COUNCIL’S RESPONSE TO MAIN MATTER 6:
The Strategic Land Allocation
Issue 6.1

6.1 Is the proposed Strategic Land Allocation (SLA) consistent with the sustainable development of the Borough and adjoining areas?

6.1.1 Yes. The Council’s response to Main Matter 2, Issue 2 (paras 2.10-2.28) sets out in detail the justification for the broad direction of growth in the Core Strategy and demonstrates that there is a lengthy history of studies, assessments, regional and sub-regional policy supporting the direction of growth to the east, west and south west of Milton Keynes.

Consistency with the sustainable development of the Borough

6.1.2 The SLA is consistent with the settlement hierarchy which focuses the vast majority of development in the Borough on the urban area of Milton Keynes, both within the existing city boundary, and on its edge in the form of sustainable urban extensions. This approach is entirely consistent with the NPPF, paragraph 52 (Submission Document NP16) which sets out that urban extensions may be the best way to plan for the supply of new homes.

6.1.3 The SLA is also in line with regional and sub regional policy and the related evidence, which has informed the Core Strategy. Both the Milton Keynes South Midlands Sub Regional Strategy (MKSM SRS) (Submission Document SR3, paragraph 97-98, MKAV Policy 1) and the South East Plan (Submission Document R6, Policy MNKAV1) make it clear that the majority of Milton Keynes’ growth will be in and adjoining the existing urban area.

6.1.4 The scale of the SLA has been reduced from that proposed for the larger South East Strategic Development Area in the Pre-Submission version of the Core Strategy, February 2010 (Submission Document
6.1.5 The allocation of the Strategic Reserve Areas in Policy CS5 of the Revised Proposed Submission Version of the Core Strategy, October 2010 (Submission Document: B133) was subject to Sustainability appraisal (Submission Document B 107). This confirmed that despite the reduction in the quantum of development, development to the south east of Milton Keynes remained a sustainable option. Other considerations supporting the allocation of the four Strategic Reserve Areas include their reserve status in the Milton Keynes Local Plan, 2005 (Submission Document LP1), identifying them as the first areas of search for further development and the inclusion of three of the SRAs in the MK Tariff which means that their development has been built into assumptions about funding growth and infrastructure in the Local Investment Plan (see the Housing Technical Paper, February 2011, para 2.131 (Submission Document B126)).

6.1.6 The sustainability appraisal work did acknowledge that the disparate and unconnected nature of those Strategic Reserve Areas along the A421 corridor created a weakness in terms of their overall sustainability and that the lack of connection between the sites had particular implications in terms of: achieving a modal shift in transport; the provision of services and facilities; and the efficient use of land.

6.1.7 This weakness has been fully addressed in the change to the allocation of the SLA in the Post Submission changes to the Core Strategy, September 2011 (Submission Document B137).
Consistency with sustainable development of adjacent areas

6.1.8 As explained in paragraph 6.1.1 above, the Council’s response to Main Matter 2, Issue 2 sets out the justification for the broad scale and direction of growth in the Core Strategy and demonstrates that there is a lengthy history of studies, assessments, regional and sub-regional policy supporting the direction of growth to the east, west and south west of Milton Keynes, including growth beyond the boundaries of Milton Keynes. The South East Plan identified a Strategic Development Area to the south east of Milton Keynes including land within Central Bedfordshire.

6.1.9 The Revised Proposed Submission Version of the Core Strategy (October 2010) (Submission Document B133) and the subsequent Post Submission changes (Submission Document B137) reduce the scale of the growth to the south east of the city, limiting its extent to land within the Milton Keynes Council area. This approach is supported by Central Bedfordshire Council in its comments on the consultation on the Strategic Site Selection Report (Submission Document B139).

6.1.10 Milton Keynes Council has an established working relationship with Central Bedfordshire Council and a track record of joint working with neighbouring local authorities dating back to 2005 when the Cross Boundary Officer Group (CBOG) and Members’ Reference Group were established to guide the preparation of the Milton Keynes Strategy for Growth to 2031 (Submission Document B18). Most recently, a South East Midlands Local Economic Partnership (SEMLEP) Planners’ Forum has been established, bringing together senior officers across the SEMLEP area, including from Central Bedfordshire and Milton Keynes, to discuss cross-boundary issues; joint working and co-operation.
6.1.11 A statement of common ground has been agreed between Milton Keynes Council and Central Bedfordshire confirming that Policy CS5 provides for the next phase of Milton Keynes growth to be fully contained within Milton Keynes boundaries and that Central Bedfordshire Council does not intend to allocate any land within Central Bedfordshire to provide for Milton Keynes’ growth up to 2031. A copy of the statement of common ground is appended to the Council’s response to Matter 1, Appendix D.

(ii) Has ‘future-proofing’ been adequately considered?

6.1.12 Yes. In line with Core Strategy Policies CS11 and CS12, the SLA is being brought forward on the basis that it maintains and future proofs the city’s grid road network and does not preclude further expansion into land to the east and south of the SLA. Future proofing also sits behind the rationale for the changes made to the Core Strategy from the February 2010 version to the October 2010 Revised Proposed Submission version (Submission Document: B133) – the section “Changes to the Core Strategy” (pages iv-v, B133) states that the land within the SRAs will need to be future proofed to allow for the possibility of further development in this area in the longer term.

6.1.13 The draft Development Framework for the SLA proposes the creation of new, and the extension of existing, grid roads into both the SLA to the south of the A421 and SRA4 (Church Farm) - see the land use budget plan at Appendix A to this statement. This approach replicates the long standing approach employed across Milton Keynes of including reserves for future grid road extensions at the city edge, for example as can currently be seen where the H10 Bletcham Way ends.
in Wavendon Gate/ Old Farm Park, and which will be used to provide access into the SR4 (Church Farm) part of the SLA.

6.1.14 The above approach future-proofs the SLA by ensuring that access could be gained into the countryside to the east and south should that be required in the future. Furthermore, although the emerging proposals for the SLA incorporate strategic landscaping they do not propose the creation of a permanent long term boundary which, under the terms of Core Strategy Policy CS12 point 10, would otherwise preclude the need to plan for future expansion.
Issue 6.2

6.2 Have the reasonable alternatives to the SLA been properly evaluated at an appropriate stage in the plan-making process?

6.2.1 It has already been demonstrated above and in relation to Matter 2, Issue 2 that, at the strategic level, there is a long history of assessments and evaluation that confirms that growth to the east/south east of Milton Keynes is sustainable and appropriate taken in the context of the reasonable alternatives.

6.2.2 The timing of the process of evaluating the reasonable alternatives to the SLA has been covered in the council's response to Issue 1.1 of Main Matter 1. This response, to Issue 6.2, summarises the changes to the Core Strategy since the Pre-Submission version of February 2010 and demonstrates that the process to identify the SLA, culminating in the Post Submission changes to the Core Strategy, September 2011 (Submission Document B137) is based on an evaluation of the reasonable alternatives.

