre improvements but felt that Northamptonshire Policy 8 should not require that this be funded only by developer contributions. Our view is that paragraph 2.14 gives the impression that the extent of any local growth at Towcester could be determined almost solely by the quantity of development necessary to complete the bypass. This is not the right starting point. The growth should primarily be determined according to other factors (such as the local growth in population referred to in paragraph 2.13). The chosen scale of housing development would then make its proper contribution towards the road and any other infrastructure required by its construction, with the remainder coming from other sources. Since it has been deemed appropriate for the small town of Towcester to be included within the area of the UDC it may be that funds would be available from that source. Our recommendation is to greatly simplify paragraph 2.14, removing repetition from the preceding paragraph in relation to urban extensions and reflecting the above comments (**R5.8**).
- 5.34 The smaller towns, particularly the rural service centres, are not of a sufficient scale to be part of a growth area strategy. General policy towards the rural areas is a matter for RPG, while the detail is for the LDD process. While our recommended revision of Policy 1 retains the reference to these smaller settlements, we conclude that paragraphs 2.9 to 2.10 and 2.16 and 2.17 are not necessary in the growth strategy, and recommend their deletion (**R5.6**). We comment further in the next chapter on issues relating to the towns in North Northamptonshire.

Recommendations

R5.1

Delete paragraphs 1.1 to 1.6 and 2.1 to 2.4, but introduce some brief paragraphs relating to the introductory sentences of Northamptonshire Policy 1 (see **R5.2**)

R5.2

Amend Northamptonshire Policy 1 to read as follows:

The majority of development in Northamptonshire will be concentrated at the Principal Urban Area of Northampton and the linked growth towns of Corby, Kettering and Wellingborough.

Beyond these main urban centres development will be focused at the sub-regional centre of Daventry, the smaller towns of Desborough, Rothwell, Burton Latimer, Rushden, Higham Ferrers and Irthlingborough and the rural service centres of Brackley, Oundle, Raunds, Thrapston and Towcester.

In the remainder of the County, the rural hinterlands, development will be limited, with the emphasis on meeting local needs and the retention of basic services and facilities.

Housing provision for each local authority area in Northamptonshire for each of the five year phases over the period 2001 to 2021 should be made at the following annual average rates:

	<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>
Corby*	560	680	1,060	1,060
Daventry	540	540	540	540
E Northants	520	520	420	420
Kettering	550	810	630	630
Northampton*	1,200	1,600	1,750	1,750
S Northants	480	480	330	330
Wellingborough	595	595	685	685
Total	4,445	5,225	5,415	5,415

*Figures for Corby and Northampton include any provision made in urban extensions across local authority boundaries. Such provision would be additional to the figures for the 'receiving authorities' in the above table.

R5.3

Amend Northamptonshire Policy 2 as follows:

The Local Development Schemes for Northampton Borough, and the District and Borough Councils of South Northamptonshire, Daventry, and Wellingborough will together identify and provide for the timely preparation of an appropriate set of LDDs making up a Local Development Framework which will put into effect the proposals of the SRS for growth within the Northampton Implementation Area (NIA), making provision for joint working where appropriate.

Together these LDDs will provide for an increase in the number of homes in the NIA in the period to 2021 as follows:

2001-2006	2006-2011	2011-2016	2016-2021	Total
6,000	8,000	8,750	8,750	31,500
(ave 1,200pa)	(ave 1,600pa)	(ave 1,750pa)	(ave 1,750pa)	

In examining future growth options the longer-term perspective of the SRS (for a further 17,500 dwellings in the decade 2021-31) should be borne in mind as an uncommitted planning assumption, subject to review at an appropriate future date.

The housing figures in the above policy relate only to the NIA (Northampton Borough, and any areas within other Districts identified for growth as part of NIA).

The LDD(s) will define appropriate arrangements for the provision of this scale of housing to be monitored against a target of net growth in jobs in West Northamptonshire (i.e. Northampton Borough and Daventry and South Northamptonshire Districts) of about 37,200 additional jobs over the period 2001-2021.

Taken in combination the LDDs within the LDS should set firm guidelines for pro-active inter-agency approaches that will:

- Meet all the principles for creating sustainable communities set out in Strategic Policy 3;
- provide for housing growth using both green field land and previously developed land, but maximising opportunities for recycling redundant and under-used urban land especially at nodal sites and on good-quality public transport routes;
- provide an adequate choice of high-quality employment sites for targeted office and high-value knowledge based industries and for existing key sectors, making a realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites, both new and existing;
- reduce the need to travel by integrating land use and transport planning, reviewing the need for new orbital and other roads, achieving a step change in the attractiveness of public transport within the urban area, implementing town-wide park and ride schemes, comprehensively improving the attractiveness of walking and cycling, and implementing demand management measures;
- provide for suitable urban extensions (without reference to local authority boundaries) clearly linked, where appropriate, with the completion of any key items of necessary associated infrastructure;
- identify an appropriate number of existing and possible future District Centres (urban hubs) to form sustainable sub-centres for shopping and for the provision of commercial and social services, giving an emphasis to regeneration needs and opportunities for urban renaissance where relevant;
- achieve a better quality of new development throughout the urban area, including strategic improvements to the public realm;
- review, and if necessary, set new targets for the provision of affordable housing within the area of the LDD;

- provide for campus development for University College Northampton;
- provide for additional primary health and social care services within existing primary care outlets, in bespoke new healthcare centres within the sustainable urban extensions and within new and expanded community hospitals;
- provide for expansion, reconfiguration and modernisation of Northampton Hospital as required to ensure sufficient capacity;
- make appropriate provision for green infrastructure including the Nene Valley Regional Park.

R5.4

New Policy

Northampton Borough Council, in partnership with other relevant bodies, will prepare an LDD to provide a long-term framework for revitalising and upgrading the quality and facilities of the town centre, including:

[incorporate the bullet points under the heading Northampton Central Area in Northamptonshire Policy 2]

R5.5

Delete paragraph 2.6 and Northamptonshire Policy 3

R5.6

Delete paragraphs 2.9-2.10 and paragraphs 2.16 and 2.17 and combine the content of paragraphs 2.11 with that of 2.13 but in an abbreviated form.

R5.7

Amend paragraph 2.12 as follows:

Daventry will grow towards a population of about 40,000 by 2021, seeking to consolidate and extend its role by revitalising and extending the role of the town centre as a sub-regional centre offering improved shopping facilities and a wider range of jobs and services. Housing growth will take place both by means of intensification within the present built-up area and expanding onto greenfield sites through one or more sustainable urban extensions. The exact scale, nature and location of this growth will be determined through the preparation of an appropriate LDD prepared by the District Council in consultation with relevant partners.

R5.8

Replace paragraph 2.14 as follows:

At Towcester it will be highly desirable to complete the bypass to enable traffic management measures and environmental enhancements to take place in the town centre and along the present A5 corridor. Options for this should be explored through an appropriate LDD.

R5.9

Revise the Table at Northamptonshire Policy 6 to reflect the latest available information from the SRA, HA and other responsible authorities on the status and timing of schemes, and to delete items that have been completed.

CHAPTER 6: NORTH NORTHAMPTONSHIRE

Introduction

- 6.1 The draft SRS proposes a “Principal Urban Area” [PUA] for Corby, Kettering and Wellingborough, together with a number of smaller towns which it states will act as “urban hubs” to complement the central areas in the three main towns. Unlike the other “Part B” statements, the one for Northamptonshire includes whole-district housing provision for the whole County, rather than just the growth locations. Responses to the draft SRS included a large volume of local opposition to the scale of growth proposed, and concerns about the effects of the proposed PUA in terms of coalescence between settlements and the impact on rural areas. Among the issues raised were objections to the proposals for individual towns, to the lack of provision relating to environmental matters, concerns about infrastructure and the delivery arrangements for the strategy.
- 6.2 We consider the issues raised and discussed at the Examination first in the context of the spatial strategy, then the amount of growth proposed and other issues at each location.

The spatial strategy

- 6.3 The proposed “PUA” gave rise to widespread concern and confusion. Whilst it may be seen as reflecting the priority for concentrating growth in the urban areas, the number of “sustainable urban extensions” proposed and the geographical extent of the area prompted references, not least in the Sustainability Appraisal, to a “linear city” (Sustainability Appraisal, para. 10.7). Revised RPG8, as the source of the PUA designation, identifies them as “settlement conurbations” (draft revised RPG 8, para. 3.1.4). Further consternation is caused by the proposal for Burton Latimer, Desborough, Higham Ferrers, Irthlingborough, Rothwell and Rushden to act as “urban hubs”. Their role is not clearly defined, other than complementing the centres of Corby Kettering and Wellingborough. Some are concerned that they will be engulfed in a massive urban sprawl, while others feel the strategy relegates them to subordinate service centres, underplaying their significance as independent small towns with development needs of their own. These concerns are heightened by the absence of any policy in the SRS to deal with the risk of coalescence or with the relationship of the various settlements within the PUA. CPRE called for a green belt or green wedges to be designated to remedy this. On the other hand, a number of representations suggested that the potential role of these smaller towns was underplayed in the SRS. We were therefore invited to recommend more specific provision for a greater amount of future development at most of the smaller towns and rural service centres in North Northamptonshire.
- 6.4 EMRA stressed that there was no intention to create a “linear city”, and the PUA designation was intended to reflect the inter-relationship between Corby, Kettering and Wellingborough and the need to plan their growth in a co-ordinated way. The “urban hubs” were so classified because it reflected their relationship with the larger towns. This was seen as more appropriate than a “local service centre” classification, as they lacked a rural hinterland. Green belt or green wedge designations were not thought appropriate but local policies would be relied upon to prevent sprawl and coalescence

of separate towns. Northamptonshire CC and others familiar with the approach generally shared this understanding, although Kettering BC felt the SRS needed clarification.

- 6.5 We take the view that the PUA and Urban Hub designations stem from an attempt to use established labels to express the strategy. Both are misnomers in this context, and are open to misinterpretation, as has indeed occurred. Corby, Kettering and Wellingborough taken together are certainly comparable in size with the PUAs listed in RPG 8, and they have important linkages e.g. through the wider employment role of Corby, and the influence of Kettering town centre. For most purposes, however, they are separate towns and will surely remain so, with significant areas of countryside between. We note, for example, that there is no proposal, or prospect, for providing a mass transit system to enable the three towns of the PUA to function as a single urban area, although better public transport provision within each of the towns is a priority. The “urban hub” towns are also distinct settlements, with their own structure and patterns of activity, albeit that they may look to the larger centres (including Northampton) for wider opportunities and “higher order” functions.
- 6.6 We conclude that, if there is any need to refer to Corby, Kettering and Wellingborough other than by their names, a term which more accurately describes their role such as “linked growth towns” should be used. If it is necessary to explain in RPG or elsewhere that, taken together, the three towns rank as equivalent to a PUA, that can be done. Similarly the term “urban hub” should not be used for the separate small towns of Burton Latimer, Desborough, Higham Ferrers, Irthlingborough, Rothwell and Rushden. Our recommendations **R5.2** (from the previous chapter) and **R6.1** for recasting Northamptonshire Policy 1 and Policy 4 reflect these conclusions.
- 6.7 We believe it is important for the SRS to make it clear that separation will be maintained between the three growth towns and between them and the nearby smaller towns. The directions for growth need to be developed so as to ensure both this approach and the continuing presence of a well managed urban fringe. This will allow positive opportunities for green infrastructure provision and contribute to the attractiveness of the three towns. This does not need to be spelt out in detail in the SRS, and nor do we believe it should propose a green belt or green wedges. It will be for LDDs to determine precise boundaries for development and provide for protection and management of the green spaces between. These conclusions are reflected in our recommendation **R6.1**.
- 6.8 We note that the LPAs support the idea of a joint LDD for the proposed “PUA”. We consider that joint working has an important part to play in determining the strategy for the “linked growth towns”. We agree that a joint LDD should be prepared, involving Corby, Kettering, Wellingborough and East Northamptonshire. It is important, however, that such a joint LDD is confined to those matters that really need to be addressed jointly, and does not attempt to be a comprehensive strategy for the whole area. Issues such as boundary crossing development, transport linkages, coalescence and green infrastructure between the towns need to be covered. Our recommendation **R 6.2** refers to this. There may be other linking issues which were not immediately apparent to us, in which case the LDD would provide an opportunity to clarify what they are and address them. There are, however, many aspects of development within each local authority area which do not need to be the subject of joint decisions. It is important that those matters are handled separately, through individual LDDs as appropriate, and do not hold up, or themselves become held up by, progress on the joint LDD.

Level of growth for North Northamptonshire

- 6.9 The draft SRS proposals for the four north Northamptonshire districts, in terms of additional dwellings, may be summarised as in the table below.

<u>District</u>	<u>2001-11</u>	<u>2011-21</u>	<u>% Split*</u>
Corby	6,200	9,800	22/35/43
E. Northants	3,600	3,600	30/30/40
Kettering	8,120	7,080	34/29/37
Wellingborough	5,400	9,600	22/38/40
Total	23,320	30,080	26/34/40

Notes: All figures relate to whole districts. Percentage split is rounded to the nearest whole number.

By reference to SRS paragraph 1.1 on page 9, and MKSM study Table 6.2 from which it is derived, and assuming “trend” rather than “higher” growth for Kettering, the above figures imply that a further 35,600 dwellings would remain to be provided in the period 2021 to 2031, giving a 30 year total of 89,000 in North Northamptonshire.

- 6.10 The job totals to which this dwelling provision relates can be inferred from the proposal submitted by the three RAs in document PART103, as follows:

<u>District</u>	<u>2001-11</u>	<u>2011-21</u>	<u>2001-21</u>
Corby	7,200	7,200	14,400
E. Northants	1,500	1,500	3,000
Kettering	6,300	6,300	12,600
Wellingborough	6,900	6,900	13,800
Total	21,900	21,900	43,800

Assuming the above job figures are split 30/30/40 as in the table in PART103, a further 29,200 jobs would arise in 2021 to 2031.

- 6.11 There was strong reaction against the overall levels of growth from many organisations and individuals in the area. The “STOP” group and others gave many reasons why the proposals were felt to be excessive. As well as the impact of the development itself on the landscape and character of existing towns and villages, it was argued that infrastructure for transport, schools, health and other facilities would be intolerably over-stretched, and new provision would not keep pace. There was scepticism about the ability of developers, or of Government, to fund the additional infrastructure required. Whilst the case for some growth was accepted, the view was that the county could not support development on the scale proposed.
- 6.12 Developers generally supported the SRS proposals, although some raised doubts about whether Corby could achieve the rate of growth proposed. It was argued that the County had successfully achieved high levels of development in the past, and that market interest in the area was high. Northamptonshire CC [NCC] also considered that the SRS proposals were achievable. They brought forward an alternative set of housing figures which were intended to clarify the presentation of the SRS proposals (document PART111). The NCC figures redistribute 2,200 of the provision from Wellingborough to East Northamptonshire, to reflect the role of Rushden, Higham Ferrers, and Irthlingborough. The Wellingborough figures are also more “front-loaded”. The PART111 proposals, set out on the same basis as in the table above, would produce the following figures for whole districts:

<u>District</u>	<u>2001-11</u>	<u>2011-21</u>	<u>% Split</u>
Corby	6,200	10,600	22/38/40
E. Northants	5,200	4,200	43/35/22
Kettering	8,120	6,280	34/26/40
Wellingborough	5,950	6,850	24/27/49
Total	25,470	27,930	29/31/40

- 6.13 We consider the overall proposed level of growth up to 2021 is supportable, but only if it is delivered in a phased programme in which housing grows in step with job growth and with the provision of transport and all the other necessary infrastructure. Although we have taken the view that detail such as numbers of primary and secondary schools in the Northamptonshire Policies is inappropriate, our conclusions in Chapter 4 above on the “no infrastructure: no growth” issue will, we believe, strengthen the SRS on this aspect. See **R4.5** with regard to Strategic Policy 1 and **R4.6** concerning paragraph 3.17 of Part A, section 3. We recommend at **R6.1** appropriate amendments to the Social Infrastructure section of Northamptonshire Policy 4.
- 6.14 We have concluded elsewhere that the SRS should include firmer guidance for the period from 2021 to 2031, if only because the present draft leaves the impression that the balance of the total development potential assessed in the MKSM Study will fall to be provided in that period. For North Northamptonshire that would mean a total of 35,600 additional dwellings in the final decade, requiring a significantly faster rate of development than in the period up to 2021. In our view it would be unwise to plan firmly for such growth in the longer term. There will be opportunities to revisit and review the strategy before detailed plans for the period 2021 – 2031 need to be put in place. In the meantime, to provide a context for the next 15 to 20 years, the assumption should be that growth after 2021 will proceed no faster than during the previous decade. On the basis of NCC’s proposed revision to the SRS figures, this would mean approximately 28,000 additional dwellings in North Northamptonshire for 2021 – 2031, rather than the 35,600 implied by the MKSM Study. This is reflected in our recommended revised Northamptonshire Policy 4 (**R6.1**).
- 6.15 We consider below issues related to the various locations within the area, which in turn reflect upon the total proposed development provision for 2001 to 2021.

Corby

- 6.16 The scale of growth proposed for Corby was generally agreed to be ambitious. It is inextricably linked, in the SRS and in the minds of Corby BC [CBC], Catalyst Corby and others, with the regeneration of the town and redevelopment and renewal of the town centre. We note the commitment on the part of the Borough Council to take forward a new LDD as proposed in the SRS, on the basis of Catalyst Corby’s Regeneration Framework. That document envisages major expansion of the town, almost doubling its population to 100,000, and supporting extensive redevelopment of the town centre and a new railway station.
- 6.17 Doubts were raised about this strategy from a number of points of view. A key concern from environmental groups and others was the extent of “sustainable urban extensions” proposed for 10,500 dwellings north east, north west, south, south west and west of Corby. This was felt to pose a threat to the surrounding countryside and neighbouring small settlements. The Rockingham Forest Trust called for retention of the part of Policy 12 in revised RPG 8 that requires development to: “consider the character of the

- countryside and protect ancient woodlands associated with the nearby Rockingham Forest”. They also pointed to the positive opportunities for green infrastructure provision, and the benefits that the Forest could provide for a growing population provided the impacts were properly managed. CPRE and others see the reliance on relatively low density peripheral development as potentially undermining the priority for regeneration within the town, and call for an emphasis on higher density, compact development.
- 6.18 As we have commented elsewhere, the draft SRS suffers by relying on policy in other places to govern environmental aspects of the proposals. We have no doubt that the intention of those involved in taking it forward is to pay due regard to these matters. But we conclude that it is important for the SRS itself to signpost what is required, particularly in relation to major green infrastructure such as the Rockingham Forest. Our recommendation **R6.1** reflects this conclusion.
- 6.19 Catalyst Corby and other supporters of the strategy argue that regeneration and peripheral development are complementary – one is needed to support the other. We accept this general argument. Clearly the major reshaping of the centre of the town and other places within it will provide opportunities for more intense development, and these need to be realised. Urban extensions will also provide focal points for some development at higher densities. It would be a mistake, however, to insist on high density development at edge of town locations where this does not relate well to the existing urban fabric or the transition to the countryside beyond. We also note the view that Corby needs to diversify its housing supply with more housing to appeal to a higher section of the market, to support the economic development of the town. Meeting this demand at Corby would also, in our view, help to lessen the pressures on surrounding smaller settlements.
- 6.20 We conclude that one objective at Corby, as elsewhere, should be to maximise the contribution of previously developed land in the urban area, and to capitalise on the particular opportunities provided by urban regeneration and redevelopment for more intense development. However, planning for urban extensions needs also to take account of other factors, including the role of the extension within the town, the existing urban fabric, and requirements for green infrastructure.
- 6.21 As discussed in Chapter 3 above (paragraphs 3.33 and 3.36), DLP and others questioned the approach of the strategy in seeking to divert to Corby a higher proportion of the Sub-Region’s growth than is indicated by projections. It was suggested that this could undermine achievement of the step change in housing output being sought. Some cast doubt on the ability of Corby to deliver the amount of development proposed. Development industry opinions about this differed sharply between those with interests at Corby and those without. In support of the strategy, Corby Landowners Group, CBC and others pointed to a very significant increase in housing completions in recent years, and to rapid increases in house prices. It was pointed out that Corby had coped with major structural change in the past, and currently had a surplus of jobs over resident workforce. We note the very confident attitude of those most closely involved that Corby could achieve the change in momentum required by the strategy.
- 6.22 We conclude that the aspirations for Corby as expressed in the SRS should be supported, as long as this does not have adverse impacts elsewhere. Thus any failure to achieve the levels of growth proposed at Corby should not lead to a requirement for more development elsewhere in Northamptonshire. The scale of growth proposed up to 2021 will be challenging. Beyond that, as noted above we consider that it would be realistic to assume that housing growth would continue no higher than the 2011 – 2021

level, i.e. 980 additional dwellings per annum. At this rate, the strategy would still be compatible with the overall aim for a population of 100,000 by about 2031 (the MKSM Study “high growth” figure corresponds to 110,000).

- 6.23 As to the timing and directions for growth, there are clearly proposals in the pipeline which can provide some early gains. Further proposals will need to be brought forward in step with the central area redevelopment and regeneration throughout the period of the strategy. This should proceed in line with the LDS, once the latter is in place. We see no reason to dispute the general directions for growth mentioned in Northamptonshire Policy 4 as areas of search for new urban extensions. Specific proposals should, however, be developed through the LDD process. The final extent of any development beyond the Borough boundary, in Kettering or East Northamptonshire District should be established through the proposed joint Area Action Plan.

Kettering Borough

- 6.24 Kettering BC [KBC] objected to the SRS proposals, calling for the scale of housing to be reduced and for the directions for urban extensions to be left to be settled through LDDs. KBC also called for more “back-loading” of provision, arguing that following finalisation of the MKSM Strategy, the time it would take to produce LDDs and development briefs, and conclude land assembly and planning permission meant that new urban extensions could not begin delivering significant supply of housing until after 2011.
- 6.25 With regard to Desborough and Rothwell, we note that significant development is already planned there in accordance with the adopted Structure Plan. While there will no doubt be continued local development needs at these two towns, we do not endorse the SRS approach of counting them as part of the proposed “PUA”. Major urban extensions there would dilute the policy of concentrating growth on the main urban areas, and would risk loading those towns with unsustainable development unrelated to local needs. With Burton Latimer the situation is similar, although it is more closely related to Kettering town, and development there will need to be carefully co-ordinated with that of the growth area.
- 6.26 It is generally recognised that Kettering has fewer options for further growth than the other linked growth towns. As elsewhere, we consider that the detailed locations and proposals for urban extensions should be progressed through the LDD process. The directions indicated in the draft SRS, east west and south of Kettering represent viable areas of search, with the east most likely to produce early results. While we note KBC’s concerns about front loading of the proposals, we do not consider it acceptable, in the context of the growth area, to assume a planning delay of seven years before the delivery of any housing from a new urban extension. It should be possible to bring forward a contribution from this source in the second half of the period 2001 – 2011. Overall, however, we propose reducing the rate of development for Kettering Borough to 550 per annum in the first five years. This takes account of the lower rate of completions (some 450 p.a.) achieved so far, and is a reflection of the fact that Kettering’s existing capacity is assessed as lower than that of Corby or Wellingborough. Our proposals also reduce the Kettering total for 2011–21 in line with the NCC’s proposal that any development of Corby across the boundary into Kettering Borough should be part of Corby’s allocation. The extent of any such development would, as noted above, be established through the proposed joint LDD.

Wellingborough and East Northamptonshire

- 6.27 At Wellingborough, the Borough Council of Wellingborough [BCW] points to the possibility of early gains from the proposed eastward extension of the town (“WEAST”), for which planning work has been proceeding. There was wide support for this proposal. Beyond that, BCW in common with the other local planning authorities argued that the directions for urban extensions should be determined through the LDD process and not detailed in the SRS. They were against westward extension of the town and argued that the total amount to be provided in urban extensions should be no more than 8,500 dwellings rather than the 11,000 proposed in the draft SRS, and that the total requirement for the Borough should be similarly reduced. It was suggested that the difference might be accommodated in East Northamptonshire, where Rushden, Higham Ferrers and Irthlingborough are proposed in the SRS as “urban Hubs”.
- 6.28 In East Northamptonshire, the District Council and a number of other participants noted the low provision of Northamptonshire Policy 1 for 360 additional dwellings per annum, compared with recent completion rates of over 600 and a significant reservoir of outstanding commitments and potential urban capacity. Developers and others also pointed to a need for the small towns and rural centres in the District for further development to maintain and enhance the services they provide.
- 6.29 The County Council’s proposal in PART111 responds to these issues by reallocating 2,200 dwellings from Wellingborough to Rushden, Higham Ferrers and Irthlingborough. We take the view that the precise amount of development allocated to those towns should be resolved through the LDD process. Furthermore, we have rejected, in paragraph 6.6 above, the idea that Rushden, Higham Ferrers and Irthlingborough should be treated as urban hubs within the growth area. Nevertheless, it is clear that these towns do have strong local development potential, both as centres for employment and services and for housing. We also accept the argument that District wide provision as low as 360 dwellings per annum would undermine the ability to plan for the local development needs of East Northants.
- 6.30 We conclude that the provision on a whole-district basis should be broadly as proposed by the County Council, but amended at Kettering to reflect our conclusion in paragraph 6.26 above. This translates to annual average provision for the four districts as set out in the table below. In keeping with our recommendations elsewhere, we have broken this down into five year periods, so as better to reflect the changing rate of development, particularly in the early period.

<u>District</u>	<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>
Corby	560	680	1060	1060
E. Northants	520	520	420	420
Kettering	550	810	630	630
Wellingborough	595	595	685	685
Total	2,225	2,605	2,795	2,795

The above provision would equate to a total of 24,150 additional dwellings in the period 2001 to 2011 and 27,950 in 2011 to 2021, some 1,300 lower overall than the draft SRS proposal. In line with our conclusion in paragraph 6.14 above, we also propose that the long term planning assumption should be that a further 27,950 dwellings would be provided in the period 2021 to 2031.

Transport

- 6.31 As we have indicated in Chapter 3 above (paragraphs 3.10-3.17) we consider the SRS needs to give far greater prominence to public transport provision and promoting modal shift in order to create sustainable communities. To match the emphasis given in the Part A Statement, we consider that the particular issues for Corby, Kettering and Wellingborough should be further brought out in Northamptonshire Policy 4. While much attention has been focused on a new railway station at Corby, it is equally important to increase public transport use for circulation within the town. The proposed urban extensions can provide a focus for this, and high quality, convenient public transport should be built into them from the outset. Similar considerations apply at the other growth locations. Our revisions to Northamptonshire Policy 4 recommended at **R6.1** include wording to give effect to this.
- 6.32 We comment at paragraph 3.18 above on the proposal for a Northampton-Wellingborough rail link listed in Part A, Strategic Policy 3. It is not clear whether there is any prospect of this proposal being implemented within the SRS time frame, or what its exact role within the growth strategy would be, or whether it is merely an aspiration at present. As an east-west link between two Northamptonshire growth centres it can be seen to be in sympathy with the strategy, but there is no suggestion about what traffic it will carry or what development, if any, may be dependent on its provision. We conclude that consideration should be given to including it in Northamptonshire Policy 7, but only if greater certainty can be established about its role, status and timing of delivery.
- 6.33 As with other lists of schemes, Northamptonshire Policy 7 should be brought into line with the latest advice from the SRA, HA and other authorities on status and timing. These conclusions are reflected in our recommendation **R6.3**.
- 6.34 The approach to rural service centres and smaller settlements over the whole of Northamptonshire is considered in paragraphs 5.31 to 5.34 above. Within north Northamptonshire, a number of respondents expressed concern that Raunds was the only settlement not mentioned at all in the settlement hierarchy set out in the SRS, despite being of a comparable size to those that were mentioned, and having local development needs and potential. In response EMRA accepted that a Rural Service Centre designation for Raunds might be appropriate. In keeping with the conclusions we have drawn in Chapter 5 above, we do not consider that the SRS should set out detailed policy for such small towns, but for completeness the Rural Service Centres, including Raunds, are listed in our revised Northamptonshire Policy 1 at **R5.2**.

Recommendations

R6.1

Amend Northamptonshire Policy 4 to read as follows:

Northamptonshire Policy 4: Corby, Kettering and Wellingborough

The Local Development Schemes for the local planning authorities of Corby, Kettering, Wellingborough and East Northamptonshire will together identify and provide for the timely preparation of an appropriate set of LDDs which will apply the principles for creating

sustainable communities set out in Strategic Policy 3 and put into effect the proposals of the SRS for North Northamptonshire, making provision for joint working where appropriate.

Within the overall provision made in Northamptonshire Policy 1, an increase of [37,800]* dwellings will be accommodated at the linked growth towns of Corby, Kettering and Wellingborough by 2021.

In examining future growth options, the longer term perspective of the SRS for a further 28,000 additional dwellings in north Northamptonshire for the period 2021 to 2031 should be borne in mind as an uncommitted planning assumption, subject to review at an appropriate future date.

Growth Locations

At all three towns the capacity of the existing built – up area to accommodate additional development will be utilised to the full, through measures to assess and bring forward surplus employment sites and other previously developed land and, particularly at Corby, through the opportunities for intensification and mixed use provided by regeneration and redevelopment. In parallel, proposals will be brought forward for sustainable urban extensions to provide for additional development at each of the three towns. Areas of search for such extensions will include:

North east, north west, south, south west and west of Corby;

To the east, west and south of Kettering;

To the east, north and west of Wellingborough.

All new sustainable urban extensions will be identified in LDDs and will be the subject of Area Action Plans.

Environment and green infrastructure

Urban extensions should be planned so as to ensure the continued physical separation of the three towns, and to prevent coalescence with smaller towns and settlements within and adjoining the growth area. Opportunities should be taken to enhance important existing environmental assets such as Rockingham Forest and promote the provision of new green infrastructure to enhance the attractiveness of the area and meet the needs of its population.

Transport

New development should be planned in conjunction with the transport schemes listed in Northamptonshire Policy 7 and other initiatives, so as to facilitate a significant modal shift towards public transport use, particularly in relation to urban extensions. As well as the new station proposal at Corby and other measures to improve access to rail services, high quality public transport services should be provided between and within each of the linked growth towns so as to connect key centres of housing, employment and service activities

Employment

The provision of housing on the scale set out in Northamptonshire Policy 1 should be monitored against a target of net growth in jobs in north Northamptonshire (i.e. Corby, Kettering, Wellingborough and East Northants) of about 43,800 additional jobs over the period 2001-2021.

Corby, Kettering and Wellingborough Central Areas

(retain existing headings and paragraphs)

Delete heading and paragraphs under “Urban Hubs”

Social Infrastructure

Replace the first and second bullet points with a new bullet point to read:

- Primary and Secondary Education: New residential development will be matched by primary and secondary school provision, whether through new build or expansion of existing schools, both within the existing towns and in urban extensions as appropriate.

Replace wording under bullet points Primary Healthcare Provision and Secondary Healthcare Provision with the wording proposed by the NHS in document PART 120.

Delete the bullet point “public transport” (replaced by new paragraph above).

*[The figure of 37,800 dwellings makes allowance for the 2,200 now assumed to be provided in East Northamptonshire. It has not been reduced to take account of local growth in Desborough and Rothwell and other locations previously proposed to be within the “PUA” but not within the three growth towns. The FSS is recommended to consider further reducing the figure of 37,800 to take account of this. See also recommendation **R4.5** regarding Strategic Policy 1.]

R6.2

Under the sub heading “Implementation”, delete Northamptonshire Policy 5 and replace paragraph 2.8 with the following:

The linked growth towns of Corby, Kettering and Wellingborough interact in various ways. There are also important relationships across the boundaries between these three Boroughs and East Northamptonshire District. In order to ensure that development is planned in a co-ordinated way, a joint LDD should be prepared involving the Boroughs of Corby, Kettering, and Wellingborough and East Northamptonshire District, but confined to those matters that need to be addressed jointly, because of their cross boundary nature. Relevant issues may include:

- the quantity and extent of any development of Corby into Kettering BC or East Northamptonshire area, and any other boundary crossing development;
- environmental issues and prevention of coalescence between towns;
- provision of green infrastructure of a strategic scale, including the possibility of a green corridor along the Ise Valley, linking the Nene Regional Park and the Rockingham Forest area;
- social infrastructure provision and other development serving more than one town in the area;
- transport linkages throughout the area

R6.3

Revise the Table at Northamptonshire Policy 7 to reflect the latest available information from the SRA, HA and other responsible authorities on the status and timing of schemes, and to delete items that have been completed. Consider adding the Northampton-Wellingborough rail link, provided reasonable certainty can be established about its status and timing.

CHAPTER 7: MILTON KEYNES

- 7.1 In our view the growth-related issues affecting Milton Keynes and Aylesbury are quite different. It would therefore be clearer in presentational terms if the material relating to these two towns were to be disentangled, and we recommend accordingly (**R7.1**).

Introduction

- 7.2 Milton Keynes, having grown steadily in the past 30 years, and as the focus of the original growth area proposal in RPG 9, attracted widespread comment both in favour and against the SRS proposals. One view was that the original new town was substantially complete and should not be allowed to grow further. It was argued that the concept of the city, particularly its dependence on the motor vehicle, was outdated and further expansion was unsustainable. Many people who accepted that Milton Keynes would continue to grow expressed concerns about the effects of what was proposed. Others felt that the SRS gave an insufficiently clear long term picture to enable proper planning of further expansion. Questions were raised about the level of future housing provision that Milton Keynes could support, and how this should be phased, given the low rate of completions in recent years. As at the other growth locations, concerns were expressed about the provision of social infrastructure and key transport facilities and the relationship between jobs and housing growth. Issues particular to Milton Keynes included the unique nature of the layout and green infrastructure of the town, the directions for growth indicated in the SRS, and the proposed southern by-pass.
- 7.3 All the above issues were discussed in Matter 5A of the Examination. Many of the points raised concerned specific local detail more appropriate to the local plan. While this was often very informative as a context for considering the strategic matters, we have not sought to recount or reach conclusions on these matters of detail, which are inappropriate for the SRS. What is important is that the SRS should not pre-empt matters which are appropriate to the local level - a point which is addressed in our conclusions and recommendations. Note that our recommendations are listed at the end of this chapter in the order of the SRS paragraphs to which they relate, not the order in which they arise in these paragraphs.
- 7.4 During the Examination, we received a copy of the Interim Report by Keith Holland, the Inspector who conducted the Public Inquiry into the Milton Keynes Local Plan, which ended in March 2004. This interim report, which was available to participants as Document PART97A, was provided as relevant background information to the Examination. We did not see it as determining any of the medium and long term issues that were before us, and nor did we see it as our role to second guess the Inspector's findings. The interim report does provide useful context to which we refer in the paragraphs below.

The Overall strategy for Milton Keynes

- 7.5 The SRS proposes that Milton Keynes: "should embrace its growth potential and continue to mature as a major and influential city, particularly through the substantial development of its central area, supported by a significantly enhanced public transport system to facilitate and support growth in major development areas." (SRS 1.2, p9). The Part B statement expands upon this, proposing selective urban intensification,

urban extensions for 14,600 homes to the west, south west and east of Milton Keynes, and stressing the focus on public transport.

- 7.6 On the overall question of whether Milton Keynes should continue to grow, we considered in Chapter 3 the regional background and issues of the need for growth. There we conclude that, in regional terms, new growth in the Milton Keynes Sub-Region is justified. We see the force of the argument, however, that the previous approach to development is now felt to be unsustainable and should not be perpetuated. For many environmental organisations and others Milton Keynes, which has grown primarily on greenfield land with low intensity of land use and dependence on the car, is the antithesis of sustainable development. Indeed it is clear that starting now, Milton Keynes would not be built as it is. But as it now exists, one of the key concerns for the Council and all those concerned with its future is how it should evolve from the archetypal late 20th century city into a sustainable 21st century one.
- 7.7 We accept the view that significant growth will be an essential element of the change that Milton Keynes now needs to make. Improving and expanding the city's public transport system, and getting people to use it, requires intensification of activity, particularly in Central Milton Keynes, which in turn presupposes continued growth in the economy and population. The town has a vigorous economy and employment will continue to grow anyway, bringing with it a need for more housing if net in-commuting is not to increase, and if the needs of second and third generations are to be met. Currently, as discussed below, Milton Keynes is failing to produce housing at a rate which anywhere near matches its growth in jobs. We also recognise that while its sustainability in transport terms may need to be improved, in many other respects Milton Keynes already delivers sustainable development, for example in terms of urban greenspace and quality of life for its residents.
- 7.8 Altogether the vision of a major new phase of growth at Milton Keynes based on sustainable development principles is a persuasive one. There is no shortage of effort going into shaping that vision, from MKC, the Economy and Learning Partnership, the Milton Keynes Forum and many other organisations. There was a sense of disappointment that the SRS does not adequately convey the vision that is required. Following the Public Examination, although we believe it can be substantially improved the final SRS will still not articulate the specific and long term vision needed to govern the next phase of the city's development. For one thing, there is insufficient local ownership of the strategy. The amendments we recommend below are, however, intended to give a clearer strategic steer for the evolution of Milton Keynes over a 30 year period. On this basis it will be for MKC, in partnership with the many local and regional organisations which are clearly eager to contribute, to put a fully fledged strategy in place.
- 7.9 The key issue for many is the role of "sustainable urban extensions" in the growth strategy. For CPRE and a number of others they are unwelcome and unnecessary, and potentially damaging both to the strategy for concentration and urban renaissance and to the identity of nearby small settlements. CPRE call for the strategy to emphasise the need to maximise the development potential of the existing urban area before considering development of greenfield land. The development industry tends to view the greenfield extensions as essential, and calls for other locations to be considered, and for a range of sites to be made available.
- 7.10 The scale of growth envisaged in the strategy would clearly require some extensions on greenfield land, as well as exploitation of the potential within the existing urban area. What is in our view central to the strategy is that new urban extensions should not undermine the achievement of the objectives for Central Milton Keynes and other parts

of the urban area. They should complement these aims, and that of improving public transport and reducing car dependency. If they are to merit the label “sustainable”, urban extensions must also be provided in such a way as to address the environmental, social and other concerns raised. Our recommendations **R7.4 and R7.5** below suggest how the Part B statement should be strengthened on this aspect. We consider the question of directions for growth, and their impact at paragraphs 7.35 to 7.45 below.

The level of growth proposed

7.11 The draft SRS proposes that Milton Keynes should provide an additional 35,100 dwellings between 2001 and 2016, divided as follows:

<u>2001 – 2011</u>	<u>2011 – 2016</u>	<u>2001 - 2016</u>
24,100	11,000	35,100

As SEERA explained in document PART 103, a percentage split of 34:31:35 over three decades was adopted for Milton Keynes in the growth study. This split implies that a further 11,000 dwellings would be added in the five years 2016 – 2021, with 24,900 in the period 2021 – 2031 to achieve the total potential of 71,000 over 30 years (from MKSM Study, table 6.2). The proposed housing provision of 35,100 to the year 2016 would be matched by 31,950 jobs. The latter is the MK component of the 44,550 jobs for Aylesbury Vale and Milton Keynes given in PART103.

