Inspector’s response to Council’s reply to his Discussion Document D5

4 March 2019

Proposed Action 1; Undertaking an early review.

I agree with this intended action, for the reasons given in the Council’s response.

Proposed Action 2; Housing requirement

I have carefully read the additional work commissioned from ORS. It covers the ground which I had asked to be covered and, in the absence of any comment from any other party, I have no reason to take issue with any of it. It represents the most up to date expert analysis available, so I agree that AVDC should proceed to prepare modifications to the plan based on that advice. That leads to an OAN for AVDC of 20,600 dwellings which, together with agreed unmet need from elsewhere in the Housing Market Area (8,000 dwellings) results in an overall Housing Requirement of 28,600. I have previously agreed with AVDC that it is appropriate to apply a 5.2% buffer to cover uncertainties of delivery. It follows that I agree with the Council that VALP should have a target of 30,100 dwellings in order to ensure that it would meet its housing requirement.

Proposed Action 3; Spatial development strategy

I have noted the correction needed to the table in paragraph 29 of my Interim Findings and will make this correction in my final report. Many thanks to the Council for pointing out this adjustment.

Proposed Action 4; Milton Keynes

I have noted the correction needed to paragraph 35 of my Interim Findings and will make this correction in my final report. Many thanks to the Council for pointing out this correction.

I note the position stated in Examination Document ED113A recording the 29,589 completions expected during the plan period.
On the presumption that the expectation has not subsequently changed, then I agree that an additional allocation of 511 homes would be sufficient to meet the target now agreed upon. The Council has previously agreed to a modification to increase the allocation at site ST0008 to 26 dwellings, so I agree that new allocations amounting to around 500 dwellings is what the Council should aim for.

In my Interim Findings and in Discussion document 5, I stated that it was for the Council to decide how it wished to meet the need for any additional allocations. The suggestion that it be met entirely by an allocation in the Milton Keynes area would adequately address the specific recommendation of paragraph 37 of my Interim Findings. The source for identifying the allocation is entirely within the Council’s discretion. I have no reason to dispute the Council’s choice of focussing its attention on those sites identified on pages 248-254 of the HELAA report V4 (January 2017) (The council’s response to my discussion document refers to page 255 but I think that must refer to a more recent edition).

**Proposed Action 5; Villages**

I welcome the Council’s agreement to put forward modifications as described in paragraph 19 of its response. I welcome the review which it describes in paragraph 20 of its response. The Council asks me to clarify how it should address the last sentence of paragraph 41 of my Interim Findings in the light of this work. I agree with the Council that it is likely that this work would lead to additional allocations at the margins of the overall target and that there is a danger of trespassing on the role anticipated for Neighbourhood Plans. In my Interim Findings I sought to set out a variety of options by which the Council might seek to respond to a higher housing target. In the light of the additional work now done, it appears that the task is not as great as I had anticipated and it may be possible for the Council to meet it entirely by additional allocation close to Milton Keynes. In that case, if the Council is successful in its proposed Action 4, then it would not need to pursue Action 5 further beyond the clarification of the role of Neighbourhood Plans in increasing housing numbers in villages which it describes in paragraph 23 of its response.

**Proposed Action 6; Infrastructure**

I welcome the Council’s response

**Proposed Action 7; Clarity and predictability**

I welcome the Council’s response

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Proposed Action 8; a mix of housing

I welcome and accept the Council’s response

Proposed Action 9; Employment policies

I welcome the Council’s response and look forward to considering the Council’s intended response to my Discussion Document 3

Proposed Action 10; Site allocations

I welcome the Council’s response

Proposed Action 11; Leighton Linslade

In the light of the Council’s other proposed actions I am happy to receive the Council’s confirmation that there is no risk that the designation of land at Leighton Linslade as Green Belt would be anything other than permanent.

Conclusion

I now look forward to receiving for consideration the Schedule of the Council’s proposed modifications before they are published.

Paul Clark