6.2.3 The Sustainable Appraisal of Reasonable Alternative Sites (SARAS) (Submission Document B110) was published in January 2011 and submitted alongside the Core Strategy in March 2011. It considered sites capable of delivering the 2,500 new dwellings as required in the Revised Proposed Submission Core Strategy.

6.2.4 The SARAS was subject to public consultation from June –July 2011. The allocation in the Core Strategy was re-considered by Cabinet on 6 September 2011 (Submission Document C6a) and Full Council (Submission Document C6b) where the Strategic Site Selection Report, September 2011 (Submission Document B139) was considered. That
report concludes that the SLA is the most appropriate location for growth in the Core Strategy (B139, section 8 page 29 onwards) and the inclusion of land between SRAs 2 and 3 overcomes the problem of connectivity and provides a single development area south of the A421.

6.2.5 A further addendum to the Core Strategy Sustainability Appraisal was published in September 2011 (Submission Document B138) incorporating and updating the SARAS (January 2011) and supporting the findings of the Site Selection Report. The reasons for allocating the SLA are set out in para 5.8 of the SA addendum (B138, page 14).
Issue 6.3

6.3 With the post-submission changes to provide for the SLA, does the Core Strategy represent the most appropriate strategy when considered against reasonable alternatives?

6.3.1 Yes. The Council’s view is that the allocation of the SLA in the Post Submission changes to the Core Strategy (B137) does represent the most appropriate strategy when considered against reasonable alternatives. See the Council’s response to Issue 1.1 of Matter 1.

6.3.2 The Council’s response to Main Matters 1 (Issue 1.1) and 2 (Issue 2.2) look at the broad direction of development to the south east of the city. The Council’s response to Matter 3 (Issue 1) deals with the broad scale of development. This response focuses on the evaluation of the reasonable alternatives within the south east area, resulting in the allocation of the SLA.

6.3.3 The principle of growth to the south east of the city was established in the Milton Keynes Local Plan (Submission document LP1) with the strategic reserve areas identified as first areas of search. MK2031 (Submission Document B18) and associated Sustainability Appraisal also identified the south east as a sustainable location for growth. Consistently throughout the Core Strategy process the south east has remained the favoured direction of growth within MK Borough.

6.3.4 As set out in the Council’s Audit Trail for the Core Strategy preparation process (Submission Document B125) a series of documents and consultations have evaluated the development strategy and the alternatives. Following the decision to revise the housing targets and growth strategy in the Core Strategy in September 2010 (Full Council,
14/09/10) reasonable alternatives to the allocation of the Strategic Reserve Areas have been assessed in:

i) The Sustainability Appraisal of Reasonable Alternatives (SARAS) January 2011 (Submission Document B110) and consulted on from June-July 2011.

ii) The Site Selection Report, September 2011 (Submission Document: B139) and Sustainability Appraisal Addendum (2) (Submission Document B138). These documents were considered by Cabinet on 6/9/11 and Full Council on 14/9/11 in agreeing to continue with the submission of the Core Strategy including the change to the SLA.

6.3.5 The conclusions (Section 5) of the Milton Keynes Core Strategy Sustainability Appraisal Addendum (2) (September 2011) and the Site Selection Report (Section 8) (September 2011) identify the SLA as a combination of the majority of land in the MKSA4 assessed site together with SRA4 (Church Farm) and conclude that the SLA is the most appropriate allocation when considered against the reasonable alternatives.

6.3.6 The reasons for allocating the SLA are set out in section 8, Conclusions and Recommendation, of the Site Selection Report, September 2011, (Submission Document B139), namely:

i) The site lies in the area consistently identified as the most sustainable direction of growth in past studies.

ii) Lower landscape value of the site and the surrounding area compared to alternatives.
iii) The impact on views and landscape setting is likely to be far smaller than for some of the alternative sites.

iv) Good integration with the existing city, including connection to the main public transport routes.

v) In an area of recent infrastructure investment.

vi) Relatively low development costs, compared to alternatives, due to lack of constraints.

vii) Not in an area of flood risk (except for a very tiny part in the northern part of the site).

viii) Established planning history and public acceptance of development in this area.

ix) Nature of site enables an element of flexibility and choice.

x) Could support an element of employment use due to good transport links.

xi) Minimal impact on the nearby rural settlements of Wavendon, Woburn Sands and Aspley Guise.

6.3.7 The allocation of the SLA in the Post Submission changes to the Core Strategy also addresses previous concerns over the dispersed nature of the SRAs by improving the connection between the sites and creating a continuous strip of development to the south of the A421.

6.3.8 The reasons for not allocating the other alternatives are set out in paragraphs 5.9 of the Sustainability Appraisal Addendum (2) and paragraph 8.10 of the Strategic Site Selection report.

6.3.9 The reasoning behind the exclusion of land to the west of Newport Road in site MKSA4 from the SLA hinges on the issues of impact on the landscape setting of and risk of coalescence with, Wavendon village. This is referred to in the assessment of site MKSA4 detailed Site Assessments in Appendix 2 of the Strategic Site Selection Report.
(Site Constraints section) and in the Appraisal Tables, Annex B of the Sustainability Appraisal Addendum (2) – see comments against SA Objective 19.
Issue 6.4

(i) What is the justification for the maximum of 2,500 dwellings?

(ii) Is there sufficient capacity within the SLA for the quantity of development required?

(iii) Are there reasonable prospects for delivery of the required number of dwellings within the plan period?

(iv) Is the SLA economically viable?

(i) What is the justification for the maximum of 2,500 dwellings?

6.4.1 A figure of 2,500 homes has been identified for the SLA in order to help to meet the revised housing targets in Table 5.2 of the Core Strategy and other land use requirements.

6.4.2 The quantum of development achievable on the SLA is being tested through the preparation of a Development Framework for the area. As noted in the Council’s response to Main Matter 3, Issues 3.3 (i) and as demonstrated in the land use budget at Appendix A to this statement, the Development Framework for the area clarifies that a figure of up to 2,500 homes is realistic once all site specific requirements and constraints are taken into account in more detail.

6.4.3 The latest masterplan and land use budget (Appendix A to this statement) shows that some 2,470 dwellings are considered achievable across the SLA, based on the delivery of 1,990 dwellings from the land south of the A421 (at 35 dph); 150 dwellings within the local centre, at a higher density of 50 dph and 330 dwellings from SR4, Church Farm based on density of 30 dph.
6.4.4 Earlier documents have provided an indication of the potential capacity of the SLA although it is necessary to note that many of these documents were prepared in pre-recession times, in a context of a more buoyant housing market supported by the availability of mortgage finance and also during a time when PPS3 set minimum density requirements for new development. These documents include:

- Milton Keynes Local Plan Inspector’s report (B141)
- MK Tariff & Framework Agreement (B12)
- GVA Grimley SDAs review (B66)
- Strategic Housing Land Availability Assessment (SHLAA) (B75 and B112)

**MKLP Inspector’s report**

6.4.5 The MKLP Inspector in his Part 1 report, para 14.4 (B141) commented that “An SRA embracing Glebe Farm and Eagle Farm south (SRAs 2 & 3) would probably have a housing capacity of around 2150 dwellings.” In recommending the allocation of Church Farm (SR4) (paragraph 15.4) as an SRA he concluded that this site had a capacity for accommodating some 300 dwellings.