7.12 Table 1 (of document PART103) shows that at Milton Keynes existing commitments, expected windfalls and proposed intensification are expected to achieve some 27,150 dwellings, leaving an additional 8,000 to be found to meet the SRS proposed total to 2016. The implied annual rate of housing increase (2,410 from 2001 to 2011 and 2,200 thereafter), compares with the rates achieved under the Development Corporation in the 1970s and 1980s. Current housing completion rates are much lower and would need to roughly double to achieve the SRS proposals.

7.13 The above figures relate to the whole MKC area, and include 1,200 homes in the rural area in 2001 to 2011. Conversely, they do not include 2,500 homes proposed for expansion of Milton Keynes into Aylesbury Vale District after 2011. Except for the inclusion of 1,200 homes in the figures, the rural areas are not the subject of any policy or proposals in the draft SRS, although we note that MKC suggested that a further 600 homes be provided for the period 2011 to 2016. The appropriate level of development for Olney and the other rural parts of MKC’s area were not discussed at the Public Examination. We therefore make no comment on the rural provision, which appears to be something that should be left to the local plan/LDF process. We address ourselves to the provision for growth at Milton Keynes urban area, including the 2,500 dwellings assumed to be provided outside MKC’s boundaries. For this the SRS proposes 22,900 additional homes from 2001 to 2011 and 11,000 from 2011 to 2016.

7.14 To understand the context for these proposals it is necessary to consider the employment growth to which they relate. From the RAs’ document PART103, an increase of 31,950 jobs is shown from 2001 to 2016 in the preferred option “high growth” scenario. This would correspond to an average annual increase of 2,130 jobs. MK Chamber, MK Economy and Learning Partnership and others argued that this represents a severe cutback compared with over 3,930 jobs annually achieved in the years 1991 to 2001 (from EXAM 43, Table 7). DLP pointed out, with reference to their document PART84 that the unmodified “trend” projection for Milton Keynes in

the Growth Study shows an increase of 46,740 jobs between 2001 and 2016, an annual average of 3,116 (MKSM Study Table 5.1).

- 7.15 We have commented in paragraphs 3.33 to 3.36 on the reasonableness of the MKSM employment assumptions overall. In the case of Milton Keynes, while past strong employment growth is an indication of likely further growth, it may be realistic to expect future growth to slow down from the very rapid rates of the past decade. A further factor is that Milton Keynes currently has a net in-commuting balance, which would increase significantly under the unmodified projections (MKSM Study Figure 5.2). In order to prevent that occurring, any job growth at Milton Keynes needs to be accompanied by an equivalent increase in housing. Nevertheless, it may be argued that the job growth assumptions for Milton Keynes in the SRS are conservative in the light of past performance.
- 7.16 As noted in paragraph 7.11 above, housing output at Milton Keynes would need to increase very markedly above recent levels in order to realise the SRS proposals. To paraphrase the analysis, it seems that for Milton Keynes the SRS is looking for a doubling of current annual housing output, to match job growth which is little more than half the rate of the 1990s. This apparent paradox could be argued to support the case for either much higher or lower levels of growth, or that the SRS is a workable compromise for delivering sustainable growth. To reach a conclusion we now turn to the housing growth aspect.
- 7.17 It is clear that raising annual completion rates from around 1,200 in the most recent years to double that, as required by the SRS, will be very challenging. However, failure to provide for housing at this level runs the risk that employment and housing growth will get seriously out of balance, adding to housing pressures, increased commuting and other adverse effects, none of which can be considered sustainable. An alternative view evident in some of the representations is that employment growth should be restrained in order to limit the adverse effects of development. We doubt whether limiting job growth to the extent that would be required would be feasible, given the generally buoyant nature of the Milton Keynes economy. Nor would it be supported by business, Government and other agencies concerned with the economy. We conclude that the only viable approach is to seek a level of growth which is deliverable, which keeps employment and housing growth reasonably in balance, and which can be accommodated sustainably. We accept that this is what the draft SRS is trying to do. In the light of all the evidence before us about the strength of the economy and the challenge of achieving higher housing output, we conclude that it would be unrealistic to adopt a significantly lower assumption about job growth, or to plan for much higher housing provision than that proposed in the draft SRS. We do not recommend any change to the SRS on this aspect. We comment below on how this overall level of growth should be accommodated.

Delivery and phasing

- 7.18 It is worth quoting the submission of MKC that “achieving completion rates above 2000 a year on a consistent and sustained basis is clearly necessary – but it will require active intervention, promotion and greatly increased funding. It will take time to put the necessary pre-conditions in place and for them to take effect”. This in our view is an accurate assessment of the challenge which the SRS poses. At **R4.5** we make recommendations for strengthening the SRS on issues concerned with delivery and resourcing by including the commitment to adequate resourcing within Strategic Policy 1.

7.19 As regards housing delivery rates, SEERA proposed a revision of the draft SRS to reduce the housing provision at Milton Keynes in the period 2001 to 2011 to reflect the fact that completions since 2001 have been running at only about half the SRS implied annual rate of 2,410. The shortfall, amounting to 3,655 over three years, would be added to the final five year phase, 2011 - 2016. This proposal, in document PART141 came too late to be discussed at the Examination, but would, we assume, meet the concern of MKC that it was not realistic to expect the shortfall to be made up earlier. PART141 attracted fierce criticism in several further submissions from development industry participants, who argued against the proposed back-loading of provision, and claimed that higher rates of completions could be brought forward earlier than SEERA assumed. They argued that the Local Plan Inspector, in his interim report, accepts that the enhanced levels of growth required by the SRS can be achieved over the plan period to 2011. Pegasus Planning (Document PART 179) referred to information supplied to the Local Plan Inquiry showing forecast completions rising above 2,400 by 2005/6 (or 2,700 including the rural area) and staying above 2,500 through to 2011. The House Builders' Federation [HBF] argued for the SRS proposals to be kept as they are, in effect suggesting that the whole shortfall should be recovered by 2011.

7.20 It is helpful to consider the issue of rate of delivery by breaking the provision into five year rather than 10 year periods, as we propose in all the growth towns. The SRS proposal is represented as evenly divided into five year periods at line a) in the table below. However, for the first three years, completions are known, totalling 3,575². A rapid acceleration from the current rate of 1,200 per annum through, say, 1,825 in 2004/5 to 2,500 in 2005/6 would give a total of 7,900 for the five year period 2001 to 2006. Thereafter, if one assumed that having once achieved the higher rate, output is increased still further to redress the backlog by 2011, this gives the profile at line b) in the table below. An alternative assumption would be to spread the backlog over the period to 2016, as shown at line c) of the table, giving 2,600 additional dwellings per annum for the urban area for the period 2006-2016 to achieve 33,900 for the fifteen year period as proposed by the SRS. The SEERA proposal in PART141 of adding the entire backlog to the final five years is illustrated at line d) of the table below.

	<u>2001-2006</u>	<u>2006-2011</u>	<u>2011-2016</u>	<u>2001 - 2016</u>
a). SRS (inferred)	11,450	11,450	11,000	33,900
b). 2006/11 recovery	7,900	15,000	11,000	33,900
c). 2006/16 recovery	7,900	13,000	13,000	33,900
d). PART141	7,790	11,450	14,660	33,900

N.B. All figures relate to the MK urban area only, including any dwellings provided in AVDC in the final period. (For the rural area the SRS would add 600 to each of the first two periods, and MKC have suggested a similar amount for the third).

7.21 One must recognise the reality that three years have passed with completions at less than half the level called for in the SRS. In practice it will be the issues of infrastructure, funding and delivery that determine how quickly housing output in Milton Keynes can be raised. Given the high profile currently being attached by

² From Table 1 of PART 141. We note that MKC/EP completion forecasts submitted to the Local Plan Inquiry and cited in Table 1 of PART179 (ii) give higher estimated completions for 2003/4 which would add 240 to this total. It is also assumed that these figures exclude the rural area, which is shown in PART179 as having 175 completions in 2001 – 2004.

Government to achieving a step change in housing delivery, and the new LDV, it is possible that this will bear fruit in an early spurt which recovers the backlog by 2011, as shown in line b) above. It must be recognised, however, that this implies maintaining output of 3,000 dwellings per annum over five years, a rate which has never been exceeded in the Milton Keynes urban area. After that, output would fall back slightly to the level proposed in the SRS. It may well be that the profile of housing delivery turns out to be more even, as in line c). “PART141” on the other hand shows a surge to a higher level in the period beyond 2011 to recover the backlog from earlier years. SEERA did not advance any particular reason why this should occur after 2011, but the general proposition is that this allows more time to get the pre-conditions in place. This option too involves maintaining the unprecedented level of 2,932 dwellings per annum over five years, from 2011–2016.

- 7.22 In conclusion, we take the view that given that the backlog represents additional housing that is urgently wanted, provision should be made for it to occur at the earliest possible time. It is relevant, but not decisive, to note that the Local Plan Inspector considers that the SRS rate of development can be provided for up to 2011. If, in the event, output does not reach that level, the Local Plan/LDD provision made for it would remain available to be implemented as soon as it proves possible. The alternative approach advanced in PART 141, if it meant lower provision for 2001 – 2011 in the Local Plan/LDD, would rule out the possibility of recovering the backlog any more quickly, even if the necessary conditions could be created. We recommend (**R7.6**) that the provision for MK urban area should be phased as in line b) of the table above. Our MK figure includes the 2,500 dwellings (or whatever other figure is established through the LDD) expected to be built in Aylesbury Vale post-2011. As AVDC’s provision for its area is included in Table B3, the need for Table B1 disappears, and we recommend it is deleted.

The longer term

- 7.23 We have concluded elsewhere that the SRS should give fuller guidance for the longer term. This is particularly important for Milton Keynes, where the major investment in public transport improvements and intensification in Central Milton Keynes needs to take place against a background of reasonable certainty. As noted in paragraph 2.33 above, we see no reason why the SRS provision for Milton Keynes should not run to 2021 as it does elsewhere in the MKSM growth area. That being so, the assumption should be that the broad rate of development of 2,200 additional dwellings per year should be maintained for 2016 to 2021. This would give a total for the urban area of 44,900 additional dwellings from 2001 to 2021. (Adding 120 per year for the rural areas would give 47,300). Our recommendations therefore include provision for this further period
- 7.24 For the period beyond 2021, there are also many calls for the growth strategy to set a long term target. The MKSM Study gives the potential for Milton Keynes as 71,000 additional dwellings over the period to 2031. On the basis of our proposals above, for the whole of MKC’s area some 23,700 of this potential (71,000 – 47,300) would remain to be realised in the final decade 2021 to 2031. This would represent a further ten years at the high levels proposed in the SRS. As indicated in the MKSM study it would leave Milton Keynes with a population of over 300,000 in 2031, as a city of regional importance. This we believe corresponds to a widely held aspiration. It will provide a platform for Milton Keynes’ major economic and cultural development, for the qualitative and quantitative change it is seeking in higher education and other fields,

and for major investment in its public transport system, in East-West Rail and other infrastructure.

- 7.25 We recognise that not everyone shares the vision outlined above. There are concerns to be addressed about the physical extent of Milton Keynes and its wider impact. Many would no doubt prefer to have better public transport and other improvements to sustainability without Milton Keynes growing on the scale envisaged, or as a prerequisite before growth is allowed. We do not see that as realistic. Rejecting the idea of longer term growth, or leaving those decisions to be made at a later time, risks losing out on the strategic decisions to be made, for example about East–West Rail, and the leverage they bring for more sustainable development. In this context, we do not accept the argument of CPRE that any growth beyond 2016 should be considered in five-yearly increments through a review of RPG/RSS9. Genuine strategic choices are not available if decisions are confined to the short term in that way. What is important, however, is that long term growth is pursued with the aims of sustainable development forming an integral part of the strategy.
- 7.26 These conclusions are reflected in our recommendation **R7.4** below, for including a new section in the Part B statement dealing with the 2031 time horizon.

Environment

- 7.27 Many respondents, including residents, developers, environmental organisations and other bodies, drew attention to the unique environment of Milton Keynes. As we know from our own visits, the extensive areas of greenspace and water spaces, and the sheer number of trees along major thoroughfares, make Milton Keynes totally unlike any other British town of comparable size. We also noted that many of the spaces are well used as a cultural and recreational resource, and provide wildlife habitats within the urban area. As DLA pointed out, Milton Keynes is unique in providing for its green infrastructure needs within the urban fabric, rather than looking to places outside it. This environment is clearly highly prized by Milton Keynes citizens, but it is not without its critics. The extent of green and water spaces is born of necessity, to deal with issues of flooding and surface drainage. The open layout, coupled with relatively low densities even in the centre and a generously planned road system may be seen as a profligate use of land, making even local trips longer and more conducive to car use than in a more compact urban area.
- 7.28 The proposed corridors for intensification were criticised, both on grounds of practicality and as posing a threat to existing urban greenspace. We have no doubt that MKC will pursue this in a practical and sensitive way. Equally, given the low intensity of land use in Central Milton Keynes, including the space used for car parking and a virtual absence of high rise development, there will clearly be continuing scope there for intensification over time, particularly as older developments wear out. Urban extensions will also need to be planned with care. While regard should be had to Government guidance on density and more sustainable forms of development, it would be unfortunate if an attempt to minimise land take resulted in breaking the continuity of existing “green corridors”, or providing new development with an inferior environment. Inevitably the same issues that dictated the existing layout of Milton Keynes will apply to some degree, and we note that the consultants took this into account when considering the overall land requirements for growth.
- 7.29 As well as needing to respect the existing urban fabric and address green infrastructure needs within Milton Keynes, the effect of the proposed growth on neighbouring areas attracted a large volume of comment. A key concern of the rural Parish Councils was

the prospect of coalescence of small villages into urban extensions, and of increased traffic. Typical of many individual letters was a plea that having moved to a village to get away from a city people did not want a city moving towards them. MKC and others pointed out that Milton Keynes had a good record of sensitivity in planning development so as to respect the character of existing smaller settlements. They expressed a willingness to work with neighbouring communities to ensure that concerns about coalescence were addressed.

- 7.30 Many participants called for the SRS to give clearer guidance on these matters. CPRE suggested that the strategy should include a proposal to establish a green belt around Milton Keynes. It could be argued that a number of the purposes of green belt would be served. However, to accept that argument implies that without a green belt unrestricted sprawl, the merging of towns and encroachment of the countryside are a real and serious threat. Planned growth of the urban area at Milton Keynes, which would of course need to be allowed for in establishing the extent of any green belt, should not lead to sprawl and coalescence. From our own observations, the urban edge of Milton Keynes is well policed in planning control terms, and we see no reason to doubt that this will continue through a further phase of planned growth which will clearly determine the new limits to Milton Keynes. We therefore conclude that the case for a green belt is not strong.
- 7.31 As we have concluded in Chapter 3 above, we consider it a shortcoming of the draft SRS that it relies entirely on guidance elsewhere to address environmental aspects of the strategy. The recommendations we make in Chapter 3 for strengthening Part A rectify this as regards the general environmental concerns. To complement this, we conclude that it would be useful for the Part B statement to make brief reference to the issues that need to be addressed in providing for new growth at Milton Keynes. This is reflected in our recommendation **R7.5** for revision of Policy 1 and **R7.4** dealing with the longer term. For the detail, however, it is essential that this is handled locally with involvement of the relevant authorities and local bodies.

Employment

- 7.32 We have already commented in paragraphs 7.13 and 7.14 above on the employment assumptions underpinning the strategy. In keeping with the approach we recommend elsewhere, we consider that the employment assumptions for Milton Keynes should be stated in the SRS, to be used for monitoring its implementation and the housing/jobs balance. SEERA have also suggested this in their document PART141. We also conclude that, like the housing figures, the jobs guideline should extend to 2021 rather than 2016. Using the overall dwellings:jobs ratio of 1:1 assumed in the MKSM Study (Table 6.2), the appropriate monitoring figure for Milton Keynes at 2021 would be 44,900 jobs in the urban area. This figure is included in our revision of Policy 1 at **R7.5** below.
- 7.33 The draft SRS gives no guidance on the location of employment related development, other than the statement in Policy 1 (p40) that there is sufficient planned supply to meet forecast demand to 2016 and that both quantitative and qualitative aspects of supply and demand should be kept under review. Unobjectionable as these statements may be, they led to various calls for fuller guidance to be given. Although it may be true that employment land supply overall is in balance, the Chamber, SEEDA and others stressed that attention needs to be given to ensuring that a suitable range of type and size of premises is available to meet the needs of different businesses. This can be particularly important for small and newly forming businesses. It would not do,

however, to specify what is required too precisely, particularly in a strategic document, since flexibility in responding to changing demand is also one of the key features stressed by business representatives.

- 7.34 The Part B Statement gives no locational guidance for employment development in Milton Keynes, although this will clearly be an important factor to complement the enhanced public transport system. The obvious locations for new employment are Central Milton Keynes together with the older centres of Bletchley, Wolverton and Newport Pagnell. Other suitable locations will be places with good public transport accessibility in the proposed urban intensification corridors, and in the proposed urban extensions, again at nodal points on the public transport system. This may all seem obvious, in line with existing guidance in PPGs and RPG9, and it is clearly the approach that MKC will be following in implementing the SRS. Nevertheless we agree with the many participants that felt the SRS should be more explicit on this issue, and this is reflected in our recommendation **R7.5** for amending Policy 1.
- 7.35 As elsewhere, knowledge-based sectors are seen by SEEDA and others as central to the further development of the economy. They point out that literacy, numeracy and skills development are relatively poor in Milton Keynes, and feel the strategy does not make enough of these issues. We recommend (**R7.8**) some strengthening of paragraph 3.5 (p42) on this issue.

Directions for Growth

- 7.36 Perhaps the most controversial aspect of the SRS for Milton Keynes was the proposal for three urban extensions west, south west and east of the city, with specific locations indicated on the diagram, and the suggestion (at paragraph 2.7 on p40) that the southerly, south easterly and easterly directions would be appropriate to look for further growth post 2016.
- 7.37 The SRS proposes that 19,300 additional dwellings or 57% of the total growth to 2016 at Milton Keynes City should be accommodated through selective urban intensification and the completion of developments already in the pipeline. We see no reason to dispute this, as it appears to relate to up to date assessments by MKC. Higher densities and the provision of more smaller units, together with further opportunities for intensification at Central Milton Keynes may in due course offer further increases within the urban area, but the constraints of the existing urban fabric and greenspace also need to be recognised. We therefore consider it would be unwise to rely on this source for more housing in the period to 2016. This leaves a further 43% or 14,600 to be provided in new urban extensions as proposed in the SRS.
- 7.38 Beyond 2016 it is clear that urban extensions will play a major role in providing for growth to 2021 and 2031. We consider it important, however, that urban intensification is also regarded as a continuous process. As well as regeneration of the older centres, there are likely to be other opportunities, particularly for increasing the residential element of Central Milton Keynes, as noted in our comment at paragraph 7.27 above. In our recommendation **R7.4** for giving fuller long term guidance, we stress the need to maintain a balance of continued change within the urban area and extensions to it. This will require further policy development in the long term strategy which we recommend and in further Local Plan/LDD reviews. We do not therefore attempt to quantify the requirement from urban extensions post-2016. It is clear, however, that the options need to be addressed on a longer time horizon than 2016, and we seek to do this below.

- 7.39 The SRS proposals include the four expansion areas (broadly north, south, east and west) from the Local Plan together with the three proposals preferred for additional development to 2016 in the GAA for Milton Keynes and Aylesbury. These three locations are to the west, immediately north of the Local Plan “Western Expansion Area”, to the south west between the A421 and the railway line to Oxford, and in the east, north of the Bletchley to Bedford railway line and flanking Wavendon. All three proposals attracted local objections, particularly the last where residents expressed concern about Wavendon being encircled by development. MKC argued that sensitive planning would retain the essential character of Wavendon and that the area around Wavendon House would not be developed. Many of the objections were linked with concerns about the proposed southern by-pass route which, on the spatial diagram, ends with an arrow in the middle of the proposed development area. We comment further on the by-pass issue in the next section.
- 7.40 Other objections were raised by many landowner and development interests to the omission from the SRS of various alternative sites (although the Examination was not considering sites, it was sites that these objectors were promoting, several plying their case in great detail). In the assessment that led to the SRS proposals, the GAA Figure MK4 included a number of arrows around the western and southern edges of the urban area, as well as the eastern “strategic reserve area” from the local plan as “Directions for Development” for 2016 – 2031. The draft SRS, not looking beyond 2016, did not include these. As DLA succinctly put it on behalf of developers: “we want our arrows back”. Other arrows were also sought, however, eastwards beyond the M1, both close to Newport Pagnell where the GAA had assessed two possible areas, and further south near Junction 13 which, it was argued, had been left out of the assessment because it went across the boundary into Bedfordshire.
- 7.41 In the Interim Report on the Local Plan, the Inspector has considered the detailed objections and arguments relating to the various sites before him and made a judgment as to the best options for meeting the SRS requirements up to 2011. Further, to go some way towards ensuring provision for 10 years from adoption of the Local Plan, he has indicated directions for growth beyond 2011. We make no comment on the Inspector’s judgements, as it is not for us to consider the local detail. What is clear is that as a result of the Local Plan process, proposals for providing SRS levels of growth at an early stage are available.
- 7.42 It is equally clear that, while the quantity of development required may be delivered by the directions of growth proposed in the SRS up to 2016, further options will need to be considered if growth is to continue to 2021 and beyond, as the SRS clearly envisages. We have already accepted that the SRS should provide firmer guidance for the medium and longer term. We therefore consider that it is necessary to re-introduce further spatial options, in addition to the three locations which have emerged as “front runners” from the GAA process. However, it is important that the SRS does not pre-empt the local plan/LDD process by determining specific locations at this stage. A process similar to that which has just been gone through for the Local Plan to 2011 will need to be repeated more than once to plan in detail for development to 2021 and eventually 2031. To guide that process we consider that the long term vision called for by MKC, and which we endorse, is essential. Part of that vision must be the broad directions for growth which shape the future of the city. We conclude at paragraph 7.7 above that the SRS will not provide that vision, but should provide the strategic steer for it.
- 7.43 Constraints of various kinds apply on all sides of the existing urban area. To the north it is generally recognised that there is little scope because of floodplain issues. At the northern edge of Milton Keynes the predominant concerns are with regeneration and maintaining the character of the older settlements of Stony Stratford, Wolverton and

- Newport Pagnell. To the west we note there are local landscape constraints (and differences of view between authorities), all along the southern edge the concerns are about coalescence and the character of the existing settlements of Newton Longville, the Brickhills, Woburn Sands and Aspley Guise, while to the east the issues are the adverse effects of the M1 and the difficulties of development crossing it (and the administrative boundary into Mid-Bedfordshire).
- 7.44 Whilst these constraining factors apply, there are also arguments that possibilities exist for accommodating development in an acceptable way in all these directions. For example it is argued that development to the west could occur whilst retaining areas of ancient woodland and without impact on Whaddon village. Sensitive local planning would avoid landscape impact and coalescence in the southerly directions. In relation to the M1, noise and other impacts can be mitigated and, it is argued, its accessibility makes this a good location for employment uses. The GAA makes one set of judgements about the options, and these are reflected in the “arrows”. These are not the only possible conclusions, however, and some are hotly disputed.
- 7.45 In the light of the strategic nature of the Public Examination, we are not in a position to decide upon specific locations for growth. Although we have seen a wealth of local detail for some of the options, none of this was discussed, and nor should it have been. We conclude, however, that there are sufficient options meriting detailed local examination to provide for development to meet the growth levels proposed in the SRS. We further conclude that the SRS should identify these options as areas of search rather than as proposals for growth. The areas of search should include the western and southern edges of the built up area of Milton Keynes, as reflected by the GAA “arrows” but also eastwards and south eastwards, including east of the M1. They will need to be further evaluated in terms of their ability to meet the objectives of the SRS, including environmental performance and access to public transport, as well as local constraints and circumstances.
- 7.46 It is important that these areas of search are properly explained in the SRS. They are the basis on which work should go forward: (a) to establish the directions for growth in the medium and longer term vision for Milton Keynes and, (b) to prepare a new LDD reviewing the Local Plan and making specific proposals for development beyond 2011. Both exercises should involve Mid-Bedfordshire and Aylesbury Vale District Councils. This does not presume that growth will necessarily be on their territory, but it will ensure that options involving land or having an impact in their area are fully considered. There will also need to be full involvement of the public, business and local organisations. These conclusions are reflected in our recommendation **R7.2**.

Transport

- 7.47 For Milton Keynes the transport strategy has begun to emerge more clearly than at most other growth towns in the SRS. Clearly the strategy is the result of much work at local level, including the Faber Maunsell study, and work continues on developing it. The SRS appears to be not so much proposing the transport strategy as illustrating it with reference to the growth proposals, showing how the two relate in spatial terms. The basic objective of strengthening public transport and reducing car dependency, by developing a high quality local network accompanied by intensification and development in locations served by it, is widely supported. There were, however, also arguments that significant changes in travel habits and modal shift would be hard to achieve. One of Milton Keynes’ advantages, certainly from a business perspective, is the ease of accessibility and movement by car, compared to other towns and cities. It is

hard for a city designed for car use suddenly to convert to other modes which, while more sustainable, are still not fashionable.

- 7.48 Clearly a high quality public transport system is essential. There may be limits, however, to how far it will go in reducing car use for many dispersed trips for which the grid road system is so well suited. It may be that, as the town evolves, further lateral thinking will suggest ways of capitalising on the ease of movement it offers, to make personal transport more sustainable. No doubt there have been many suggestions over the years for taxi systems, shared electric vehicles and the like, and there are likely to be more. Such innovations could be more adept than the conventional bus for penetrating the residential areas and serving diffuse personal trip patterns. One possibility is that they could in future, as part of the strategy, complement and reinforce the primary public transport system rather than undermining it, as continued motor car use would tend to do.
- 7.49 In the meantime, we take the view that the basic strategy of immediately developing an upgraded city-wide core bus network, and then proceeding with east/west and north/south mass transit corridors is sound. It seeks to ally development and intensification with creating new standards of quality and accessibility on public transport. Many people have their own views of the detail of the Faber Maunsell study proposals and the ultimate options for converting buses to higher grade systems. Ideas also vary on what are the best routes, as evidenced by criticisms of the cruciform network (which was given various other names) depicted in the SRS diagram. We have no improvements to offer, the important thing being that MKC and its partners get on with developing and implementing the strategy.
- 7.50 Park and Ride is seen as an important part of achieving more sustainable transport in Milton Keynes, although one view is that it can also encourage car travel. Four Park and Ride locations are identified in the SRS diagram, but confusion reigned as to their purpose as two of them were linked in Policy 1 (p40) to Parkway stations on the East-West Rail line at Newton Longville and Junction 13. Park and Ride as we understand it is proposed to provide access into the city from the M1 and other roads by way of the public transport network. The purpose of the proposed East West Rail Parkway stations was less clear, since it could be either to facilitate access to Bletchley and Central Milton Keynes by local rail, or for rail trips from the area towards Oxford and Aylesbury, and eastwards to Bedford and possibly beyond. This clearly needs more thought. Our recommendation **R7.5** for revising Policy 1 distinguishes more clearly between urban Park and Ride and Parkway stations which form part of the E-W rail proposal.
- 7.51 The E-W rail line itself is clearly seen by many as a key feature in the strategy. Our views on this proposal are given in Chapter 3 at paragraphs 3.19-3.23. In the context of Milton Keynes, we see its importance as improving east-west connections generally, rather than as an essential part of the urban public transport system. There is clearly scope however, given the frequency of stops on the line, for it to be used for work and other local trips. No doubt many of those in the villages it serves would welcome the service, but not necessarily the growth that would improve its viability.
- 7.52 Strategic highway issues for Milton Keynes centre upon improvements to the M1 and access to it, and the proposed southern by-pass. The HA made clear the latest position with regard to timing and delivery of improvements to the M1. These, particularly improved access at Junction 13, are seen as crucial underpinning on which the growth strategy depends. Nevertheless, it is clear that growing traffic volumes remain a problem for the future, and the strategy needs to succeed in developing public transport use for strategic as well as local movement if development is to be sustainable. Many

representations, notably from developers and business, argued that improved access to the Motorway remained a priority, and there was strong support for “Junction 13A” to provide more direct access from the centre of Milton Keynes. We note that the HA is not currently in favour of this, because of congestion problems, and the adverse effects of carrying local traffic on the Motorway. This is in our view another area for further work, and needs to be tackled jointly with sorting out more local traffic issues, in particular east-west movement.

- 7.53 The single proposal which attracted the largest number of individual representations was the Milton Keynes Southern Bypass. It is shown with an extraordinary degree of precision on the Part B diagram, notwithstanding the fact that in Table A (p44) its status is only “proposed for investigation”, and implementation is for 2011-16 and, for the westernmost section, beyond 2016, and no formal procedures have yet been begun. Not surprisingly in our view, reaction to the proposal was intense and it was difficult to identify who originally made it, though it appears to stem from the MKSM Study and the GAA. The line of the route at the western end, looping round Newton Longville, has fuelled worries about that settlement being engulfed as part of the extended urban area. The route then turns into the urban area at Fenny Stratford along the old A5, making it less of a bypass and more part of the urban road system, and then veers off along grid road H10. Finally, it heads east from a roundabout clearly identifiable to local people, especially the parents of children at local schools, and ends in an arrow at the development area proposed near Wavendon, although from its description in Table A1 (p44) it is clear that its ultimate destination is Junction 13.
- 7.54 There appears to be little justification for the specific proposal shown in the draft SRS, ahead of the investigations that are needed. We have no hesitation in concluding that it has no place in a strategic plan like the SRS and should be deleted, and we recommend accordingly **R7.7**.
- 7.55 The real problem is that a strong demand for east west movement by road already causes problems of through traffic on the A421, which are likely to increase. Present connections are ill equipped to carry that movement, even with improvement. Public transport solutions, including the proposed mass transit network and east-west rail, ought to make some impact on the problem, and everything should be done to facilitate this. But this will not entirely solve the problem of road access, particularly across the southern part of Milton Keynes, from east to west. A major part of that problem is the key attractor/generator of Junction 13. Not surprisingly, local people have devised their own solution to the highway problems they experience every day. That solution is not about creating a bypass but uses the existing A421 passing through Milton Keynes, dualling the present single carriageway section to give access to Junction 13. Many objections link this with “Junction 13A”.
- 7.56 The A421 solution has much to commend it, not least because of the volume of local support for it, and no doubt the traffic/economic case would be strong. Despite the HA’s current reluctance to interpose a further junction between 13 and 14, there are solutions that can be considered, such as linked slip roads that avoid increasing the number of exits and accesses to the Motorway itself. We are not in a position to conclude that either upgrading the A421 or creating a Junction 13A is the answer. But at this stage, we conclude they should be kept in the frame, while further work is done to address the key local and strategic traffic problems. We therefore recommend (**R7.7**) that the SRS includes, in place of the three “MK Southern Bypass” schemes in Table A1, a proposal to improve east west movement by road and access from Milton Keynes to the M1. The status, as with the bypass proposal, would be “proposed for investigation”, and the timing beyond 2011 going to post 2016, pending investigation and proper consultation. Our recommendations also include corresponding

amendments to the text at paragraph 2.6 and in the final bullet point of Policy 1 (**R7.3** and **R7.5**).

Social infrastructure

- 7.57 There is a perception that because Milton Keynes has not been in existence as long as other towns of its size, it has not acquired the same level of equipment with social infrastructure in fields such as higher education. Part of the vision for the coming era of Milton Keynes development is to remedy this and provide the scale of facilities that a city of its size is seen to merit, such as the aspiration for a new university, on which we have commented under Part A of the SRS at paragraph 3.55 and recommendation **R3.9** above. We have already concluded (**R7.8** and paragraph 7.34 above) that paragraph 3.5 should be strengthened on the importance of education and skills.
- 7.58 A specific proposal is made in Policy 3 (p43) for a new hospital, and a site for this is shown on the spatial diagram. The Health and Social Care Group, while agreeing that the SRS should refer to the need for substantial new healthcare investment, including meeting existing deficits in capacity, argue that the hospital proposal is not necessarily the way this will be provided. They suggest indicating a new healthcare campus, with the precise location to be determined through the LDD process. We agree with this and recommend (**R7.9**) that the NHS amendments to the Part B Statement put forward in document PART120 are adopted.

Recommendations

R7.1

Separate the Part B material relating to Milton Keynes and Aylesbury, deleting paragraphs 1.1 to 2.3 and other common paragraphs, and replacing them as necessary with brief paragraphs relating to each of the growth towns.

R7.2

Revise paragraphs 2.4 and 2.5 on page 39 to read as follows:

- 2.4 Milton Keynes will see a new phase of long term growth establishing it as a city of regional importance and adding a high quality public transport system to its unique advantages of modernity and good environment. It is planned to accommodate an increase of 44,900 homes at Milton Keynes urban area in the period up to 2021. Development in the rest of Milton Keynes Unitary Authority area will continue to be related to local needs.
- 2.5 The majority of development will be provided within the existing urban area of Milton Keynes in conjunction with development of the City Centre, selective urban intensification and the completion of developments already planned as part of the new town programme. These sources are expected to provide some 19,000 additional homes up to 2016, and more in the period beyond. The remaining requirement of 14,600 up to 2016 will be provided through sustainable urban extensions to Milton Keynes City to the west, the south west and the east. Beyond 2016 a balanced programme of urban extensions and opportunities within the urban area should continue.

[New paragraph] In order to establish details of directions for growth at Milton Keynes up to 2021, beyond those established through the Milton Keynes Local Plan, an appropriate LDD will be prepared, considering areas of search around the city. This LDD should be prepared jointly with Aylesbury Vale and Mid-Bedfordshire District Councils in order to ensure that possible directions for growth outside the Milton Keynes Unitary Authority area and other boundary crossing issues are fully addressed.

R7.3

In paragraph 2.6 revise the second sentence to read:

Within this overall framework there is a particular emphasis on development of new public transport nodes and interchanges, well related to new urban extensions and linked with the provision of an upgraded mass transit system and its interchange with enhanced strategic transport infrastructure as set out in Part A (i.e. East-West Rail and MI Junction 13).

Replace the final sentence of paragraph 2.6 with:

East-west movement by road across the southern part of Milton Keynes needs to be improved. Measures are needed to address traffic problems on the existing A421, to improve access to the M1 and to make space available for enhanced public transport.

R 7.4

Replace draft SRS paragraph 2.7 with a new paragraph to read as follows:

Milton Keynes in the longer term

Beyond 2021 Milton Keynes should expect to continue to grow at broadly the same rate, adding a further 23,700 homes in the following decade. Over this period the city should become a centre of major regional importance, with a population of over 300,000 and some 290,000 jobs. In order to guide this change over the longer term, a vision for 2031 should be prepared, involving Milton Keynes Council, its neighbouring authorities, local communities, Government and a wide range of other stakeholders. The vision will provide a platform for major economic and cultural development, for qualitative and quantitative change in higher education, health and other infrastructure, and facilitate long term investment decisions in the public transport system, in East West Rail and other infrastructure.

The principles of this SRS should continue to guide the strategy beyond 2021. The vision should reflect:

- a continuing programme of selective intensification and renaissance of Central Milton Keynes and other urban locations, complemented by:
- sensitively planned urban extensions to provide new homes and workplaces and reinforce public transport, while respecting local context;
- continued development and upgrading of the public transport system, and reducing dependence on car use;
- maintenance and provision of new green infrastructure including parks, greenspace and water spaces within the urban area;
- the highest environmental standards in design and construction.

R 7.5

Revise Policy 1 on page 40 to read:

Milton Keynes should accommodate an additional 44,900 dwellings in the urban area over the period 2001-2021 (including any provided outside the boundary of the Milton Keynes Council area). New development will be delivered through a combination of urban intensification and the development of new sustainable urban extensions, integrated with the provision of new and enhanced public transport systems and interchanges. Locations for development will be those established through the Milton Keynes Local Plan, and in appropriate LDDs on the basis of areas of search around the western, southern and eastern edges of the urban area. LDDs should apply the principles for creating sustainable communities as set out in Strategic Policy 3.

Sustainable urban extensions should be carefully programmed so as to complement and not undermine the contribution of development and regeneration within the urban area. Both urban intensification and sustainable urban extensions will be planned in such a way as to maintain and extend the city's green infrastructure, and to ensure that issues of impact on landscape character and coalescence of settlements are addressed.

The levels of development proposed are based on the need to plan for an increase in employment of 44,900 jobs in the period to 2021. Key locations for employment related development will be Central Milton Keynes, Bletchley, Wolverton and Newport Pagnell and some locations within new urban extensions at focal points on the public transport system. At present there is sufficient planned employment land supply in Milton Keynes to meet forecast demand to 2016. Both quantitative and qualitative aspects of supply and demand for employment land will be kept under review through the LDD process, to ensure provision of a range of types and sizes of premises to meet the needs of the economy, and that any land no longer required for employment purposes is considered for other use.

Local transport infrastructure will require early development and continued enhancement and upgrades to facilitate the delivery of sustainable growth throughout the period to 2021 and beyond. Key elements are:

- City wide core bus network upgrade
- East/West and North/South Mass Transit Corridors
- Park and Ride accompanied by appropriate traffic management measures
- Measures to resolve east-west traffic problems across the southern half of Milton Keynes.

New and upgraded strategic transport links will be vital in underpinning the sustainable growth of Milton Keynes, including East-West Rail and possible new Parkway stations. Details of strategic transport infrastructure are set out in the Part A Statement.

R 7.6

Delete Table B1 on Page 45. Replace Table B2 with the following table:

Milton Keynes Housing Provision

	<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	<u>2001-2016</u>	<u>2001-2021</u>
Urban Area*	7,900	15,000	11,000	11,000	33,900	44,900
Annual Rate	(1,580)	(3,000)	(2,200)	(2,200)	(2,260)	(2,245)

* Figures include any housing arising from Milton Keynes growth and provided in Aylesbury Vale or Mid-Bedfordshire DC areas after 2011.

R7.7

Remove the route for the proposed Southern Bypass shown on the spatial diagram on page 47. In Table A1 on page 44 the three “MK Southern Bypass” schemes should be replaced by: “Improving east west movement by road and access from Milton Keynes to the M1”. The status should be shown as “proposed for investigation”, and the phasing as 2011-2016 and post 2016.

R7.8

Add two new sentences at the beginning of paragraph 3.5 as follows:

Educational attainment and skills levels at Milton Keynes need to be improved in order to support economic growth and enable local people to participate fully in it. New facilities and programmes will need to be brought forward in step with development.

