MILTON KEYNES CORE STRATEGY EXAMINATION

Matter 6 – The Strategic Land Allocation

Submission on behalf of Connolly Homes PLC
Representor Number 414546
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MATTER 6 – STRATEGIC LAND ALLOCATION

ISSUE 6.1

Is the proposed Strategic Land Allocation (SLA) consistent with the sustainable development of the Borough and adjoining areas? Has Future proofing been appropriately considered.

2.1 The CS sets a clear strategy for identifying new growth locations and contains sufficient flexibility to allow this issue to be addressed through the preparation of Site Allocation DPDs for the rural area and through supplementary planning documents in the form of a Development Frameworks for the identified SLA. The former process will address the merits of specific sites and their deliverability and phasing in the rural areas. The latter process of Development Frameworks in the Urban area will enable the allocated land parcels to be considered promptly. This process has commenced and future proofing is inherent in the draft principles to date. We consider it reasonable to expect this principle to continue into the draft document.

ISSUE 6.2

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

3.1 MKC has prepared a significant evidence base, more recently summarised in its housing Topic Paper which sets out its approach to assessing housing need and qualifying housing provision. The SA in respect of Alternative sites and the continued identification of the former SRA's was carried out pre-Submission. The general audit trail appears compliant albeit the main testing was undertaken as part of a wider SDA. The general assumptions have not changed and there are no clear show stoppers raised by any other objector that these previous assumptions were flawed. The additional SA work was undertaken to meet the basic procedural and legal requirements and to respond to objections made by third parties. We consider the work was undertaken at a suitable time given the change in direction following wider issues and uncertainties raised outside the authorities control. The subsequent post-submission change to incorporate the golf course land does not alter the general thrust of that assessment and approach.

3.2 The evidence remains conclusive that the former SRA's are the most logical option based on the lower growth scenario. They rightly represent the locations previously earmarked and safeguarded through the former local plan process and remain a reasonable choice for delivering the housing
requirements to 2026. As with any strategy there are invariably other options that could be included but the chosen strategy and the soundness of the plan should be considered on its merit and provided the evidence base is clear and remains justified, the CS should be found sound. We do not see any overriding evidence (aside from the overall numbers issue) that suggests the retention of these former SRA’s and their specific allocation through the CS is the wrong conclusion. The post-submission change to include the additional land comprising the golf course is accepted and creates a better defined SLA to include sufficient land for the identified additional need of 2,500 homes overall. This meets the requested increase in housing numbers raised by previous objectors (i.e. Berkley Strategic, Burford Group and Merton College, Bow Brickhill Consortium) who focused on this quantum issue rather than a challenge to the principle of allocating the specific SRA’s at the submission stage.

3.3 Whilst we consider the stage of the evaluation of reasonable alternatives is not challenged, we continue to question some of the assessment criteria and consider it inconsistent as set out in our detailed representations on this matter.

4 **ISSUE 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?*

4.1 The reasonable alternatives set out in CS Document B110 have been shown to be of similar or lesser quality to the allocated SLA. There can be no dispute that the direction for growth to this urban edge is a logical and appropriate strategy to deliver the growth strategy. We accept that there are other permutations that could be progressed and are being pursued through objectors representations. However the extent to which the non-allocation of the other land parcels renders the CS unsound is disputed. There are some clear exceptions, such as the land west of the A1530 (Ex1h & Ex1n of the SHLAA) which we consider is directly impacted by the allocation of the more logical SLA parcel (to the east of the A5130). Allocation of the SLA elevates this land to afford greater protection as a green wedge and buffer to protect and maintain the character of Wavendon village from encroachment. The allocation of the Church Farm land (formerly SR4) does not do this, as it has clear separation by a wooded area and it draws its reference and infrastructure from the grid road network off Wavendon Gate. The impact of any Church Farm development when viewed in the context of the village or the approach to Wavendon village from any part of the existing road network is negligible.
4.2 The benefit of allocation the SLA is threefold. The landscape and infrastructure impacts have been assessed at a strategic level and raise no constraint to development. The benefits to arise through the improvements of the local infrastructure and specifically education and local services will be apparent through allocation of an urban extension of this scale. The delivery of these land parcels will facilitate increased shopping, business and schools which would not otherwise be delivered or justified through a smaller scale of development to this side of the city or through an alternative dispersed strategy.

5 **ISSUE 6.4**

*What is the justification for the maximum of 2,500 dwellings; Is there sufficient capacity within the SLA for the quantity of development required?; Are there reasonable prospects of delivery of the required number of dwellings within the plan period; Is the SLA economically viable?*

5.1 We suggest a minor modification to facilitate an early start on the SLA following the adoption of a Development Framework. There is a reasonable prospect of an earlier start for some parts of the SLA based on the locational differences i.e. accessibility and infrastructure provision requirements. This does not conflict with the overall approach or sustainability of the identified area as a whole but serves to recognise that there are parts that can come forward early i.e. Church Farm. The delivery of associated services and facilities would be assessed at the outset through the Development Framework so that economies of scale can still be applied to deliver linked benefits to this part of the city and the new population.

5.2 Indeed the new timeline suggested in our representations remains appropriate.

5.3 However we suggest there is no justification for a maximum limit of 2500 dwellings. We suggest a minor modification to enable the scale of development to be set by the site capacity and associated social, environmental and physical infrastructure. By setting a maximum upper limit on the SLA at this stage without proper testing through masterplanning is misleading. It is also potentially restricting and difficult to ensure the most efficient use of land. As the sites are within different ownships and with differing infrastructure requirements that will impact upon the timescale for delivery, sufficient flexibility should remain in the CS to not be prohibitive if, for example, the upper limit is reached prior to the individual planning applications being determined for these sites.

5.4 By providing for a maximum the Council is unreasonably constraining the development plan particularly in terms of NPPF advice at paragraph 47 whereby local authorities need to ensure that their local plans reach the full objectively assessed needs for market and affordable housing in the housing market area and to identify sites which are available and suitable with a reasonable
prospect of the housing being delivered within the next 5 years. Church Farm meets all such criteria (as agreed within the Council's Statement of Common Ground) and to have a maximum figure is unwarranted.

6 ISSUE 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?

6.1 To be determined through future planning applications. There is no reason to consider the SLA is any different to the other parts of the City where this has been achieved.

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

6.2 No comment

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?

6.3 No comment

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?

6.4 Agree. The SLA is capable of achieving these aims through the masterplanning process.

7 ISSUE 6.6

Having regard to the above, is the SLA site boundary appropriately and sufficiently defined?

7.1 The Proposals Map clearly defines the extent of land which is to be allocated. These remain logical on the ground and clearly relate to defined boundaries with or comprising established natural features or existing infrastructure. We consider them adequately defined. The appropriateness is undermined by the description of that allocation which needs to be clearer within the accompanying text to ensure that the relevant landowners/developers have flexibility on densities and that any increase above the 2500 units threshold capacity is not falsely engineered to comply with definitive boundaries. This is easily overcome by the removal of the text 'maximum' and its substitution with 'about'.


8 ISSUE 6.8

Overall, does the Core Strategy provide sufficient guidance to bring forward the SLA through a single Development Framework?

8.1 We question the clarity and whilst we appreciate this process has commenced and is progressing, the text within the CS needs to properly reflect the outcome of that document, its status and delivery.