**MK Tariff**

6.4.6 The number of dwellings to be delivered from the SLA is also derived in general terms from the Milton Keynes Tariff which is based on the premise that the Urban Development Area (UDA) expansion areas to the east and west of the city together with the Strategic Reserve Areas to the east of the city are capable of being developed by 2016 and are expected to accommodate an estimated 15,000 new dwellings and 500,000sqm of commercial floorspace (Submission Document B12).
Core Strategy Table 5.7 provides the housing capacity for the expansion areas within the UDA:

Western Expansion Area: 6,600 dwellings  
Eastern Expansion Area: 4,000 dwellings  
Tattenhoe Park: 1,300 dwellings  
Kingsmead South: 450 dwellings  

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Total 12,350 dwellings
Residual (15,000 – 12,350) 2,650 dwellings to be met from SRAs

GVA Grimley Strategic Development Areas Review, April 2008

6.4.7 Para 5.6 of this study gives an approximate capacity figure for the four Strategic Reserve Areas as 2,500 dwellings.

SHLAA

6.4.8 The SHLAA, 2009 (B75) carries forward the estimated capacity of the four Strategic Reserve Areas of 2,500 dwellings drawn from the above sources. Assessing the site capacity now on the same basis as the other sites in the SHLAA and taking account of the work on the Development Framework would suggest an estimated capacity of the SRAs of some 2,055 dwellings (50% site developed for housing at 35 dph). Using the same assumptions, the additional land between SRAs 2 and 3 in the SLA brings an additional 500 dwellings to the total SLA capacity.
(ii) Is there sufficient capacity within the SLA for the quantity of development required?

6.4.9 Yes. It has been estimated that the SLA could accommodate up to 2,500 homes. As discussed in the response to (i) above and as demonstrated in the land use budget for the Development Framework (Appendix A to this response), the council is confident that there is sufficient capacity to accommodate 2,500 dwellings and associated infrastructure and facilities.

6.4.10 The land use budget for the SLA at Appendix A replicates the division of land uses seen in the development of other grid squares elsewhere in Milton Keynes, with some 54% of the total allocation coming forward for residential and employment uses; 20% for green infrastructure and 10% for highway infrastructure.

(iii) Are there reasonable prospects for delivery of the required number of dwellings within the plan period?

6.4.11 Yes. The delivery of the SLA is supported in a number of ways:

6.4.12 Three of the four Strategic Reserve Areas in the SLA (SRAs 1, 2 and 3) are covered by the MK Tariff Framework Agreement. SRA4 is not currently party to the Tariff although Connolly Homes have indicated that they would be prepared to enter into a tariff style S106 agreement (see Statement of Common Ground from Connolly Homes at Appendix C to this statement). As discussed in the Council’s response to Matter 8.1, paragraphs 1.6 onwards, the existing Milton Keynes Tariff arrangement gives a greater degree of certainty of delivery of strategic infrastructure than would be the case in other areas. Developers who have signed up to the Tariff Framework Agreement also have a more accurate understanding of the costs and funding constraints of
complying with our planning obligations when preparing their planning proposals.

6.4.13 The Council’s response to Matter 8.1 (paragraphs 1.8-1.13) goes on to discuss the implications of the introduction of the Community Infrastructure Levy on the Tariff. In order to continue to apply the Tariff to the SLA, the council is seeking to be in a position to grant outline planning permission for development there prior to April 2014. In support of this, the statement submitted by Gallagher Estates on the delivery of the SLA (Appendix C of this statement) confirms their intention to progress the delivery of the site as soon as possible and envisages the submission of outline planning applications for the parcels of land within their ownership by the end of 2012.

6.4.14 The Council is working closely with the landowners and developers on the preparation of the Development Framework for the area. The work is being undertaken by the Council’s in-house Urban Design team, with the work funded by the landowners. The landowners or their representatives are members of the Project Board overseeing the preparation of the Development Framework. The project timetable for the Framework is attached at Appendix B to this statement.

6.4.15 The Council has also established stakeholder groups for SR4 (Church Farm) and for the SLA area south of the A421 which are intended to provide a forum where information about the proposed development can be shared with local stakeholders and residents groups, to identify outstanding concerns and issues and to enable discussion and resolution as early in the planning process as possible. The stakeholder groups approach to engagement and involvement in the planning process for major sites has been used successfully in the Eastern and Western Expansion Areas.
(iv) **Is the SLA economically viable?**

6.4.16 Yes. The landowners across the SLA are either signed up to the MK Tariff, or are keen to sign up to Tariff style S106 agreements for the SLA (see the supporting statement from Connolly Homes at Appendix C to this statement).

6.4.17 As explained in 6.4.13 above and backed up by the supporting statements from landowners, there is commitment to bringing the site forward which must mean that the SLA is economically viable.
Issue 6.5

6.5 Are the other principles of development set out in Policy CS 5 clearly justified and deliverable? In particular:

i) how would opportunities for sustainable travel patterns be maximised?

ii) Is the safeguarding of land for a multi-modal transport hub justified and is the scheme deliverable?

iii) Are the requirements/aims for zero carbon and water efficient development and a community energy network sufficiently clear, and are they justified and deliverable?

iv) Are the requirements for strategic landscaping, integration with the city, and protection of the character and integrity of existing settlements mutually consistent and achievable?

6.5.1 The principles in Policy CS5 are intended to set out the Council’s approach to the development of the SLA. They also provide the context for the guidance to be provided in the Development Framework. The Council considers that at the time of preparing the Revised Proposed Submission Version of the Core Strategy this approach was in line with the guidance in PPS12, paragraphs 4.6 and 4.7 (strategic site allocations).

6.5.2 Policy CS5 is clear that development in the SLA will be permitted in accordance with other relevant policies in the Core Strategy and the Council is therefore of the view that when taken together with those other relevant policies, the requirements for the SLA are sufficiently clear, justified and deliverable.
6.5.3 Overall the principles are intended to ensure that the development of the SLA is undertaken in a comprehensive manner allowing issues such as sustainable transport, integration with the city whilst avoiding coalescence with the surrounding villages, and development standards to be fully considered in the subsequent Development Framework and planning applications. We consider that this approach is consistent with the NPPF (NP16) paragraph 157, 5th bullet: “local plans should allocate sites to promote development….provide detail on form, scale, access and quantum of development”. The use of a Development Framework is also considered to be in line with the NPPF, paragraph 153, as it is intended to assist in the making of successful applications on the site and to aid infrastructure delivery across the whole site, rather than delivering a piecemeal form of development.

i) how would opportunities for sustainable travel patterns be maximised?