R7.9

Revise the wording of the 4th bullet point of Policy 3 on page 43 as follows:

- Healthcare – substantial investment in expanding and modernising primary and community health and social care and secondary healthcare facilities (including meeting existing deficits in capacity at Milton Keynes);

Remove the site for a New Hospital indicated on the Spatial Diagram

CHAPTER 8: AYLESBURY

Introduction

- 8.1 Some participants (e.g. the CPRE and DLA) object to the inclusion of Aylesbury in the MKSM growth area, suggesting that as the furthest south of the selected growth points it is more naturally linked with the Thames Valley and not well connected to the main components of the MKSM sub-region in functional and transport terms. These views tended to be countered by SEERA, SEEDA and the County Council in terms of the town's need to exploit the potential of its well-qualified workforce and its geographical location in the Oxford-Cambridge Arc. In addition concern was expressed that the town should not fall into a position where its ability to obtain investment and resources for renaissance becomes increasingly prejudiced by the ever-growing Milton Keynes. There may be some force in this position, especially as all other sizeable towns within the general ambit of Milton Keynes are included within the strategy. Leighton-Linslade is an exception to this, although we recommend at Chapter 10 that it should make some contribution towards the aims of the SRS. However, interestingly, we note that two of the key ODPM documents outlining the Sustainable Communities Plan, both dated 2003, refer to a five-centre (rather than a six-centre) strategy, omitting any reference to Aylesbury as a sub-regional growth point ('Sustainable Communities: Building for the Future' (p54) and 'Sustainable Communities in the South East: Building for the Future' (p8)). These documents, together with paragraph 8.9 of the MKSM Study, do not tend to suggest that the town has been seen as having a central role within the SCP or SRS.

General vision for the town

- 8.2 The general vision of the SRS for Aylesbury is summarised at paragraph 1.2 as being to "maximise its identified opportunities for growth...in a way that strengthens its traditional county town heritage and role (with) particular emphasis on urban renaissance through improvements to the town centre so that it can develop an enhanced role commensurate with the needs of a larger urban location".
- 8.3 There was general support for the concept of taking measures to strengthen Aylesbury's role as a traditional market and county town and for making it more self-sufficient in employment terms. However, some (such as SAVE, CPRE) questioned whether enhancing this 'traditional' role is compatible with greenfield growth on the scale envisaged in the longer term beyond 2016. Others, such as the County Council, were also cautious about the implications of the largely implicit, less clear longer term 'repositioning' of the town, especially as the town's past economic performance (particularly in relation to the District as a whole) has been mixed and there is considerable reliance on commuting to London and apparently increasingly to Milton Keynes. We share these concerns to a certain extent and note that the District Council with others such as SEEDA and the Chamber is undertaking work funded through the Sustainable Communities Fund to produce an economic vision for the District which may give a clearer long-term indication of where the town is intended to be heading, especially its potential ability to gear up to make an early contribution to the knowledge-based economy. PART149 represents a draft of the economic strategy for Aylesbury Vale District as a whole.

Scale of growth

8.4 It is evident from the up-to-date Aylesbury Vale District Local Plan [AVDLP] that Aylesbury town is currently going through a phase of considerable growth including the substantial green field allocations made in the AVDLP. Regardless of the SRS the town is expected to grow to a population of about 75,000 by 2011, an increase of about 29% over that in 1996 (paragraph 5.3 of the AVDLP). Contributing to that growth are existing commitments for 2001-2011 amounting to 5,700 dwellings (including expected urban capacity windfalls), while a further 2,040 remain for implementation in the following decade to 2016 (Table 9.3 of the Growth Area Assessment). SRS Policy 2 for Aylesbury Growth Area would add a further 2,900 to the town's housing provision for the 2001-2016 period, as indicated in Table 1 of PART103. With this enhanced provision the town's households would increase (according to the District Council) by a total of 46% in the 15-year period 2001-2016.

8.5 However, under the longer-term perspective of the SRS (working on a 30:30:40 split) the following 15-year period would see an even steeper rate of growth amounting to 17,050 additional dwellings in Aylesbury Vale District as a whole in the period 2016-2031. Under the present SRS assumption (Table B3) that 75% of the additional dwellings in Aylesbury Vale would be at Aylesbury itself that would represent a further 12,800 dwellings targeted in and around the town. Under that scenario, and according to the Council's reckoning, household numbers in the town would increase by 124% over the 30-year period 2001-2031, by which time its population could be reaching 120,000.

8.6 Against this background a substantial body of opinion including a number of Parish Councils, SAVE, FOE and many individuals, strongly opposes the quantity of additional growth proposed through the SRS coming hard on the heels of existing commitments entered into through the recent Local Plan. This is regarded as 'top-down' imposed growth which will inevitably result in further greenfield expansion, no matter what optimistic or pessimistic view is taken of the potential urban capacity of the town.

8.7 Looking at the SRS proposals for housing growth in Aylesbury town over five-year periods on the GAA's present three-decade split of 30:30:40 (and extending the growth perspective to 2031 on the basis discussed two paragraphs above), this equates to:

<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	<u>2021-26</u>	<u>2026-31</u>
2,850	2,850	4,900	4,250	4,250	4,250
(570pa)	(570pa)	(980pa)	(850pa)	(850pa)	(850pa)

8.8 In our view support in principle can fairly readily be given to the SRS proposals to 2016. Although they make a modest addition to the provision already made in the Local Plan for a shorter period, achieving completions at that rate would still represent a substantial increase in local house-building. According to the HBF completion rates in and around the town have only averaged about 350pa over the past 12 years. However, we are somewhat less convinced about the justification contained in the GAA for prolonging building at the high rate implied after 2016.

8.9 As in the case of Milton Keynes, we support those who argued for the South-East regional growth proposals to be extended to 2021 across the whole of the SRS area in order to provide a consistent time horizon. However, in the present state of knowledge and certainty about what can or should be aimed for at Aylesbury we consider that the rate should be scaled down after 2016 rather than maintained at a high historic level.

We believe that there is already considerable risk that house-building in Aylesbury to 2016 could tend to act as a further incentive to commuting. On one view this may provide the many households unable to afford London prices some chance of acquiring a (comparatively) less expensive house, and thus could be seen as fulfilling one of the aims of the SCP which is to assist the housing needs of the South East. But on another level further fuelling of commuting trends would not be regarded as sustainable.

8.10 Our recommendation is to scale down the growth to be aimed for in the period 2016-21 significantly but not too dramatically. This will provide a degree of flexibility for future reviews to make adjustments to the strategy either upwards or downwards according to what has then been defined and justified as an appropriate, sustainable and realisable vision for the town. This approach will also avoid raising unnecessarily high fears (among residents’ and conservation groups) or expectations (among developers and others) of continuous large-scale growth over a 30-year period. At this stage we do not consider that the SRS should provide any particular longer-term planning assumptions for the period beyond 2021. We reflect this point in our recommended revision of Strategic Policy 1 (R4.5).

8.11 As to the other growth towns we consider that growth should be phased over the four five-year periods to provide a more realistic, but still ambitious, growth trajectory for 2001-21 as follows:

<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	<u>2001-21</u>
2,400	3,800	4,400	3,500	14,100
(480pa)	(760pa)	(880pa)	(700pa)	

8.12 As also in the case of the other growth towns we recommend that provision of this amount of housing be monitored against the achievement of net District-wide job gains so that changes to the direction of the strategy can be made in future reviews if appropriate. The target we have included for 2001-2021 maintains the same ratio of jobs:houses as is set out in PART103 for the period 2001-31 (i.e. 0.9:1.0) (R8.1).

Directions for growth

8.13 An urban extension of about 2,000 dwellings is under construction on the western side of the town. A further two are allocated to the north in the AVDLP and a third (to the east) was omitted from the local plan at the recommendation of the Inspector. In the District Council’s view a direction for growth to the south of the town as proposed in the SRS would provide some ‘balance’ to the evolving urban structure. Developers with land interests to the south of the town also support this view, but representatives of communities to the south of the town expressed strong opposition, fearing urban encroachment or coalescence, loss of identity and severe environmental impact.

8.14 Aylesbury Town Council and the Oxford Diocesan Board consider that any additional growth would be better directed towards the north of the town where it can plug into the wide range of infrastructure provisions and employment improvements that will come to that area through the future urban extensions at Berryfields and Weedon Hill. On the other hand, the National Trust and others believe that the SRS should have re-assessed all the green field growth directions from first principles, including the allocations to the north. This group of objectors tends to consider that the best direction for growth would be to the east and south east of the town.

8.15 The County and District Councils and many representatives of local organisations consider the SRS and its background documents too precise about the intended location

of growth. The County Council, in particular, made detailed criticism of the methods adopted in the GAA and felt that it may have failed to identify possible less damaging options. There was a widespread view that growth locations need to be decided through an LDD, which provides a much stronger process of community involvement. The District Council is keen to extend forward planning for the town by pressing ahead with this task. We support that approach. We recognise that development to the south is an option and have noted the remarks made by the Local Plan Inspector about some sites in that area. However we consider that circumstances in Aylesbury, including our recommended extension of the timescale of the SRS by a further five years, require the preparation of an appropriate LDD or LDDs that can take on the challenge of providing a long-term framework for expansion to 2021 based on the housing and employment targets we have referred to above. In that context it will be important for a wider range of options to be considered (**R8.1**).

Transport infrastructure

- 8.16 We were told that the current modal split for journeys to work in Aylesbury town is 15% by foot and 3% in every case by cycle, bus and train. Clearly, there is a requirement for substantially improved alternatives to the car if the sustainability of the town in transport terms is to outpace the future levels of proposed housing and employment growth envisaged in the SRS.
- 8.17 Present LTP strategy concentrates on providing a system of high quality radial bus corridors at a rate of one per annum feeding into a town centre transport hub serving the town centre and the rail and bus stations. The latter could be operational by 2007. While we heard that there are difficult operational issues to overcome on some radial corridors we consider it essential for the LDV to ensure that resources are made available to complete the whole system as soon as possible in order to provide effective alternative travel opportunities to the town's fast-growing population, and recommend reinforcement of this point in Table A2 and elsewhere (**R8.4**).
- 8.18 Turning to rail, a number of participants (including the SRA and Chiltern Railways) expressed the view that it would be both possible and desirable to extend the Chiltern Line from the terminus at Aylesbury northwards via the existing freight line to serve the new development at Berryfields where a station site is safeguarded. We consider that there would be real benefits in achieving this as soon as possible. It would relieve congestion at the present terminus, provide a rail option for residents of the committed future urban extension, and be a step along the way to (although not dependent on) completion of the link between Aylesbury and the proposed re-opening of the passenger rail line between Oxford and Bedford via Bicester and Bletchley. In our view the LDV should seek to develop the business case and bring this forward from the timing indicated in Table A2 (ie seek to deliver it in 2006-11). We have recommended accordingly. We agree with the County Council that a new station at Calvert (item 3 in table A2) would bring no clearly identifiable benefits to the growth area or the SRS, although we make no comment upon whether it is something that should be pursued in future in other contexts (**R8.4**).
- 8.19 A major area of disagreement amongst participants was the proposed Southern Distributor Road. SEERA states that the road is required both to provide access to the new development areas and to relieve current congestion in the town by linking the improved A41 to the east with the A418 to the west. SEEDA, Buckinghamshire [Bucks CC] and some developers see the road as a crucial piece of infrastructure although others (e.g. CPRE and Barton Willmore) believe that the SRS is over-reliant

on it. In terms of delivery, the County and District Councils doubt whether a road of this length could be funded by developers given the limited level of proposed additional housing to 2016 in the SRS. SAVE are concerned that the funding requirements for the road would leave developers with insufficient resources to fund other essential infrastructure. SEERA and GO-SE favour forward-funding of the road (its estimated total cost being about £16m), suggesting amendment of the SRS to indicate completion of the entire length at an earlier date, i.e. by 2016. Pegasus also picks up this point, suggesting that the phasing of housing on the southern edge of the town should be advanced.

- 8.20 However, in the view of CPRE and the District Council there is no proven need for a large scale bypass to serve growth to the south of the town up to 2016. The District Council points out that the distributor road would be of a different scale to the grade-separated bypass rejected by the Government in the 1990s, but considers that there needs to be a wider transport study to consider the longer-term transport needs of the town, including its role as a ‘Regional Hub’, its links to the Thames Valley and the key links between radial roads. We support this view and were interested to hear the County Council’s view that there is a need (but not yet any guaranteed resources) to review the current 13-year old transport model for Aylesbury Vale District, without which any need for the road cannot definitely be substantiated. Overall, there seemed to be a certain amount of ambivalence in the County Council’s position in that they state that previous studies have shown “a relatively modest amount of bypassable traffic in Aylesbury” but also consider that removing 11% of traffic from the town would be useful.
- 8.21 While the case for a bypass/development-related distributor road could increase with further development on a large scale to the south of the town we have already indicated that we are not convinced that growth on the scale implied for 2021-31 is necessarily appropriate or supportable. Indeed, as CPRE and others pointed out, there sometimes seemed (in discussion of the southern distributor road) to be a danger of circular argument: the road is said to be necessary to justify large-scale development and vice versa. It does not seem to us to be certain that the road is justified in the terms described in paragraph 13.50 of the GAA. We therefore recommend that transport issues affecting the town and its future development options should be explored in more depth in association with consideration of the transport and other implications of the other candidate growth directions in the preparation of the LDD or LDDs for Aylesbury (**R8.4**).

Other infrastructure issues

- 8.22 It became evident during the Examination that the proposed levels of growth at Aylesbury present fundamental issues in terms of wastewater management. Due to the characteristics of the River Thame and the regulatory requirements to protect river water quality, a new consent level for Aylesbury Sewage Works will be required from April 2005. Thames Water has significant concerns over its ability to treat waste to the new standards, affecting not only additional SRS growth post 2011 but also the implementation of present committed levels of growth.
- 8.23 After a considerable amount of earlier conflicting evidence a joint statement was presented close to the end of the session on Aylesbury by SEERA, GO-SE, the EA and Thames Water (PART145). This commits the bodies to work together to plan positively for the timely delivery of essential infrastructure, using the SRS as a means of doing so. It suggests changes to the SRS recognising that Thames Water will need

to be funded to build a new treatment plant either at the existing works or elsewhere to serve development post-2011 and that the necessary lead times for the new plant may make it necessary to phase housing development accordingly.

- 8.24 The above statement does not finally make it clear whether wastewater management will act as a real inhibitor to achievement of the early higher level of housing delivery at Aylesbury that we otherwise endorse. There appears to be a substantial risk of this unless critical funding and other decisions are made very soon. We therefore recommend a much stronger reference to this matter in paragraph 3.6. However, although the level of cost is likely to be well in excess of what is suggested in Table 1 we do not recommend change to the figure for ‘utilities’. As we have recommended in other areas we consider that tables of this kind should be deleted as they (and the parent work in the GAA) have largely already done their job of providing SCP managers with ball park figures on costs (**R8.3**). There seems to be little point in attempting to refine these tables in the SRS as detailed funding issues will now be taken up by the IRB, the soon-to-be-formed Utilities Task Group and the LDVs.
- 8.25 On a wider point, the Thames Water representative explained that the Aylesbury context could require water to be pumped three times and said that she did not know of another area where this is necessary. The EA and FOE expressed concern that this kind of approach is not the most sustainable. We would agree with this and find it unfortunate that growth area plans have progressed thus far, apparently without it being possible fully to address the operational aspects of this issue, their implications for Aylesbury as a viable part of the SRS, and their wider sustainability ramifications.
- 8.26 As for the ‘linear park’, a great deal of misunderstanding was caused by the way this scheme was portrayed in the key diagram. Many people understandably gained the impression (a) that the park would be very extensive and (b) that the concept was anyway at odds with the arrows indicating ‘directions of development 2016-31’. Responding to this point SEERA submitted suggested revisions to the text and diagram seeking to convey a clearer indication of what is intended (PART141). However, in our view the provision of appropriate levels of open space, taking account of local needs and circumstances, is an important matter for all the growth towns, not just for Aylesbury. A linear park in the terms outlined by SEERA does not appear to be something that can be identified at this stage as having sub-regional importance. We recommend that open space provision is better left for consideration at the local level, through the LDD process, so that any unusual funding implications calling for SCP contributions can be explored through the LDV when they are more firmly identified. As the park is not referred to in the text of the SRS no modification is called for in that respect, while our recommendation concerning the spatial diagrams is at **R4.3**.

Environment

- 8.27 As in all the Part B areas a number of participants called for the SRS to recognise the need created by further growth for adequate resources to be devoted to protecting and enhancing important sub-regional ‘green infrastructure’. We have already made some recommendations on this matter in the context of Part A (**R3.11**). In the Aylesbury area the Chilterns AONB is an important area where appropriately funded careful management will be required to ensure that fragile habitats are not put under unsustainable pressures.

Other towns in the Aylesbury area

- 8.28 Some respondents sought recognition of Winslow as a potential location for some brownfield growth, aided by the future East-West rail link from Bicester to Bletchley. However, we do not consider growth in this small town to be of sub-regional significance. This is a matter for determination in a more local context.
- 8.29 We were also asked to recommend that some of the growth proposed for Aylesbury should be diverted to High Wycombe, a town said to have greater brownfield development opportunities than Aylesbury. Since High Wycombe has still less association with the core MKSM area than Aylesbury and has not been part of the MKSM studies and employment projections we do not recommend this. However, it would be unfortunate if High Wycombe were to be disadvantaged in terms of resource availability for renewal of its urban fabric by non-inclusion in the SRS. In this connection we note a potential anomaly in that the Regional Housing Strategy highlights the growth areas as a priority for funding yet the assessed affordable housing needs of Wycombe District are three times of those of Aylesbury Vale.
- 8.30 In a more general sense there was some discussion about whether the SRS should provide more guidance on other larger settlements in Buckinghamshire, similar to the approach taken in Northamptonshire. Although Bucks CC felt that the SRS could profitably do so we do not regard this as one of its primary concerns.

Recommendations

R8.1

Amend title of Policy 2 to “Aylesbury Growth Town” as follows:

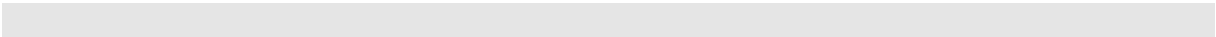
An expanded Aylesbury should accommodate a total of 14,100 new dwellings over the period 2001-2021. [Other parts of Aylesbury Vale District should provide for a further 3,300 new dwellings in the shorter period of 2001-16, excluding any growth directly related to the urban area of Milton Keynes that may be identified through a cross-border LDD for that town.]

Development at Aylesbury should be delivered through maximising the use and re-use of land within the urban area and through the development of new sustainable urban extensions integrated with the provision of new and enhanced public transport systems and interchanges.

Sustainable urban extensions to the north of the town at Berryfields and Weedon Hill have already been identified through the Aylesbury Vale District Local Plan. While every effort should be made to maximise the use of urban land further extensions will also be identified through the preparation of an appropriate LDD or LDDs.

The LDD or LDDs should provide a strategic long-term framework for the development of the town centring on:

- identifying land for new housing as follows:



2001-06	2006-11	2011-16	2016-21
2,400	3,800	4,400	3,500
(480pa)	(760pa)	(880pa)	(700pa)

- applying the principles for creating sustainable communities as set out in Strategic Policy 3;
- identifying and ensuring the availability of appropriate strategic high quality employment sites;
- identifying and implementing measures to achieve an urban renaissance of the town centre, strengthening its traditional role and heritage as a county town (possibly to be articulated through the preparation of a separate LDD);
- providing for a sustainable transport system for the expanded town, including completion of the following key elements of local transport infrastructure;

- strategic bus corridors including bus priority measures

- extension of the Chiltern Line to a new station at Berryfields

- connection of Aylesbury to the East-West Rail route from Bicester to Bletchley

Appropriate arrangements will need to be defined for monitoring the provision of this scale of housing against a target of net growth in jobs in Aylesbury Vale District of 635pa over the period 2001-21 (total 12,690).

R8.2

Amend paragraphs 2.8 to 4.5 to reflect the content of our overall recommendations for Aylesbury to 2021, including less specificity as to directions of growth and the Southern Distributor Road; removal of references to particular locations such as Stoke Mandeville Station; inclusion of references to the need to provide properly-resourced protection from increased environmental impact of green infrastructure resources of sub-regional significance such as the Chilterns AONB and updated reference to the delivery arrangements.

In particular, add to the third bullet point of paragraph 3.6 a comment that “Growth at Aylesbury may not be able to proceed even to the limits of current commitments unless a sustainable technical solution can be found to the achievement of adequate water quality standards in the River Thames and the necessary resources are committed to implementing it.”

R8.3

Table 1: delete

R8.4

Table A2: amend as follows:

- * Item 1 Rename ‘Quality bus corridors and urban transport hub’. Clarify ‘status’. Confirm completion in 2006-11.
- * Item 2 Bring forward to 2006/11. Involve wider stakeholders in implementation, including the LDV.
- * Item 3 Delete
- * Items 4-5 Delete [the further longer-term transport needs of the town would be established through further studies associated with the LDD providing the future planning framework for the expansion of Aylesbury]
- * Item 6 Clarify the apparent confusion resulting from the inclusion of the A418 in both Figure 3 (p12) and Table A2 (p45)

R8.5

Annex B

- * Table B1 Delete, *[as already set out in the recommendations for Milton Keynes – see R7.5]*
- * Table B3 Delete, because this subject matter is now covered elsewhere in the recommended new Aylesbury policy **R8.1**

CHAPTER 9: BEDFORD

- 9.1 As in the case of Milton Keynes and Aylesbury, we consider that expansion of Bedford and Luton/Dunstable/Houghton Regis raise distinct issues and that presentationally these two parts of the MKSM Growth Area should be separated out as free-standing elements. Our recommendation **R9.1** proposes changes to the Part B statement to give effect to this.

Growth Strategy for Bedford and Kempston and the Northern Marston Vale

- 9.2 The SRS proposes growth for Bedford and the Northern Marston Vale totalling 19,000 dwellings over the period 2001–2021. The strategy stresses revitalising the town centre, and developing its role as a regional centre, particularly using opportunities on previously developed land within the town. The “trend” rather than “high” growth scenario from the MKSM Study has been adopted, and the SRS states that there is sufficient residential and employment land already committed to meet the Growth Area requirements. The northern part of Marston Vale is identified as a location for an urban extension as is “south-west of Bedford”. The emphasis is on fulfilling existing commitments and remedying the area’s past under-performance.
- 9.3 This strategy was broadly supported by the local authorities and GO-East, as being realistic and well related to established priorities for regeneration in Bedford and the northern Marston Vale. There was a concern, however, shared by some developer representatives as well as FOE, CPRE and others, that the SRS did not present a full enough vision for Bedford, setting growth firmly in the context of urban renaissance. Views varied about what that vision should consist of, although there was a common view that it needed to redress the past failure of Bedford to achieve its potential for development within the town and regeneration of the town centre. Beyond that, while developers called for more growth options, the environmental groups considered that the SRS was being used as an excuse for peripheral growth which would undermine the achievement of regeneration.
- 9.4 There was criticism from developers that the strategy lacked ambition, going no further than existing committed and planned developments. More potential was being unlocked as long term infrastructure constraints were being cleared, with the Western Bypass and other road improvements and the increase in rail capacity to London. It was suggested that past under achievement was related not only to such constraints but also to a planning culture which was unwelcoming, or at least complacent towards delivering development commitments. Although the SRS proposals, which equate to some 950 dwellings per annum, represent a large increase on the average rates of development achieved in the past decade, this was still felt to be too modest to achieve a step change in housing supply. DLP argued that the “high growth” rather than the “trend” scenario should be taken, and called for at least 2,000 dwellings to be added to the total. Phillips Planning Services [PPS] called for an urban extension to the North of Bedford to be included, as this option had been considered in the original MKSM Study but excluded from the GAA. DLA argued for more emphasis on the Marston Vale as a strategic corridor linking Bedford with Milton Keynes.

Scale of growth

- 9.5 The strategy for Bedford needs to be seen in the broader context of the Sub-Region as well as its own planning history. Bedford certainly now has an opportunity, through the Growth Area strategy, to achieve some of the growth and revitalisation that have previously eluded it. Whatever the planning culture (and the developers' view was fiercely contested by the authorities themselves), it should be noted that Bedford's "under achievement", and the planning of much of the development still to be realised, occurred at a time when policy deliberately sought to shift growth from the south of the County to the north. That policy emphasis has now changed, and we support the new strategy of meeting more of the growth needs in the south of the County where they arise (see Chapter 10 below). The corollary is, however, that Bedford's future growth will be more reliant on the town's inherent ability to attract growth, because some of the "push" from the south will have been removed. It will also have to take place against the background of strong growth plans for Milton Keynes and Northampton, which are widely seen as rival attractors.
- 9.6 Against this background, we consider that there is a need for realism in the growth expectations now placed on Bedford. The comparison with the step change in housing output sought at Milton Keynes and Corby is relevant. Both the latter have a new town "culture" and a well established momentum towards a new phase of growth, and appropriate delivery arrangements are being put in place. At Bedford the culture is indeed different, reflecting its history as an historic county town with regeneration needs and infrastructure problems. Its economic position is also different, as reflected in a net out-commuting balance, compared with the in-commuting balances of Corby and Milton Keynes and, as noted in the Bedford Housing Market Study (PART157), a history of relatively weak housing demand. None of these things will be changed simply by increasing the SRS housing requirement at Bedford.
- 9.7 We note that the level of housing growth for Bedford proposed in the SRS is actually some 500 dwellings below the figure for existing commitments, urban capacity and allocations given in Table 1 of document PART103, which leaves the balance of development to be provided through the SRS as a minus quantity. To rectify this anomaly, we propose a marginal increase in the SRS provision for Bedford and northern Marston Vale, from 19,000 to 19,500 additional dwellings over the period 2001 to 2021. This level of growth is probably quite challenging enough, at least for the period up to 2011. It will certainly be important to establish greater momentum for economic development within the town, linked with regeneration and re-use of previously developed sites, and establishing a focus for major employment in the centre. We comment on these aspects below.

Phasing of growth

- 9.8 As at the other growth towns, we consider that the housing provision should be phased in five year periods, rather than 10 years as in the SRS. GO-East and Bedford Borough Council are of the same view, and the Council's written submission includes a proposed table, which back-loads the provision to the later periods. The Council's argument is that it will be challenging to achieve the step change from a Borough average of 643 dwellings per annum to the 812 implied by the strategy. Creating the conditions in the local economy and the housing market, and delivering the infrastructure on which some of the major developments depend will all take time. The

- Council’s proposal shows housing delivery in the growth area increasing steadily over time, from 623 per annum in 2001-2005 to 1165 per annum in 2016-2021.
- 9.9 Against the Council’s view, developers argued that the growth town should show some early gains, from opportunities within the urban area and as long standing commitments already established through Local Plans are finally realised. As discussed below, the Council also supports a very buoyant approach to job creation, which we consider will require early progress if it is to have a chance of success. As argued by the house building industry, new housing will itself be one of the ingredients for the growth and job-creation being sought. Furthermore, we note that all the key infrastructure requirements for Bedford and the northern Marston Vale are shown in Policy 2 (SRS p23) for delivery by 2011. The Council’s own suggested amendment to Policy 2 agrees with this.
- 9.10 All this suggests, in our view, that it would be counter-productive to back-load the provision so much as to signal a slow start to growth. A rapid rise in output in the first period, towards “full speed” in the period 2006-2011 and beyond would send a positive message to match the aspirations for growing the economy of the town. We recommend **(R9.3)** a breakdown of provision which reflects this. As with any Plan, if monitoring shows that the planned rates are not being achieved, judgements will have to be made on whether development will catch up in later periods, or whether a change in approach is called for.
- 9.11 If key local infrastructure is delivered on schedule, and if Bedford “takes off” as a result of the SRS proposals, this could pave the way for a higher rate of growth after 2011. This fact is recognised in the footnote to Policy 1 on page 21, which suggests that subsequent reviews of RPG14 might increase the figures for the period 2011-2021. CPRE saw the footnote to Policy 1 as sinister in that it could result in much of the north of the Marston Vale being developed without the principle having been fully examined. We do not consider that to be a necessary consequence of the approach. The northern Marston Vale is not the only option for accommodating additional development in the sub-area. Other options exist either in other parts of the Vale or elsewhere on the periphery of Bedford. The correct process for determining this would be through the LDD process, once it was established that the strategic conditions for additional development had been achieved. We believe the best way of doing this is for the SRS to make it clear that (a) realisation of a higher rate of development would be dependent on achieving the infrastructure provision and economic development proposed for the period 2001–2011, and (b) locations for the additional development would be determined through the LDD process. This should be a joint exercise involving Bedford BC and Mid Bedfordshire DC.
- 9.12 Our recommended revisions to the Part B Statement for Bedford (**R9.3** and **R9.6**) reflect these conclusions.

Directions for Growth in Bedford and the northern Marston Vale

- 9.13 The directions for growth identified in the SRS have the merit of being already established. The focus for new growth will be on implementing the key allocations for housing and employment around the town, and on the major driver of the Wixams development to the south of the town. We recognise that there are other options, for example to the north of the town, with or without a new Bedford North railway station. There is therefore theoretical capacity for more development than is currently proposed, although this would need to be subject to further evaluation. One argument put to us is that an “over allocation” of 30% or more would help to achieve the levels of growth

planned. However, we conclude that at this stage identifying additional directions for growth or increasing the dwelling numbers that would be provided in peripheral development at Bedford risks diluting the strategy. Most seriously it could undermine the focus on strengthening and regenerating the centre of Bedford. This we see to be fundamental to the strategy, and something which has to be pursued vigorously in the early stages in order to provide the employment growth and service functions which form the basis for expansion of the town.

- 9.14 The SRS confines its proposals for the Marston Vale to the northern end of the Vale, focused on existing commitments at Elstow (the Wixams) and Wootton. While these proposals are in themselves well supported, DLA and others argued that the strategy should give much greater emphasis to the Vale as a strategic corridor linked with settlements on the East-West rail line, and complementing the strategy for regeneration and environmental improvement in the Vale.
- 9.15 We note that the suspended draft Bedfordshire Structure Plan 2016 did not pursue the concept of a strategic development corridor for the Vale. Such a concept may be seen as contrary to the sequential approach advocated in PPG3, given the availability of other locations better related to the existing major urban area. Whilst the railway exists as a public transport corridor, inevitably there would be considerable dependence on the A421 for road communication to Bedford and to Milton Keynes. The MKSM Study, while combining elements of a “corridor” option with “urban concentration” to produce the preferred option for the SRS, emphasised concentration in and around the main urban areas, rather than linear extensions. Moreover, the GAA for Bedford concluded that there was little justification for substantial development further down the Vale in less sustainable locations (than Elstow and Wootton) to 2021 (Bedford Growth Area Study, Entec, p55). There are, however, Local Plan allocations which will see significant development at a number of the settlements in the Vale. Such development should in our view continue to be pursued in the light of local growth needs and in the context of the strategy for regeneration in the Vale, and is not dependent on the SRS. We conclude that the SRS should not identify a major urban growth corridor along the Marston Vale.
- 9.16 As with the other growth areas, the detailed identification of locations for development should be a matter for the LDD process. However, one respect in which the strategy for Bedford differs from some other growth locations is that for the short term the proposals have already been largely established in the existing Local Plans for Bedford and Mid Bedfordshire. It would be counter productive to reopen those issues at an early stage, but in due course it should be for a new joint LDD to determine detailed proposals for the future, particularly once additional locations for growth are required. This is reflected in our recommendation **R9.6**.

The longer term

- 9.17 Additional directions for growth are likely to come into play if and when the current strategy succeeds in delivering the scale of growth proposed, and assuming Bedford is to continue to grow in the period 2021 – 2031. For that period the “trend” growth assumption would leave a further 11,300 dwellings to be provided, beyond the 19,000 that will have been achieved by 2021. The situation would need to be reviewed in the light of monitoring of development in the meantime. If additional growth is brought forward in the period 2011 – 2021, as indicated in paragraph 9.7 above, this could mean that a reduced amount remained to be provided in the final decade. Alternatively, it could mean that Bedford had moved from “trend” to a “high growth” profile within the

MKSM area, and additional provision would be appropriate. At this stage we consider the planning assumption should be that the growth level of the preceding decade will continue beyond 2021, and our recommendation (**R9.5**) reflects this conclusion.

Economy and employment

- 9.18 There was unanimity on the importance of increasing the number of jobs in Bedford. The SRS is criticised, by EEDA and Bedford BC among others, for failing to bring out the changes needed in Bedford's economy to support the level of housing growth proposed. We have already considered this issue in relation to the whole SRS in Chapters 3 and 4 above and our recommendation **R4.5** takes up the three RAs' proposal that employment growth assumptions should be added as targets for monitoring. To establish the appropriate figure for Bedford it is first necessary to consider the background.
- 9.19 Deriving from Table 6.2 of the MKSM Study, the relevant figures up to 2021 for Bedford are 9,000 additional jobs under "trend" growth and 11,400 under "high growth". However, as the GAA notes (p25, Fig. 4.3 and Table 4.7) the MKSM "preferred option" figures for Bedford are considerably higher than other available scenario projections. The next highest, the "Robert Huggins Study" (document ECO17, Table 2.1) shows only 5,427 additional jobs in Bedford to 2021 (all figures relate to the whole Borough). It should be noted, however, that the latter study also shows very strong growth in Mid Beds. The "Bone Wells" study for EEDA (Document CORE14G) paints a still more pessimistic picture for job growth in Bedford. A concern of a number of participants is that, without a matching growth in local jobs, achieving the housing totals will depend on other drivers, such as the area's good schools and environmental quality, and accessibility to London.
- 9.20 EEDA drew attention to the job growth target of 33,000 to the year 2021 for Bedford /Kempston/northern Marston Vale included in Policy E2 of the "banked" draft of RPG/RSS14. We are not sure of the origin of this figure, which is out of all proportion with any other projection or assumption that has emerged from the SRS background. It is equivalent to the MKSM study "high growth" assumption for the whole of Bedford and Mid-Bedfordshire districts to 2031. In the SRS context it would also mean 1.74 additional jobs for every additional dwelling, again out of proportion with anything elsewhere. We wonder whether the figure of 33,000 is an error and, since the Table in draft RSS14 is stated to be provisional, we take no further notice of it.
- 9.21 The Borough Council advocates a target of 14,000 net additional jobs by 2021 for Bedford and Marston Vale, which is stated to come from the Bedford Growth Area Study, and is derived from the MKSM "High Growth" scenario. This figure, against the proposal for 19,500 dwellings would give a new jobs: dwellings ratio of about 0.7, higher than the 0.6 derived from MKSM Study Table 6.2, but still well below the equivalent values for Northamptonshire and Milton Keynes. We appreciate the vigour with which the Borough Council seeks to address the need for increasing economic activity to match housing growth. This is reflected in the work on an economic vision for Bedford and an impressive list of initiatives involving EEDA and other partners. The brief for the Vision talks of creating as many as 20,000 jobs in the Bedford area by 2016 (document PART158 paragraph 24). This may be aspirational, but it clearly reflects a desire locally to avoid Bedford's role becoming predominantly that of a dormitory town. Given its advantages of good rail connections and quality of life, commuting and income from London and elsewhere are likely to continue to play an

important part in the Bedford economy. Nevertheless, it is important that this is balanced by growing indigenous business and new economic sectors in Bedford.

- 9.22 The Council's stance might appear illogical in seeking "high growth" employment while agreeing that, in housing terms, even the "trend growth" level will be difficult to deliver. We consider, however, that a figure of the order proposed, equivalent to 0.7 jobs per additional dwelling would make a suitable employment target for monitoring purposes, and this is reflected in our recommendation **R9.4**. This will still be challenging to achieve, and would require greater success in attracting jobs and growing the local economy than has been achieved in the past. To the figure of 14,000 additional jobs for Bedford Borough, for monitoring purposes the employment growth for Mid-Bedfordshire District also needs to be added. From document PART103 this amounts to 8,400 additional jobs, giving a total of 22,400 additional jobs to 2021. This figure is included in **R9.4**.
- 9.23 With regard to employment land, EEDA and many others argue that, while there is a quantitative over-supply of employment land to meet the likely needs of the area, there is a need to address the quality and suitability of the employment sites on offer if the economic objectives for Bedford are to be achieved. Although the SRS (paragraph 2.2 p18) recognises that this may mean a need to release further land to meet the requirements of modern businesses, the counterpart to this is that the available land needs to be kept under review so as to ensure that surplus sites are not neglected but promoted as assets. Such land may provide opportunities for housing, mixed uses or social or green infrastructure. This conclusion is reflected in our recommendation **R9.6**.
- 9.24 While the creation of more office space in Bedford town centre and an increase in the area's knowledge based economy are seen as important, there is less clarity about the area's role in the wider Sub-Regional and Regional economy. Competition from Northampton and Milton Keynes, widely agreed as having inhibited growth at Bedford in the past, will remain strong. Answers are being sought in terms of growing the local economy and exploiting initiatives under the Oxford to Cambridge Arc. It would be inappropriate for the SRS to go into great detail on these issues, which are being pursued by the local authorities, EEDA and business organisations. However, stronger references are included in our suggested revisions to the Bedford growth area paragraphs **R9.2**.

Transport

- 9.25 Transport infrastructure, and deficiencies in it, have been seen as a key constraint on development at Bedford in the past. One of the positive aspects of the growth strategy is that much of this constraint has been or is in the process of being removed, with the provision of the southern and western bypasses, and with the Midland Mainline Route Utilisation Strategy due to show a 40% increase in main line capacity from the end of 2005. Public transport improvements will be a key element of further transport improvement, in order to try to secure modal shift, particularly in connection with new housing and employment related development. Despite this, the footnote to Policy 2 on page 23 appears to give the greatest priority to three developer funded road schemes.
- 9.26 Among the strategic schemes from Part A, East West Rail clearly has major relevance to development in Bedford and the Marston Vale. We note the SRA's comments about the ambivalence, and potential conflict in the line's local and strategic functions. Strategically, the case for East West Rail is based on providing a link between major centres – Bedford, Milton Keynes, Oxford and Aylesbury, and ultimately others, which

is best provided with fast, limited stop services. Locally, the line serves shorter distance work, education and other trips between Bedford, Bletchley and smaller settlements in between in the Marston Vale, which require a regular service with frequent stops. The SRA is concerned about additional local stops on the Marston Vale line and the impact they may have on journey times. While we do not consider the strategic E/W Rail proposal and the Part B station proposals to be necessarily in conflict, there is clearly a need to ensure that the local and strategic rail projects are progressed in a complementary way.

- 9.27 There is some confusion between the proposed Park and Ride facilities and Parkway stations, which are shown with the same notation on the diagram. For clarity, these should be shown with separate notations **R9.8**. Although the proposed Interchange Park Rail Station is shown for delivery by 2011 through the LTP, we were concerned to note that the SRA appeared uncertain about it, having had little involvement so far. Nor is it clear from the SRS what its essential role is in meeting the needs of the Growth Area. We conclude that if this proposal is to be retained in the SRS, its status and function should be more clearly explained.
- 9.28 Otherwise, there seems to be broad agreement that the key infrastructure elements shown in Policy 2 on page 23 are the right ones. Consistent with our recommendations elsewhere, we recommend **R9.7** that the Table should be revised to reflect the latest available information on delivery, and broken into five-year rather than 10-year periods.