6.5.4 As explained in the Council’s response to Main Matter 2, evidence based growth studies show that the most sustainable direction for Milton Keynes growth is to the south-east of the city. These growth studies are supported by complementary transport studies that assess the transport impacts of Milton Keynes’ growth to the south-east.

6.5.5 Policy CS11 of the Revised Proposed Submission Version of the Core Strategy (B133) sets out the council’s approach to improving accessibility whilst reducing the need to travel and cutting the city’s carbon footprint. The measures in Policy CS11 will apply to development in the SLA including planning the new development so that it is capable of being well served by public transport and easily
accessible by walking and cycling; providing new (or extensions to existing) bus services to serve the SLA; and extending the Redway network into the new development so encouraging walking and cycling and links to the rest of the city.

6.5.6 The results of the modelling by the Milton Keynes Multi Modal Model confirm that the Core Strategy development proposals, especially the focus of development to the south-east, have no significant impact on the highway network including the Strategic Road Network.

6.5.7 The Council’s Local Transport Plan 3 (Submission Document LP17) outlines the Council’s Transport Vision and Strategy for the period 2011-2031. It proposes the expansion of the city’s grid road network, public transport, walking and cycle networks into new developments.

6.5.8 Section 1 of the LPT3 (Transport Vision for Milton Keynes) identifies a number of mechanisms for encouraging more sustainable travel patterns across the city, including:

i) the provision of bus routes serving new development as soon as new houses and other land uses are constructed;
ii) car sharing, car and other vehicle pools, as well as cycle hire schemes and pooling;
iii) vehicles will use alternative fuels;
iv) more sustainable modes of transport will be promoted to new and existing residents;
v) a high capacity, fast and frequent public transport network along main arterial corridors and other key corridors serving Central Milton Keynes, the hospital and other key destinations;
vi) Park & Ride sites strategically located on the edge of the city and at key highway junctions.
6.5.9 The above mechanisms can all be utilised in the development of the SLA. LTP3 identifies a number of key interventions, listed in Table 5.1 of the Implementation Plan, which are particularly relevant for the SLA.

(ii) Is the safeguarding of land for a multi-modal transport hub justified and is the scheme deliverable?

6.5.10 This principle has been carried over from the February 2010 version of the Core Strategy and originally applied to the SE SDA. In that context, a multi-modal hub was a relevant development objective as the much larger SDA area included the M1 Junction 13 and the East-West rail route, allowing for the delivery of an interchange between varying modes of transport.

6.5.11 Given the location and more limited extent of the SLA and in order to bring the requirement in Policy CS5 into line with wording in Policy CS11 (measure 8), the Council would like to propose a change to Principle 6 of Policy CS5 to refer instead to the safeguarding of land for a high quality transport interchange, incorporating a park and ride site.

6.5.12 As discussed in paragraph 6.5.8 above, LTP3 includes a number of interventions of relevance to the SLA. Key Intervention Bo5 seeks possible locations for park and ride sites at locations around Milton Keynes city including one to serve M1 Junction 13. Given this commitment in LTP3, the Council considers that it is justified to seek to safeguard land for a park and ride site in the SLA.
(iii) Are the requirements/aims for zero carbon and water efficient development and a community energy network sufficiently clear, and are they justified and deliverable?

6.5.13 The requirement for zero carbon and water efficiency in Policy CS5 is in line with the requirements of Core Strategy Policy CS14. Detailed justification for Policy CS14 including the carbon off-set payment is set out in the Council’s response to Main Matter 7, Issues 7.4 and 7.5.

6.5.14 Turning to the requirement for a community energy network it is suggested that requirement 8 of Policy CS5 should be amended in order to bring it into line with both Policy CS15 later in the Core Strategy and also paragraph 96 and paragraph 97, 5th bullet point, of the NPPF (NP17) in terms of the feasibility and viability of a community energy network. It is therefore suggested that requirement 8 should be reworded to say:

“Meet the requirement in Policy CS15 for a strategic approach to the delivery of a community energy network unless it can be proven that this is not feasible on technical or economic grounds”.

(iv) Are the requirements for strategic landscaping, integration with the city, and protection of the character and integrity of existing settlements mutually consistent and achievable?

6.5.15 Yes. The principles in Policy CS5 of the Core Strategy seek to create strategic landscape boundaries to the outer edge of development whilst integrating the SLA with the existing city and protecting the integrity of the adjoining settlements of Wavendon, Woburn Sands and those washed over by the open countryside designation on the proposals map.
6.5.16 Where the SLA boundary adjoins the existing built up part of the city (the northern boundaries of SRAs 2 and 3; the southern and western boundaries of SR1 and the western boundary of SR4), the new development needs to integrate with the existing city.

6.5.17 The use of strategic landscape to the outer (southern and eastern) boundaries of the SLA can be used to define the extent of new development and help to soften its impact on the open countryside beyond. This approach also helps to address the issue of coalescence with and the need to maintain the character and integrity of, the existing settlements.

6.5.18 The ongoing work on the Development Framework has progressed the definition and location of strategic landscaping across the SLA and this is illustrated on the draft land use plan at Appendix A of this statement. The approach replicates the historical approach to masterplanning across Milton Keynes, with the focus on linear parks; landscaped corridors, incorporating Sustainable Urban Drainage Systems into green infrastructure.
Issue 6.6

6.6 Having regard to all of the above, is the SLA boundary appropriately and sufficiently defined?

6.6.1 Yes. The allocated SLA, its location and extent are identified on Figure 5.2, the Key Diagram for the urban area and also on the Proposals Map Amendment for the Post Submission changes to the Core Strategy

6.6.2 The Council’s response to Issue 6.3 above and to Main Matter 1, Issues 1.1 set out the basis on which the SLA boundary has been identified.
Issue 6.7

6.7 Taking account of the reference to retail and other facilities in CS5, is there sufficient guidance in the Core Strategy about how the needs of the SLA will be met?

6.7.1 Yes. Policy CS5 together with other policies in the Core Strategy provides an appropriate level of guidance as to the types of services and facilities that will need to be provided to meet the needs of the SLA. In line with Policy CS5, 3rd paragraph, the requirements are being defined in more detail through the preparation of the Development Framework, in which the landowners are closely involved.

6.7.2 The approach of establishing the principles of development in policy and then adding more detail through a development framework has been used successfully in the past for the Eastern and Western Expansion Areas.