Environmental issues

- 9.29 The familiar complaint about the lack of coverage of environmental and green infrastructure issues in the SRS has particular relevance to the Bedford and Marston Vale area. Our recommendations in Chapter 3 are intended to remedy these omissions, and will be relevant to addressing green infrastructure and potential flood risk issues at Bedford.
- 9.30 Many participants found it unacceptable that the major long term programme of environmental regeneration in the Marston Vale, and in particular the Forest of Marston Vale, receives no mention at all in the SRS. We accept that it is not the function of the SRS to determine or be the main vehicle for these initiatives. Moreover, the SRS does not propose major urbanisation throughout the Vale, but is confined to locations already identified for development in the northern part. Nevertheless, we consider that the approach to environmental improvement in the Vale as a whole, and the creation of the Forest of Marston Vale as a green infrastructure resource of at least Sub-Regional significance, are too important to be left out of the strategy entirely.
- 9.31 The importance of this is twofold. Firstly, to the extent that development encroaches on the Vale there is a need to take account of the character of the Vale and settlements within it, and to ensure that opportunities for environmental enhancement are realised. Secondly, there is the contribution that the Vale, and the Community Forest in particular, can play in meeting the cultural and recreational needs of people in the growth area, and improving the image of the Sub-Region. Initiatives such as the Surface Waters Plan are clearly contributing to this already. It is ironic that this relationship has been recognised in the Government's Sustainable Communities Plan and through £2.6m of funding from ODPM for projects in the Vale, but not, apparently, in the SRS itself. We conclude that, whilst it is not necessary to go into great depth, the Part B Statement should make these connections, and this is reflected in our recommendation **R9.2**.

- 9.32 Land use conflicts in the Marston Vale also raised a more specific issue for the Examination. Developer representatives and others drew attention to the continuing problems of environmental degradation and poor image resulting from mineral extraction and landfilling of waste imported from outside the Sub-Region. This activity has a long history in the Vale. Clearly the situation has now changed, with the changes in the brick industry, the effects of the Landfill Directive, and environmental regeneration in the Vale moving into a new phase. We were asked to give a firm steer against continued landfilling of waste in the Vale, in order to create a more positive image and acceptable environment for the housing and other development taking place. In particular Gallagher Estates, who are involved in the Wixams new settlement at Elstow, called for a new policy in the SRS ruling out further permissions for waste disposal.
- 9.33 Attention was drawn to the Inspector’s report on the Bedfordshire and Luton Minerals and Waste Local Plan Review (MWLP). Whilst that report clearly identifies the link between the future of the MWLP and the conclusions of the MKSM Examination, we do not agree with those participants who interpret the Inspector’s conclusions as calling upon us to rule out further landfill in the Vale. We have no difficulty in agreeing with the Inspector that “landfilling is not a use which would normally be considered desirable within a major development area” (I.R. paragraph 3.11.23). Equally, although we are not agreeing to suggestions of a major urbanisation corridor in the Marston Vale beyond what is proposed in the SRS, it is clear that developments in the northern part of the Vale have a key part to play in the strategy for the Bedford sub-area. We also take the view that continued landfilling in the Vale close to locations for development would militate against achieving the objectives of the SRS. However, we are in no position to determine whether or not there is a case for any further landfill to be permitted in the Vale, or how long it should continue. That depends not only on its effects on development but also on regional questions of need, on the alternative options available, and on considerations of BPEO. No evidence on any of those matters was before us.
- 9.34 EERA explained that it would be for the forthcoming RSS14 to address the issue from a regional perspective, and that this would take account of our conclusions. The MWLP Inspector appears to concur with this view (I.R. 3.1.88) and we agree that this is the appropriate way forward. These conclusions are reflected in our recommendation **R9.2**.

Recommendations

R9.1

Delete paragraphs 1.1 - 1.3 and 2.1 – 2.7, but possibly replace these with suitable brief scene-setting introductions to the SRS proposals for Bedford and for LDHR with Leighton-Linslade.

R 9.2

Replace paragraphs 2.8 and 2.9 on page 19 with a new statement on the priorities for the Bedford and northern Marston Vale growth area on the following lines:

Strategy for Bedford/Kempston and northern Marston Vale

Bedford/Kempston and the northern Marston Vale form one of the six growth locations in the Milton Keynes and South Midlands Strategy. The strategy provides for urban renaissance at Bedford/Kempston coupled with significantly increased delivery of new housing, economic development and new jobs, and the continued regeneration of the Marston Vale.

In order to strengthen the existing role and function of Bedford as a regional centre, the highest priorities will be the revitalisation of Bedford town centre and facilitating economic development and the provision of new employment in the town. Significant progress has already been made in recycling previously developed land and buildings for increased housing and mixed use developments. Progress has also been made in improving the quality of development, maintaining and improving the environment, and improving town centre safety and security. The East of England Development Agency has identified Bedford as an Urban Priority Area, and a number of economic initiatives have been supported, including the Priory Park Innovation Centre and Bedford Enterprise Hub. Work has been commissioned to develop the economic vision for the area, and Bedford town centre is identified as one of the pilot areas for Business Improvement Districts.

In the Marston Vale, development opportunities in the northern part have been brought forward, while environmental improvement and regeneration has been the focus throughout the Vale, with significant progress being achieved by the Forest of Marston Vale. Initiatives such as the Surface Waters Plan, and projects supported by the Sustainable Communities Greenspaces Fund are helping to add to the green infrastructure of the growth area.

Key future priorities

Key priorities for Bedford and the northern Marston Vale include:

- Taking forward the new Development Framework for Bedford Town Centre in order to enhance the retail, cultural and leisure facilities and achieve the general revitalisation of the central area. This will involve completing a range of redevelopment, refurbishment and environmental improvement projects.
- Developing the local economy to provide significant increase in employment, by identifying and fostering a range of growth sectors, particularly in high value knowledge-based sectors, with appropriate effort going into business support and skills development. This will include creating a focus for offices in the town centre, through the provision of a range of accommodation from small suites to large office space in both new and converted buildings.
- Securing a significantly higher rate of housing increase in the area through the implementation of existing commitments within the town and in the northern Marston Vale.
- Major improvements to public transport through the implementation of quality bus and priority corridors and park and ride proposals, such as to secure a significant shift towards public transport and non-motorised modes, particularly in connection with new development. Particular projects will include redevelopment of the bus station and creation of improved interchange, and convenient and attractive access to railway stations.

- Developing cultural and heritage focused tourism in Bedford by enhancing the existing cultural and heritage facilities and attractions, and through the provision of new facilities to foster a cultural quarter near the town centre and an increased range of centrally located over-night accommodation.
- Supporting a continued strategy of environmental regeneration in the Marston Vale and the creation and enhancement of green infrastructure through the Forest of Marston Vale. This includes resolving land use and environmental conflicts which may have an impact on the growth area strategy.

R9.3

Replace the Bedford/Kempston/Marston Vale part of Policy 1 with the following Policy:

Dwelling provision in the Bedford/Kempston/northern Marston Vale growth area will be as follows:

	<u>2001-2006</u>	<u>2006-2011</u>	<u>2011-2016</u>	<u>2016-2021</u>	<u>2001-2021</u>
Total	3,750	5,250	5,250	5,250	19,500
Annual rate	750	1,050	1,050	1,050	975

The proportions of the growth area total to be provided within Bedford Borough and Mid Bedfordshire District should be determined through Local Plans/LDDs. Existing Local Plan allocations suggest that Mid-Bedfordshire will provide 3,230 of the total of 19,500 additional dwellings up to 2021.

Achieving these rates of dwelling provision will require an acceleration of the economic performance of the area and delivery of the key local infrastructure set out in [Policy 2]. If monitoring shows that this is being achieved, it may be appropriate to revise upwards the figures for period 2011-2021. Any such revision should be brought forward and tested as part of a review of this SRS and RSS14.

R9.4

Add a new paragraph after the Policy recommended at **R9.3** to say:

For the purpose of monitoring the implementation of the strategy, a target of 22,400 additional jobs between 2001 and 2021 in Bedford Borough and Mid Bedfordshire District should be assumed.

R9.5

Add a further paragraph to say:

Beyond 2021, it should be assumed that development will continue at broadly the same rate as in the period 2011-2021, i.e. approximately 10,000 additional dwellings in the period 2021 - 2031. This should be regarded as an uncommitted planning assumption which should be reviewed in future reviews of the SRS and RSS14, in the light of monitoring and further studies.

R9.6

In place of paragraph 2.2 on page 18, include two new paragraphs as follows:

For housing development, the area already has sufficient land already committed as a result of existing planning permissions and local plan allocations to meet the requirements identified up to 2021. These include opportunities within the existing urban area and urban extensions south-west of Bedford and in the northern part of the Marston Vale. To meet any further requirements arising from non-delivery of existing commitments, or from additional provision that may be added after 2011, opportunities within the urban area arising from further regeneration, re-use of employment land, intensification and mixed-use development should be considered first, followed by further sustainable urban extensions. Locations for any such additional extensions should be established through a joint LDD prepared by Bedford Borough Council and Mid Bedfordshire District Council. The joint LDD should apply the principles for creating sustainable communities set out in Strategic Policy 3.

Existing commitments also include sufficient land to meet estimated employment development in quantitative terms. In terms of quality, regard needs to be had to the needs of business and the development required to facilitate economic growth. This may lead to additional land being required to provide for the right quality and type of development in sustainable locations. The stock of employment land should be kept under review, so as to offer an appropriate range of type, size and location of site, and also to ensure that land which is surplus to employment requirements is recycled for other uses including housing and mixed-use development.

R9.7

Policy 2 on page 23 relating to key infrastructure for Bedford/Kempston and Marston Vale should be revised to allocate schemes to five year periods consistent with Revised Policy 1 as recommended at **R9.3** above, taking account of the latest information on timing available from the relevant delivery agencies. The purpose and status of the Interchange Park rail station should be clarified.

R9.8

The diagram should make a clear distinction between the park and ride facilities being progressed by Bedfordshire County Council and proposals for new Parkway stations.

CHAPTER 10: LUTON, DUNSTABLE AND HOUGHTON REGIS

Overall objectives for LDHR

- 10.1 EERA's response to our discussion note for matter 6B identified four main components of the vision for LDHR. These provide a useful set of topics for considering the growth proposals of the SRS and can be summarised as follows:
- providing significant numbers of new homes and jobs by 2021;
 - focusing on strengthening Luton's role as a regional centre through urban renaissance and regeneration of the town centre, maximising use of brownfield land, and bringing qualitative improvements throughout the area;
 - maximising the opportunities presented by key employment sites to improve the local offer and improve on past economic under-performance, concurrent with raising local skill levels;
 - as an essential pre-requisite to much of the above, bringing forward necessary infrastructure including the M1 widening, the Dunstable and Luton bypasses, and improvement of public transport opportunities.

Scale and balance of the SRS homes/jobs targets for LDHR

- 10.2 The scale of housing growth proposed for the period to 2021 was criticised as excessive by South Bedfordshire DC, Dunstable and Houghton Regis Town Councils, Parish Councils to the north of the conurbation and many members of the public including the 30,000 signatories to the petition. These participants considered the level of provision out of proportion to local needs and the capacity of local infrastructure and felt that it would erode the character and distinctiveness of the towns and necessitate too much incursion into Green Belt countryside.
- 10.3 However, from the evidence of the County Council and Luton BC a substantial proportion of the SRS proposals for LDHR to 2021 would cater for internally-generated needs arising from factors such as the conurbation's relatively young age structure. Recently these 'local' growth pressures have necessarily been increasingly diverted to areas further north in the county, often with weaker sustainability credentials, because the restrictive nature of the tight Green Belt around LDHR has not made it possible to meet them in or around the urban area. It does not seem to us that this situation should continue any longer.
- 10.4 An additional consideration in Luton/South Bedfordshire is whether or not Leighton-Linslade should make a specific contribution to the SRS. Although SBDC does not favour this, the Town Council is attracted to the principle of accepting further growth (of an unspecified amount) provided that this is coupled with access to the resources attached to the SCP via the Inter-Regional Board. It sees this as a way of beginning to address a list of perceived existing infrastructure deficits accumulated as a result of past developments and ensuring that employment is attracted to the town to replace recent closure-associated losses, as well as catering for new demands created by future SRS-related development. The Town Council and a major landowner both felt that the town could contribute growth to the SRS at an early date, compensating for any delay in development at LDHR due to infrastructure constraints (which we discuss below).

- 10.5 As indicated at paragraphs 3.33-3.36 we are reasonably satisfied with the main principles of the methodology for arriving at the homes/jobs balance for the various growth areas in the MKSM area. We do not repeat those considerations here although in the debates at the Examination they were particularly pursued in the context of Luton/South Bedfordshire. However, in the context of these administrative areas there are two particular issues which cause us to recommend an upward adjustment of the proportion of the SRS housing provision for South Bedfordshire to be specifically accommodated within the “growth area”. The first is the issue of the “apportionment” between the Dunstable/Houghton Regis area and the remainder of the District. The second is the “Leighton-Linslade dimension”.
- 10.6 The GAA discusses the Dunstable/Houghton Regis issue at paragraphs 3.34 to 3.41, allocating 27% of the District’s growth to these places on a fairly pragmatic and contingent basis, although recognising that this may not represent an appropriately proportional contribution to the District total. Since Dunstable/Houghton Regis account for nearly half of the District’s population and the other towns and settlements (apart from Leighton-Linslade) are generally much smaller, we consider it reasonable for the LDHR urban area to accommodate a considerably higher share of South Bedfordshire growth. This would better reflect the Strategy’s concentration on the more sustainable larger settlements while also reducing the pressure to provide currently placed on the District’s smaller Green Belt towns and villages.
- 10.7 Turning to Leighton-Linslade, the combined urban area of Leighton Buzzard and Linslade has a population of nearly 34,000, accounting for about 30% of the total residing in South Bedfordshire. In the past 20-30 years, with reducing space for development in Dunstable/Houghton Regis, it has taken substantial shares of the District’s growth in employment and housing. The current Local Plan has provided for a further 2,500 dwellings and other uses, now being implemented. The towns are situated midway between LDHR and Milton Keynes and on the West Coast Main Line and in our view there is merit in the Town Council’s aspiration for a continuing level of growth here as long as it does not divert or dilute the efforts of the UDC for LDHR and its partners in regenerating the main conurbation.
- 10.8 In our view it would be reasonable to plan on the basis that Dunstable, Houghton Regis and Leighton-Linslade should together accept a total of 90% of the growth allocated to South Bedfordshire in the SRS. This would positively concentrate development into the most appropriate and sustainable locations and further relieve pressure on the District’s smaller Green Belt settlements.
- 10.9 From the high growth figures for South Bedfordshire in Tables 3.2 and 3.6 of the GAA, the consequence of the above approach would be to add 2,268 [(3,600 x 90%)-972] to the LDHR/Leighton-Linslade total in each of the periods 2001-11 and 2011-21. In the longer term perspective in 2021-31 the addition would be 3,024 [(4,800 x 90%)-1296]. The LDHR/Leighton-Linslade total would be 11,568 in each of the first two decades and 15,424 in the third, an overall total of 38,560. However, in our recommended new Policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 1 (**R10.2**) we redistribute the phasing of this growth over the 30-year period to better reflect what is likely to be achievable in the local circumstances discussed in this Chapter.
- 10.10 We therefore turn to the ways in which provision for this scale of growth can be made. Although every effort needs to be made to maximise the use of previously-developed land within the built-up area of LDHR it is clear that a substantial amount of development on green field land will be necessary if the proposals for the growth area are to proceed. Luton Borough is already developed to almost every part of its perimeter, so that the deposit draft structure plan to 2016 and ‘banked’ draft RPG14

provide for annual building rates for Luton of only 105pa to 2016 and 175pa to 2021 respectively. Expansion in South Bedfordshire beyond the developed areas of LDHR and Leighton-Linslade is not possible without revision to the Green Belt.

- 10.11 We received conflicting suggestions about the extent to which it would be possible to recycle land more efficiently within LDHR and therefore achieve greater numbers of dwellings through redevelopment, changes of land use and general intensification. The GAA suggested that up to 100ha of former employment land in the conurbation could become surplus to modern requirements and therefore available for redevelopment. A more recent study by the County Council concluded that the potential was much more limited. On the other hand, development control monitoring exercises indicate that former employment sites have provided a steady supply of new housing land in both Luton and Dunstable/Houghton Regis for some considerable time. With more modern and attractive employment sites coming on stream there seems little reason to suppose that current levels of recycling will not be at least maintained for some time. Moreover, we recommend that a more interventionist approach be taken to the active management and recycling of all categories of previously-developed land in the conurbation, reflecting the priority placed by Government on this matter, as further explained below (**R10.2**). This should help to drive up supply from this source. Nonetheless it is very evident that considerable expansion beyond the present urban area will be required even to meet LDHR's own locally generated needs, no matter what degree of success is achieved in increasing the rate of recycling land to residential and other uses. Also, a considerable amount of additional land will be required beyond the urban area for many other uses associated with the creation of sustainable urban extensions and the making-up of existing land use deficits within the existing conurbation.
- 10.12 The likely need for a review of the Green Belt around LDHR has been recognised for some time. The Bedfordshire Structure Plan 2011 (1997) recognised that a review may be necessary at the next roll-forward of the plan. Subsequently the deposit draft of the Bedfordshire and Luton Structure Plan 2016 (November 2002) accepted that there was "an exceptional case (for the release of an urban extension to the north of LDHR) to meet the housing and employment needs of the area to 2016 and...possibly beyond." That area was considered to be "the most sustainable location for meeting the majority of the dwelling requirement that cannot be accommodated from existing commitments or from within the existing urban area".
- 10.13 Against this background it is surprising that the SRS merely states that "urban extensions...north of LDHR and west of Dunstable...will require revisions to the South Bedfordshire Green Belt boundary" without meeting the requirement of PPG2 (paragraph 2.6) to explain the exceptional circumstances justifying the proposed review. However, we are satisfied that the situation described in the above paragraphs is sufficiently exceptional to warrant a review of the Green Belt undertaken jointly by the relevant local authorities in the case of LDHR and by South Bedfordshire in the case of Leighton-Linslade (see the recommended policy at **R10.2** below). We therefore recommend that the case for a Green Belt review be clearly summarised in the SRS.
- 10.14 The Green Belt review should aim to provide the necessary headroom to meet the land use needs of the SRS to 2021 and, in addition, should identify sufficient areas of safeguarded reserve land to meet longer term needs using the SRS perspective for the period 2021-31 as uncommitted planning assumptions. In the case of LDHR we heard some arguments both in favour of (and against) a number of directions of growth in a wide and more or less continuous arc from west of Dunstable, through north of Dunstable and Luton, to east of Luton (including the "key reserve site" in North

Hertfordshire), to south of Luton at an area dubbed by its promoters as the “Luton Business Triangle”. We were invited by some to indicate preferred priorities for one or another of these directions of growth but different sets of environmental impacts would be caused by development in all these areas and there are a number of strong constraints to be taken into account, some obvious major examples being Maiden Bower Hill Fort, the Chilterns AONB, a number of SSSIs (including Galley and Warden Hills), the highly sensitive valley landscape of Lilley Bottom, and the historic parks at Putteridge Bury and Luton Hoo. The identity of nearby villages to the north will also need to be appropriately recognised.

- 10.15 Another crucial factor currently receiving reconsideration through an ODPM-funded study is the routes of the northern and eastern bypasses. In our view there needs to be an iterative relationship between a number of factors. These include (a) consideration of the best bypass routes resulting from a deeper examination of landscape and other environmental factors (b) a more thorough and fully debated appreciation than is offered by the assumptions within the GAA of the quantum of land that needs to be taken out of the Green Belt (including but not restricted to the disputed issues of density and open space assumptions), and (c) identification of the detailed impacts of possible development sites. The complexity of these matters goes far beyond the scope of the information available to us, the time available to examine it, or the proper context for community involvement in site-specific planning. Resolution can only be achieved through an appropriate LDD or LDDs. We therefore consider that it would be unhelpful for us to rank the directions of growth in any order or to express any preferences between them. In that respect we support the view of EERA that what is required is “a mechanism, not an answer”. Consequently we confine ourselves to recommending (**R10.2**) a new policy which sets a clear brief for action by the three local authorities involved (Luton BC, SBDC and North Hertfordshire DC). Our recommended change to the key diagram reflects this approach by referring to an “arc of search for urban extensions and safeguarded land beyond the present green belt boundary” from west of Dunstable to south of Luton. We do not know whether all these growth directions will be required, but all should be examined through the LDD process.
- 10.16 Turning to the potential contribution of Leighton-Linslade, Hives Partnership sought definite reference in the SRS to a growth direction to the north-east and east of the town, sufficient to provide for up to 6,000 houses, associated mixed use development including employment, and an eastern bypass. However, there may well be other options that were not put forward for consideration. We therefore do not endorse any particular growth direction. In any case, our view is that Leighton-Linslade should be looked at afresh in the context of being called upon to make an appropriate contribution to the growth levels described above. We do not consider it necessarily appropriate to conclude that Leighton-Linslade should receive growth in some way proportional to its share of South Bedfordshire’s total present or future (i.e. post SRS) population. For one thing, we do not know how far such a share would relate to commitments already made. More importantly, it may be that an analysis of the constraints and opportunities affecting LDHR and Leighton-Linslade would suggest some other split of the 90% South Bedfordshire growth figures between the two areas. Our recommendation leaves this for resolution at local level.

Urban renaissance and regeneration

- 10.17 There was widespread agreement among participants (eg the local authorities, the economy-related bodies, the ‘green’ organisations, and the developers) that LDHR is in need of substantial positive action on many fronts to achieve regeneration and an urban renaissance. However, the LDHR GAA itself recognises (paragraph 2.29) that “On the face of it, there are several reasons why the delivery of growth areas as part of an urban renaissance might appear unwelcome and indeed contradictory”. After considering a number of possible negative consequences (paragraph 2.31) the Assessment finally concludes (paragraph 2.32) that significant growth “would only be appropriate and successful if delivered as part of the urban renaissance agenda” and could in some ways assist it.
- 10.18 A number of participants (e.g. SBDC, the Town Councils, CPRE and FOE) pointed to the apparent illogicality of the SRS in identifying growth directions for substantial green field urban extensions at the northern edge of the conurbation at the opposite end of the built-up area from the principal town centre, the airport and the main employment areas. Urban extensions in these areas would be some 7.5km from Luton Town Centre and up to 9km from the main employment areas near the airport with journeys between the two involving travel through a highly congested road network lacking rapid connections by public transport. This situation was characterised as likely to undermine efforts to meet the more taxing development challenges within the urban area necessary to achieve the “dramatic re-branding of LDHR, underpinned by major investment” (GAA paragraph 2.30).
- 10.19 Infrastructure constraints are likely to prevent much progress being made in implementing urban extensions in the immediate future, as discussed below. Consequently, we consider it imperative that efforts are focused initially on beginning to upgrade the image of the whole urban area. This will be the major challenge for the proposed UDC and its partners over the next five years or so and will require the deployment of substantial resources. It is clear that the town has not fared well in recent decades in acquiring developments of substantial quality. The recent high quality development at Capability Green, to which our attention was directed, serves both to contrast with the mediocre and insensitive nature of too much development elsewhere and to provide an example of what needs to be achieved in the future.
- 10.20 We learned that consultants are working on a master plan for the town centre. This is timely. The output of that work needs to represent an important part of a wider programme of steady and concerted action on many fronts by the relevant partners to upgrade the present poor image of the town. Land assembly powers may need to be exercised to help to repair and knit together the somewhat tattered urban fabric. In this context major priorities are likely to be transforming the gateway area to the town centre around the rail and bus stations, enabling the creation of some more worthy landmark buildings on prominent sites, and assisting and speeding the process of recycling outworn buildings and areas of underused ‘previously developed land’. Such actions need to be extended to the other town centres within LDHR as well as to other carefully identified nodal sites and public transport corridors where dense clusters of development could maximise the use of previously developed land while also enhancing the image of the conurbation.
- 10.21 Another regeneration-linked priority in the early years will be the need to make solid progress in tackling the serious issues of traffic congestion within the conurbation. Unless this is achieved many of the above initiatives will be hampered. Investors will

be less likely to be attracted to the conurbation and in our view it will not be possible for the planned urban extensions to be plugged into the urban fabric in a sustainable way.

- 10.22 At the time of the Examination there was considerable interest among local participants in the future of the planned Translink busway. Luton BC were about to continue as sole promoters of the scheme under the Transport and Works Act procedures, Bedfordshire CC having withdrawn from participation but latterly confirmed their support for the principle of the scheme. Some participants such as Dunstable Town Council and FOE remained strongly opposed to the scheme, being wholly unconvinced of its benefits or viability and in favour of other solutions such as re-opening of the Dunstable-Luton rail link. On the other hand, other participants, such as a number of the developers, advocated the benefits of Translink.
- 10.23 The Examination was not the appropriate place for considering the merits or otherwise of the Translink process and we make no comment upon it, although we note that the MKSM study (paragraph 7.11) was predicated on the provision of a suitable ‘mass transit’ system for Luton. Whether or not Translink is implemented the important thing from the SRS standpoint is that a convincing package of transport-related measures is put in place to assist the regeneration process. The key transport objective for LDHR must go well beyond the simple re-connection of Dunstable town with the Midland Mainline but extend to a step change in public transport accessibility and use throughout the conurbation. As recognised in the Luton-Dunstable LTP 2001-2006 (p2), regeneration “will only be successfully achieved through good accessibility, much improved and integrated facilities, some restriction on car use, particularly at peak periods, and close partnership with the community and other stakeholders in achieving changes in travel behaviour.” The LTP roll-forward for 2006-2011 will therefore need to provide for solid achievements in increasing the attractiveness of public transport, offering real opportunities for modal shift throughout the urban area and creating a convincing network that can be extended to the urban extensions as they begin to come on stream. It should also aim to develop better links between LDHR and the Leighton-Linslade area.
- 10.24 We conclude that early action in all these areas will form an essential pre-requisite to advancement of the regeneration and renaissance objectives of the SRS and lay important foundations for the future success of the urban extensions. Our recommendation (**R10.1**) in relation to paragraph 2.14 (p20) of the SRS reflects this.

Employment issues

- 10.25 LDHR is recognised as a PAER, parts of which benefit from Assisted Area status. This reflects the relatively poor circumstances of the Borough Council’s area, which has the highest unemployment rate in the SRS area, higher than the national average and twice the regional average, despite its proximity to London. Apart from Corby it also has the lowest levels of qualifications among its residents and has experienced the lowest percentage increase in the number of jobs in the period 1991-2000. Consequently there is a need to enhance employment prospects by increasing the local skills base, changing employers’ perceptions of the town, and providing a variety and choice of high-quality employment sites.
- 10.26 A number of participants advocated an increase in the employment and housing provision for LDHR, pointing to factors such as its nodal road, rail and air transport location close to London. Reference was also made to the Bedfordshire and Luton

- Commercial Land and Property Study which suggests that the recent rate of economic growth is substantially above the level forecast in the MKSM study.
- 10.27 In this context, a particular issue discussed at the Examination was whether or not the SRS fully reflects the dynamism of Luton Airport and its contribution to the local economy. Many, including the Borough Council, EEDA, the airport operators, and a number of developers, felt that the SRS should more fully address the consequences of the recent Government White Paper (The future of Air Transport, December 2003) which states that “continued expansion of Luton Airport has the potential to play a key role in delivering employment-led growth”. According to the York Aviation Report commissioned by LLAOL in 2002, growth from 7mppa at present to 31mppa in 2030 would increase the total quantity of direct, indirect and induced airport-related employment from an estimated 10,300 to 22,200 in 2030. However, others (e.g. FOE and CPRE) urged caution, suggesting that such reliance on the aviation industry could prove to be unsustainable.
- 10.28 In our view it would not be advisable to increase the quantity of growth to be planned for at LDHR purely on the basis of this possible airport growth scenario to 2030. Since Luton is heavily dependent on inexpensive holiday flights, a highly price-elastic form of demand, its future prosperity will depend on so many variable and uncertain factors that it would be hazardous to place too much faith on continuation of steady airport growth to the above forecast levels over a thirty-year period. The safely-foreseeable and sustainable needs of the airport need to be met within future plans for Luton and the forthcoming airport master-plan should help to define them. However, we do not consider that the housing and employment targets of the SRS should be specifically increased or redirected to place too much emphasis upon this particular sector. The town has already experienced the difficulties that can occur as a result of too much reliance on a single employer and industry. In any case, we were told by EERA that the SRS and draft RPG14 already assume a background level of airport usage of 15-20 mppa.
- 10.29 In our view the SRS should seek to encourage a more varied approach, exploiting the geographical advantages of the towns to make them attractive to a wider range of employers, including those in the much sought-after knowledge-based sectors. This is likely to require provision of a better mixture of high-quality sites at a greater variety of well-connected locations, seeking to overcome the perceived lack of choice identified by the Chesterton Report and referred to by some participants (eg EEDA, Savills). More concentrated efforts to regenerate and increase the attractiveness of areas within the conurbation (as discussed above) will also contribute to this approach. As in the case of the preferred directions for housing growth, claims were made for certain areas to be specifically identified for such employment expansion eg areas in the vicinity of the airport and within urban extensions to the north. However, we consider that this is another matter best dealt with through the brief set for the joint LDD.
- 10.30 As with the other growth towns we support the inclusion of the relevant employment figures from PART103 for use in the process of monitoring and reviewing the Strategy (**R10.2**).

Infrastructure

- 10.31 Major improvements to the transport infrastructure of LDHR are planned. In terms of road infrastructure, the HA currently estimates completion of M1 widening from J6-J10 by 2008, while the length from J10-J13, together with the Dunstable Northern Bypass (A5-M1) will be complete by 2011. The Luton Northern Bypass (M1-A6) and any

eastwards extensions of this towards Luton Airport are matters to be dealt with through the Local Transport Plan. Despite the current route studies this length of the bypass could not fulfil its intended function until connected with the widened M1. These timings indicate that the growth-related aspects of the SRS will not get fully under way before 2011. As indicated above, this will shift the immediate focus for the relevant implementation agencies onto activities designed to achieve urban regeneration and renaissance and the planning and implementation of public transport infrastructure to allow urban extensions to be plugged successfully into the wider urban area.

- 10.32 A number of developer-participants at the Examination were anxious to make progress as fast as possible with implementation of any urban extensions emerging from the Green Belt review. There was concern that the SRS suggested an embargo on any northwards extensions prior to completion of the M1 widening, although in EERA's view the essential need was to avoid construction on any particular site commencing before there was certainty that the end date for completion of both the development and any item(s) of related infrastructure would reasonably coincide. On the other hand the local authorities were wary of the SRS appearing to adopt any trigger mechanisms that could appear to relax the 'no infrastructure, no development' approach. In our view the important thing is for the preparation of the joint LDDs, including the review of the Green Belt, to commence as soon as possible. This is the process by which it will be possible (a) to identify any sites which may be able to be developed at a relatively early date because their infrastructure implications are not dependent on a longer term infrastructure project and (b) to devise any appropriate trigger mechanisms that may be necessary to link occupation of dwellings or other forms of development with completion of associated infrastructure. We build this point into our recommendation concerning the brief for the LDDs (**R10.2**).
- 10.33 The SRA were concerned about another item in the list of key infrastructure requirements (Policy 2, p24) – the proposed new station at Luton North, which would be a fourth on the Midland Mainline/Thameslink within the LDHR urban area and could therefore raise operational capacity issues. This scheme is in the lowest category of certainty ('proposed for investigation') and we were not made aware of any work to appraise the role of the station or prepare a business case for assessment. There is likely to be a substantial amount of development in the vicinity of the station after 2011, so a station here could be deliverable within the second decade of the SRS. However, the case for construction of a station here (either instead of, or complementary to, other public transport initiatives for the northern expansion areas) has yet to be made. This is another matter that needs to be resolved through the LDD process.
- 10.34 As in the case of the other growth towns we recommend (**R10.3**) that the items in Policy 2 be placed into five-year bands based on the operational plans and expectations of the implementing bodies.

Additional growth areas proposed by others

- 10.35 J B Planning put forward the suggestion that Barton-le-Clay be included within the SRS, with its own directions of growth to the north and east, stressing that these could contribute earlier than urban extensions to the north or east of LDHR. In written representations we were also asked to recommend a greater role for Ampthill and Flitwick. In our view these relatively small settlements have little to commend them as sustainable elements within the SRS as compared with LDHR and Leighton-Linslade.

Consideration of the merits or otherwise of any future growth at such locations should remain a local matter for the District Council.

Overall conclusions - LDHR/Leighton-Linslade

10.36 Our principal conclusion is that Policy Bedfordshire/Luton 1 should be replaced by a new policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 1 (**R10.2**), requiring the timely preparation of a set of LDDs to put the SRS proposals into effect for the LDHR conurbation and a second LLD for Leighton-Linslade, prepared by South Bedfordshire. In this new policy we redistribute the slightly increased housing growth figures for LDHR and Leighton-Linslade into five-year, rather than 10-year, bands. We consider that this provides a more realistic indication of the way in which development levels could build up over the next 20 years. During the first five year period (2001-2006) development will start only modestly above the present relatively low levels now occurring but will increase steadily thereafter through a period of actively-managed and accelerated re-use of previously developed land mixed with some emerging green field development on land identified through the LLD (2006-2011). Development will then increase further in the two five-year periods of the second decade when urban extensions will be able to come on stream at a faster pace. Depending on subsequent monitoring and review, the development trajectory could continue at much the same level after 2021 if this is found to be appropriate. On the basis of what we heard we judge that the split adopted for the three decades in the SRS (30:30:40%) should be roughly 24:39:37%. However, we emphasis strongly that if it proves possible to achieve a faster build-up during the first decade (for example through earlier contributions at Leighton-Linslade) the LLDs should strive to achieve this.

RECOMMENDATIONS

R10.1

Delete paragraphs 2.10-2.17, but provide a new statement for the LDHR growth area as follows:

Although still perceived by some as three separate towns, Luton, Dunstable and Houghton Regis have coalesced into a single conurbation forming the largest urban area in Bedfordshire. Administratively they are split with Luton as a unitary authority, built up to its boundaries, and Dunstable and Houghton Regis together forming the largest urban area in South Bedfordshire District.

Despite its favourable location on the M1 and Midland Mainline corridors, the presence of London Luton Airport and its proximity to London the economy of the urban area is in a poor condition, with unemployment above the national average and twice the regional average. There has been a historic over-reliance on manufacturing, particularly the vehicle industry, and a failure to attract sufficient representation in services and the knowledge-based industries. The skills base is poorly matched with these economic growth sectors. Consequently the towns have been recognised in RPG9 as a Priority Area for Economic Regeneration and have Assisted Area status. There is a need for concentrated efforts to achieve urban renaissance and regeneration to transform the image and townscape of the urban area, relieve the severe levels of congestion, and improve the quality of development.

While some of these aims can be met within the present confines of the urban area others cannot. The Green Belt now forms a tight boundary all around the towns so that, in recent years, it has become increasingly impossible to meet locally-generated needs, especially for housing of the relatively young population. Development has been diverted north of the green belt to other parts of Bedfordshire and beyond, sometimes to locations less inherently sustainable than Luton/Dunstable/Houghton Regis.

Although efforts need to be made to release more of the development capacity within the towns this will not allow even local needs to be met, nor will it provide sufficient scope for regeneration to the point where the conurbation can capitalise on its locational advantages to achieve an urban renaissance and contribute to the wider housing needs of the South East as sought by the Sustainable Communities Plan. As has been increasingly recognised in recent years, these circumstances are exceptional and require a comprehensive review of the Green Belt around LDHR to provide headroom for possible development requirements to 2031.

The Green Belt will also be reviewed around Leighton-Linslade to provide the town with scope to increase its sustainability and make an appropriate contribution to the SRS.

Positive action by the local authorities, the UDC and other parties will also be required on a number of short and medium terms issues. The initial focus will be on:

- accelerating the recycling of urban land,
- increasing the attractiveness of the town centres for retailing, cultural and other activities (especially Luton), and raising environmental quality, especially around the rail and bus stations,
- tackling congestion and providing better public transport,
- achieving better quality development,
- providing a better choice of employment sites, to attract a wider range of companies, including those in the high-value knowledge-based sectors,
- laying the foundations for sustainable urban extensions to be plugged into the improving urban fabric mainly, but not necessarily entirely, after completion of the M1 widening and the northern bypasses, expected to be in 2011.

Sufficient land will need to be excluded from the Green Belt to accommodate significant numbers of new homes and jobs in the period to 2021. The Green Belt review will also need to exclude other land, safeguarded against further possible development needs to 2031, using a provisional planning assumption that development levels in 2021-31 may be broadly similar to those in the preceding decade.

The town centres in LDHR

Luton: The strategy will be to build up the town centre as the conurbation's principal focus for retailing, service functions, cultural activities and office development; to encourage improvements in the quality of development and the appearance of the public realm; to enhance accessibility by public transport; to improve public safety and security, and to implement the agreed recommendations of the master plan.

Dunstable: [Existing paragraph 2.15]

Houghton Regis: [Existing paragraph 2.16]

Leighton-Linslade:

This detached urban area lies roughly halfway between Luton & Milton Keynes and comprises the two contiguous towns of Leighton Buzzard and Linslade set on opposite sides of the West Coast Main Line. The towns have developed steadily to a population of about 34,000 and would benefit from a continuing level of growth at an appropriate level to improve their economy, functioning and infrastructure. This growth would contribute towards the overall SRS provision for Luton and South Bedfordshire. The level of growth will be determined through an appropriate LDD prepared by the District Council contemporaneously with the new planning strategy for Luton Dunstable and Houghton Regis so that the two can together make provision for the level of growth set out in the SRS in Policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 1.

R10.2

Insert new policy Luton/Dunstable/Houghton Regis 1, as follows, in place of Bedfordshire Policy 1 and its footnotes:

New Policy Luton/Dunstable/Houghton Regis 1

The Local Development Schemes for Luton Borough Council, South Bedfordshire District Council and North Hertfordshire District Council will identify and make provision for the timely preparation of a set of appropriate LDDs to put into effect the proposals of the SRS to 2021. Provision will be made for joint working where necessary.

The LDDs will make a comprehensive review of Green Belt boundaries around the LDHR conurbations and Leighton-Linslade respectively, so that in (combination) the necessary headroom is provided to meet the foreseeable land use needs of the SRS to 2021. Sufficient areas of safeguarded reserve land will also need to be excluded from the Green Belt to meet the longer-term perspective provided by the SRS to 2031.

LDDs within the Local Development Schemes should set firm guidelines for pro-active inter-agency approaches that will:-

- meet the requirements of Strategic Policy 3;
- maximise opportunities for recycling redundant and under-used urban land especially at nodal sites and on good-quality public transport routes;
- upgrade the qualities of the town centres and the facilities which they offer;
- achieve a better quality of new development throughout the urban area, including strategic improvements to the public realm;
- provide an adequate choice of high-quality employment sites for key target and existing sectors, making a realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites;
- reduce the need to travel by private vehicles by integrating land use and transport planning, achieving a step-change in the attractiveness of public transport within the conurbation, implementing conurbation-wide park and ride schemes, improving the

- attractiveness of walking and cycling, and implementing travel demand management measures;
- provide for sustainable urban extensions clearly linked, where appropriate, with the completion of any key items of necessary associated infrastructure including the M1 widening (J6-J10 and J10-J13), the Dunstable and Luton Northern Bypasses and the Luton Eastern Bypass:
 - investigate the possible role of a new station to be built in the vicinity of the junction between the M1 and the northern bypasses:
 - review, and if necessary, set new targets for the provision of affordable housing .