6.7.3 The preparation of the Development Framework is proceeding well and provides additional information and certainty to assist landowners in preparing planning applications. Its preparation is based on a comprehensive engagement strategy – the Council carried out extensive informal consultation in late 2011/ early 2012 and there will be a 12 week consultation on the draft SPD from July to September (see the project programme at Appendix B of this statement). Two stakeholder groups have also been established which provide an interface between the Council, the landowners, service providers and the local community and which facilitate early engagement in the preparation of planning guidance as well as planning applications.
Retail:

6.7.4 Policy CS5, development principle 16, requires retail and commercial development of a scale to meet the weekly convenience shopping needs of new and existing residents. Table 5.7 in the Core Strategy suggests that a 3,500 sqm anchor store could be provided, noting that the size is to be assessed through the Development Framework process. Policy CS4, paragraph 5.35 is clear that the 3,500sqm figure is a guideline figure and that the consultants preparing the Retail Capacity Study have advised that the Council should adopt a flexible stance on the size of the new foodstore, so that it reflects the scale of development to be served.

6.7.5 The level of retail provision in the SLA has subsequently been examined as part of the Retail Capacity Report update, August 2011 (Submission Document B136). The RCS Update commented (page 23, paragraph 4.3.1) that “there are four strategic reserve areas proposed to be located in the South East which could accommodate around 2,500 dwellings. We would not envisage a large food store in this area to serve these developments. We would anticipate that there may be a need for small scale local provision to provide more of a top up shopping facility and that the existing store at Kingston, and the proposed stores at Oakgrove and at Brooklands would also serve these areas.

6.7.6 A local centre serving the SLA sits in the fourth tier of the council’s retail hierarchy (Core Strategy, Table 5.5) and, as such, is expected to perform a purely local role and cater for its local catchment. Based on the findings of the Retail Capacity Study Update, August 2011, the Council is of the view that a proposal of around 2,000+ sqm (gross) for a general, all purpose convenience store on this site should be more than sufficient to cater for the needs of residents.
Employment:

6.7.7 Policy CS5 requires the provision of employment as part of the SLA development to contribute to the Borough-wide target of 1.5 jobs per new home. Table 5.7 identifies potential for an element of industrial and warehousing development to be provided on the SLA and for this to be investigated through the Development Framework.

6.7.8 The land use budget for the draft Development Framework at Appendix A to this statement allocates some 12.4ha of land for employment uses B1/B2/B8 on SR1 (Eagle Farm North). In line with Core Strategy Table 5.7, the development of 2,500 homes on the SLA would also be expected to generate some 1,700 jobs in schools, retail and community facilities across the city.

Other facilities: schools

6.7.9 Principle 17 of Policy CS5 requires provision of schools in relation to the size of the development and the Council’s current standards of provision. Policy CS16 requires the delivery of primary and secondary schools as part of growth plans. Paragraph 13.29 of the Delivery section of that policy refers to the provision of sufficient school places for the SLA.

6.7.10 The School Organisation Framework 2011-2012\(^1\) (Submission Document B149) seeks to bring together the national and local factors that impact on school organisation and which drive the Council’s education capital investment programme. Section D of the Framework document identifies an increasing shortfall in primary school places

from 2012 onwards and an increasing shortfall of secondary school places from 2014 onwards. Section D, page 26, explains that detailed research has been carried out to determine the likely additional pupil yield from new housing. From an analysis of 12 greenfield sites, the conclusion has been reached that, on average, 5.8 pupils per year group are generated by every 100 houses built. This rate of 5.8% can be applied to future years’ planned housing, to give a projection of the likely number of additional places required. The application of this pupil yield to the development of 2,500 homes in the SLA has resulted in the council seeking the provision of a five form of entry secondary school there to meet the needs arising directly from the development.

6.7.11 The Development Framework land use budget at Appendix A to this response, includes land for the provision of two primary schools and a secondary school on the land south of the A421. It is not yet clear how best to meet the school provision needs of the SR4 (Church Farm) part of the SLA, however it is not felt best to secure a primary school site on this small part of the development as the numbers of children living there are not sufficient to provide demand for a financially and educationally viable primary school. Instead it is likely that the need will either be met by expansion of existing school facilities within the wider area, funded by S106 contributions, or via the two sites on the other parts of the development, or via a change to school defined areas. It is currently too early to choose which option will be best for the community.

Health provision, emergency services and voluntary sector

6.7.12 Provision of these facilities is being determined in conjunction with the relevant service providers and the developers through the development framework process. Where required, the intention would be to
accommodate such uses within the local centre planned for the part of the SLA south of the A421.

Community facilities, sports and leisure

6.7.13 Provision of community, sport and leisure facilities, together with open space will be determined through the Development Framework process, in line with the Council’s current standards.

6.7.14 Community centres should be provided in line with the Milton Keynes Local Plan Policy C3. For the SLA, this means the provision of one site which should be co-located with playing pitches.

6.7.15 Milton Keynes Local Plan Policy L3 and Appendix L3 set out the standards for recreation and leisure facilities which have been applied to the SLA in the emerging Development Framework.
Issue 6.8
Overall, does the Core Strategy provide sufficient guidance to bring forward the SLA through a single Development Framework?

6.8.1 Yes. In preparing the Core Strategy, the Council has been mindful of the advice in the then PPS12 (Submission Document NP8) (paragraph 4.5) that the Core Strategy should make clear spatial choices about where development should go in broad terms and that in so doing this should mean that the work involved in the preparation of any subsequent DPDs should be reduced.

6.8.2 The approach in Policy CS5 is also in line with the CLG Plan Making Manual that supported PPS12. The site boundaries of the SLA are clearly delineated on the Proposals Map and the allocation is supported by a set of broad development principles which guide the future development proposals.

6.8.3 The approach of establishing the principles of development in policy and then adding more detail through a development framework has been used successfully in the past in the Milton Keynes Local Plan for the Eastern and Western Expansion Areas.

6.8.4 It is the Council’s view that the guidance in Policy CS5 is sufficient to support the allocation of the SLA, with the more precise details to be confirmed through the preparation of the Development Framework which will be adopted as a Supplementary Planning Document. Moreover, the approach used, that of a strategic site allocation in the Core Strategy and a Development Framework SPD, is in line with advice in the NPPF (Submission Document NP16) paragraph 153, that supplementary planning documents should be used where they can
help applicants make successful applications or aid infrastructure
delivery. It is the view of the Council that the emerging Development
Framework delivers both of these objectives.