Levels of growth

Together, the LDDs for the area should provide for total growth in the period 2001-2021 as follows:

	2001-2006	2006-11	2011-16	2016-21	Total
Dwellings (LDHR)	3,000	6,000	7,500	7,800	24,300
	(ave 600pa)	(ave 1,200pa)	(ave 1,500pa)	(ave 1,560pa)	

The provision of housing on the above scale will be monitored against a target of net growth in jobs in Luton Borough and South Bedfordshire District of about 12,600 additional jobs over the period 2001-2021.

1,600	3,100	3,900	4,000	12,600
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For the purposes of the Green Belt reviews land should be safeguarded for a total of a further 15,400 houses and 7,400 jobs in the period 2021-2031 although allowances should be made within these figures for continuing recycling of urban land after 2021. Moreover, these longer-term figures are to be regarded as uncommitted planning assumptions purely for the purpose of the Green Belt reviews and will be subject to further review at an appropriate future date.

The housing figures in the above policy relate only to the LDHR/Leighton-Linslade growth towns (including any areas within North Hertfordshire identified for growth associated with LDHR). Residual growth levels in other parts of South Bedfordshire and non LDHR-linked parts of North Hertfordshire will be identified through RPG14/RSS14.

R10.3

Policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 2

Review the timing of these items and place them into five-year phases based upon the operational plans and expectations of the implementing bodies and include a reference to major public transport improvements throughout the urban areas.

R10.4

(See also paragraph 4.17 and **R4.4**) Revise section 4 to cover the proposed arrangements for the Urban Development Corporation.

11 SCHEDULE OF RECOMMENDATIONS

Number/Location	Recommendation
Chapter 3	
<u>R3.1</u>	<p data-bbox="443 491 2123 528">Revise paragraphs 2.1 to 2.3 as follows:</p> <p data-bbox="443 564 2123 715">2.1 As a growth area, the Sub-region will undergo more change and development than many other areas. Change is key to all aspects of sustainable development. It is important, therefore, that the growth area acts as a driver of sustainable development, rather than running counter to it. The Strategy provides many opportunities to do this, through the way development is planned and carried out, and through the resources and activity it will bring into the area.</p> <p data-bbox="443 751 2123 863">2.2 Revise bullet points as follows: Add a fourth bullet point:</p> <ul data-bbox="472 895 2123 975" style="list-style-type: none"> • Urban areas that relate well to the surrounding landscape and contribute to maintaining and enhancing environmental assets as a cultural and recreational resource, and to resources for biodiversity; <p data-bbox="443 1011 2123 1054">Revise the existing 6th bullet point to read:</p> <ul data-bbox="472 1091 2123 1203" style="list-style-type: none"> • An urban fabric and individual buildings which can meet different needs over time, which minimise the use of energy and natural resources, facilitate the reduction, recycling and sustainable management of waste and contribute to improved air and water quality. <p data-bbox="443 1246 2123 1321">2.3 These requirements are largely dealt with in national and regional guidance. However, it is important that every aspect of the growth area strategy is focused on delivering them. The following subsections show how this will be approached.</p>
<u>R3.2</u>	Amend the section “Strategic Communications Infrastructure” under a new heading as follows:

Number/Location	Recommendation
	<p>Strategy for Movement</p> <p>1.6 The growth area gives rise to substantial movement needs which will increase strongly in future, against a background of existing shortcomings in capacity and quality of the transport system. Consistent with the priorities in the Regional Transport Strategies, the strategy for the growth area will involve:</p> <ul style="list-style-type: none"> • encouraging modal shift towards the more sustainable modes, • taking advantage of major improvements to the capacity, quality and accessibility of key public transport facilities • increasingly applying demand management approaches to influence travel behaviour and protect the capacity of the strategic highway network, • investing in highway improvements to ensure that strategically important movements are carried efficiently. <p>1.7 Notwithstanding the priority for reducing the Sub-Region’s dependence on increasing road traffic, and for moving to more sustainable travel patterns, the growth area aspirations will require significant infrastructure investment. If these requirements are not met, the Sub-Region will not be able to achieve the levels of housing and economic growth envisaged.</p> <p>1.8 (as existing draft SRS paragraph 1.6)</p> <p>1.9 (as existing draft SRS paragraph 1.8).</p>
<p><u>R3.3</u></p>	<p>Add a new subsection in Section 2 “Sustainable Communities” under a new sub-heading to come after paragraph 2.10, as follows:</p> <p>Sustainable Movement</p> <p>[New] 2.11 As part of the strategy for improving sustainable transport in the Sub-Region, a priority for each of the six main growth locations will be to develop high-quality, comprehensive public transport systems. Such systems should connect homes and workplaces, town centres, schools and other key attractors, and interchanges to improve access to the inter-urban rail network. These developments should be accompanied by improvements in pedestrian circulation and facilities for cycle use, together with appropriate traffic management measures, in order to achieve a</p>

Number/Location	Recommendation
	<p>significant modal shift away from car use.</p> <p>2.12 Where sustainable urban extensions or other major developments are planned, measures will need to be incorporated from the outset to promote sustainable travel patterns. In particular strong public transport connections to town centres and employment areas will need to be provided.</p>
<u>R3.4</u>	Figure 3 on page 12 should be amended to provide separate descriptions, status and timing for the Oxford - Bletchley and Bedford – Stansted sections of the East-West Rail project. Other amendments to the table should be made to reflect the Strategic Rail Authority’s latest information on the status and timing of schemes.
<u>R3.5</u>	Information on the highway schemes in Figure 3 on page 12 should be updated to reflect the Highways Agency’s latest information on the status and timing of schemes.
<u>R3.6</u>	The proposed Milton Keynes – Bedford canal should not be shown in any of the SRS diagrams.
<u>R3.7</u>	<p>Amend paragraph 2.14 (Part A) to read:</p> <p>Further education resources need to be expanded to serve the increasing education and training needs of the Sub-Region’s population, and to provide the increase in skills and qualifications the workforce will need. Such provision must be in easily accessible locations. The higher education sector also has a key part to play in the Sub-Region’s growth, in the context of the aim of increasing its knowledge based economy, and providing properly resourced university facilities of a scale and excellence befitting a major growth area.</p>
<u>R3.8</u>	<p>In paragraphs 2.2, 2.6, Strategic Policy 3 and paragraph 3.15, replace the words “health care” or “health” with “health and social care”.</p> <p>Replace paragraphs 2.15 and 2.16 with the following:</p> <p>2.15 NHS service delivery is through primary care (GP surgeries, health centres), intermediate care (community hospitals), secondary care (general hospitals and mental health facilities) and tertiary care (regional specialist</p>

Number/Location	Recommendation
	<p>centres). In the Sub-Region, capacity is stretched across all these areas.</p> <p>2.16 The trend in health and social care is to deliver services as near to the patient’s home as possible, reducing time spent in hospital and promoting independence. Over the next thirty years this will require significant changes in the configuration of services. In particular, while secondary and tertiary care will expand, provision should be focused on new and expanded primary and community health and social care facilities, delivered by a range of sectors.</p> <p>[new 2.17] In order to ensure the availability of the trained and specialist staff required, a major expansion of health related training and education will be needed, whether through new institutions or increased provision by existing ones.</p>
<u>R3.9</u>	Remove references to 30% and 40% targets for affordable housing from the Part B Statement for Milton Keynes and Aylesbury.
<u>R3.10</u>	<p>Add a new sub-section “Affordable Housing” to Part A section 2. This sub-section should clarify:</p> <ul style="list-style-type: none"> c) the role of the growth area, if any, in meeting wider affordable housing needs arising from areas outside the MKSM sub-region; d) the degree to which the strategy is dependent on additional funding for affordable housing, and whether funding will be in proportion to locally identified needs or on some other basis.
<u>R3.11</u>	<p>Add a new heading and paragraphs after the “Community Infrastructure” sub-section to read as follows:</p> <p>Environment and Green Infrastructure</p> <p>Advantage needs to be taken of the opportunities of the Sub-Region’s growth to create advances in sustainability. This will involve promoting the highest standards of environmental performance, not only in the design of new buildings but also in masterplanning and managing development. An integrated approach is required in which resource efficiency, including water use, opportunities for renewables, waste reduction, emissions, protecting and promoting biodiversity and creating</p>

Number/Location	Recommendation
	<p>attractive, healthy and safe places to live are considered at the earliest stage. What is achievable at any given location will depend on local circumstances and the scale of development taking place, but innovative solutions need to be encouraged at every level.</p> <p>The Sub-Region’s important environmental and cultural assets, some of which are of national or regional significance, need not only to be protected but also, where appropriate, enhanced. The growth area provides opportunities for this, and for access and management for the benefit of an increased population, which needs to be achieved without damage to the assets themselves.</p> <p>The provision of green infrastructure needs to be addressed in the planning of development throughout the Sub-Region so as to ensure a net gain to meet the needs generated by growth and, where relevant, help to address existing deficiencies. This may take the form of protection of existing resources, enhancement, extension or the provision of new or replacement facilities. Green infrastructure includes recreational and sports facilities, pathways and routes, natural and historic sites and water spaces, as well as accessible countryside. A network of multi-function green spaces in urban areas, urban fringe and the wider countryside needs to be established.</p> <p>Water use will be a significant environmental impact of the Sub-Region’s growth and demand management to achieve savings of some 25–30% on current water usage will be an essential part of the strategy. Meeting the demand for water, as part of wider regional needs is likely to entail major development outside the Sub-Region, the impacts of which will need to be assessed. Progress with such provision needs to be kept in view as it may affect the rate of growth that can be realised within the Sub-Region.</p>
<p><u>R3.12</u></p>	<p>Revise Strategic Policy 3 to read as follows:</p> <p>Sustainable Communities will be achieved in the Sub-Region through the implementation of development in accordance with the following principles:</p> <ul style="list-style-type: none"> • Designing attractive cities, towns and public places and promoting the highest standards of environmental performance; • Providing better public transport and facilitating safe and convenient movement on foot;

Number/Location	Recommendation
	<ul style="list-style-type: none"> • Maximising the opportunities afforded by growth to facilitate the regeneration of deprived communities; • Maintaining and increasing the Sub-Region’s stock of strategic environmental and cultural assets; • Providing green infrastructure for existing and expanding communities, including access to green space that promotes healthy lifestyles and can be used for formal and informal recreation and educational purposes; • Improving skills levels and enterprise support; • Ensuring a supply of housing of the right types, sizes and tenure, and providing a step change in both the quantity and quality of affordable housing to meet the needs of the Sub-Region; • Providing the social (e.g. primary, secondary, further and higher education, health and social care) and environmental (e.g. water supply and treatment) infrastructure to meet current deficits and additional demands; • Providing high quality employment land and premises which meets the needs of growing industries; • Maximising the contribution of previously developed land to the Sub-Region’s growth; • Promoting and facilitating community development through the active involvement of the voluntary and community sectors.
Chapter 4	
<u>R4.1</u>	Thoroughly edit the SRS to ensure that the paragraph numbers run sequentially through the entire document, and that policies, figures and tables are numbered consistently and in a single sequence.
<u>R4.2</u>	Review Figure 1 to correct the key and ensure that all relevant features are included.

Number/Location	Recommendation
<p><u>R4.3</u></p>	<p>Modify the spatial diagrams to form a single SRS-wide diagram with a Northamptonshire inset as indicated in paragraphs 4.3 to 4.8 above.</p>
<p><u>R4.4</u></p>	<p>Replace paragraphs 1-16 as follows:</p> <p>The origin of the Sub-Regional Strategy (SRS)</p> <ol style="list-style-type: none"> 1. [Retain paragraph 1, but include reference to Peterborough after Cambridge.] 2. The wider context for the SRS is set by the Government’s Sustainable Communities Plan. This seeks to accommodate the economic success of London and the wider South-East and ensure that the international competitiveness of the region is sustained for the benefit of the region and the whole country. Specifically, the policy statement ‘Sustainable Communities in the South East (2003)’ seeks (p4-16) to address a number of strategic challenges facing the South East: <ul style="list-style-type: none"> • to increase housing supply by providing for the region’s growing population, turning around the trend in house completions, improving the match between housing needs and provision, and making better use of land; • to make home ownership more affordable; • to tackle transport issues; • to address issues concerning skills and the labour market; and • to tackle deprivation and the need for urban renewal 3. The Sustainable Communities Plan makes clear that where it is necessary to expand communities to meet these ends this should be achieved through the creation of places that are sustainable, well-designed, high-quality and attractive where

Number/Location	Recommendation
	<p>people will positively choose to live and work.</p> <p>The evolution of the SRS</p> <ol style="list-style-type: none"> 4. The SRS has been prepared in response to the Government’s request to the three Regional Planning Bodies whose areas cover parts of the sub-region to develop proposed Alterations to Regional Planning Guidance for the South East, East Midlands and East of England. 5. In July 2001 consultants were commissioned by the Government and the Regional Assemblies and Regional Development Agencies for the South East, East of England and the East Midlands. The final report (The Milton Keynes and South Midlands Study) was published in September 2002. The report concluded that the area had considerable potential for sustainable economic growth over the next 30 years which would be of benefit both locally and nationally. Having examined the possible outcome of a number of economic growth scenarios it concluded that the area could grow at the “high growth” scenario. This would generate from 230-300,000 jobs (300-360,000 households) by 2031 compared with some 150,000 jobs (210,000 households) if current planning policies continued. Without a change in current policy there would be a worsening imbalance between jobs and resident workers in most parts of the MKSM area, leading to increased commuting by private transport. However, at a strategic level, the extent of growth identified in the study is not exceptional in relation to past trends. 6. The study evaluated four options for distributing growth: dispersed growth on the current model; urban concentration based on four centres (Milton Keynes, Northampton, Bedford and Luton/Dunstable/Houghton Regis); a corridor option based on the Midland Mainline and the West Coast Main Line; and a metropolitan double centre focussed on Northampton and Milton Keynes. The latter two were perceived to be most in line with sustainable development principles, but could have caused an unacceptable degree of coalescence. A ‘preferred option’ was therefore developed, focussing on Northampton, Milton Keynes, Bedford, Luton/Dunstable/Houghton Regis, and Kettering/Wellingborough/Corby. Growth is also identified for Aylesbury Vale. The advantages of this option, as noted at paragraph 6.63 of the MKSM Study, are: <ul style="list-style-type: none"> • the scale of economic growth it delivers • the focus on growth in the main urban centres and prospects for their improvement

Number/Location	Recommendation
	<ul style="list-style-type: none"> • a better balance (than other options) between the location of jobs and workers • the potential for regeneration of key centres which are struggling • the ability to deliver significant improvements to public transport, with real opportunities for achieving a shift away from car borne journeys. <p>7. Following on from the MKSM Study, consultants were appointed to carry out individual ‘Growth Area Assessments’ (GAAs) of the main growth points. The purposes of these assessments were to test the feasibility and timing of growth that would be appropriate for future strategic planning to 2021 (2016 in the cases of Milton Keynes and Aylesbury); to provide confirmation of a recommended broad pattern, timing and phasing of development; to determine how much growth is capable of being accommodated in the urban areas; and to provide guidance on how the area could be developed in the most sustainable way. All of the GAAs recommended a preferred spatial development scenario for their area to 2016/2021 and looked further ahead to 2031 to ensure that there would be potential for the longer term to 2031. The collection of individual development scenarios to 2016/2021 then formed the basis for the SRS. <i>[The FSS to insert here a brief explanation of, and justification for, the way in which any of the development scenarios for any of the growth towns in the approved SRS depart from the MKSM study’s “high growth” option.]</i></p> <p>8. While the initial outputs from the GAAs were shared with a certain number of stakeholders the techniques and methods employed in the studies were not subject to public consultation at the time and could not be validated by the Public Examination process. Nonetheless the overall effect of the GAAs has been to demonstrate that there is strategic capacity for growth on the scale indicated by the MKSM study, with certain minor exceptions. While the GAAs remain as background information their detail should not be taken as having any policy significance. The site specific issues now need to be thoroughly re-examined against other possible site specific options through the more transparent process of preparing LDDs to take forward the strategic policies of the SRS.</p> <p>Purposes of the SRS</p> <p>9. Accordingly, the purposes of the SRS are:</p> <ul style="list-style-type: none"> • to provide strategic guidance on the scale, location and timing of development and associated employment, transport,

Number/Location	Recommendation
	<p>and other infrastructure to 2021 and the necessary delivery mechanisms; and</p> <ul style="list-style-type: none"> to provide a longer-term perspective for the sub-region to 2031 in the form of uncommitted planning assumptions subject to later review. <p>The SRS will also:</p> <ul style="list-style-type: none"> provide the necessary strategic guidance for Local Planning Authorities in preparing Local Development Documents (LDDs) which, together, will provide a clear planning framework for implementing the proposals of the SRS in all the main growth towns; inform the preparation of Community Strategies, the Regional Economic Strategies, the Regional Housing Strategies and other operational plans and policies of bodies responsible for undertaking investment in the public, private and voluntary sectors, including the delivery bodies. <p>Format and content of the SRS</p> <p>10. The SRS comprises an overarching strategy and key spatial diagram for the whole of the Sub-Region (Part A) and a set of separate statements providing more specific guidance for all of the growth towns (Part B).</p> <p>11. The SRS is focussed on these growth towns and does not seek to duplicate other topics covered in national or regional guidance.</p> <p>Key characteristics of the Sub-Region</p> <p>12. [Retain paragraph 13]</p> <p>13. Some of the key characteristics of the Sub-Region are:</p> <p>* There is no dominant focus or urban centre.</p> <ul style="list-style-type: none"> Economic growth rates have been high but uneven, with Milton Keynes and Northampton developing more balanced

Number/Location	Recommendation
	<p>economies while difficulties in achieving structural changes have held back growth in other centres, particularly Bedford, Corby and Luton.</p> <ul style="list-style-type: none"> • There is a deficit in terms of transport and community infrastructure: for example, the transport network has weak east-west links, public transport is in need of substantial improvement and there is a need for strengthening of acute healthcare facilities and higher and further education provision. • There is a need to diversify the sub-region’s local economies and attract new economic sectors including higher value knowledge based activities while also raising the skills of the local workforce to face these challenges. • The sub-region contains some environmental assets of national importance (e.g. the Chilterns AONB) and regional significance (e.g. the Nene and Great Ouse Valleys and the Marston Vale and Rockingham Forests) as well as features of more local interest, and its countryside and rural settlements have a rich and varied character. • Notwithstanding its environmental qualities the sub-region provides substantial opportunities for growth and development, particularly at the major towns.
<u>R4.5</u>	<p>Replace the Part A Statement, Chapter 1 as follows:</p>
	<p>Objectives of the SRS</p>
	<p>The objectives of the SRS are:</p> <ul style="list-style-type: none"> • To achieve a major increase in the number of new homes provided in the area, meeting needs for affordable housing and a range of types and sizes of market housing. • To provide for economic growth, particularly in the high value, knowledge-based sectors, increasing jobs in line with housing growth and developing skills in the workforce. • To locate development in the main urban areas to support urban renaissance, regeneration of deprived areas, recycling

Number/Location	Recommendation
	<p>of land and sustainable patterns of travel.</p> <ul style="list-style-type: none"> • To ensure that development contributes to better urban environment, providing green infrastructure to meet the needs of an increasing population, protecting environmental assets and respecting/contributing to landscape, biodiversity, sustainable construction, flood protection and water supply. • To meet existing transport infrastructure deficits and provide for needs generated by new development, by investment in new and improved infrastructure, planning to reduce the need to travel and creating a shift to more sustainable modes of travel. • To deliver the resources necessary to bring about growth by creating effective delivery arrangements, and to create sustainable communities by ensuring that social infrastructure needs are met in step with growth and by involving the community and voluntary sectors in planning and delivery. <p>Locations for growth</p> <p>To help achieve the above objectives the majority of development in the sub-region will be focussed at the following towns:</p> <ul style="list-style-type: none"> • Milton Keynes, which will embrace its potential to mature as a major regional city, particularly through the substantial development of its central area supported by a significantly enhanced public transport system to facilitate and support growth in major development areas. • Northampton, which will continue to grow in stature as an important regional centre with a key emphasis on renaissance of the town centre and major enhancement of the public transport network. • Corby, Kettering and Wellingborough, which will grow as linked growth towns, working in a complementary way. At Corby the emphasis will be on regeneration of the town, renewal of its urban fabric, and redevelopment of the town centre. At Kettering and Wellingborough the emphasis will be on managing growth and job creation in a sustainable way that realises their potential. • Bedford/Kempston/northern Marston Vale, where the emphasis should be on strengthening the role of this key centre through economic regeneration and growth. Priorities will be urban renaissance, improved economic performance

Number/Location	Recommendation
	<p>and selective harnessing of the potential of appropriate areas in the north of Marston Vale.</p> <ul style="list-style-type: none"> • Luton/Dunstable/Houghton Regis (LDHR), where the effort should be on building the towns into a vibrant, culturally diversified conurbation with a major improvement in the local economy and skills base. This should be achieved through economic regeneration across the urban area, making the most of its location close to London and other parts of the South-East and its good transport links. Leighton-Linslade will absorb a limited amount of the growth allocated to LDHR in order to contribute to the aims of the SRS and make the most of its location between LDHR and Milton Keynes. • Aylesbury, which should grow through strengthening and extending its traditional role as a county and market town, including urban renaissance of the centre that will allow it to meet the demands of a larger population. <p>At all of these towns growth and development will be underpinned by the more effective use of previously-developed land; the building of high-quality and affordable housing in sustainable locations; the attraction and provision of a range of good quality jobs; the provision of necessary services in the fields of education and training, health and social care, recreation, and other community activities; and the provision of high quality green infrastructure of all kinds. Underpinning all these will be an integrated approach to accessibility, aiming at reduction in dependence on private car use through the provision of a step change in public transport (including movement within and between the main centres), walking and cycling.</p> <p>Other locations in the sub-region</p> <p>Although growth will be focused at the above towns there will continue to be some development in other parts of the sub-region. Some limited reference is made to this within the strategy under the Part B Statements (e.g. in relation to Daventry and Leighton-Linslade), but most will be a matter for local determination through LDDs within overall District allocations made by Regional Spatial Strategies.</p> <p>Strategic Policy 1</p> <p>The majority of development in the sub-region will be focused at the following growth towns, including sustainable urban extensions well served by public transport. The figures stated beneath are for new homes in the main towns only, not to housing growth in the whole of the administrative area(s) in which they are located, and give an indication of the ‘additional’ provision made through the SRS as compared with that already committed through current plans and policies. [These existing commitments</p>

Number/Location	Recommendation		
	consist of outstanding planning permissions, allocations in current plans, and an allowance for homes presently expected to be derived from future permissions within the urban area. However, the SRS encourages further provision to be made from the latter source].		
	Current policies	SRS additions	Total to 2021
Aylesbury	7,750	6,350	14,100
Bedford	19,500	Nil	19,500
Corby, Kettering & Wellingborough	14,900	[22,900]	[37,800]
Luton/Dunstable & Houghton Regis (with Leighton-Linslade)	[4,750]	[19,550]	24,300
Milton Keynes	27,150	17,750	44,900
Northampton	28,100	3,400	31,500
MKSM AREA TOTAL	[102,150]	[69,950]	[172,100]
All figures are rounded to the nearest 50			
<i>[In the case of Luton/Dunstable/Houghton Regis the FSS is recommended to add to the number of homes in the ‘current policies’ column and make a corresponding reduction in the number in the ‘SRS additions’ column to reflect current commitments at Leighton-Linslade.</i>			
<i>In the case of Corby, Kettering and Wellingborough the FSS is recommended to reduce the amounts in the ‘SRS additions’ and</i>			

Number/Location	Recommendation
	<p><i>‘Total to 2021’ columns to indicate more precisely the quantum of development to take place at the three growth towns themselves rather than in the other smaller towns in these Districts.]</i></p>
	<p>Housing growth at the six main towns to 2021 will be monitored against progress in moving towards achieving the following overall net levels of employment growth by the same date:</p>
	<p>Aylesbury Vale District (for Aylesbury growth town) 12,690.</p>
	<p>Bedford Borough and Mid Beds District (for Bedford growth town) 14,000</p>
	<p>Corby, Kettering, Wellingborough Boroughs, and East Northamptonshire District (for CKW linked growth towns) 43,800</p>
	<p>Luton Borough and South Beds District (for LDHR growth towns) 12,600</p>
	<p>Milton Keynes Borough (for Milton Keynes growth town) 44,900</p>
	<p>Northampton Borough and South Northants and Daventry Districts (for Northampton Growth Town) 37,200</p>
	<p>The above figures are reference values to be used only for monitoring and reviewing the SRS as a whole, not as targets specifically related to individual areas or phases of housing development.</p>
	<p>The SRS includes provisional planning assumptions about further levels of housing growth at the above towns in the period 2021-31, as set out beneath. These are intended to provide a longer term perspective for infrastructure planning but are without commitment at this stage and will be subject to future review.</p>
	<p>Aylesbury [subject to future review]</p>
	<p>Bedford/Kempston/Northern Marston Vale 10,000</p>

Number/Location	Recommendation
	<p>Corby/Kettering/Wellingborough 28,000</p> <p>Luton/Dunstable/Houghton Regis (with Leighton-Linslade) 15,400</p> <p>Milton Keynes 23,700</p> <p>Northampton 17,500</p> <p>The above levels of growth will require the commitment of substantial levels of resources to deliver many kinds of necessary strategic infrastructure, both to serve the new developments and to make good a number of existing deficiencies. Appropriate contributions will be required from many sources, both in the private and public sectors. Unless these needs are met it will not be possible to provide the levels of housing and economic growth set out in the SRS. This will be an important matter for review by the Regional Assemblies and the delivery bodies.</p> <p>[Our recommendations for the remainder of this chapter, concerning paragraphs 1.6 to 1.8, Strategic Policy 2 and Figure 3, are to be found at R3.1, R3.2 and R3.4]</p> <p>Omit the text boxes containing objectives above paragraphs 1.1, 2.1 and 3.1</p>
<p><u>R4.6</u></p>	<p>Part A, Chapter 3 (Effective Delivery)</p> <p>“Objectives” box Delete</p> <p>Mechanisms for implementation</p> <p>Paragraph 3.1 Retain</p> <p>Paragraphs 3.2-3.4 Replace with updated content describing the role of the Inter-Regional Board and its structure of supporting groups (the Growth Implementation Group and the inter-agency working groups).</p> <p>Paragraphs 3.5-3.7 Replace with an updated general description of the purposes of the ‘Local Delivery Vehicles’, but consider</p>

Number/Location	Recommendation
	<p>the use of a more human, less mechanical title such as ‘local delivery partnerships’.</p> <p>[Part B sub-area sections: Northamptonshire paragraphs 3.1-3.4/Bedfordshire and Luton paragraphs 4.1-4.4/Milton Keynes and Aylesbury paragraph 4.4 Replace these paragraphs with a more detailed description of the composition and functions of the six local bodies in the relevant Part B sub-area sections, including in each case a sentence as follows: “The (local implementation partnerships) will work within the statutory plan-led system, implementing strategies adopted by the local planning authorities after thorough processes of public consultation.”</p> <p>Paragraphs 3.8 – 310 Replace with revised paragraphs reflecting decisions made in response to our discussion of these issues at paragraphs 4.18-4.19 above, and include a commitment by the Inter-Regional Board and the RAs to support and supplement the resources of the LPAs, where necessary, to enable them to achieve the necessary high quality output in the limited timescales available.</p> <p>Paragraph 3.11 Retain.</p> <p>Paragraphs 3.12 and 3.13 Retain first sentence of paragraph 3.12; amend second sentence as follows: “The following sub-regional implementation and guidance documents will seek to address this issue and will be prepared under the auspices of the Inter-Regional Board;</p>
	<ul style="list-style-type: none"> • Strategy and guidance for a community chest approach to collecting and allocating contributions to infrastructure needs at sub-area level; • Co-ordinated parking standards for new development; • Guidance for consistent application of available best practice standards on the creation of sustainable communities”
	<p>Paragraph 3.14 Replace with an amended heading and text as follows: “Master Plans/Strategic Development Briefs. A master-planning approach will be required for all the sustainable urban extensions and for other major urban developments, sufficient to (a) demonstrate how the overall development will meet the aims of the SRS and (b) provide a coherent framework into which any individual phases of development will fit.”</p> <p>Paragraph 3.15 Amend the third bullet point to read “Regeneration, the economy and enterprise”. Amend the fourth bullet</p>

Number/Location	Recommendation
	<p>point to read “Social infrastructure including the emergency services, primary and secondary education, health and social care facilities, and provision for leisure.” Add a further bullet point to read “Higher and further education and the development of employment skills”.</p> <p>Paragraph 3.16 Amend as follows: “Agencies involved in the delivery of the above aspects will be expected to make appropriate contributions to the preparation of LDDs and to the strategic plans of the (local implementation partnerships). Some may be represented on the partnerships.”</p> <p>Paragraph 3.17 Retain the first four sentences. Delete the fifth sentence. Replace the sixth sentence as follows: “Government will work, through the Inter-Regional Board and other available avenues, to secure commitment to the funding for key infrastructure and other investment essential to delivering this Growth Area Strategy in a sustainable fashion.”</p> <p>Paragraphs 3.18-3.21 Replace the heading “Implementation Schedules” with “Implementation and Monitoring”. Replace paragraphs as follows:</p> <p>“The Part B Statements for the six growth towns provide guidance on the housing and jobs targets and the key infrastructure proposals that need to be developed in more detail in appropriate Local Development Documents for all the growth towns and taken forward in the strategic plans of the Growth Town Implementation Partnerships.</p> <p>The phasing of the development in the Part B Statements is based on the objective of bringing forward the delivery of housing as fast as possible tempered by judgements about what are balanced and achievable development trajectories in terms of factors such as infrastructure provision and the housing market.</p> <p>An annual sub-regional monitoring statement will be prepared under the auspices of the Inter-Regional Board. This will monitor progress in achieving the main elements of the SRS, as developed in more detail by the LDDs, and as revealed by a range of appropriate indicators, including the following:</p> <ul style="list-style-type: none"> Housing completions, including affordable housing Net change in jobs totals, including those in defined key sectors Commencement/completion of key infrastructure

Number/Location	Recommendation
	<p>Development on previously-developed/green field land</p> <p>Changes in skills levels</p> <p>Higher and further education delivery indicators</p> <p>Health and social care delivery indicators</p> <p>Environmental indicators</p> <p>Resolution of strategic water resource issues, particularly where these involve development outside the MKSM area</p> <p>Paragraph 3.22 Replace as follows: “In order to maintain the clarity of focus necessary to increase the cohesion of the sub-region and implement these unusually long-term policies the SRS will be formally reviewed as a single entity five years after its adoption, and every five years thereafter. It will be expected that the strategy’s policies for the six growth towns (as they exist after the completion of every review) will be included in the relevant rolled-forward Regional Spatial Strategies without alteration.”</p> <p>Strategic Policy 4</p> <p>Update and revise to reflect all the above recommendations.</p>
Chapter 5	
<u>R5.1</u>	Delete paragraphs 1.1 to 1.6 and 2.1 to 2.4, but introduce some brief paragraphs relating to the introductory sentences of Northamptonshire Policy 1 (see R5.2)

Number/Location	Recommendation																																																
<u>R5.2</u>	<p>Amend Northamptonshire Policy 1 to read as follows:</p> <p>The majority of development in Northamptonshire will be concentrated at the Principal Urban Area of Northampton and the linked growth towns of Corby, Kettering and Wellingborough.</p> <p>Beyond these main urban centres development will be focused at the sub-regional centre of Daventry, the smaller towns of Desborough, Rothwell, Burton Latimer, Rushden, Higham Ferrers and Irthlingborough and the rural service centres of Brackley, Oundle, Raunds, Thrapston and Towcester.</p> <p>In the remainder of the County, the rural hinterlands, development will be limited, with the emphasis on meeting local needs and the retention of basic services and facilities.</p> <p>Housing provision for each local authority area in Northamptonshire for each of the five year phases over the period 2001 to 2021 should be made at the following annual average rates:</p> <table border="1" data-bbox="443 794 1496 1385"> <thead> <tr> <th></th> <th><u>2001-06</u></th> <th><u>2006-11</u></th> <th><u>2011-16</u></th> <th><u>2016-21</u></th> </tr> </thead> <tbody> <tr> <td>Corby*</td> <td>560</td> <td>680</td> <td>1,060</td> <td>1,060</td> </tr> <tr> <td>Daventry</td> <td>540</td> <td>540</td> <td>540</td> <td>540</td> </tr> <tr> <td>E Northants</td> <td>520</td> <td>520</td> <td>420</td> <td>420</td> </tr> <tr> <td>Kettering</td> <td>550</td> <td>810</td> <td>630</td> <td>630</td> </tr> <tr> <td>Northampton*</td> <td>1,200</td> <td>1,600</td> <td>1,750</td> <td>1,750</td> </tr> <tr> <td>S Northants</td> <td>480</td> <td>480</td> <td>330</td> <td>330</td> </tr> <tr> <td>Wellingborough</td> <td>595</td> <td>595</td> <td>685</td> <td>685</td> </tr> <tr> <td>Total</td> <td>4,445</td> <td>5,225</td> <td>5,415</td> <td>5,415</td> </tr> </tbody> </table>					<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	Corby*	560	680	1,060	1,060	Daventry	540	540	540	540	E Northants	520	520	420	420	Kettering	550	810	630	630	Northampton*	1,200	1,600	1,750	1,750	S Northants	480	480	330	330	Wellingborough	595	595	685	685	Total	4,445	5,225	5,415	5,415
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Number/Location	Recommendation															
	<p>*Figures for Corby and Northampton include any provision made in urban extensions across local authority boundaries. Such provision would be additional to the figures for the ‘receiving authorities’ in the above table.</p>															
<p><u>R5.3</u></p>	<p>Amend Northamptonshire Policy 2 as follows:</p> <p>The Local Development Schemes for Northampton Borough, and the District and Borough Councils of South Northamptonshire, Daventry, and Wellingborough will together identify and provide for the timely preparation of an appropriate set of LDDs making up a Local Development Framework which will put into effect the proposals of the SRS for the growth within the Northampton Implementation Area (NIA), making provision for joint working where appropriate.</p> <p>Together these LDDs will provide for an increase in the number of homes in the NIA in the period to 2021 as follows:</p> <table border="0" data-bbox="616 758 1579 941"> <thead> <tr> <th>2001-2006</th> <th>2006-2011</th> <th>2011-2016</th> <th>2016-2021</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>6,000</td> <td>8,000</td> <td>8,750</td> <td>8,750</td> <td>31,500</td> </tr> <tr> <td>(ave 1,200pa)</td> <td>(ave 1,600pa)</td> <td>(ave 1,750pa)</td> <td>(ave 1,750pa)</td> <td></td> </tr> </tbody> </table> <p>In examining future growth options the longer-term perspective of the SRS (for a further 17,500 dwellings in the decade 2021-31) should be borne in mind as an uncommitted planning assumption, subject to review at an appropriate future date.</p> <p>The housing figures in the above policy relate only to the NIA (Northampton Borough, and any areas within other Districts identified for growth as part of NIA).</p> <p>The LDD(s) will define appropriate arrangements for the provision of this scale of housing to be monitored against a target of net growth in jobs in West Northamptonshire (i.e. Northampton Borough and Daventry and South Northamptonshire Districts) of about 37,200 additional jobs over the period 2001-2021.</p> <p>Taken in combination the LDDs within the LDS should set firm guidelines for pro-active inter-agency approaches that will:</p>	2001-2006	2006-2011	2011-2016	2016-2021	Total	6,000	8,000	8,750	8,750	31,500	(ave 1,200pa)	(ave 1,600pa)	(ave 1,750pa)	(ave 1,750pa)	
2001-2006	2006-2011	2011-2016	2016-2021	Total												
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Number/Location	Recommendation
	<ul style="list-style-type: none"> • Meet all the principles for creating sustainable communities set out in Strategic Policy 3; • provide for housing growth using both green field land and previously developed land, but maximising opportunities for recycling redundant and under-used urban land especially at nodal sites and on good-quality public transport routes; • provide an adequate choice of high-quality employment sites for targeted office and high-value knowledge based industries and for existing key sectors, making a realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites, both new and existing; • reduce the need to travel by integrating land use and transport planning, reviewing the need for new orbital and other roads, achieving a step change in the attractiveness of public transport within the urban area, implementing town-wide park and ride schemes, comprehensively improving the attractiveness of walking and cycling, and implementing demand management measures; • provide for suitable urban extensions (without reference to local authority boundaries) clearly linked, where appropriate, with the completion of any key items of necessary associated infrastructure; • identify an appropriate number of existing and possible future District Centres (urban hubs) to form sustainable sub-centres for shopping and for the provision of commercial and social services, giving an emphasis to regeneration needs and opportunities for urban renaissance where relevant; • achieve a better quality of new development throughout the urban area, including strategic improvements to the public realm; • review, and if necessary, set new targets for the provision of affordable housing within the area of the LDD; • provide for campus development for University College Northampton; • provide for additional primary health and social care services within existing primary care outlets, in bespoke new healthcare centres within the sustainable urban extensions and within new and expanded community hospitals; • provide for expansion, reconfiguration and modernisation of Northampton Hospital as required to ensure sufficient

Number/Location	Recommendation
	<p>capacity;</p> <ul style="list-style-type: none"> • make appropriate provision for green infrastructure including the Nene Valley Regional Park
<u>R5.4</u>	<p>New Policy</p> <p>Northampton Borough Council, in partnership with other relevant bodies, will prepare an LDD to provide a long-term framework for revitalising and upgrading the quality and facilities of the town centre, including:</p> <p>[incorporate the bullet points under the heading Northampton Central Area in Northampton shire Policy 2]</p>
<u>R5.5.</u>	<p>Delete paragraph 2.6 and Northamptonshire Policy 3</p>
<u>R5.6.</u>	<p>Delete paragraphs 2.9-2.10 and paragraphs 2.16 and 2.17 and combine the content of paragraphs 2.11 with that of 2.13 but in an abbreviated form.</p>
<u>R5.7</u>	<p>Amend paragraph 2.12 as follows:</p> <p>Daventry will grow towards a population of about 40,000 by 2021, seeking to consolidate and extend its role by revitalising and extending the role of the town centre as a sub-regional centre offering improved shopping facilities and a wider range of jobs and services. Housing growth will take place both by means of intensification within the present built-up area and expanding onto greenfield sites through one or more sustainable urban extensions. The exact scale, nature and location of this growth will be determined through the preparation of an appropriate LDD prepared by the District Council in consultation with relevant partners.</p>
<u>R5.8</u>	<p>Replace paragraph 2.14 as follows:</p> <p>At Towcester it will be highly desirable to complete the bypass to enable traffic management measures and environmental</p>