6.8.5 The programme of work for the production of the SLA Development
Framework is attached at Appendix B if this statement.
LIST OF APPENDICES TO THE COUNCIL’S RESPONSE TO MAIN MATTER 6

APPENDIX A – LAND USE BUDGET FOR STRATEGIC LAND ALLOCATION AS AT 20 APRIL 2012

APPENDIX B – STRATEGIC LAND ALLOCATION DEVELOPMENT FRAMEWORK PROJECT PROGRAMME

APPENDIX C – SUPPORTING STATEMENTS FROM SLA LANDOWNERS (Gallagher Estates and Connolly Homes)

DATE: 1 June, 2012
APPENDIX A: LAND USE BUDGET FOR STRATEGIC LAND
ALLOCATION AS AT 20 APRIL 2012

1. Entire Masterplan area
2. Land south of A421
3. SRA1, Eagle Farm North
4. SRA4, Church Farm
5. Draft Development Framework

### 1. ENTIRE MASTERPLAN AREA

<table>
<thead>
<tr>
<th>LAND USE</th>
<th>TOTAL</th>
<th>PERCENT OF TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GREEN INFRASTRUCTURE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formal recreation</td>
<td>7.4 ha</td>
<td></td>
</tr>
<tr>
<td>Informal open space, landscape and balancing areas</td>
<td>20 ha</td>
<td></td>
</tr>
<tr>
<td>Allotments</td>
<td>1.2 ha</td>
<td></td>
</tr>
<tr>
<td>Paddocks</td>
<td>2.8 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>31.4 ha</td>
<td>20.97%</td>
</tr>
<tr>
<td><strong>HIGHWAYS INFRASTRUCTURE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spine roads</td>
<td>4.8 ha</td>
<td></td>
</tr>
<tr>
<td>Grid road corridors</td>
<td>8.7 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>13.5 ha</td>
<td>9.02%</td>
</tr>
<tr>
<td><strong>TRANSPORT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lorry park</td>
<td>3.5 ha</td>
<td></td>
</tr>
<tr>
<td>Park and ride site</td>
<td>2.5 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>6.0 ha</td>
<td>4.01%</td>
</tr>
<tr>
<td><strong>EMPLOYMENT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment</td>
<td>12.4 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>12.4 ha</td>
<td>8.28%</td>
</tr>
<tr>
<td><strong>EDUCATION AND COMMUNITY</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>EDUCATION</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Combined secondary and primary school</td>
<td>8.9 ha</td>
<td></td>
</tr>
</tbody>
</table>

**DATE**: 1 June, 2012
Primary school 2.1 ha

MIXED USE
Local centre 3.0 ha
Reserve sites 2.0 ha

SUBTOTAL 16.0 ha 10.69%

RESIDENTIAL

<table>
<thead>
<tr>
<th>Average density dw/ha</th>
<th>Dwellings</th>
<th>Dwelling Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>South of A421</td>
<td>35</td>
<td>1990</td>
</tr>
<tr>
<td>Local centre</td>
<td>50</td>
<td>150</td>
</tr>
<tr>
<td>Church Farm</td>
<td>30</td>
<td>330</td>
</tr>
</tbody>
</table>

SUBTOTAL 2470 69.8 ha 46.63%

EXISTING USES
Golf course clubhouse 0.6 ha

SUBTOTAL 0.6 ha 0.40%

TOTAL 149.7 ha 100%

2. Land South of A421

<table>
<thead>
<tr>
<th>LAND USE</th>
<th>TOTAL</th>
<th>PERCENT OF TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>GREEN INFRASTRUCTURE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formal recreation</td>
<td>7.4 ha</td>
<td></td>
</tr>
<tr>
<td>Informal open space, landscape and balancing areas</td>
<td>15 ha</td>
<td></td>
</tr>
<tr>
<td>Allotments</td>
<td>1.2 ha</td>
<td></td>
</tr>
<tr>
<td>Paddocks</td>
<td>2.8 ha</td>
<td></td>
</tr>
</tbody>
</table>

SUBTOTAL 26.4 ha 24.76%

INFRASTRUCTURE
Spine roads 1.9 ha
Grid road corridors 5.1 ha

SUBTOTAL 7.0 ha 6.57%

EDUCATION AND COMMUNITY
EDUCATION
### Combined secondary and primary school
- 8.9 ha

### Primary school
- 2.1 ha

### MIXED USE
- Local centre: 3.0 ha
- Reserve sites: 1.7 ha

**SUBTOTAL**
- **15.7 ha**
- **14.73%**

### RESIDENTIAL

<table>
<thead>
<tr>
<th>Average density dw/ha</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>35</td>
<td>1990</td>
</tr>
<tr>
<td></td>
<td>56.9</td>
</tr>
</tbody>
</table>

**SUBTOTAL**
- **56.9 ha**
- **53.38%**

### EXISTING USES
- Golf course clubhouse: 0.6 ha

**SUBTOTAL**
- **0.6 ha**
- **0.56%**

**TOTAL**
- **106.6 ha**
- **100%**

### 3. SRA1

#### LAND USE

<table>
<thead>
<tr>
<th>GREEN INFRASTRUCTURE</th>
</tr>
</thead>
</table>
| Informal open space and landscape | 3.1 ha

**SUBTOTAL**
- **3.1 ha**
- **13.42%**

#### INFRASTRUCTURE
- Spine roads: 1.6 ha
- Lorry park: 3.5 ha
- Park & ride: 2.5 ha

**SUBTOTAL**
- **7.6 ha**
- **32.90%**

#### EMPLOYMENT
- Employment: 12.4 ha

**SUBTOTAL**
- **12.4 ha**
- **53.68%**

**TOTAL**
- **23.1 ha**
- **100%**

**DATE:** 1 June, 2012
4. SRA4, Church Farm

<table>
<thead>
<tr>
<th>LAND USE</th>
<th>TOTAL</th>
<th>PERCENT OF TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GREEN INFRASTRUCTURE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Informal open space, landscape and balancing areas</td>
<td>1.9 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>1.9 ha</td>
<td>9.50%</td>
</tr>
<tr>
<td><strong>INFRASTRUCTURE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spine roads</td>
<td>1.3 ha</td>
<td></td>
</tr>
<tr>
<td>Grid road corridors</td>
<td>3.6 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>4.9 ha</td>
<td>24.50%</td>
</tr>
<tr>
<td><strong>RESIDENTIAL</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average density dw/ha</td>
<td>Dwellings</td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>30</td>
<td>318</td>
</tr>
<tr>
<td>5</td>
<td>12</td>
<td>2.3 ha</td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>330</td>
<td>12.9 ha 64.50%</td>
</tr>
<tr>
<td><strong>EDUCATION AND COMMUNITY</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reserve sites</td>
<td>0.3 ha</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>0.3 ha</td>
<td>1.50%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>20 ha</td>
<td>100%</td>
</tr>
</tbody>
</table>

DATE : 1 June, 2012
5. Draft Development Framework
APPENDIX B - STRATEGIC LAND ALLOCATION DEVELOPMENT FRAMEWORK PROJECT PROGRAMME

Stage 1: Completed end – June 2011

Revisit background studies, undertake site/context analysis, meet with service providers about their needs/requirements based on a maximum of 2500 homes.