Number/Location	Recommendation
	enhancements to take place in the town centre and along the present A5 corridor. Options for this should be explored through an appropriate LDD.
<u>R5.9.</u>	Revise the Table at Northamptonshire Policy 6 to reflect the latest available information from the SRA, HA and other responsible authorities on the status and timing of schemes, and to delete items that have been completed.
Chapter 6	
<u>R6.1</u>	<p>Amend Northamptonshire Policy 4 to read as follows:</p> <p>Northamptonshire Policy 4: Corby, Kettering and Wellingborough</p> <p>The Local Development Schemes for the local planning authorities of Corby, Kettering, Wellingborough and East Northamptonshire will together identify and provide for the timely preparation of an appropriate set of LDDs which will apply the principles for creating sustainable communities set out in Strategic Policy 3 and put into effect the proposals of the SRS for North Northamptonshire, making provision for joint working where appropriate.</p> <p>Within the overall provision made in Northamptonshire Policy 1, an increase of [37,800]* dwellings will be accommodated at the linked growth towns of Corby, Kettering and Wellingborough by 2021.</p> <p>In examining future growth options, the longer term perspective of the SRS for a further 28,000 additional dwellings in north Northamptonshire for the period 2021 to 2031 should be borne in mind as an uncommitted planning assumption, subject to review at an appropriate future date.</p> <p>Growth Locations</p> <p>At all three towns the capacity of the existing built – up area to accommodate additional development will be utilised to the full, through measures to assess and bring forward surplus employment sites and other previously developed land and, particularly at Corby, through the opportunities for intensification and mixed use provided by regeneration and redevelopment. In parallel, proposals will be brought forward for sustainable urban extensions to provide for additional development at each of the three</p>

Number/Location	Recommendation
	<p>towns. Areas of search for such extensions will include:</p> <p>North east, north west, south, south west and west of Corby;</p> <p>To the east, west and south of Kettering;</p> <p>To the east, north and west of Wellingborough.</p> <p>All new sustainable urban extensions will be identified in LDDs and will be the subject of Area Action Plans.</p> <p>Environment and green infrastructure</p> <p>Urban extensions should be planned so as to ensure the continued physical separation of the three towns, and to prevent coalescence with smaller towns and settlements within and adjoining the growth area. Opportunities should be taken to enhance important existing environmental assets such as Rockingham Forest and promote the provision of new green infrastructure to enhance the attractiveness of the area and meet the needs of its population.</p> <p>Transport</p> <p>New development should be planned in conjunction with the transport schemes listed in Northamptonshire Policy 7 and other initiatives, so as to facilitate a significant modal shift towards public transport use, particularly in relation to urban extensions. As well as the new station proposal at Corby and other measures to improve access to rail services, high quality public transport services should be provided between and within each of the linked growth towns so as to connect key centres of housing, employment and service activities</p> <p>Employment</p> <p>The provision of housing on the scale set out in Northamptonshire Policy 1 should be monitored against a target of net growth in jobs in north Northamptonshire (i.e. Corby, Kettering, Wellingborough and East Northamptonshire) of about 43,800 additional jobs over the period 2001-2021.</p> <p>Corby, Kettering and Wellingborough Central Areas</p>

Number/Location	Recommendation
	<p>(retain existing headings and paragraphs)</p> <p>Delete heading and paragraphs under “Urban Hubs”</p> <p>Social Infrastructure</p> <p>Replace the first and second bullet points with a new bullet point to read:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <ul style="list-style-type: none"> • Primary and Secondary Education: New residential development will be matched by primary and secondary school provision, whether through new build or expansion of existing schools, both within the existing towns and in urban extensions as appropriate. </div> <p>Replace wording under bullet points Primary Healthcare Provision and Secondary Healthcare Provision with the wording proposed by the NHS in document PART 120.</p> <p>Delete the bullet point “public transport” (replaced by new paragraph above).</p> <p>*[The figure of 37,800 dwellings makes allowance for the 2,200 now assumed to be provided in East Northamptonshire. It has not been reduced to take account of local growth in Desborough and Rothwell and other locations previously proposed to be within the “PUA” but not within the three growth towns. The FSS is recommended to consider further reducing the figure of 37,800 to take account of this. See also recommendation R4.5 regarding Strategic Policy 1.]</p>
<u>R6.2</u>	<p>Under the sub heading “Implementation”, delete Northamptonshire Policy 5 and replace paragraph 2.8 with the following:</p> <p>The linked growth towns of Corby, Kettering and Wellingborough interact in various ways. There are also important relationships across the boundaries between these three Boroughs and East Northamptonshire District. In order to ensure that development is planned in a co-ordinated way, a joint LDD should be prepared involving the Boroughs of Corby, Kettering, and Wellingborough and East Northamptonshire District, but confined to those matters that need to be addressed jointly, because of their cross boundary nature. Relevant issues may include:</p>

Number/Location	Recommendation
	<ul style="list-style-type: none"> • the quantity and extent of any development of Corby into Kettering BC or East Northamptonshire area, and any other boundary crossing development; • environmental issues and prevention of coalescence between towns; • provision of green infrastructure of a strategic scale, including the possibility of a green corridor along the Ise Valley, linking the Nene Regional Park and the Rockingham Forest area; • social infrastructure provision and other development serving more than one town in the area; • transport linkages throughout the area
<u>R6.3</u>	<p>Revise the Table at Northamptonshire Policy 7 to reflect the latest available information from the SRA, HA and other responsible authorities on the status and timing of schemes, and to delete items that have been completed. Consider adding the Northampton-Wellingborough rail link, provided reasonable certainty can be established about its status and timing.</p>
Chapter 7	
<u>R7.1</u>	<p>Separate the Part B material relating to Milton Keynes and Aylesbury, deleting paragraphs 1.1 to 2.3 and other common paragraphs, and replacing them as necessary with brief paragraphs relating to each of the growth towns.</p>
<u>R7.2</u>	<p>Revise paragraphs 2.4 and 2.5 on page 39 to read as follows:</p> <p>2.4 Milton Keynes will see a new phase of long term growth establishing it as a city of regional importance and adding a high quality public transport system to its unique advantages of modernity and good environment. It is planned to accommodate an increase of 44,900 homes at Milton Keynes urban area in the period up to 2021. Development in the rest of Milton Keynes Unitary Authority area will continue to be related to local needs.</p> <p>2.5 The majority of development will be provided within the existing urban area of Milton Keynes in conjunction with development of the City Centre, selective urban intensification and the completion of developments already planned as part</p>

Number/Location	Recommendation
	<p>of the new town programme. These sources are expected to provide some 19,000 additional homes up to 2016, and more in the period beyond. The remaining requirement of 14,600 up to 2016 will be provided through sustainable urban extensions to Milton Keynes City to the west, the south west and the east. Beyond 2016 a balanced programme of urban extensions and opportunities within the urban area should continue.</p> <p>[New paragraph] In order to establish details of directions for growth at Milton Keynes up to 2021, beyond those established through the Milton Keynes Local Plan, an appropriate LDD will be prepared, considering areas of search around the city. This LDD should be prepared jointly with Aylesbury Vale and Mid-Bedfordshire District Councils in order to ensure that possible directions for growth outside the Milton Keynes Unitary Authority area and other boundary crossing issues are fully addressed.</p>
<p><u>R7.3</u></p>	<p>In paragraph 2.6 revise the second sentence to read:</p> <p>Within this overall framework there is a particular emphasis on development of new public transport nodes and interchanges, well related to new urban extensions and linked with the provision of an upgraded mass transit system and its interchange with enhanced strategic transport infrastructure as set out in Part A (i.e. East-West Rail and MI Junction 13).</p> <p>Replace the final sentence of paragraph 2.6 with:</p> <p>East–west movement by road across the southern part of Milton Keynes needs to be improved. Measures are needed to address traffic problems on the existing A421, to improve access to the M1 and to make space available for enhanced public transport.</p>
<p><u>R7.4</u></p>	<p>Replace draft SRS paragraph 2.7 with a new paragraph to read as follows:</p> <p>Milton Keynes in the longer term</p> <p>Beyond 2021 Milton Keynes should expect to continue to grow at broadly the same rate, adding a further 23,700 homes in the following decade. Over this period the city should become a centre of major regional importance, with a population of over 300,000 and some 290,000 jobs. In order to guide this change over the longer term, a vision for 2031 should be prepared, involving Milton Keynes Council, its neighbouring authorities, local communities, Government and a wide range of other stakeholders. The vision will provide a platform for major economic and cultural development, for qualitative and quantitative change in higher education, health and other infrastructure, and facilitate long term investment decisions in the public transport</p>

Number/Location	Recommendation
	<p>system, in East West Rail and other infrastructure.</p> <p>The principles of this SRS should continue to guide the strategy beyond 2021. The vision should reflect:</p> <ul style="list-style-type: none"> • a continuing programme of selective intensification and renaissance of Central Milton Keynes and other urban locations, complemented by: • sensitively planned urban extensions to provide new homes and workplaces and reinforce public transport, while respecting local context; • continued development and upgrading of the public transport system, and reducing dependence on car use; • maintenance and provision of new green infrastructure including parks, greenspace and water spaces within the urban area; • the highest environmental standards in design and construction.
<p><u>R7.5</u></p>	<p>Revise Policy 1 on page 40 to read:</p> <p>Milton Keynes should accommodate an additional 44,900 dwellings in the urban area over the period 2001-2021 (including any provided outside the boundary of the Milton Keynes Council area). New development will be delivered through a combination of urban intensification and the development of new sustainable urban extensions, integrated with the provision of new and enhanced public transport systems and interchanges. Locations for development will be those established through the Milton Keynes Local Plan, and in appropriate LDDs on the basis of areas of search around the western, southern and eastern edges of the urban area. LDDs should apply the principles for creating sustainable communities set out in Strategic Policy 3.</p> <p>Sustainable urban extensions should be carefully programmed so as to complement and not undermine the contribution of development and regeneration within the urban area. Both urban intensification and sustainable urban extensions will be planned in such a way as to maintain and extend the city’s green infrastructure, and to ensure that issues of impact on landscape character and coalescence of settlements are addressed.</p> <p>The levels of development proposed are based on the need to plan for an increase in employment of 44,900 jobs in the period to</p>

Number/Location	Recommendation																					
	<p>2021. Key locations for employment related development will be Central Milton Keynes, Bletchley, Wolverton and Newport Pagnell and some locations within new urban extensions at focal points on the public transport system. At present there is sufficient planned employment land supply in Milton Keynes to meet forecast demand to 2016. Both quantitative and qualitative aspects of supply and demand for employment land will be kept under review through the LDD process, to ensure provision of a range of types and sizes of premises to meet the needs of the economy, and that any land no longer required for employment purposes is considered for other use.</p> <p>Local transport infrastructure will require early development and continued enhancement and upgrades to facilitate the delivery of sustainable growth throughout the period to 2021 and beyond. Key elements are:</p> <ul style="list-style-type: none"> • City wide core bus network upgrade • East/West and North/South Mass Transit Corridors • Park and Ride accompanied by appropriate traffic management measures • Measures to resolve east-west traffic problems across the southern half of Milton Keynes. <p>New and upgraded strategic transport links will be vital in underpinning the sustainable growth of Milton Keynes, including East-West Rail and possible new Parkway stations. Details of strategic transport infrastructure are set out in the Part A Statement.</p>																					
<p><u>R7.6</u></p>	<p>Delete Table B1 on Page 45. Replace Table B2 with the following table:</p> <p>Milton Keynes Housing Provision</p> <table border="1"> <thead> <tr> <th></th> <th><u>2001-06</u></th> <th><u>2006-11</u></th> <th><u>2011-16</u></th> <th><u>2016-21</u></th> <th><u>2001-2016</u></th> <th><u>2001-2021</u></th> </tr> </thead> <tbody> <tr> <td>Urban Area*</td> <td>7,900</td> <td>15,000</td> <td>11,000</td> <td>11,000</td> <td>33,900</td> <td>44,900</td> </tr> <tr> <td>Annual Rate</td> <td>(1,580)</td> <td>(3,000)</td> <td>(2,200)</td> <td>(2,200)</td> <td>(2,260)</td> <td>(2,245)</td> </tr> </tbody> </table> <p>* Figures include any housing arising from Milton Keynes growth and provided in Aylesbury Vale or Mid-Bedfordshire DC areas</p>		<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	<u>2001-2016</u>	<u>2001-2021</u>	Urban Area*	7,900	15,000	11,000	11,000	33,900	44,900	Annual Rate	(1,580)	(3,000)	(2,200)	(2,200)	(2,260)	(2,245)
	<u>2001-06</u>	<u>2006-11</u>	<u>2011-16</u>	<u>2016-21</u>	<u>2001-2016</u>	<u>2001-2021</u>																
Urban Area*	7,900	15,000	11,000	11,000	33,900	44,900																
Annual Rate	(1,580)	(3,000)	(2,200)	(2,200)	(2,260)	(2,245)																

Number/Location	Recommendation
	after 2011.
<u>R7.7</u>	Remove the route for the proposed Southern Bypass shown on the spatial diagram on page 47. In Table A1 on page 44 the three “MK Southern Bypass” schemes should be replaced by: “Improving east west movement by road and access from Milton Keynes to the M1”. The status should be shown as “proposed for investigation”, and the phasing as 2011-2016 and post 2016.
<u>R7.8</u>	<p>Add two new sentences at the beginning of paragraph 3.5 as follows:</p> <p>Educational attainment and skills levels at Milton Keynes need to be improved in order to support economic growth and enable local people to participate fully in it. New facilities and programmes will need to be brought forward in step with development.</p>
<u>R7.9</u>	<p>Revise the wording of the 4th bullet point of Policy 3 on page 43 as follows:</p> <ul style="list-style-type: none"> • Healthcare – substantial investment in expanding and modernising primary and community health and social care and secondary healthcare facilities (including meeting existing deficits in capacity at Milton Keynes); <p>Remove the site for a New Hospital indicated on the Spatial Diagram</p>
Chapter 8	
<u>R8.1</u>	<p>Amend the title of Policy 2 to “Aylesbury Growth Town” as follows:</p> <p>An expanded Aylesbury should accommodate a total of 14,100 new dwellings over the period 2001-2021. [Other parts of Aylesbury Vale District should provide for a further 3,300 new dwellings in the shorter period of 2001-16, <u>excluding</u> any growth directly related to the urban area of Milton Keynes that may be identified through a cross-border LDD.]</p> <p>Development at Aylesbury should be delivered through maximising the use and re-use of land within the urban area and through the development of new sustainable urban extensions integrated with the provision of new and enhanced public transport systems</p>

Number/Location	Recommendation												
	<p>and interchanges.</p> <p>Sustainable urban extensions to the north of the town at Berryfields and Weedon Hill have already been identified through the Aylesbury Vale District Local Plan. While every effort should be made to maximise the use of urban land further extensions will also be identified through the preparation of an appropriate LDD or LDDs.</p> <p>The LDD or LDDs should provide a strategic long-term framework for the development of the town centring on:</p> <ul style="list-style-type: none"> • identifying land for new housing as follows: <table border="1" data-bbox="427 694 2123 895"> <thead> <tr> <th data-bbox="427 694 712 738">2001-06</th> <th data-bbox="712 694 996 738">2006-11</th> <th data-bbox="996 694 1281 738">2011-16</th> <th data-bbox="1281 694 1565 738">2016-21</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 770 712 815">2400</td> <td data-bbox="712 770 996 815">3800</td> <td data-bbox="996 770 1281 815">4400</td> <td data-bbox="1281 770 1565 815">3500</td> </tr> <tr> <td data-bbox="427 850 712 895">(480pa)</td> <td data-bbox="712 850 996 895">(760pa)</td> <td data-bbox="996 850 1281 895">(880pa)</td> <td data-bbox="1281 850 1565 895">(700pa)</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • applying the principles for creating sustainable communities set out in Strategic Policy 3; • identifying and ensuring the availability of appropriate strategic high quality employment sites; • identifying and implementing measures to achieve an urban renaissance of the town centre, strengthening its traditional role and heritage as a county town (possibly to be articulated through the preparation of a separate LDD); • providing for a sustainable transport system for the expanded town, including completion of the following key elements of local transport infrastructure; <ul style="list-style-type: none"> - strategic bus corridors including bus priority measures 	2001-06	2006-11	2011-16	2016-21	2400	3800	4400	3500	(480pa)	(760pa)	(880pa)	(700pa)
2001-06	2006-11	2011-16	2016-21										
2400	3800	4400	3500										
(480pa)	(760pa)	(880pa)	(700pa)										

Number/Location	Recommendation
	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">- extension of the Chiltern Line to a new station at Berryfields</div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">- connection of Aylesbury to the East-West Rail route from Bicester to Bletchley</div> <p>Appropriate arrangements will need to be defined for monitoring the provision of this scale of housing against a target of net growth in jobs in Aylesbury Vale District of 635pa over the period 2001-21 (total 12,690).</p>
<u>R8.2</u>	<p>Amend paragraphs 2.8 to 4.5 to reflect the content of our overall recommendations for Aylesbury to 2021, including less specificity as to directions of growth and the Southern Distributor Road; removal of references to particular locations such as Stoke Mandeville Station; inclusion of references to the need to provide properly-resourced protection from increased environmental impact of green infrastructure resources of sub-regional significance such as the Chilterns AONB and updated reference to the delivery arrangements.</p> <p>In particular, add to the third bullet point of paragraph 3.6 a comment that “Growth at Aylesbury may not be able to proceed even to the limits of current commitments unless a sustainable technical solution can be found to the achievement of adequate water quality standards in the River Thames and the necessary resources are committed to implementing it.”</p>
<u>R8.3</u>	Table 1: delete
<u>R8.4</u>	<p>Table A2: amend as follows:</p> <ul style="list-style-type: none"> * Item 1 Rename ‘Quality bus corridors and urban transport hub’. Clarify ‘status’. Confirm completion in 2006-11. * Item 2 Bring forward to 2006/11. Involve wider stakeholders in implementation, including the LDV. * Item 3 Delete * Items 4-5 Delete [the further longer-term transport needs of the town would be established through further studies associated with the LDD providing the future planning framework for the expansion of Aylesbury] * Item 6 Clarify the apparent confusion resulting from the inclusion of the A418 in both Figure 3 (p12) and Table A2 (p45)

Number/Location	Recommendation
<p><u>R8.5</u></p>	<p>Annex B</p> <ul style="list-style-type: none"> * Table B1 Delete, <i>[as already set out in the recommendations for Milton Keynes – see R7.5]</i> * Table B3 Delete, because this subject matter is now covered elsewhere in the recommended new Aylesbury policy R8.1
<p>Chapter 9</p>	
<p><u>R9.1</u></p>	<p>Delete paragraphs 1.1 - 1.3 and 2.1 – 2.7, but possibly replace these with suitable brief scene-setting introductions to the SRS proposals for Bedford and for LDHR with Leighton-Linslade.</p>
<p><u>R9.2</u></p>	<p>Replace paragraphs 2.8 and 2.9 on page 19 with a new statement on the priorities for the Bedford and northern Marston Vale growth area on the following lines:</p> <p>Strategy for Bedford/Kempston and northern Marston Vale</p> <p>Bedford/Kempston and the northern Marston Vale form one of the six growth locations in the Milton Keynes and South Midlands Strategy. The strategy provides for urban renaissance at Bedford/Kempston coupled with significantly increased delivery of new housing, economic development and new jobs, and the continued regeneration of the Marston Vale.</p> <p>In order to strengthen the existing role and function of Bedford as a regional centre, the highest priorities will be the revitalisation of Bedford town centre and facilitating economic development and the provision of new employment in the town. Significant progress has already been made in recycling previously developed land and buildings for increased housing and mixed use developments. Progress has also been made in improving the quality of development, maintaining and improving the environment, and improving town centre safety and security. The East of England Development Agency has identified Bedford as an Urban Priority Area, and a number of economic initiatives have been supported, including the Priory Park Innovation Centre and Bedford Enterprise Hub. Work has been commissioned to develop the economic vision for the area, and Bedford town centre is identified as one of the pilot areas for Business Improvement Districts.</p>

Number/Location	Recommendation
	<p>In the Marston Vale, development opportunities in the northern part have been brought forward, while environmental improvement and regeneration has been the focus throughout the Vale, with significant progress being achieved by the Forest of Marston Vale. Initiatives such as the Surface Waters Plan, and projects supported by the Sustainable Communities Greenspaces Fund are helping to add to the green infrastructure of the growth area.</p> <p>Key future priorities</p> <p>Key priorities for Bedford and the northern Marston Vale include:</p> <ul style="list-style-type: none"> • Taking forward the new Development Framework for Bedford Town Centre in order to enhance the retail, cultural and leisure facilities and achieve the general revitalisation of the central area. This will involve completing a range of redevelopment, refurbishment and environmental improvement projects. • Developing the local economy to provide significant increase in employment, by identifying and fostering a range of growth sectors, particularly in high value knowledge-based sectors, with appropriate effort going into business support and skills development. This will include creating a focus for offices in the town centre, through the provision of a range of accommodation from small suites to large office space in both new and converted buildings. • Securing a significantly higher rate of housing increase in the area through the implementation of existing commitments within the town and in the northern Marston Vale. • Major improvements to public transport through the implementation of quality bus and priority corridors and park and ride proposals, such as to secure a significant shift towards public transport and non-motorised modes, particularly in connection with new development. Particular projects will include redevelopment of the bus station and creation of improved interchange, and convenient and attractive access to railway stations. • Developing cultural and heritage focused tourism in Bedford by enhancing the existing cultural and heritage facilities and attractions, and through the provision of new facilities to foster a cultural quarter near the town centre and an increased range of centrally located over-night accommodation. • Supporting a continued strategy of environmental regeneration in the Marston Vale and the creation and enhancement of green infrastructure through the Forest of Marston Vale. This includes resolving land use and environmental conflicts

Number/Location	Recommendation																		
	<p style="text-align: center;">which may have an impact on the growth area strategy.</p>																		
<p><u>R9.3</u></p>	<p>Replace the Bedford/Kempston/northern Marston Vale part of Policy 1 with the following Policy:</p> <p>Dwelling provision in the Bedford/Kempston/Marston Vale growth area will be as follows:</p> <table border="1" data-bbox="443 475 1527 657"> <thead> <tr> <th></th> <th><u>2001-2006</u></th> <th><u>2006-2011</u></th> <th><u>2011-2016</u></th> <th><u>2016-2021</u></th> <th><u>2001-2021</u></th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>3,750</td> <td>5,250</td> <td>5,250</td> <td>5,250</td> <td>19,500</td> </tr> <tr> <td>Annual rate</td> <td>750</td> <td>1,050</td> <td>1,050</td> <td>1,050</td> <td>975</td> </tr> </tbody> </table> <p>The proportions of the growth area total to be provided within Bedford Borough and Mid Bedfordshire District should be determined through Local Plans/LDDs. Existing Local Plan allocations suggest that Mid-Bedfordshire will provide 3,230 of the total of 19,500 additional dwellings up to 2021.</p> <p>Achieving these rates of dwelling provision will require an acceleration of the economic performance of the area and delivery of the key local infrastructure set out in [Policy 2]. If monitoring shows that this is being achieved, it may be appropriate to revise upwards the figures for period 2011-2021. Any such revision should be brought forward and tested as part of a review of this SRS and RSS14.</p>		<u>2001-2006</u>	<u>2006-2011</u>	<u>2011-2016</u>	<u>2016-2021</u>	<u>2001-2021</u>	Total	3,750	5,250	5,250	5,250	19,500	Annual rate	750	1,050	1,050	1,050	975
	<u>2001-2006</u>	<u>2006-2011</u>	<u>2011-2016</u>	<u>2016-2021</u>	<u>2001-2021</u>														
Total	3,750	5,250	5,250	5,250	19,500														
Annual rate	750	1,050	1,050	1,050	975														
<p><u>R9.4</u></p>	<p>Add a new paragraph after the Policy recommended at R9.3 to say:</p> <p>For the purpose of monitoring the implementation of the strategy, a target of 22,400 additional jobs between 2001 and 2021 in Bedford Borough and Mid Bedfordshire District should be assumed.</p>																		
<p><u>R9.5</u></p>	<p>Add a further paragraph to say:</p> <p>Beyond 2021, it should be assumed that development will continue at broadly the same rate as in the period 2011-2021, i.e. approximately 10,000 additional dwellings in the period 2021 - 2031. This should be regarded as an uncommitted planning assumption which should be reviewed in future reviews of the SRS and RSS14, in the light of monitoring and further studies.</p>																		

Number/Location	Recommendation
<p><u>R9.6</u></p>	<p>In place of paragraph 2.2 on page 18, include two new paragraphs as follows:</p> <p>For housing development, the area already has sufficient land already committed as a result of existing planning permissions and local plan allocations to meet the requirements identified up to 2021. These include opportunities within the existing urban area and urban extensions south–west of Bedford and in the northern part of the Marston Vale. To meet any further requirements arising from non-delivery of existing commitments, or from additional provision that may be added after 2011, opportunities within the urban area arising from further regeneration, re-use of employment land, intensification and mixed-use development should be considered first, followed by further sustainable urban extensions. Locations for any such additional extensions should be established through a joint LDD prepared by Bedford Borough Council and Mid Bedfordshire District Council. The joint LDD should apply the principles for creating sustainable communities set out in Strategic Policy 3.</p> <p>Existing commitments also include sufficient land to meet estimated employment development in quantitative terms. In terms of quality, regard needs to be had to the needs of business and the development required to facilitate economic growth. This may lead to additional land being required to provide for the right quality and type of development in sustainable locations. The stock of employment land should be kept under review, so as to offer an appropriate range of type, size and location of site, and also to ensure that land which is surplus to employment requirements is recycled for other uses including housing and mixed-use development.</p>
<p><u>R9.7</u></p>	<p>Policy 2 on page 23 relating to key infrastructure for Bedford/Kempston and Marston Vale should be revised to allocate schemes to five year periods consistent with Revised Policy 1 as recommended at R9.3 above, taking account of the latest information on timing available from the relevant delivery agencies. The purpose and status of the Interchange Park rail station should be clarified.</p>
<p><u>R9.8</u></p>	<p>The diagram should make a clear distinction between the park and ride facilities being progressed by Bedfordshire County Council and proposals for new Parkway stations.</p>

Chapter 10	
<u>R10.1</u>	<p>Delete paragraphs 2.10-2.17, but provide a new statement for the LDHR growth area as follows:</p> <p>Although still perceived by some as three separate towns, Luton, Dunstable and Houghton Regis have coalesced into a single conurbation forming the largest urban area in Bedfordshire. Administratively they are split with Luton as a unitary authority, built up to its boundaries, and Dunstable and Houghton Regis together forming the largest urban area in South Bedfordshire District.</p> <p>Despite its favourable location on the M1 and Midland Mainline corridors, the presence of London Luton Airport and its proximity to London the economy of the urban area is in a poor condition, with unemployment above the national average and twice the regional average. There has been a historic over-reliance on manufacturing, particularly the vehicle industry, and a failure to attract sufficient representation in services and the knowledge-based industries. The skills base is poorly matched with these economic growth sectors. Consequently the towns have been recognised in RPG9 as a Priority Area for Economic Regeneration and have Assisted Area status. There is a need for concentrated efforts to achieve urban renaissance and regeneration to transform the image and townscape of the urban area, relieve the severe levels of congestion, and improve the quality of development.</p> <p>While some of these aims can be met within the present confines of the urban area others cannot. The green belt now forms a tight boundary all around the towns so that, in recent years, it has become increasingly impossible to meet locally generated needs, especially for housing of the relatively young population. Development has been diverted north of the Green Belt to other parts of Bedfordshire and beyond, sometimes to locations less inherently sustainable than Luton/Dunstable/Houghton Regis.</p> <p>Although efforts need to be made to release more of the development capacity within the towns this will not allow even local needs to be met, nor will it provide sufficient scope for regeneration to the point where the conurbation can capitalise on its locational advantages to achieve an urban renaissance and contribute to the wider housing needs of the South East as sought by the Sustainable Communities Plan. As has been increasingly recognised in recent years, these circumstances are exceptional and require a comprehensive review of the Green Belt to around LDHR provide headroom for possible development requirements to 2031.</p> <p>The Green Belt will also be reviewed around Leighton-Linslade to provide the town with scope to increase its sustainability and</p>

	<p>make an appropriate contribution to the SRS.</p> <p>Positive action by the local authorities, the UDC and other parties will also be required on a number of short and medium terms issues. The initial focus will be on:</p> <ul style="list-style-type: none"> • accelerating the recycling of urban land, • increasing the attractiveness of the town centres for retailing, cultural and other activities (especially Luton), and raising environmental quality, especially around the rail and bus stations, • tackling congestion and providing better public transport, • achieving better quality development, • providing a better choice of employment sites, to attract a wider range of companies, including those in the high-value knowledge-based sectors, • laying the foundations for sustainable urban extensions to be plugged into the improving urban fabric mainly, but not necessarily entirely, after completion of the M1 widening and the northern bypasses, expected to be in 2011. <p>Sufficient land will need to be excluded from the Green Belt to accommodate significant numbers of new homes and jobs in the period to 2021. The Green Belt review will also need to exclude other land, safeguarded against further possible development needs to 2031, using a provisional planning assumption that development levels in 2021-31 may be broadly similar to those in the preceding decade.</p> <p>The town centres in LDHR</p> <p>Luton: The strategy will be to build up the town centre as the conurbation’s principal focus for retailing, service functions, cultural activities and office development; to encourage improvements in the quality of development and the appearance of the public realm; to enhance accessibility by public transport; to improve public safety and security, and to implement the agreed recommendations of the master plan.</p> <p>Dunstable: [Existing paragraph 2.15]</p>
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	<p>Houghton Regis: [Existing paragraph 2.16]</p> <p>Leighton-Linslade:</p> <p>This detached urban area lies roughly halfway between Luton & Milton Keynes and comprises the two contiguous towns of Leighton Buzzard and Linslade set on opposite sides of the West Coast Main Line. The towns have developed steadily to a population of about 34,000 and would benefit from a continuing level of growth at an appropriate level to improve their economy, functioning and infrastructure. This growth would contribute towards the overall SRS provision for Luton and South Bedfordshire. The level of growth will be determined through an appropriate LDD prepared by the District Council contemporaneously with the new planning strategy for Luton Dunstable and Houghton Regis so that the two can together make provision for the level of growth set out in the SRS in Policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 1.</p>
<p><u>R10.2.</u></p>	<p>Insert new policy Luton/Dunstable/ Houghton Regis 1, as follows, in place of Bedfordshire Policy 1 and its footnotes:</p> <p>New Policy Luton/Dunstable/Houghton Regis 1</p> <p>The Local Development Schemes for Luton Borough Council, South Bedfordshire District Council and North Herts District Council will identify and make provision for the timely preparation of a set of appropriate LDDs to put into effect the proposals of the SRS to 2021. Provision will be made for joint working where necessary.</p> <p>The LDDs will make a comprehensive review of Green Belt boundaries around the LDHR conurbations and Leighton-Linslade respectively, so that in (combination) the necessary headroom is provided to meet the foreseeable land use needs of the SRS to 2021. Sufficient areas of safeguarded reserve land will also need to be excluded from the Green Belt to meet the longer term perspective provided by the SRS to 2031.</p> <p>LDDs within the Local Development Schemes should set firm guidelines for pro-active inter-agency approaches that will:-</p> <ul style="list-style-type: none"> • meet the requirements of Strategic Policy 3; • maximise opportunities for recycling redundant and under-used urban land especially at nodal sites and on good-quality public transport routes; • upgrade the qualities of the town centres and the facilities which they offer;

- achieve a better quality of new development throughout the urban area, including strategic improvements to the public realm;
- provide an adequate choice of high-quality employment sites for key target and existing sectors, making a realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites;
- reduce the need to travel by private vehicles by integrating land use and transport planning, achieving a step-change in the attractiveness of public transport within the conurbation, implementing conurbation-wide park and ride schemes, improving the attractiveness of walking and cycling, and implementing travel demand management measures;
- provide for sustainable urban extensions clearly linked, where appropriate, with the completion of any key items of necessary associated infrastructure including the M1 widening (J6-J10 and J10-J13), the Dunstable and Luton Northern Bypasses and the Luton Eastern Bypass:
- investigate the possible role of a new station to be built in the vicinity of the junction between the M1 and the northern bypasses:
- review, and if necessary, set new targets for the provision of affordable housing.

Levels of growth

Together, the LDDs for the area should provide for total growth in the period 2001-2021 as follows:

	2001-2006	2006-11	2011-16	2016-21	Total
Dwellings (LDHR)	3,000	6,000	7,500	7,800	24,300
	(ave 600pa)	(ave 1,200pa)	(ave 1,500pa)	(ave 1,560pa)	

	<p>The provision of housing on the above scale will be monitored against a target of net growth in jobs in Luton Borough and South Bedfordshire District of about 12,600 additional jobs over the period 2001-2021.</p> <p style="text-align: center;">1,600 3,100 3,900 4,000 12,600</p> <p>For the purposes of the Green Belt reviews land should be safeguarded for a total of a further 15,400 houses and 7,400 jobs in the period 2021-2031 although allowances should be made within these figures for continuing recycling of urban land after 2021. Moreover, these longer-term figures are to be regarded as uncommitted planning assumptions purely for the purpose of the Green Belt reviews and will be subject to further review at an appropriate future date.</p> <p>The housing figures in the above policy relate only to the LDHR/Leighton-Linslade growth towns (including any areas within North Hertfordshire identified for growth associated with LDHR). Residual growth levels in other parts of South Bedfordshire and non LDHR-linked parts of North Hertfordshire will be identified through RPG14/RSS14.</p>
<p><u>R10.3:</u></p>	<p>Policy Luton/Dunstable/Houghton Regis/Leighton-Linslade 2</p> <p>Review the timing of these items and place them into five-year phases based upon the operational plans and expectations of the implementing bodies and include a reference to major public transport improvements throughout the urban areas.</p>
<p><u>R10.4.</u></p>	<p>(See also paragraph 4.17 and R4.4) Revise section 4 to cover the proposed arrangements for the Urban Development Corporation.</p>

APPENDIX A

GLOSSARY

Milton Keynes and South Midlands Sub-Regional Strategy

Public Examination – March/April 2004

Abbreviations used in the Report

Regional Assemblies

EERA	East of England Regional Assembly
EMRA	East Midlands Regional Assembly
RA	Regional Assembly
SEERA	South East England Regional Assembly

Participants

AVDC	Aylesbury Vale District Council
BC	Borough Council
Bucks CC	Buckinghamshire County Council
BCW	Borough Council of Wellingborough
CBC	Corby Borough Council
CC	County Council
CPRE	Campaign to Protect Rural England
DC	District Council
DLA	David Lock Associates
DLP	Development Land & Planning Consultants
EA	The Environment Agency
EEDA	East of England Development Agency
EH	English Heritage
EMDA	East Midlands Development Agency
EP	English Partnerships
FOE	Friends of the Earth
GO	Government Office
GO-East	Government Office for the East of England
GO-SE	Government Office for the South East
HA	The Highways Agency
HBF	The House Builders' Federation
KBC	Kettering Borough Council
LLAOL	London Luton Airport Operation Ltd

MKC	Milton Keynes Council
NCC	Northamptonshire County Council
PPS	Phillips Planning Services
RDA	Regional Development Agency
RSPB	Royal Society for the Protection of Birds
SAVE	Support Aylesbury Vale's Environment
SBDC	South Bedfordshire District Council
SEEDA	South East England Development Agency
SRA	Strategic Rail Authority
STOP	Stop the Over-Development Group
UCN	University College Northampton
WMRA	West Midlands Regional Assembly

Documents

COPELA	Commercial Property & Employment Land Assessment (NCC)
GAA	Growth Area Assessments
IR	Inspector's Report
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Schemes
LSMMMS	London-South Midlands Multi-Modal Study
LTP	Local Transport Plans
PPG	Planning Policy Guidance
PPS	Planning Policy Statements
RELPS	Regional & Employment Land Priorities Study
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCP	Sustainable Communities Plan
SRS	Milton Keynes and South Midlands Sub Regional Strategy

Others

AONB	Area of Outstanding Natural Beauty
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BPEO	Best Practicable Environmental Option
BREEAM	Building Research Establishment Environmental Assessment Method
CHP	Combined Heat and Power
CKW	Corby, Kettering, Wellingborough
FSS	First Secretary of State
IRB	Inter-Regional Board
HEFC	Higher Education Funding Council
LDHR	Luton, Dunstable, Houghton Regis
LDV	Local Delivery Vehicle
LPA	Local Planning Authority
mppa	Million passengers per annum
NIA	Northampton Implementation Area
ODPM	Office of the Deputy Prime Minister
PAER	Priority Area for Economic Regeneration
PDL	Previously Developed Land
PUA	Principle Urban Area
SSSI	Site of Special Scientific Interest
UDC	Urban Development Corporation

APPENDIX B

LIST OF MATTERS

List of Matters

Matter 1: Basis for the Sub Regional Strategy

Justification

1A What is the justification for the level of growth, particularly for employment and housing development, proposed in the Strategy and its location in the MKSM area? In particular:

- Does the proposed strategy broadly reflect the objectives of the Communities Plan?
- Are the proposals necessary in order to meet the current and expected future housing and economic development needs of the area and the wider South East, East of England and East Midlands regions?
- Do the background studies to the SRS (the MKSM Study 2002 and the Growth Area Assessments 2003) provide generally sound and consistent information on economic and employment issues, urban capacity, existing housing commitments and infrastructure issues?

Soundness

1B How sound are the main features of the Strategy, in particular:

- Are the objectives set out at paragraph 16 of the SRS the right ones for realising the aspirations of the Strategy?
- Is the spatial strategy for the sub-region, focussed on six urban areas an appropriate approach to accommodating development needs sustainably?
- Does the Strategy give sufficient attention to economic development objectives and does it provide an acceptable balance between employment generation and housing provision?
- Does the Strategy provide for a consistent approach to development in the sub-areas within it? Is there a need to deal more fully with growth expectations and infrastructure needs beyond the proposed time horizons of 2016 and 2021, towards 2031?

Effect on adjacent areas

1C What effects would the Strategy have on adjacent areas, e.g. through development pressures and transport demands, diversion of resources, or undermining of regeneration priorities?

Matter 2: Sustainability

Amount and location of land for development

2A Does the Strategy provide for development in the sub-region to take place in a sustainable way, having regard to urban renaissance and national priorities for maximising the proportion of development on brownfield land as opposed to Greenfield sites?

Communities

2B Does the Strategy reflect adequately the need for communities to be designed in ways which promote health, community cohesion, social well-being and community safety?

Transport

2C Is the Strategy sustainable with regard to minimising the need to travel and providing accessibility by sustainable transport modes between homes, employment and services? Is there a need for greater prioritisation of the transport proposals and clearer linkage between them and other aspects of the Strategy?