Stage 2: Completed end – July 2011

Meet with external service providers, local stakeholders (local/ nearby landowners and Parish Councils) to discuss their issues and needs and present to them the key findings of Stage 1.

Stage 3: Completed mid – October 2011

Putting together a first draft of the Development Framework based on the first 2 stages including a 'concept masterplan'.

Stage 4: Completed end – January 2012

Preparation for, and undertaking of, first informal consultation. The consultation period would include a week long exhibition, public meeting as well as presentations/meetings with key stakeholders (parish council, ward members).

Stage 5: Completion end – May 2012


Stage 6: 26 June 2012

Obtain permission to go out to formal consultation with delegated decision.

Stage 7: Consultation to end September 2012

Formal 12-week consultation, including exhibition and various presentations.

Stage 8: Completion end – November 2012

DATE : 1 June, 2012
Amend Development Framework in light of formal consultation.

**Stage 9: Adoption end – December 2012**

Adopt Development Framework as SPD at Cabinet.

{Adoption of Development Framework dependent on adoption of Core Strategy.}
Introduction

The following statement has been prepared on behalf of Gallagher Estates regarding the delivery of the Strategic Land Allocation (SLA) which forms part of the Core Strategy. The statement deals with the land within the SLA which is owned or controlled by Gallagher Estates, comprising:

i. Glebe Farm;

ii. Eagle Farm South; and

iii. Eagle Farm North.

Implementation

We currently anticipate the following programme for obtaining planning permission and up to first completions being delivered from the SLA:

DATE : 1 June, 2012
- Late 2012 – outline planning applications submitted for all three Gallagher sites.
- Spring 2013 – outline planning permissions granted
- Late 2013 – reserved matters planning applications submitted
- Summer 2014 – approval of reserved matters applications and discharge of conditions
- Late 2014 – contractors appointed
- Early 2015 – infrastructure commences with first disposal of land scale parcels
- Summer 2015 – housebuilding commences
- Late 2015 – first housing completions

**Housing Delivery**

The following trajectory details the anticipated delivery of housing from the land within the control of Gallagher Estates. The total scale of housing expected to be delivered is currently around 1,700 homes. The estimated completion rates have had regard to the planned delivery of housing development within the plan period from other land which forms part of the SLA. Please note that this development is not included in the figures presented below and will therefore be additional to the completions set out below.

<table>
<thead>
<tr>
<th>Year</th>
<th>15/16</th>
<th>16/17</th>
<th>17/18</th>
<th>18/19</th>
<th>19/20</th>
<th>20/21</th>
<th>21/22</th>
<th>22/23</th>
<th>23/24</th>
<th>24/25</th>
<th>25/26</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Completions</td>
<td>35</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>50</td>
<td>0</td>
</tr>
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</table>

DATE: 1 June, 2012
MILTON KEYNES COUNCIL’S CORE STRATEGY DPD EXAMINATION

Statement of Common Ground

The Burford Group & Merton College

May 2012
Introduction

I write on behalf of my clients, the Burford Group and Merton College, in response to Milton Keynes Council’s (MKC) request to submit a Statement of Common Ground relating to Matter 6 – Strategic Allocation. We would like to make the following comments.

Background

The Burford Group and Merton College own Wavendon Golf Course fronting the A421 between the two former Strategic Reserve Areas, SR2 Glebe Farm and SR3 Eagle Farm. The land is south of the A421, opposite Magna Park, west of Cranfield Road and includes the 9 hole par 3 golf course, 9 hole pitch and putt course, a driving range and club house to the north of Lower End Road.

Milton Keynes Council’s proposed Strategic Allocation is based on creating one logical development strip along the south side of the A421 incorporating both SR2 Glebe Farm, SR3 Eagle Farm and the land in between which includes that controlled by the Burford Group and Merton College. (Please see attached plan – WAV001/010) Without the inclusion of this key piece of land controlled by the Burford Group and Merton College, a sustainable urban extension cannot be delivered. Half of this parcel of land is owned by another party but the Burford Group and Merton College understand that the vision for this land is shared.

There is no impediment to this part of the golf course operation coming forward for development. The Burford Group and Merton College are committed to producing a planning application for the proposed development land and details are set out in this short paper.

Sport England Position

Sport England have issued their standard objection to the loss of golf facilities proposed by Milton Keynes Council through the revised Core Strategy proposal. Sport England indicated that they were content to remove their objection on the condition that Milton Keynes Council’s Leisure Department are satisfied by the proposals.

The Burford Group and Merton College have been working with Milton Keynes Council’s planning and leisure department to arrive at an agreement which will remove this objection. Agreement has now been reached between Milton Keynes Council and the Burford Group and Merton College. The leisure department are content and the Council has asked Sport England to remove its objection.

The loss of the 9 hole course and driving range is not an impediment on delivery. The club house may be retained or replaced south of Lower End Road, according to viability and until the land is required.

Deliverability

The land is available for redevelopment now. The 9 hole golf course and driving range are not viable operations and so could close immediately if required. The loss
the facilities has been agreed and does not impact upon delivery. Burford Group and Merton College own the 18 hole golf course south of Lower End Road which allows the continued provision of golf facilities in this area.

Viability

At this point, no unusual issues have arisen which could impact viability.

It is understood that depending on when the land comes forward, the landowners could sign the MK Tariff, or an agreement on similar terms. My clients would welcome this approach and are happy to engage with MKP and MKC on this matter at the appropriate time.

Capacity

Burford Group and Merton College are on the Project Board of Milton Keynes Council’s emerging Development Framework for the land. The Development Framework Process has tested the site’s capacity as part of the wider allocation and has shown around 350 dwellings on this land along with formal and informal open space. My clients own analysis of the capacity supports this figure.

A421 Landform

The relationship with the A421 and employment area of Magna Park requires careful consideration. There are a range of options for dealing with this relationship which MKC will expect to be addressed at the planning application stage. The Burford Group and Merton College are currently examining one possible option, whether a raised landform along the northern edge of land adjacent to the A421 could mitigate against noise and visual impact as well as providing visual containment and increased residential amenity. The scale of the landscaping could be similar to that seen in grid road corridors across Milton Keynes.

Gas Pipeline

The landowners have confirmed with the Health and Safety Executive and Southern Gas Networks that the gas pipeline crossing the site requires a limited setback of 6 metres and does not impact on delivery.

Education

MKC is considering all options to meet demand for a secondary school both on and off site and is considering the implications on the residential capacity across the wider Strategic Allocation of providing a site for a secondary school there. The Burford Group and Merton College are clear that they will contribute to the cost of the required primary and secondary places to meet the justified demand generated from homes on its land by way of a planning obligation or tariff.
One of the possible options for secondary provision in this area includes the possibility of securing a larger site to pick up the existing latent demand in the wider area.

Access

Burford Group and Merton College are collaborating with Gallagher Estates (who control adjoining land) to plan the area comprehensively, including the provision of access to all land parcels as and when required.