Environment and resources

2D Does the Strategy provide for sustainable development having regard to:

- The sub-region's stock of environmental and cultural assets and biodiversity, and opportunities to increase as well as protect it;

- Provision for green infrastructure including access to the countryside;
- Natural resource issues and constraints, in particular energy efficiency, water resources and the contribution of sustainable design and construction.

Matter 3 Delivery and Implementation

Infrastructure requirements and delivery

3A Is the Strategy sufficiently clear about the infrastructure that will be required to support the growth proposals? This includes not only transport infrastructure but also utilities, schools, health and other social infrastructure [and green infrastructure]. In particular:

- Does the Strategy make clear whether particular items of infrastructure are considered to be essential pre-requisites to development? What is the practical significance of the distinction between “strategic” infrastructure in Part A and the “local” infrastructure in Part B?
- Are the likely costs of the infrastructure requirements adequately identifiable?
- Is greater clarity required about sources of funding, in particular the contributions expected from development, from existing programmes and from new funding available to the sub-region, and is funding likely to be obtainable?
- Will the proposed arrangements ensure adequate involvement of service providers, public private and community sectors? Will the Strategy and proposed delivery mechanisms ensure that necessary infrastructure and services are provided in step with development? What would be the implications of a failure of infrastructure to come forward?

Implementation, monitoring and review

3B Does the Strategy fulfil its purpose in the planning system, in particular:

- How does it mesh with existing and emerging Regional Planning Guidance (RPG/RSS) and does it provide an appropriate level of guidance?
- How does the level of detail in the Strategy relate to the preparation of Development Plan reviews or future Local Development frameworks (LDFs)?
- Are the arrangements for monitoring, management and review of the sub-regional strategy adequate? What indicators and targets should the Strategy include to be incorporated into the three RPG/RSS and local plans/LDFs?

Matter 4 Spatial framework for Northamptonshire

4A Northampton Growth Area

4A1 Growth strategy for ‘Northampton Implementation Area’

Does the part B statement and spatial diagram communicate an appropriate vision for Northampton to achieve the objective (at Part A, para 1.2) of continuing ‘to grow in stature as an important regional centre’ with a key emphasis on ‘renaissance of the town centre and waterfront areas’? If not how should the SRS be redirected to provide for the urban area to make an appropriate contribution to the strategy?

4A2 Growth strategy for Daventry and other towns in South Northants and Daventry Districts

Do the part B statement and spatial diagram make a clear and appropriate response to the potential of Daventry and other towns in the Northampton Implementation Area (ie South Northamptonshire and Daventry Districts)?

4A3 Employment matters

Does the SRS make appropriate employment proposals for the Northampton PUA and Implementation Areas, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

4A4 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues, the need to protect and enhance the area’s environmental and cultural assets and potential opportunities to secure more sustainable development?

Does the strategy adequately address concerns about the relationship between the growth area and nearby villages?

4A5 Housing targets

Do the housing provisions of the SRS to 2021 (roughly one additional urban extension in addition to existing commitments and plans) represent an appropriate and sustainable strategy?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Does the SRS give sufficient guidance on local needs for affordable housing? Should it set a specific target? If so, what should this be?

4A6 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Northampton Implementation Area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

Is there a need for more explicit links between development and infrastructure provision in the Northampton Implementation Area? If so, what should these be?

4B Corby/Kettering/Wellingborough

4B1 Growth Strategy for Corby

Does the part B statement and spatial diagram communicate an appropriate vision for ‘the regeneration of Corby and its urban fabric and redevelopment of the town centre’ (see Part A, para 1.2)? If not how should the SRS be redirected to provide for the town to make an appropriate contribution to the strategy?

4B2 Growth strategy for Kettering and Wellingborough

Does the part B statement and spatial diagram communicate an appropriate vision for Kettering and Wellingborough to ‘sustainably manage growth and job creation that realises their potential’ (see Part A, para 1.2)? If not how should the SRS be redirected to provide for the towns to make appropriate contributions to the strategy?

4B3 Growth strategy for other towns and centres in Corby, Kettering and Wellingborough and East Northamptonshire

Does the part B statement and spatial diagram make a clear and appropriate response to the potential of the ‘smaller towns’ in the Corby, Kettering and Wellingborough PUA and the identified ‘Rural Service Centres’?

4B4 Employment matters

Does the SRS make appropriate employment proposals for the Corby, Kettering and Wellingborough Implementation Area, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

4B5 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues, the need to protect and enhance the area's environmental and cultural assets and potential opportunities to secure more sustainable development?

Does the strategy adequately address concerns about the relationships between the 3 growth towns and the nearby villages?

4B6 Housing targets

Do the housing provisions of the SRS to 2021 represent an appropriate and sustainable strategy?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Does the SRS give sufficient guidance on local needs for affordable housing? Should it set a specific target? If so, what should this be?

4B7 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Corby, Kettering and Wellingborough Implementation Area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

Is there a need for more explicit links between development and infrastructure provision in the Corby, Kettering and Wellingborough Implementation Area? If so, what should these be?

4C Northamptonshire-wide themes

4C1 Does the content of the Part B statement and the spatial diagram provide adequate overall guidance at an appropriate level for the preparation of LDDs in Northamptonshire?

4C2 Is the strategy's advice on urban hubs, sub-regional centres, rural service centres and local centres sufficiently clear, and will it be helpful to local authorities preparing LDDs?

Matter 5 Spatial framework for Milton Keynes and Aylesbury

Note: Any issues relating to the expansion of the urban area of Milton Keynes but involving land in Aylesbury Vale or Mid-Bedfordshire Districts will be dealt with under matter 5.

5A Milton Keynes

5A1 Growth strategy for Milton Keynes

Does the Part B statement and spatial diagram communicate an appropriate vision for MK ‘to embrace its growth potential and continue to mature as a major and influential city’ (see part A, para 1.2)? If not, how should the SRS be redirected to provide for the towns to make appropriate contributions to the strategy?

5A2 Employment matters

Does the SRS make appropriate employment proposals for the Milton Keynes Growth Area, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

5A3 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues, the need to protect and enhance the environmental and cultural assets of the Milton Keynes area and the potential opportunities to secure more sustainable development?

Does the strategy adequately address concerns about the relationship between the growth area and nearby villages?

5A4 Housing targets

Do the levels of proposed housing development to 2016 (about 8000 dwellings in addition to current commitments and plans) represent an appropriate and sustainable strategy for the town’s growth?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Does the SRS give sufficient guidance on affordable housing? How does the 30% target relate to expected local needs and is it likely to be achievable given past performance and current housing commitments?

5A5 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Milton Keynes Growth Area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

In particular, are the proposed southern bypass, East-West rail, and the transit corridors essential elements of the local strategy and can they be provided in the period 2011-2016?

Does the strategy give adequate guidance for achieving the aspiration in para 2.14 concerning a university and teaching hospital?

Is there sufficient clarity about the utility infrastructure required to support growth at Milton Keynes in relation to water supply and quality?

Is there a need for more explicit links between development and infrastructure provision in the Milton Keynes Growth Area? If so, what should these be?

5B Aylesbury

5B1 Growth strategy for Aylesbury

Does the Part B statement and spatial diagram communicate an appropriate vision for Aylesbury to play its intended role within the sub-region of a ‘strengthened traditional county town’ (see part A, para 1.2)? If not, how should the SRS be redirected to provide for the town to make an appropriate contribution to the strategy?

5B2 Employment matters

Does the SRS make appropriate employment proposals for the Aylesbury Growth Area, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

5B3 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues, the need to protect and enhance the environmental and cultural assets of the Aylesbury area and the potential opportunities to secure more sustainable development?

Does the strategy adequately address concerns about the relationship between the growth area and nearby villages?

5B4 Housing targets

Do the levels of proposed housing development to 2016 (about 3000 dwellings in addition to current commitments and plans) represent an appropriate and sustainable strategy for the town’s growth?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Does the SRS give sufficient guidance on affordable housing? How does the 40% target relate to expected local needs and is it likely to be achievable given past performance and current housing commitments?

5B5 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Aylesbury Growth Area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

In particular, are the Southern Distributor Road and the ‘quality bus corridors’ essential elements of the local strategy and can they be provided in the periods proposed? Should earlier implementation of the distributor road be sought to assist the ‘central area decongestant benefits’ identified in the Roger Tym Growth Area Assessment (para 13.51)?

Is there sufficient clarity about the utility infrastructure required to support growth at Aylesbury in relation to water supply and quality?

Is there a need for more explicit links between development and infrastructure provision in the Aylesbury Growth Area? If so, what should these be?

5C Milton Keynes & Aylesbury common sub-matter

[Note:- Matter 5C subsumed within 5A & 5B as appropriate]

Does the content of the Part B statement and spatial diagram provide adequate guidance at an appropriate level for the preparation of LDDs by Milton Keynes Borough Council, Aylesbury Vale District Council and Mid Bedfordshire District Council (if involved)?

Matter 6 Spatial framework for Bedfordshire and Luton

Note: Any issues relating to Leighton-Linslade will be dealt with under matter 6B.

6A Bedford

6A1 Growth strategy for Bedford

Does the Part B statement and spatial diagram communicate an appropriate vision for Bedford-Kempston-North Marston Vale to ‘strengthen its growing role as a key centre through economic regeneration and growth, with priorities on urban renaissance, improved economic performance and harnessing the potential of the Marston Vale (see part A, para 1.2)? If not, how should the SRS be redirected to provide for the growth area to make an appropriate contribution to the strategy?

6A2 Employment matters

Does the SRS make appropriate employment proposals for the Bedford growth area, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

6A3 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues (including flood risk and the water environment), the need to protect and enhance the environmental and cultural assets of the Bedford growth area and the potential opportunities to secure more sustainable development?

Does the strategy adequately address concerns about the relationship between the growth area and nearby villages?

6A4 Housing targets

Do the levels of proposed housing development to 2021 (representing little overall change to already-committed and planned levels) represent an appropriate and sustainable strategy for the growth area?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Does the SRS give sufficient guidance on affordable housing? What are the needs within the growth area and should a specific target be set? If so, what should this be?

6A5 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Bedford growth area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

Is there a need for more explicit links between development and infrastructure provision in the growth area? If so, what should these be?

6B Luton/Dunstable/Houghton Regis

6B1 Growth strategy

Does the Part B statement and spatial diagram communicate an appropriate vision for the Luton/Dunstable/Houghton Regis area to ‘build itself into a vibrant, culturally diversified urban location with a step change improvement in its local economy and skills base...achieved through economic regeneration across the urban area, optimising its strategic location close to London and the South East and the proximity of an international airport’ (see part A, para 1.2)? If not, how should the SRS be redirected to provide for the growth area to make an appropriate contribution to the strategy?

6B2 Employment matters

Does the SRS make appropriate employment proposals for the growth area, reflecting realistic local assumptions about levels of economic activity, employment skills and land requirements?

6B3 Environment

Do the part B policies and spatial diagram pay sufficient regard to environmental issues, the need to protect and enhance the environmental and cultural assets of the growth area and the potential opportunities to secure more sustainable development?

Does the strategy take sufficient account of (a) the implications of proposals to review the extent of the Green Belt (b) the environmental constraints imposed by the Chilterns AONB and other local areas of sensitivity and (b) the character of Dunstable, Houghton Regis and nearby villages?

6B4 Housing targets

Do the proposals represent an appropriate balance of greenfield and brownfield development consistent with the local urban regeneration agenda?

Can completions be achieved at the levels sought, bearing in mind the past performance of the housing market in this area?

Are there impediments to achieving the proposed house-building rates and, if so, could the SRS be modified to help overcome these barriers?

Will the proposed housing areas to the north of Luton be implemented sufficiently early to avoid development pre-2016 on other land elsewhere?

Does the SRS give sufficient guidance on affordable housing? What are the needs of the area and should a specific target be set, such as that discussed in the Growth Area Assessment by Roger Tym and Partners?

6B5 Key local infrastructure

Does the part B statement and spatial diagram correctly identify the key items of local infrastructure essential to the strategy for the Luton/Dunstable/Houghton Regis growth area? (This includes transport, utilities, education, health and other social infrastructure.)

Can these works be completed within the timescales provided, given the likely availability of resources and the emerging arrangements for delivery mechanisms?

Is there a need for more explicit links between development and infrastructure provision in the Implementation Area? If so, what should these be?

6C Bedfordshire and Luton common sub-matters

[Note: Matter 6C subsumed into 6A & 6B]

6C1 Does the content of the Part B statement and spatial diagram provide adequate guidance at an appropriate level for the preparation of LDDs by Bedford and Luton Borough Councils, and South and Mid Bedfordshire District Councils?

6C2 In particular, does the SRS provide sufficient advice on the apportionment of housing provision among the local planning authority areas?

APPENDIX C

LIST OF PARTICIPANTS

**MILTON KEYNES & SOUTH MIDLANDS SUB-REGIONAL SPATIAL STRATEGY
PUBLIC EXAMINATION**

FINAL LIST OF INVITED PARTICIPANTS TO SESSIONS

Matters 1A – 1C

Matter or Session	Ref.No	Participants & Agents	Note
1A-C	1	East of England Regional Assembly (R1103)	
1A-C	2	East Midlands Assembly	
1A-C	3	South East of East England Assembly	
1A-C	4	Government Offices (R1150)	
1A-C	5	Regional Development Agencies (R1341)	
1A-C	6	Bedfordshire CC (R0723)	
1A-C	7	Buckinghamshire CC (R0290)	
1A-C	8	Northamptonshire CC (R0885)	
1A-C	9	South Bedfordshire DC (R0421)	
1A-C	10	Milton Keynes Council (R1343)	
1A-C	11	Northampton BC (R0873)	
1C	12	West Midlands Regional Assembly (R1151)	
1C	13	Hertfordshire CC (R1153)	
1C	14	Warwickshire CC (R1425)	
1C	15	Leicestershire Authorities (R0476) (R0222)	
1A-C	16	House Builders' Federation (HBF) (R0882)	
1A-C	17	Town and Country Planning Association (R1482)	
1A-C	18	Environment Agency (R0608)	
1A-C	19	Campaign to Protect Rural England (CPRE) (R0708)	
1A-C	20	Friends of the Earth (R-various)	
1A-C	21	David Lock Associates for O+H Properties; BT, Gazeley & Countryside Estates; Stamford Homes; DLA & Trenport Investments (R0892 - R0896)	
1A-C	22	Development Land & Planning for William Davis Ltd & Countryside Properties and others (R1286 –R1287)	
1A-C	23	Star Planning for Bovis Homes Ltd (R0712)	
1A-C	24	Pegasus Planning for RMC Group; Ensign Group; Taylor Woodrow; Willis Dawson; CJC Developments; the North Luton Consortium & Genesis Holdings (R0861 -R0866 & R0875)	

Matters 2A – 2D

Matter or Session	Ref.No	Participants & Agents	Note
2A-D	1	East of England Assembly (R1103)	
2A-D	2	East Midlands Assembly	
2A-D	3	South East of England Regional Assembly	
2A-D	4	Government Offices (R1150)	
2A-D	5	Regional Development Agencies (R1341)	

2A-D	6	Bedfordshire CC (R0723)	
2A-D	7	Buckinghamshire CC (R0290)	
2A-D	8	Northamptonshire CC (R0885)	
2A-D	9	South Bedfordshire DC (R0421)	
2A-D	10	Milton Keynes Council (1343)	
2A-D	11	Northampton BC (R0843) (A & C) Kettering BC (R0716) (B & D)	
2A-C	12	English Partnerships (R1379)	
2A-D	13	Northamptonshire Chamber (R1309)	
2A-D	14	David Lock Associates for O+H Properties; BT, Gazeley & Countryside Estates; Stamford Homes; DLA & Trenport Investments (R0892 – R0896)	
2A-D	15	Development Land & Planning for William Davis Ltd & Countryside Properties and others (R1286 –R1287)	
2A-C	16	Arup for Gallagher Estates (R1490)	
2A	17	CPRE (R0708)	
2B	17	Learning + Skills Council (R0857)	
2B	18	Voluntary & Community Sector representative (R1032)	
2B	19	MKSM Health & Social Care representative (R0155)	
2B	20	Countryside Agency (R0703)	
2B	21	English Nature (R1592)	
2B	22	Friends of the Earth (R-various)	
2B	23	CPRE (R0708)	
2B	24	Sport England – East Midlands (R1486)	
2B	25	Wildlife Trusts (R0733)	
2C	17	Highways Agency (R1463)	
2C	18	Strategic Rail Authority (SRA) (R0247)	
2C	19	Chiltern Railways (R1564) representing the Association of Train Operating Companies	
2C	20	National Federation of Bus Users (R0444)	Did not attend
2C	21	Rail Passengers' Committee - Midlands (R0428)	
2C	22	East Midlands Transport Activists Roundtable (EMTAR) (R1495)	
2C	23	East-West Rail Consortium (R0836)	
2D	16	Countryside Agency (R0703)	
2D	17	English Heritage (R0732)	
2D	18	English Nature (R1592)	
2D	19	Friends of the Earth (R-various)	
2D	20	CPRE (R0708)	
2D	21	Wildlife Trusts (R0733)	
2D	22	Environment Agency (R0608)	
2D	23	Anglian Water Services (R0623)	
2D	24	Thames Water Property (R1475)	

Matters 3A – 3B

Matter or Session	Ref.No	Participants & Agents	Note
3A-B	1	East of England Assembly (R1103)	
3A-B	2	East Midlands Assembly	
3A-B	3	South East of England Regional Assembly	
3A-B	4	Government Offices (R1150)	
3A-B	5	Regional Development Agencies (R1341)	
3A-B	6	Bedfordshire CC (R0723)	
3A-B	7	Buckinghamshire CC (R0290)	
3A-B	8	Northamptonshire CC (R0885)	
3A-B	9	South Bedfordshire DC (R0421)	
3A-B	10	Milton Keynes Council (R1343)	

3A-B	11	Daventry DC (1460) (3A); Corby BC (R1453) (3B)	
3A-B	12	Countryside Agency (R0703)	
3A-B	13	Environment Agency (R0608)	
3A-B	14	English Nature (R1592)	
3A-B	15	CPRE (R0708)	
3A-B	16	Friends of the Earth (R-various)	
3A-B	17	Royal Society for the Protection of Birds (R0705)	
3A	18	English Heritage (R0732)	
3A-B	19	East Midlands Churches Forum (R1457)	
3A	20	MKSM Health & Social Care representative (R0155)	
3A-B	21	Learning + Skills Council (R0857)	
3A-B	22	SRA (R0247)	
3A-B	23	Highways Agency (R1463)	
3A-B	24	English Partnerships (R1379)	
3A-B	25	HBF (R0882)	
3A-B	26	Redrow Homes (Midlands) (R0874)	
3A-B	27	Arup for Gallagher Estates (R1490)	
3A-B	28	Milton Keynes Forward (R0772)	

Matters 4A1 – 4A6

Matter or Session	Ref.No	Participants & Agents	Note
4A	1	East Midlands Assembly	
4A	2	Government Office for the East Midlands (R1150)	
4A	3	East Midlands Development Agency (R1341)	
4A	4	Northamptonshire CC (R0885)	
4A	5	South Northamptonshire Council (R1336)	
4A	6	Daventry DC (R1460)	
4A	7	Northampton BC (R0873)	
4A	8	S Northamptonshire Independent Parishes (SNIP)	
4A	9	Mid Northamptonshire Parishes 2001 (R0206)	
4A	10	Daventry Villages Together/N.A.L.C.	
4A	11	HBF (R0882)	
4A	12	National Housing Federation (NHF) (R1447)	Did not attend
4A6	13	Highways Agency (R1463)	
4A6	14	SRA (R0247)	
4A	15	English Partnerships (R1379)	
4A	16	Northamptonshire Chamber (R1309)	
4A	17	Learning + Skills Council (R0857)	
4A	18	University College, Northampton (R0008)	
4A	19	CPRE (R0708)	
4A	20	Friends of the Earth – Northamptonshire (R0883)	
4A	21	MKSM Health & Social Care representative (R0155)	
4A	22	Barton Willmore for Southfields Property; Wilson Connolly & the Dallington Grange Consortium (R0709 –R0711)	
4A	23	Redrow Homes (Midlands) (R0874)	
4A	24	Development Land & Planning for William Davis Ltd & Countryside Properties and others (R1286 – R1287)	
4A	25	Charles Planning Associates for Croudace Ltd (R1088)	
4A	26	Star Planning for Bovis Homes (R0712)	
4A	27	Smith Stuart Reynolds for the Moulton Consortium (R0871)	

Matters 4B1 – 4B7

Matter or Session	Ref.No	Participants & Agents	Note
4B	1	East Midlands Assembly	
4B	2	Government Office for the East Midlands (R1150)	
4B	3	East Midlands Development Agency (R1341)	
4B	4	Northamptonshire CC (R0885)	
4B	5	Kettering BC (R0716)	
4B	6	Corby BC (R1453)	
4B	7	Wellingborough BC (R0334)	
4B	8	East Northamptonshire Council (R0613)	
4B	9	Mid Northamptonshire Parishes 2001 (R0206)	
4B	10	Kettering Rural Forum (R0164)	
4B	11	Stop the Over-Development (S.T.O.P.) (R0429)	
4B	12	HBF (R0882)	
4B	13	NHF (R1447)	Did not attend
4B	14	MKSM Health & Social Care representative (R0155)	
4B7	15	Highways Agency (R1463)	
4B7	16	SRA (R0247)	
4B	17	Learning + Skills Council (R0857)	
4B	18	Kettering Chamber (R1091)	
4B	19	Catalyst Corby (R1555)	
4B	20	CPRE (R0708)	
4B	21	Friends of the Earth - Northamptonshire (R0883)	
4B	22	Rockingham Forest Trust (R1478)	
4B	23	Lovejoy (Birmingham) for Bovis Homes; William Davis; Hallam Land & Wellingborough East Landowners Group (R1299) + Brian Barber Associates for Hallam Land (R0887)	
4B	24	Development Land & Planning for Countryside Properties and others (R1287)	
4B	25	Smith Stuart Reynolds for Persimmon Homes & Wilson Connolly (R0699 & R0869)	
4B	26	DLA Solicitors for the Corby Landowners Group (R1152)	

Matters 4C1 – 4C2

Matter or Session	Ref.No	Participants & Agents	Note
4C	1	East Midlands Assembly	
4C	2	Government Office for the East Midlands (R1150)	
4C	3	East Midlands Development Agency (R1341)	
4C	4	Northamptonshire CC (R0885)	
4C	5	Daventry DC (R1460) (4C1) & South Northamptonshire Council (R1336) (4C2)	
4C	6	East Northamptonshire Council (R0613)	
4C	7	S.N.I.P.	
4C	8	Daventry Villages Together	
4C	9	Kettering Rural Forum (R0164)	
4C	10	S.T.O.P. (R0429)	
4C	11	Local Strategic Partnerships	
4C	12	Catalyst Corby (R1555)	
4C	13	Northamptonshire Chamber (R1309)	

4C	14	CPRE (R0708)	
4C	15	Friends of the Earth - Northamptonshire (R0883)	
4C	16	Barton Willmore for Southfields Property; Wilson Connolly & the Dallington Grange Consortium (R0709 – R0711)	
4C	17	Redrow Homes (Midlands) (R0874)	
4C	18	Development Land & Planning for William Davis Ltd & Countryside Properties and others (R1286 – R1287)	
4C	19	Charles Planning Associates for Croudace Ltd (R1088)	
4C	20	Lovejoy (Birmingham) for Bovis Homes; William Davis; Hallam Land & Wellingborough East Landowners Group (R1299)	
4C	21	Smith Stuart Reynolds for Persimmon Homes & Wilson Connolly (R0699 & R0869)	

Matters 5A1 – 5A5 (+ 5C)

Matter or Session	Ref.No	Participants & Agents	Note
5A	1	South East of England Regional Assembly	
5A	2	Government.Office for the South East (R1150)	
5A	3	South East England Development Agency (R1341)	
5A	4	Buckinghamshire CC (R0290)	
5A	5	Milton Keynes Council (R1343)	
5A	6	Mid Bedfordshire DC (R1293)	
5A	7	Milton Keynes Association of Urban Parishes	
5A	8	North Bucks Parishes Planning Consortium (R0701)	
5A	9	'South East Parishes'	
5A	10	Oxford University Medical Sciences (R1012)	
5A	11	M Keynes Economy & Learning Partnership (R0205)	
5A	12	MK & North Bucks Chamber of Commerce (R1383)	
5A	13	HBF (R0882)	
5A	14	NHF (R1447)	Did not attend
5A	15	MKSM Health & Social Care representative (R0155)	
5A	16	Anglian Water Services (R0623)	
5A5	17	English Partnerships (R1379)	
5A	18	CPRE (R0708)	
5A	19	Friends of the Earth – Milton Keynes (R0750)	
5A	20	Milton Keynes Forum (R0363)	
5A	21	Highways Agency (R1463)	
5A	22	Environment Agency (R0608)	
5A	23	East - West Rail Consortium (R0836)	
5A	24	Development Land & Planning for Milton Keynes Forward (R0772)	
5A	25	Pegasus Planning for Genesis Holdings (R0875)	
5A	26	FPD-Savills for the South East Milton Keynes Consortium (R1076)	
5A	27	Development Land & Planning for William Davis Ltd; Countryside Properties and others & Taylor Woodrow (R1286 - R1288)	
5A	28	Berkeley Group (R1080)	
5A	29	Aylesbury Vale DC (R0284)	
5A	30	David Lock Associates (R0895)	
5A	31	Milton Keynes Local Strategic Partnership	

Matters 5B1 – 5B5 (+ 5C)

Matter or Session	Ref.No	Participants & Agents	Note
5B	1	South East of England Regional Assembly	
5B	2	Government.Office for the South East (R1150)	
5B	3	South East England Development Agency (R1341)	
5B	4	Buckinghamshire CC (R0290)	
5B	5	Aylesbury Vale DC (R0284)	
5B	6	Aylesbury Town C (R0123)	Did not attend
5B	7	Stoke Mandeville Parish Council (R1604)	
5B	8	Bucks Association of Local Councils (R1601)	
5B	9	HBF (R0882)	
5B	10	NHF (R1447)	
5B	11	Environment Agency (R0608)	
5B	12	Thames Water Property (R1475)	
5B	13	MKSM Health & Social Care representative (R0155)	
5B	14	Learning + Skills Council (R0857)	
5B	15	Support Aylesbury Vale's Environment (S.A.V.E.) (R0487)	
5B	16	CPRE (R0708)	
5B	17	Friends of the Earth – Milton Keynes (R0750)	
5B	18	MK & North Bucks Chamber of Commerce (R1383)	
5B	19	Pegasus Planning for Taylor Woodrow (R0863)	
5B	20	Hives Partnership Planning for the Oxford Diocesan Board (R0859)	
5B	21	Barton Willmore for Lands Improvement Holdings (R1084)	
5B	22	Milton Keynes Local Strategic Partnership	

Matters 6A1 – 6A5 (+ 6C1 – 6C2)

Matter or Session	Ref.No	Participants & Agents	Note
6A	1	East of England Regional Assembly (R1103)	
6A	2	Government Office for the East of England (R1150)	
6A	3	East of England Development Agency (R1341)	
6A	4	Bedfordshire CC (R0723)	
6A	5	Bedford BC (R0186)	
6A	6	Mid Bedfordshire DC (R1293)	
6A	7	Bedfordshire Association of Town & Parish Councils (R0591)	
6A	8	Bedfordshire Association of Town & Parish Councils (R0591)	
6A	9	Bedfordshire Association of Town & Parish Councils (R0591)	
6A	10	HBF (R0882)	
6A	11	NHF (R1447)	Did not attend
6A	12	Chamber Business Luton (R0695)	Did not attend
6A	13	Learning + Skills Council (R0857)	Did not attend
6A	14	CPRE (R0708)	
6A	15	Friends of the Earth – Milton Keynes (R0750)	
6A	16	Forest of Marston Vale (R0702)	
6A	17	Environment Agency (R0608)	
6A	18	SRA (R0247)	
6A	19	MKSM Health & Social Care representative (R0155)	
6A	20	Phillips Planning Services for Persimmon Homes and Mr	

		D Stewart (R1078)	
6A	21	Arup for Gallagher Estates (R1490)	
6A	22	David Lock Associates for O + H Properties (R0892)	
6A	23	Development Land & Planning for Countryside Properties and others & Taylor Woodrow (R1287 - R1288)	
6A	24	English Partnerships (R1379)	
6A	25	Anglian Water Services (R0623)	Did not attend
6A	26	Highways Agency (R1463)	
6A	27	Voaden Sandbrook for Hanson Building Products (R1411)	
6A	28	South Bedfordshire Local Strategic Partnership (R1307)	

Matters 6B1 – 6B5 (+ 6C1 – 6C2)

Matter or Session	Ref.No	Participants & Agents	Note
6B	1	East of England Regional Assembly (R1103)	
6B	2	Government Office for the East of England (R1150)	
6B	3	East of England Development Agency (R1341)	
6B	4	Bedfordshire CC (R0723)	
6B	5	Luton BC (R0475)	
6B	6	South Bedfordshire DC (R0421)	
6B	7	North Hertfordshire DC (R0610)	
6B	8	Dunstable Town Council (R1289)	
6B	9	Houghton Regis Town Council (R0715)	
6B	10	Leighton Linlade Town Council (R1179)	
6B	11	Anglian Water Services (R0623)	Did not attend
6B	12	HBF (R0882)	
6B	13	NHF (R1447)	Did not attend
6B	14	CPRE (R0708)	
6B	15	Friends of the Earth – Luton (R1503)	
6B	16	Chilterns Conservation Board (R1621)	
6B	17	Learning + Skills Council (R0857)	Did not attend
6B	18	Chamber Business Luton (R0695)	Did not attend
6B	19	London Luton Airport Operations Ltd (R0729)	
6B	20	MKSM Health & Social Care representative (R0155)	
6B	21	SRA (R0247)	
6B	22	Highways Agency (R1463)	
6B	23	Pegasus Planning for Willis Dawson & the North Luton Consortium (R0864 & R0866)	
6B	24	Smith Stuart Reynolds for Old Road Securities; AXA/REIM & Lands Improvement holdings (R0590)	
6B	25	Terence O'Rourke for Bloor Homes (R1306)	
6B	26	Hives Partnership Planning for Arnold White Estates (R0860)	
6B	27	JB Planning for Templeview Developments (R0868)	
6B	28	FPD Savills for Legal & General Assurance (R1075)	
6B	29	Development Land & Planning for the Crown Estate (R0713)	
6B	30	Countryside Agency (R0703)	
6B	31	South Bedfordshire Local Strategic Partnership (R1307)	

APPENDIX D

PROGRAMME

WEEK 1 (Venue: Northampton)**[Day 1] Tuesday 23rd March 2004**

1000 – 1030	Opening Statements
1030 – 1200	Matter 1A: Basis for the Sub-Regional Strategy - Justification
1200 – 1300	Lunch
1300 – 1430	Matter 1A: Basis for the Sub-Regional Strategy - Justification
1430 – 1500	Mid afternoon break
1500 – 1630	Matter 1A: Basis for the Sub-Regional Strategy - Justification

[Day 2] Wednesday 24th March 2004

0930 – 1100	Matter 1B: Basis for the Sub-Regional Strategy - Soundness
1100 – 1130	Mid morning break
1130 – 1300	Matter 1B: Basis for the Sub-Regional Strategy - Soundness
1300 – 1400	Lunch
1400 – 1530	Matter 1B: Basis for the Sub-Regional Strategy - Soundness
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 1B: Basis for the Sub-Regional Strategy - Soundness

[Day 3] Thursday 25th March 2004

0930 – 1100	Matter 1C: Basis for the Sub-Regional Strategy - Effect on adjacent areas
1100 – 1130	Mid morning break
1130 – 1300	Matter 1C: Basis for the Sub-Regional Strategy - Effect on adjacent areas
1300 – 1400	Lunch
1400 – 1530	Matter 2A:Sustainability – Amount and location of land for development
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 2A:Sustainability – Amount and location of land for development

Friday 26th March 2004

NO SITTING

Week 2 (Venue: Northampton)**[Day 4] Tuesday 30th March 2004**

0930 – 1100	Matter 2B: Sustainability - Communities
1100 – 1130	Mid morning break
1130 – 1300	Matter 2B: Sustainability - Communities
1300 – 1400	Lunch
1400 – 1530	Matter 2C: Sustainability - Transport
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 2C: Sustainability - Transport

[Day 5] Wednesday 31st March 2004

0930 – 1100	Matter 2D: Sustainability – Environment and resources
1100 – 1130	Mid morning break
1130 – 1300	Matter 2D: Sustainability – Environment and resources
1300 – 1400	Lunch
1400 – 1530	Matter 2D: Sustainability – Environment and resources
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 2D: Sustainability – Environment and resources

[Day 6] Thursday 1st April 2004

0930 – 1100	Matter 3A: Delivery & Implementation – Infrastructure requirements & delivery
1100 – 1130	Mid morning break
1130 – 1300	Matter 3A: Delivery & Implementation – Infrastructure requirements & delivery
1300 – 1400	Lunch
1400 – 1530	Matter 3B: Delivery & Implementation – Implementation, monitoring & review
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 3B: Delivery & Implementation – Implementation, monitoring & review

Friday 2nd April 2004

NO SITTING

Week 3 (Venue: Northampton)**[Day 7] Monday 5th April 2004 – Northampton Growth Area**

1400 – 1530	Matter 4A1 & 2: Growth Strategy for Northampton Implementation Area, Daventry, & other towns in South Northamptonshire and Daventry Districts
1530 – 1600	Mid afternoon break
1600 – 1730	Matter 4A3: Employment matters

[Day 8] Tuesday 6th April 2004 – Northampton Growth Area (continued)

0930 – 1100	Matter 4A4: Environment
1100 – 1130	Mid morning break
1130 – 1300	Matter 4A5: Housing targets
1300 – 1400	Lunch
1400 – 1530	Matter 4A6: Key local infrastructure
1530 – 1600	Mid afternoon break

Corby/Kettering/Wellingborough Growth Area

1600 – 1730 Matter 4B1-3: Growth Strategy for Corby, Kettering and Wellingborough and other towns and centres in Corby, Kettering, Wellingborough and East Northamptonshire Districts

[Day 9] Wednesday 7th April 2004 – Corby/Kettering/Wellingborough Growth Area (continued)

0930 – 1100 Matter 4B4: Employment matters
 1100 – 1130 Mid morning break
 1130 – 1300 Matter 4B5: Environment
 1300 – 1400 Lunch
 1400 – 1530 Matter 4B6: Housing targets
 1530 – 1600 Mid afternoon break
 1600 – 1730 Matter 4B7: Key local infrastructure

[Day 10] Thursday 8th April 2004 - Northamptonshire-wide themes

0930 – 1100 Matter 4C1 & 2: Northamptonshire wide themes
 1100 – 1130 Mid morning break
 1130 – 1300 Matter 4C1 & 2: Northamptonshire wide themes

Adjournment until 20th April 2004

Week 4 (Venue: Milton Keynes)

NB: Any issues relating to the expansion of the urban area of Milton Keynes but involving land in Aylesbury Vale or Mid Bedfordshire Districts will be dealt with under Matter 5

[Day 11] Tuesday 20th April 2004 – Milton Keynes Growth Area

0930 – 1100 Matter 5A1: Growth Strategy for Milton Keynes
 1100 – 1130 Mid morning break
 1130 – 1300 Matter 5A1: Growth Strategy for Milton Keynes
 1300 – 1400 Lunch
 1400 – 1530 Matter 5A2: Employment matters
 1530 – 1600 Mid afternoon break
 1600 – 1730 Matter 5A2: Employment matters

[Day 12] Wednesday 21st April 2004 – Milton Keynes Growth Area (continued)

0930 – 1100 Matter 5A3: Environment
 1100 – 1130 Mid morning break
 1130 – 1300 Matter 5A4: Housing targets
 1300 – 1400 Lunch
 1400 – 1530 Matter 5A5: Key local infrastructure
 1530 – 1600 Mid afternoon break

1600 – 1730 **Aylesbury Growth Area**
Matter 5B1: Growth Strategy for Aylesbury

[Day 13] Thursday 22nd April 2004 - Aylesbury Growth Area (continued)

0930 – 1100 Matter 5B2: Employment matters
1100 – 1130 Mid morning break
1130 – 1300 Matter 5B3: Environment
1300 – 1400 Lunch
1400 – 1530 Matter 5B4: Housing targets
1530 – 1600 Mid afternoon break (if required)
1600 – 1730 Matter 5B5: Key local infrastructure

Friday 23rd April 2004

NO SITTING

Week 5 (Venue: Luton)

NB: Any issues relating to Leighton-Linslade will be dealt with under Matter 6B

[Day 14] Tuesday 27th April 2004 - Bedford

0930 – 1100 Matter 6A1: Growth Strategy for Bedford
1100 – 1130 Mid morning break
1130 – 1300 Matter 6A2: Employment matters
1300 – 1400 Lunch
1400 – 1530 Matter 6A3: Environment
1530 – 1600 Matter 6A4: Housing targets
 Mid afternoon break
1600 – 1730 Matter 6A5: Key local infrastructure

[Day 15] Wednesday 28th April 2004 – Luton/Dunstable/Houghton Regis

0930 – 1100 NO SITTING
Luton/Dunstable/Houghton Regis
1130 – 1300 Matter 6B1: Growth Strategy for Luton/Dunstable/Houghton Regis
1300 – 1400 Lunch
1400 – 1530 Matter 6B2: Employment matters
1530 – 1600 Mid afternoon break
1600 – 1730 Matter 6B3: Environment & 6B4: Housing targets

[Day 16] Thursday 29th April 2004 – Luton/Dunstable/Houghton Regis (continued)

0930 – 1100 Matter 6B3: Environment & 6B4: Housing targets
1100 – 1130 Mid morning break
1130 – 1300 Matter 6B3: Environment & 6B4: Housing targets
1300 – 1400 Lunch
1400 – 1550 Matter 6B5: Key local infrastructure
Close of Public Examination

APPENDIX E

CORE DOCUMENTS

Milton Keynes and South Midlands Sub-Regional Strategy

March/April 2004

Document List

Library Reference No	Document Group	Publication Date
	CORE DOCUMENTS	
CORE1	Milton Keynes & South Midlands Sub-Regional Strategy (Alterations to Regional Planning Guidance/Emerging Regional Spatial Strategies covering the East of England, East Midlands, South East of England) (Consultation Draft) EERA, EMA, SEERA www.go-em.gov.uk/planning/mksm/examination	July 2003
CORE2	Sustainability Appraisal of the Draft Milton Keynes-South Midlands Sub-Regional Spatial Strategy Parts A and B – A Report to the Regional Planning Bodies for the East of England, East Midlands & South East of England by Baker Associates www.go-em.gov.uk/planning/mksm/examination	June 2003
CORE3A	Growth Area Assessments – Northampton & Corby, Kettering, Wellingborough. Final Stage 1 Report by DTZ Pieda Consulting	May 2003
CORE3B	Growth Area Assessments – Northampton & Corby, Kettering, Wellingborough. Final Stage 2 Report by DTZ Pieda Consulting	May 2003
CORE3C	Growth Area Assessments – Northampton & Corby, Kettering, Wellingborough. Technical Appendix (DTZ Pieda Consulting)	March 2003
CORE4	Milton Keynes and Aylesbury Growth Area Studies. Final Report by Roger Tym & Partners with Halcrow and Three Dragons	May 2003
CORE4A	Milton Keynes and Aylesbury Growth Area Assessment - Project Brief For Consultants. South East England Regional Assembly	January 2003
CORE5	Luton/Dunstable/Houghton Regis Growth Area Study. Final Report by Roger Tym & Partners with Halcrow and Three Dragons	May 2003
CORE6	Bedford Growth Area Study. Final Report by Entec UK Limited in association with Faber Maunsell and Borie Wells Associates	May 2003
CORE7	Milton Keynes-South Midlands Growth Area: Assessment of Transport Interventions Study. Final Report by Faber Maunsell	November 2003
CORE8	Milton Keynes and South Midlands Study, final report of Study, Roger Tym & Partners, Halcrow and Three Dragons http://www.emrlga.gov.uk/rpg/docs/mk_smstudy-contents.pdf	September 2002
CORE9A	Regional Planning Guidance for the East Midlands to 2021. GO-EM www.go-em.gov.uk/planning/rpg	January 2002
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TRAN5	Multi-Modal Study A453 Nottingham To M1 Junction 24 Final Report – Pell Frischman http://www.a453multimodal.com/Final%20Report.htm	July 2002
TRAN6	South Pennines Integrated Transport Strategy Public Consultation – Peak Park Transport Forum	December 1998
TRAN7	The National Cycling Strategy – The Department Of Transport http://www.dft.gov.uk/stellent/groups/dft_transstats/documents/pdf/dft_transstats_pdf_505587.pdf	July 1996
TRAN8	The Strategic Plan, Passengers. Freight. Infrastructure – SRA Strategic Rail Authority http://nc2-0004.web.dircon.net/sra/publications/default.tt2	January 2002
TRAN9	Strategic Sub Regional Development Study Of The Area Around J24 Of The M1 – DTZ Piedad Consulting	November 1999
TRAN10	The State of Freight In The East Midlands, Report 1: State of Freight Picture – Sinclair Knight Merz http://www.emrlga.gov.uk/rpg/archive.asp	August 2002
TRAN11	The State of Freight In The East Midlands, Report 2: Strategy – Sinclair Knight Merz http://www.emrlga.gov.uk/rpg/archive.asp	August 2002
TRAN12	Capacity Utilisation Policy – Network Utilisation Strategy, SRA	June 2003
TRAN13	Multi Modal Study: North/South Movements on the M1 Corridor in the East Midlands – Final Report http://www.east-midlands-multi-modal-study.org.uk/reports.htm	April 2002
TRAN14	See CORE 12B	
TRAN15	London to South Midlands Multi Modal Study http://www.lsmmultimodal.com/	February 2003
TRAN16	Local Authority Performance on Cycling. English Regions Cycling Development Team	
TRAN17	10 Year Plan, DETR	2000
TRAN18	10 Year Plan – Background Analysis, DETR	2000
TRAN19	West to East Midlands Multi Modal Study – Final Report, Jacobs Consultancy	August 2003
TRAN20	West to East Midlands Multi Modal Study – Final Report Executive	August 2003

	Summary, Jacobs Consultancy	
TRAN21	Midland Mainline/East Midlands Route Utilisation Study – Strategic Rail Authority	March 2004
TRAN22	SRA Strategic Plan 2003 – Part 1, Part 2 & Route Descriptions. Strategic Rail Authority www.sra.gov.uk/publications/strategy	2003
TRAN23	Regional Planning Frameworks – Regional Planning Assessments. Strategic Rail Authority www.sra.gov.uk/publications/strategy	2003
TRAN24	West Coast Main Line Strategy. Strategic Rail Authority www.sra.gov.uk/publications/general	2003
TRAN25	Appraisal Criteria. Strategic Rail Authority www.sra.gov.uk/publications/general	8 April 2003
TRAN26	“Everyone’s Railway”. Strategic Rail Authority www.sra.gov.uk/publications/index_page	
TRAN27	Public Transport Long Term Vision for Milton Keynes – Consultation. Milton Keynes Council	January 2004
TRAN28	Government’s 10 Year Plan for Transport. DfT	2003
TRAN29	Northampton Multi-Modal Study Final Report. Ove Arup & partners for Northamptonshire County Council, Northampton Borough Council & English Partnerships	December 2003
TRAN30	“Getting Northampton To Work” – Annex E Submission. Ove Arup & partners for Northamptonshire County Council	July 2003
TRAN31	Northamptonshire Inter-Urban Public Transport Bid.	March 2004
TRAN32	“Corby Star On Call” – Application for funding of bus network. Northamptonshire County Council and others	2003
	ENERGY TITLES	
EN1	Energy Issues and the Review of Regional Planning Guidance for the East Midlands (RPG8), Land Use Consultants, IT Power, National Energy Foundation http://www.emrlga.gov.uk/rpg/docs/11-02-03_pt_a_input.PDF	January 2003
EN2	VOID	
EN3	VOID	
EN4	VOID	
EN5	Towards a Regional Energy Strategy: A Sustainable Approach to Energy in the East Midlands, Consultation Document, EMRA http://www.eastmidlandsassembly.org.uk/index.asp?pg=energy/index_2.html	June 2003
EN6	Towards a Regional Energy Strategy: A Sustainable Approach to Energy in the East Midlands, Executive Summary, EMRA http://www.eastmidlandsassembly.org.uk/index.asp?pg=energy/index_2.html	June 2003
	HOUSING TITLES	
HOUS1	Housing Capacity In Urban Areas of The East Midlands Region – ENTEC in Association with DMU	November 1998
HOUS2	Planning and Affordable Housing – DETR http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/pdf/odpm_plan_pdf_606806.pdf	8 th April 1998
HOUS3	Regional Housing Strategy for the East of England 2003-2006. East of England Regional Housing Forum/EERA	2003
HOUS4	Regional Strategy for Housing Investment. Government Office for the East Midlands	July 2003

HOUS5	South East Regional Housing Strategy 2004/05 to 2005/06 South East Regional Housing Board	2003
HOUS6	South East Regional Housing Strategy 2006 – 2009 – Green Paper: the key issues South East Regional Housing Board	March 2004
HOUS7	The Provision of Affordable Housing in the East of England 1996-2021 – Executive Summary. East of England Regional Assembly	26 June 2003
HOUS8	The Provision of Affordable Housing in the East of England 1996-2021 – Revised Main Technical Report. Cambridge Centre for Housing & Planning Research with Colin Buchanan & Partners for the East of England Regional Assembly (February 2003)	26 June 2003
	SOCIETY & CULTURE TITLES	
SOCULT1	Game Plan: A Strategy for Delivering Governments Sport and Physical Activity Objectives, Strategy Unit http://www.number-10.gov.uk/su/sport/report/pdf.htm	December 2002
SOCULT2	Viewpoints on Social Exclusion in the East Midlands, EMRA	December 2000
SOCULT3	Viewpoints on Health in the East Midlands, EMDA	November 1999
SOCULT4	Culture: A Catalyst for Change. Living East/GO-East	
SOCULT5	Voluntary & Community Sector Infrastructure – a consultation document. Home Office Active Community Unit	September 2003
SOCULT6	“Building Civic Renewal” – Government support for community capacity buildings and proposals for change – Review findings of the Civic Renewal Unit. Home Office www.homeoffice.gov.uk/docs2/reviewfindings.pdf	January 2004
SOCULT7	“The Cultural Cornerstone” – a Strategy for the Development of Cultural Activity and its benefits in the South East. South East England Cultural Consortium	June 2001
SOCULT8	“The Cultural Agenda” – Realising the Cultural Strategy of the South East of England Cultural Consortium	November 2002
	EXAMINATION DOCUMENTS	
EXAM1	Representations Received on the Draft Milton Keynes and South Midlands Sub-Regional Spatial Strategy	October 2003
EXAM2	Draft List of Matters and Participants	8 December 2003
EXAM3	Notes for Participants	15 December 2003 & January 2004
EXAM4	Draft Supplementary List of Private Developer Participants	30 December 2003
EXAM5	Notes of the First Preliminary Meeting at the Saints RFC Ground, Northampton 6 January 2004	12 January 2004
EXAM6	Provisional Public Examination Timetable	12 January 2004
EXAM7	Comments Received on the Draft List of Matters and Participants and Draft Supplementary List of Private Developer Participants	19 January 2004
EXAM8	Final List of Matters and Participants (including any updates post 6 February)	6 February 2004
EXAM9	Public Examination Timetable	6 February 2004
EXAM10	Notes of the Second Preliminary Meeting at the Saints RFC Ground, Northampton 17 February 2004	20 February 2004
EXAM11	Matter 1 Written Statements	24 February 2004

EXAM12	Matter 2 Written Statements	24 February 2004
EXAM13	Matter 3 Written Statements	24 February 2004
EXAM14	Matter 4 Written Statements	24 February 2004
EXAM15	Matter 5 Written Statements	23 March 2004
EXAM16	Matter 6 Written Statements	23 March 2004
EXAM17	VOID	
EXAM18	The Opening Statement on behalf of the East Midlands, East of England, and South East of England Regional Assemblies	23 March 2004
EXAM19	The Opening Statement on behalf of the Government and the Government Offices by Henry Cleary (ODPM)	23 March 2004
EXAM20	Panel Note Matter 1	15 March 2004
EXAM21	Panel Note Matter 2	18 March 2004
EXAM22	Panel Note Matter 3	18 March 2004
EXAM23	Panel Note Matter 4	31 March 2004
EXAM24	Panel Note Matter 5	8 April 2004
EXAM25	Panel Note Matter 6	
EXAM26	Background Paper prepared by the Government Offices	17 February 2003
EXAM27	Panel Tours	
EXAM28	Attendance Sheets: Preliminary Meetings and Examination Sessions	January 2004 onwards
EXAM29	Statement by the Strategic Rail Authority on the Proposed East-West Rail Project	February 2004
EXAM30	Statement by the Strategic Rail Authority on New Station Proposals	February 2004
EXAM31	Statement by the O2C arc and supporting papers	February 2004
EXAM32	Statement by the Bedfordshire and Luton Green Infrastructure Consortium in respect of Matter 2D	February 2004
EXAM33	Statement submitted by the 'Friends of Broughton Area'	February 2004
EXAM34	Background Paper by the MK & SM Technical Steering Group relating to Matter 2D: Sustainability – Environment Resources	February 2004
EXAM35	Petition representations submitted by Phil Sawford MP (R0614) as part of his original representation	October 2003
EXAM36	Letter from Panel to ODPM re. consultations on “An Urban Development Area for Milton Keynes” and “An Urban development Corporation for West Northamptonshire” + reply from ODPM	3 March 2004/ 16 March 2004
EXAM37	Panel Briefing on Housing and Employment Matters. East of England, East Midlands & South East England Regional Assemblies (see also EXAM43). ALSO: Response note from South Beds DC	March 2004
EXAM38	Correspondence between the House Builders' Federation, Government Offices and the Panel.	March 2004
EXAM39	Revised Background Paper prepared by the Government Offices	15 March 2004
EXAM40	Reply from East Midlands Assembly to West Midlands Regional Assembly regarding housing and employment land and targets.	17 March 2004
EXAM41	Statement by the Bedfordshire and Luton Green Infrastructure Consortium in respect of Matter 6B	March 2004
EXAM42	Supplementary Statement by the Highways Agency	18 March 2004
EXAM43	Revised Panel Briefing on Housing and Employment Matters. East of England, East Midlands & South East England Regional Assemblies	23 March 2004
EXAM44	Statement by the Bedfordshire and Luton Green Infrastructure Consortium in respect of Matter 6A	March 2004
EXAM45	VOID	
EXAM46	Representation from the “Western Front Residents' Association” in respect of Matter 5A & 5C	24 March 2004
EXAM47	Statement by The Strategic Rail Authority in respect of “A passenger Rail Service To Corby”	24 March 2004

EXAM48	Terms of Reference and Minutes of Meeting One (11.2.04) of the Milton Keynes & South Midlands Growth Area Inter Regional Board	25 March 2004
EXAM57	Milton Keynes UDA: full regulatory impact assessment (ODPM)	31 March 2004
EXAM58	Panel Briefing on Migration Flows – Northamptonshire and the West Midlands – submitted by the East of England, East Midlands and South East of England Regional Assemblies	31 March 2004
EXAM59	Additional Information on Employment and Housing Matters – submitted by the 3 Regional Assemblies [superseded by PART103]	1 April 2004
EXAM60	Suggested New Policy 1B – submitted by the 3 Regional Assemblies	1 April 2004
EXAM61	Findings from the South East Energy and Tourism Public Examination – letter to Panel from Corinne Swain, Panel Chair, South East RPG(9) Review Public Examinations	8 April 2004
EXAM62	Statement by The Strategic Rail Authority in respect of Corby and rail freight	16 April 2004
EXAM63	Sustainable Communities – an Urban Development Corporation for West Northamptonshire – consultation response from the Northampton NHS PCT	11 March 2004
PARTICIPANTS DOCUMENTS		
PART1	Bedfordshire Railway & Transport Association (Appendices 1- 7)	February 2003
PART2	Chilterns Conservation Board/AONB Unit (Appendix)	February 2003
PART3	“A joint statement on the need for ‘Green Infrastructure’ in the Milton Keynes & South Midlands Sub-Regional Strategy” (Statutory Agencies, Local Authorities, Voluntary Organisations and Trusts)	October 2003
PART4	“A joint statement on the need for ‘Green Infrastructure’ in the Milton Keynes & South Midlands Sub-Regional Strategy” (Statutory Agencies, Local Authorities, Voluntary Organisations and Trusts)	February 2004
PART5	“Milton Keynes & South Midlands Sub-Regional Strategy: Historic Environment Assessment – Milton Keynes Urban Expansion” Buckinghamshire County Council in partnership with English Heritage and Milton Keynes Council	February 2004
PART6	North Wellingborough Urban Expansion – Nathaniel Lichfield & Partners for Bee Bee Developments	February 2004
PART7	Advantage West Midlands – Press Briefing Note (submitted by WMRA)	February 2004
PART8	“Delivering Advantage” The West Midlands Economic Strategy and Action Plan 2004-2010. AWM/West Midlands Regional Assembly www.wmra.gov.uk/documents	February 2004
PART9	The West Midlands Regional Innovation Strategy – Action Plan 2004-2010 AWM/West Midlands Regional Assembly www.advantagewm.co.uk/innovation	February 2004
PART10	West Midlands Business Council – Letter to West Midlands Regional Planning Body	15 February 2004
PART11	“New Homes for Home Owners” – R Forrest & A Murie (DoE) – submitted by WMRA	1993
PART12	“Urban Exodus” – T Champion, D Atkins, M Coombes & S Fotheringham (CPRE) – submitted by WMRA	1998
PART13	South Bedfordshire DC – Research Note 1 (MK&SM Growth Areas – Analysis of Housing Figures & Brownfield/Greenfield Development)	February 2004
PART14	South Bedfordshire DC – Research Note 2 (Professional and Construction Skills Shortages)	February 2004
PART15	Luton, Dunstable and Houghton Regis Economic Vision – GHK in association with Regional Forecasts Limited (Bedfordshire & Luton Economic Development Partnership) – submitted by South Beds DC	February 2004
PART16	Milton Keynes Drainage Strategy – Development & Flood Risk: Draft Supplementary Planning Guidance. Milton Keynes Council www.mkweb.co.uk/local_plan_review/documents/Draft_SPG_-_Flood.pdf	January 2004
PART17	South Bedfordshire DC – Research Note 3 (Analysis of MK&SM Growth Area Build Rate Requirements)	February 2004
PART18	South Bedfordshire DC – Research Note 4 (Local Authority Housing	February 2004

	Performance Against Structure Plan Requirements)	
PART19	South Bedfordshire DC – Research Note 5 (South East & South Midlands Housebuilding: Starts and Completions 1999/2002)	February 2004
PART20	South Bedfordshire DC – Research Note 6 (Development Constraints within the MK&SM Growth Areas)	February 2004
PART21	Dallington Grange Consortium: Appendices 1 – 4 to the statement submitted by Barton Willmore Planning	February 2004
PART22	Taylor Woodrow Developments: Appendices 1 – 4 to the statement submitted by Barton Willmore Planning	February 2004
PART23	“Towards a Brownfield Strategy” – English Partnerships research findings for ODPM – appendix to statement submitted by the Environment Agency	September 2003
PART24	Milton Keynes Drainage Strategy Technical Report – appendix to statement submitted by the Environment Agency	July 2003
PART25	The Surface Waters Plan: Bedfordshire & River Ivel Internal Drainage Board and Forest of Marston Vale – appendix to the statement submitted by the Environment Agency	2002
PART26	Water Resources for the Future – a strategy for the Thames Region – appendix to the statement submitted by the Environment Agency	March 2001
PART27	Water Resources for the Future – a strategy for the Anglian Region – appendix to the statement submitted by the Environment Agency	March 2001
PART28	Daventry Town Centre Vision – Plans – A Consultation Document – appendix to statement submitted by Daventry District Council	February 2004
PART29	East-West Rail – Western Section: Consolidated Business Case and Integrating Development & Transport: Steer Davies Gleave for the East-West Rail Consortium – appendices to statement submitted by EWRC	December 2003
PART30	Operational Assessment of the Strategic Highway Network. URS Corporation Ltd for the Highways Agency – appendix to the statement submitted by the HA	February 2004
PART31	Letter from Lord Rooker to Chairman East of England Regional Planning Board – submitted by East of England Regional Assembly	21 January 2004
PART32	Launch of “Making It Happen: The Northern Way” by the Deputy Prime Minister – submitted by East of England Regional Assembly	2 February 2004
PART33	ODPM News Release – Peterborough to benefit from being in growth area – submitted by East of England Regional Assembly	2 February 2004
PART34	Urban Renaissance Strategy 2002-2004 (SEEDA) – submitted by East of England Regional Assembly	2002
PART35	Secretary of State for Transport’s Response to the London to South Midlands Multi-Modal Study – submitted by East of England Regional Assembly	9 July 2003
PART36	Providing Accessible Natural Greenspace in Towns & Cities – A Practical guide To Assessing the Resource etc. – English Nature	2003
PART37	Natural Assets And Opportunities – A framework for developing green infrastructure in Northamptonshire – Part 1 Final Report – submitted by English Nature	September 2003
PART38	Natural Assets And Opportunities – A framework for developing green infrastructure in Northamptonshire – Part 2 Assets & Opportunities Mapping – submitted by English Nature	September 2003
PART39	[VOID]	
PART40	[VOID]	
PART41	Weston Hampton – appendices to Issue 4 statement submitted by Development Land & Planning Consultants for Countryside Properties & Hampton Brook Ltd	February 2004
PART42	Weston Hampton – Meeting The Challenges..... – appendix to statement submitted by DLP for Countryside Properties. etc.	February 2004
PART43	Landscape Character Assessment Of Potential Development Options Adjacent to Milton Keynes. Babbie Group for Buckinghamshire CC and Aylesbury Vale DC	February 2004
PART44	Petition representations submitted by South Bedfordshire DC (R0421) as part of its original representation	October 20003
PART45	Petition representations submitted by Dunstable Town Council	October 2003

	(R1289) as part of its original representation	
PART46	Luton/Dunstable/Houghton Regis Growth Area – Proposed Local Delivery Vehicle. Note of the Joint Member Meeting – submitted by Luton Borough Council	11 February 2004
PART47	Additional material relating to the submission for Matters 4A & 4C made by South Northamptonshire Council	February 2004
PART48	Wellingborough East Development Framework – Supplementary Planning Guidance – submitted by Borough Council of Wellingborough	November 2003
PART49	“Housing The Rural Economy” (Country Land & Business Association) – submitted by Cluttons for The Broughton Estates Ltd with a further submission in respect of Matter 4B	February 2004
PART50	Letter dated 30/9/03 from the Bedford Commuters’ Association to the Strategic Rail Authority re. the Midland Mainline/East Midlands Route Utilisation Strategy – submitted by BRTA in respect of Matters 5A, 5C, 6A, 6B & 6C	February 2004
PART51	Milton Keynes & South Midlands Growth Area: Inter Regional Board – appendix to the submission by the House Builders’ Federation in respect of Matter 3A	February 2004
PART52	A Strategy for Marston Vale – Update. David Lock Associates for O + H Properties in association with further submissions to the Public Examination	March 2004
PART53	Thameslink 2000: Note of a meeting held at The Guildhall, City of London, to update consortium members on progress of the project – submitted by BRTA in respect of Matters 5A, 5C, 6A, 6B & 6C	10 December 2003
PART54	Appendix 1 to further the written statement submitted by Bedford Commuters’ Association in respect of Matters 5A, 5C, 6A, 6B & 6C	March 2004
PART55	London to South Midlands Multi-Modal Study -Secretary of State’s Response and letter from Tony McNulty to East of England Assembly. Submitted by the Government Offices	9 July 2003
PART56	Record of adjournment debate (question raised by Andrew Selous MP regarding the MKSM Strategy & South Bedfordshire) – Hansard Volume No. 418 Part No. 50 – submitted by EMTAR	5 March 2004
PART57	Luton, Dunstable and Houghton Regis Economic Vision Part 2: Planning, Land and Infrastructure and Economy – GHK in association with Regional Forecasts Limited (Bedfordshire & Luton Economic Development Partnership) – submitted by South Beds DC	March 2004
PART58	Urban Housing Capacity Study September 2003 – Methodology and Results. South Bedfordshire District Council	September 2003
PART59	Luton, Dunstable, Houghton Regis Growth Area; Local Delivery Vehicle; Final Report For Discussion – submitted by Luton Borough Council	March 2004
PART60	Forest Plan – submitted by The Forest of Marston Vale	2000
PART61	Submission in support of written statement for Matter 5A. Buckinghamshire County Council	March 2004
PART62	Submission in support of written statement for Matter 5B. Buckinghamshire County Council	March 2004
PART63	Bedfordshire and Luton Commercial Land and Property Study – Stage 1 Background Research. BLEP in conjunction with the Bedfordshire local planning authorities – submitted by Luton BC	July 2003
PART64	Bedfordshire and Luton Commercial Land and Property Study – Executive Summary. BLEP in conjunction with the Bedfordshire local planning authorities – submitted by Luton BC	July 2003
PART65	Extract from the Future Development of Air Transport in the UK: South East, Second Edition Summary (pp42-3 & 46-7). Department for Transport - submitted by Luton BC	February 2003
PART66	Letter from Houghton Regis Town Council regarding the result of a Town Poll in relation to the MKSM Sub-Regional Strategy and the Translink project.	19 March 2004
PART67	“Greater Milton Keynes?”: A paper for discussion. David Lock Associates for the MK & North Bucks Chamber of Commerce	June 1999
PART68	Milton Keynes Local Plan Inquiry: Western Expansion Area –	November

	Consolidated version of Policy EA5 and supporting text. Milton Keynes Council – submitted by David Lock Associates	2003
PART69	Rugby Radio Station: a new broadband community. David Lock Associates	March 2003
PART70	Strategy for the Marston Vale: Update March 2004. david lock Associates	March 2004
PART71	“The Vision – Sustainable Development for Luton” – submitted for the Crown Estate by WS Atkins and Development Land & Planning Consultants Ltd (DLP)	March 2004
PART72	New Leys Consortium: South West Milton Keynes. Prepared by Scott Wilson and others and submitted by DLP	March 2004
PART73	Eastern Expansion Area, Milton Keynes – initial design appraisal. Halcrow – submitted by DLP	2004
PART74	Eastern Expansion Area, Milton Keynes – Strategic Reserve – submitted by DLP	February 2004
PART75	Land adjacent to the M1, Broughton, Milton Keynes – Noise & Air Quality Assessment. Wardell Armstrong for Hallam Land Management Ltd – submitted by DLP	July 2003
PART76	Land adjacent to the M1, Broughton, Milton Keynes – Noise Monitoring Report. Wardell Armstrong for Hallam Land Management Ltd – submitted by DLP	January 2004
PART77	Eastern Expansion Area, Milton Keynes – Strategic Reserve, Ecology Walkover Survey. CPM – submitted by DLP	March 2004
PART78	Eastern Expansion Area, Milton Keynes – Strategic Reserve, Sitescope Environmental Report with RPS Risk Assessment – Search No. 927036. Sitescope Limited for Hallam Land Management Ltd – submitted by DLP	25 November 2003
PART78	Eastern Expansion Area, Milton Keynes – Strategic Reserve, Sitescope Environmental Report with RPS Risk Assessment – Search No. 927064. Sitescope Limited for Hallam Land Management Ltd – submitted by DLP	25 November 2003
PART80	Eastern Expansion Area, Milton Keynes – Strategic Reserve, Desk Based Archaeological Assessment. John Samuels Archaeological Consultants for Hallam Land Management Ltd – submitted by DLP	January 2004
PART81	Eastern Expansion Area, Milton Keynes – Strategic Reserve, Landscape Assessment. CPM – submitted by DLP	March 2004
PART82	Petition submitted by “Stop The Over-development” (STOP) in relation to Matter 4B	23 March 2004
PART83	Letter from Hertfordshire County Council regarding the employment land assessment undertaken by Bedfordshire CC for EERA	22 March 2004
PART84	Table showing comparison of past rates of job growth (Table 7, EXAM43) and trend based job growth – submitted by Development Land & Planning Consultants (“EIP Submission Table 1”)	25 March 2004
PART85	The Greenway Project – Strategic Overview of Planning Issues – submitted by Phillips Planning Services for Green W Limited	July 2003
PART86	Newport Pagnell Regeneration Community Village – Executive Summary – submitted by The Berkeley Group plc	
PART87	Appendices 1 – 4 to the written statement submitted by “SAVE” in respect of Matters 5B & 5C (Summary of the 2000 Annual Business Inquiry-Bucks CC; 2001 Annual Business Inquiry Supplement-Bucks CC; Affordable Warmth Strategy March 2001-Aylesbury vale DC; and House of Commons Select Committee 8 th Report from ODPM)	23 March 2004
PART88	“A Basis On Which To Build?” Europe Economics for CPRE	February 2004
PART89	“Undermining The Land-Based Economy”. Dr Lucy Nichol for CPRE	February 2004
PART90	“The Missing Links” (Commentary on the Interim Report of Kate Barker) – submitted by CPRE	March 2004
PART91	“A Park & Ride Station at J13 of the M1 Motorway” -Technical Appendix to the written statement submitted by FPD-Savills in respect of Matter 5A	March 2004
PART92	“Kent Thames-Side – Looking to an Integrated Future” – submitted by David Lock Associates	1999
PART93	“Kent Thames-Side – Realising the Potential” – submitted by David	2002

	Lock Associates	
PART94	“Kent Thames-Side – Reporting Progress on Regeneration in Dartford and Gravesham” – submitted by David Lock Associates	1997
PART95	“Information on EERA’s View of Strategy” (Compilation of reports to and Minutes of EERA’s Regional Planning Panel) – submitted by South Bedfordshire District Council	March 2004
PART96	Written Statement submitted by the Countryside Agency in respect of Matters 5A and 5B	30 March 2004
PART97	Letter from Milton Keynes Council regarding the publication of an Interim Report by the Local Plan Inquiry Inspector	22 March 2004
PART97A	Milton Keynes Local Plan Inquiry - Interim Report by the Inspector	14 April 2004
PART97B	Milton Keynes Local Plan Inquiry - Interim Report by the Inspector – summary by Milton Keynes Council	April 2004
PART97C	Milton Keynes Local Plan Inquiry - Interim Report by the Inspector – statement by Milton Keynes Council re. publication of report	8 April 2004
PART98	Letter from Luton Borough Council regarding Matter 2C and the Translink Project	30 March 2004
PART99	Summary of anticipated levels of employment growth required to support proposed dwelling provision in the Northampton Implementation Area - submitted by Development Land & Planning in respect of Matter 4A	5 April 2004
PART100	Letter from Northamptonshire County Council to the WCRM Team regarding the West Coast September 2004 Timetable	3 March 2004
PART101	Northampton Principal Urban Area – Projected use of Greenfield and previously used land – submitted by Northampton Borough Council in respect of Matter 4A	5 April 2004
PART102	Letter from South Bedfordshire District Council in respect of Translink and the Luton – Dunstable rail link	2 April 2004
PART103	Additional Information on Employment and Housing Matters – submitted by the 3 Regional Assemblies - amendments to Table 1 [this document supersedes EXAM59]	6 April 2004
PART104	Letter from GOSE to the Director of Planning, South East England Regional Assembly that covers (<i>inter alia</i>) the Barker Report [STRAT23] – submitted by Barton Willmore Planning	8 January 2004
PART105	Suggested rewording to and comments on policies in the Draft Strategy Document – submitted by the Strategic Rail Authority	5 April 2004
PART106	Errata sheet from Colin Buchanan & Partners on behalf of Bee Bee Developments in respect of their written statement for Matter 4B	6 April 2004
PART107	Letter to ODPM regarding the proposed UDC for West Northamptonshire – submitted by Charles Planning Associates for Croudace Ltd	12 March 2003
PART108	Statement submitted by Northampton Borough Council and English Partnerships regarding housing capacity in the South West Northampton Urban Extension	5 April 2004
PART109	Schedule of Major Schemes (TPI) that are currently programmed or under construction – submitted by the Highways Agency	6 April 2004
PART110	Housing Completions in Corby – submitted by Catalyst Corby	6 April 2004
PART111	Suggested amendments to policies relating to Corby/Kettering/Wellingborough PUA – submitted by Northamptonshire County Council	7 April 2004
PART112	Response letter from Bedfordshire County Council regarding the Employment Land Survey undertaken for EERA and comments by Hertfordshire County Council	2 April 2004
PART113	Letter from Mr J Middleton and press cutting ref. Matter 2C	7 April 2004
PART114	Suggested changes re. Sustainable Communities and Matter 2B – submitted by the Countryside Agency	7 April 2004
PART115	Suggested changes re. The Urban Fringe and Matter 3B – submitted by the Countryside Agency	7 April 2004
PART116	East Northamptonshire Capacity Assessment – DTZ Piedad Consulting for East Northamptonshire Council	March 2004
PART117	“Design for the Future – Growth Options for the District” – East Northamptonshire Council	March 2004

PART118	Suggested alternative wording (Part A – 2.14) and additional wording (Part B – Policy 2) – submitted by University College, Northampton	8 April 2004
PART119	Report to Executive regarding The Managed Release of Housing Sites – Northampton Borough Council	8 September 2003
PART120	Suggested changes to policies relating to the delivery of health and social care services – submitted by Milton Keynes/South Midlands Sub-Region NHS	8 April 2004
PART121	Sustainable Communities: An Urban Development Corporation for West Northamptonshire – A Consultation Paper. Representations prepared by Taylor Woodrow Development Limited – submitted by Barton Willmore Planning	8 April 2004
PART122	Comments on documents EXAM37 and PART111 – submitted by Kettering Borough Council	8 April 2004
PART123	Luton-Dunstable Translink: Environmental Appraisal – Volume 1 Non-Technical Summary. Faber Maunsell for Luton Borough Council/Bedfordshire County Council/Luton Translink	December 2003
PART124	Letter from Corby Borough Council re. inclusion of diagram showing directions of growth for Corby	16 April 2004
PART125	Housing Provision in Milton Keynes – Historic and Recent Housing Completion Rates. Milton Keynes Council	April 2004
PART126	Letter from Thames Water Property Services Ltd. In respect of water supply in the Aylesbury area and the Panel Briefing Notes for Matters 5A and 5B	15 April 2004
PART127	Letter from Dr Phyllis Starkey MP (Milton Keynes SW) regarding the East-West Rail Link and the Strategic Rail Authority's position – submitted by the Milton Keynes Association of Urban Parishes	15 April 2004
PART128	Supplementary Statement by Arup on behalf of Gallagher Estates re. the Inspector's Report on the Bedfordshire and Luton Minerals and Waste Local Plan (LPA8H)	20 April 2004
PART129	Mid Northamptonshire Parishes response to the Joint Statement on Green Infrastructure document (PART4)	15 April 2004
PART130	Mid Northamptonshire Parishes response to the Proposed Urban Development Corporation for West Northamptonshire consultation document	20 April 2004
PART131	Environment Agency letter re. Panel Briefing Note 5B and water issues	20 April 2004
PART132	Statement by East of England Regional Assembly on the relationship of Milton Keynes proposals to the East of England Region.	20 April 2004
PART133	Supplementary observation by Pegasus Planning Group on behalf of Ensign Group re. the Northampton Implementation Area – Directions for Growth	20 April 2004
PART134	"Infrastructure in Successful Regeneration" – document by AWG plc – submitted by Milton Keynes Council	20 April 2004
PART135	Comments on Spatial Framework for Milton Keynes – submitted by Mid Bedfordshire DC	21 April 2004
PART136	Additional comments on Balance between Dwellings & Jobs (Bedfordshire & Luton) – submitted by South Bedfordshire DC	21 April 2004
PART137	Draft Aylesbury Vale Local Delivery Vehicle – submitted by Aylesbury Vale District Council	22 April 2004
PART138	Aylesbury Urban Area – Public Transport Development Strategy – submitted by Buckinghamshire County Council	22 April 2004
PART139	"From New Town to International City" – Milton Keynes Long Term Economic Vision (Draft Final report) – submitted by Milton Keynes Economy and Learning Partnership	22 April 2004
PART140	Secretary of State for Transport's decision on the public local inquiries into the proposed A416 Stoke Hammond and Linslade Western Bypass – submitted by Government Office South East	7 April 2004
PART141	Statement containing clarification of SRS Policy changes suggested to the Panel in respect of Matter 5 – submitted by the South East England Regional Assembly (see also PART163)	23 April 2004
PART142	Worker/Job Balance in Bedfordshire (Tables 1 and 2) – submitted by East of England Regional Assembly	26 April 2004

PART143	Note on Population, Employment and Dwelling Projections for Bedfordshire – submitted by East of England Regional Assembly	26 April 2004
PART144	Creating Sustainable Communities (Milton Keynes Section) – response by Milton Keynes Friends of the Earth	26 April 2004
PART145	Aylesbury Growth Area – River SE Quality & Sewage Treatment – joint statement by Environment Agency, Thames Water, South East England Regional Assembly and Government Office for the South East	26 April 2004
PART146	Key Diagram for Luton/Dunstable/Houghton Regis – submitted by South Bedfordshire District Council	26 April 2004
PART147	Translink – copy of Resolution by Bedfordshire County Council	22 April 2004
PART148	Business Relocation of UK Firms: A Presentation by Prism Research Ltd - submitted by Bedfordshire County Council	7 July 2000
PART149	Aylesbury Vale: State of the Economy Strategy (Draft prepared by Roger Tym & Partners for Aylesbury Vale District Council	March 2004
PART150	Supplementary statement by David Lock Associates re. Rugby Radio Station and Matter 1	26 April 2004
PART151	Monitoring (Matter 3B) – joint response to the Regional Assemblies' Initial Proposals – submitted by the Government Offices	27 April 2004
PART152	Supplementary statement by Gerald Eve on behalf of Bee Bee Developments and Matter 4B6	26 April 2004
PART153	Marston Vale – diagram showing major mineral/waste sites (2004) – submitted by Bedfordshire County Council	27 April 2004
PART154	Summary of statement given by Thames Water Property re. Matter 5B (Aylesbury Vale)	22 April 2004
PART155	Audit trail or Approach to Employment Forecasting Job Potential. Roger Tym & Partners for EERA	26 April 2004
PART156	Letter from Milton Keynes Green Party (Mr A Francis)	27 April 2004
PART157	Bedford Housing Market Study: Final Report. Roger Tym & Partners for Bedford Borough Council	April 1999
PART158	Milton Keynes/South Midlands Growth Area – Economic Vision for the Bedford Area: Project Brief for Consultants – Bedford BC	2004
PART159	Bedford Town Centre - Development Framework: Project Brief for Consultants – English Partnerships, Bedford BC & EEDA	July 2003
PART160	Employment Land in Luton 2004 – submitted by Luton BC	15 April 2004
PART161	Letter from Lord Rooker re. UDC for Luton etc. – submitted by Luton Borough Council	17 April 2004
PART162	Letter from Hertfordshire CC re. potential for employment land recycling in 'the Luton conurbation'	28 April 2004
PART163	Joint GO submission in response to SEERA (PART141)	28 April 2004
PART164	Joint GO submission – Audit of Consultation	28 April 2004
PART165	Letter from East Northamptonshire Council re., 'cross-boundary allocation' (see PART152)	28 April 2004
PART166	'Leighton-Linslade: Toward Strategies for Growth-Comparison & Vision' – submitted by Hives Partnership for Arnold White Estates	15 September 2003
PART166A	'Leighton-Linslade: Toward Strategies for Growth-An Appraisal of the Town within the Landscape' – submitted by Hives Partnership for Arnold White Estates	2 January 2003
PART167	Response to PART141 – submitted by Development Land & Planning Consultants on behalf of Countryside Properties & others	29 April 2004
PART168	Extract from 'The Future of Air Transport' (DfT) – submitted by London Luton Airport Operations Limited	December 2003
PART169	Additional statement by Friends of the Earth (Luton) re.Matter 6B5	29 April 2004
PART170	Additional statement by Friends of the Earth (Luton) re.Matter 1A	29 April 2004
PART171	Extract from Chilterns AONB Boundary Review: Report on informal public consultation (Countryside Commission) - submitted by EERA	April 1987
PART172	(VOID)	
PART173	Tables re. employment and housing site allocations etc. and Dunstable regeneration sites – submitted by South Bedfordshire DC	29 April 2004
PART174	Supplementary Note from David Lock Associates re. Matter 5A and the Roger Tym & partners Growth Area Assessment for Milton	29 April 2004

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PART175	Letter from 'S.T.O.P.' re. additional petition signatures (Matter 4B)	29 April 2004
PART176	Note from Milton Keynes Forward re. PART141	29 April 2004
PART177	Apportionment of Luton/Dunstable/Houghton Regis growth proposals within South Bedfordshire district – table submitted by EERA	29 April 2004
PART178	Supplementary notes and plans re. (a) the Joint Statement on Green Infrastructure (PART4); and (b) land west of Northampton – submitted by Redrow Homes (Midlands)	29 April 2004
PART179	Supplementary note from Pegasus Planning for Genesis Holdings re. PART141	
PART180	Supplementary note from the House Builders' Federation re. PART141	
PART181	Supplementary note from Arup for Gallagher Estates re. PART141	
PART182	Corby: The Regeneration Framework - submitted by Catalyst Corby	September 2003
PART183	Supplementary note from the House Builders' Federation re. PART141	6 May 2004
PART184	Letter and supporting papers re. the Milton Keynes/South Midlands Growth Area Inter-Regional Board – submitted by the Joint Government office Team for the MK/SM Growth Area	16 April 2004
PART185	Responses from 'Daventry Villages Together' in respect of Matters 4A and 4C	29 April 2004