The Council’s emerging Development Framework shows vehicular access to the A421 from land within the control of Gallagher Estates i.e. outside of Burford and Merton College’s control. Agreement is being negotiated with Gallagher to afford access to those parcels of land (i.e. Burford/ Merton and Haynes) which do not currently have planned direct access to the A421.

Timetable

The Burford Group and Merton College are working towards the submission of an outline planning application on their land this year. Technical work has been commissioned to produce the necessary assessments of impacts and produce the various documents and statements to accompany a planning application. This includes the production of a voluntary Environmental Impact Assessment. Consultants have been commissioned to assess the following:

- Transport
- Land use and soils;
- Landscape and visual impact;
- Air quality;
- Noise;
- Archaeology and cultural heritage; and
- Waste
- Flood Risk assessment and Drainage Strategy
- Traffic Assessment
- Water Resources
- Sustainability Statement
- Public Utilities
- Ecology
- Land contamination.

There is no indication of any significant issues, or potential for delay to delivery from the site investigations undertaken so far.

Collaboration with adjoining landowners
Burford Group and Merton College are collaborating with Gallagher Estates (who control adjoining land) in sharing background data and details to ensure consistency of assessments across the Strategic Allocation. The respective landowners are likely to submit separate planning applications based on ownership boundaries but it is the intention of both parties that the applications will be complementary.

I trust the above comments are self explanatory. Should you have any comments please do not hesitate to contact me.
STATEMENT OF COMMON GROUND

MKC Core Strategy Independent Examination
Land at Church Farm, Wavendon, Milton Keynes

Parties: Connolly Homes Plc
Milton Keynes Council

Date of Examination: 12 July 2012 – Matter 6 – The Strategic Land Allocation

1 MATTERS NOT IN DISPUTE

The areas of common ground relate to specific questions raised by the Inspector pertaining to the Strategic Land Allocation (SLA) in general and specifically the Church Farm site, as set out in Questions 6.1 to 6.8 of the Matters and Issues for the examination.

The Parties accept that the following matters can be taken as agreed:

1. The Church farm land is available for development.

2. The proposed SLA is consistent with the sustainable development of the borough and adjoining areas and represents an appropriate strategy to 2026. It does not prejudice the plan-making process currently being undertaken by neighbouring planning authorities and Policy CS6 includes the development principles to be adopted by Milton Keynes Council to demonstrate its duty to cooperate under the Localism Act and NPPF requirements.

3. Future proofing has been appropriately considered at the strategic level as set out in Core Strategy Objective 8. Core Policy CS6 includes the mechanism to secure this principle should other authority areas seek extensions to the city edge. The Parties agree that Core Policy CS11 provides the development control basis for the determination of planning applications on the SLA and accept the principle of reserving transport corridors through each land parcel including Church Farm.

4. The reasonable alternatives have been assessed at an appropriate stage in the plan-making process. This is on the basis that it responded to a particular change in an evolving planning environment and a need to be consistent with central government advice. The timing of that stage also properly reflected changes made to the plan-making process of adjoining authority areas.

5. Minor changes to wording of Policy CS6 as set out in the post Submission Changes 2011 insofar as they directly relate to the classification of the SLA.

6. The changed boundary for the wider SLA as set out in the Post-submission Proposals Map Amendment 2011.
7. The defined boundary for the Church Farm part of the SLA as shown on the Submission Proposals Map and reproduced on the post-Submission Proposals Map Amendment 2011.

8. That Core Policy CSS5 is sufficiently flexible to deliver strategic scale growth to the south east of the city within the plan period to 2025. An early start can be made at Church Farm which is acknowledged to have a shorter lead in time, reduced onsite infrastructure requirements and therefore enable the delivery of completed units in the early years.

9. The analysis of the issues and opportunities affecting the defined Church Farm site and the policy framework against which proposals to address these will be considered is determined in Core Policy CSS5. The Development Framework will consider the design principles.

10. The development of Church Farm will be for residential uses under the terms of Core Policy CSS5.

11. That developer contributions from the SLA can be secured under the Tariff or similar mechanism, subject to implementation of CIL.

12. It is acknowledged that the SLA will provide for education to contribute towards addressing the aims of the Core Strategy but there will be no on-site requirement for education provision on Church Farm land.

Relevance of any Development Framework of SLA to be published by LPA

13. The Parties have agreed the terms of reference for the production of a Development Framework to meet the provisions of Core Policy CSS5.

14. Each area within the SLA has different opportunities and constraints deriving from their location, adjacent uses and linkages influencing the types and forms of development most sensitive and appropriate to the location.

15. The Development Framework will include general principles and options for development which will demonstrate a residential development at Church Farm.

16. The housing trajectory and delivery assumptions set out in the Core Strategy as updated by the Post Submission Changes are not disputed on the basis that the Church farm site is capable of delivering early growth from 2015/2016.

17. Church Farm is capable of accommodating at least 330 units.

18. The timeframe and delivery mechanism set out in the Submitted Core Strategy and the SLA Development Framework Project Programme (May 2012 version) are reasonable on the basis that Outline Planning Applications will follow the adoption of the Core Strategy and Development Framework, subject to either process not being unreasonably delayed i.e. beyond 2012 for the Core Strategy adoption and the SLA Development Framework programme agreed at the 8 May 2012 Project Board (published version May 2012 attached).
Delivery/Highways Issues

19. Core Policy CSS requires preparation and submission of a Development Framework for the SLA at which stage these detailed issues will be assessed and determined.

20. Both parties agree that a key element required to ensure the delivery (in transport terms) of the Church farm part of the SLA is a comprehensive mitigation strategy for the development. This will need to include a variety of mitigation measures to address the impact of the development on the local road network. Currently the developer’s consultant PBA is working to produce this comprehensive strategy.

21. It is further agreed that in relation to the potential grid road extension, a joint working partnership between the Council and prospective developers has been set up, to agree a sound means to assess the impact of the development proposals and to help identify necessary mitigation measures. It is the intention that these parties will continue with this close partnership arrangement.

2 MATTERS STILL DISPUTED

22. Whilst the parties agree with the general assumptions made in the draft SLA Development Framework background paperwork relating to density and housing numbers, and the principle that the SLA is capable of delivering the required 2500 units based on developable area, Connolly Homes Plc do not agree with the number of dwellings stated in Core Policy CSS expressed as a maximum. This should remain a target (or minimum) figure until such time as the full assessment of site capacity has been undertaken through the site specific analysis of design issues and other development control considerations. Future stages of the Development Framework Process and subsequent planning applications will establish the ‘maximum’ figure.

23. The detailed assessment of the SLA within the Council’s Sustainability Assessment of Reasonable Alternatives as set out in Connolly Homes Plc representations.

3 DECLARATION

The contents of this document are agreed for the purposes of the MK Core Strategy Examination Main Matter 6.