Introduction

I write on behalf of my clients, the Burford Group and Merton College, in response to Milton Keynes Council’s (MKC) Updated Housing Technical Paper- Submission Document B126 (March 2012). We would like to make the following comments on the document.

Housing Numbers

To provide for just 1,750 dwellings per year based on historic delivery is unacceptable. The Core Strategy must adopt a level of housing that is reflected and supported by credible evidence. The housing target must be increased to meet the need identified.

Housing completions were 1,295 in 2010/11 and 1,580 in 2011/12 which is a significant shortfall from the Council’s annualised target of 1,750 dwellings per annum. The figures are also significantly lower than the South East Plan figure of 2,068 dwellings per annum which was examined and agreed to be the need of the city.

At the meeting of Full Council on 14 September 2010 it was recognised that the most recent assessment of housing requirements in the Strategic Housing Market Assessment (SHMA) for the Borough identified the need for more new homes each year than the old regional housing target – i.e. 3,280 homes per year compared to 2,070 in the South East Plan, or 2,620 if the South East Plan proposals for Strategic Development Areas adjoining the city in Aylesbury Vale and Central Bedfordshire.

Housing is a crucial driver for economic growth through construction and in creating a city which attracts new businesses and a highly skilled workforce. It is entwined with Milton Keynes future prosperity. Under provision will have a negative effect of the health and competitiveness of the city.

Windfalls

MKC suggest including an annual allowance of 80 homes from windfalls per year across the Borough. This equates to a significant figure of 1,120 homes and is being used by the Council to inflate their supply figures. This cannot go unchallenged. There is little evidence to suggest the figure of 80 homes per annum is a credible assumption of what will continue to come forward over the life of the plan.

Furthermore, if the Council’s figures are correct, Burford and Merton College strongly question the logic in allowing 1,120 home windfall homes to be constructed. This housing is unlikely to come forward with any significant supporting facilities placing increased pressure on existing schools, open space, doctors, dentist and other essential infrastructure. This level of development equates to almost half that proposed in the Strategic Allocation, which is coming forward with a range of supporting uses to avoid placing pressure on existing facilities. A sensible alternative would be to identify a further strategic allocation in which this level of housing could be built.

Housing under delivery

MKC recognise that there is “an argument that MK should be planning for a 20% buffer based on under performance against housing targets” (as set out in the National Planning Policy Framework). Unsurprisingly MKC state that they would not accept the suggestion citing a “high level of completions over a sustained period”. However, in reality housing completions were 1,420 in 2009/10, 1,295 in 2010/11 and 1,580 in 2011/12 which is a significant shortfall from the Council’s annualised target of 1,750 dwellings per annum. The shortfall has been caused in part to the lengthy manner in which the Western and Eastern Expansion Areas have been brought forward (housing is still to be delivered on these sites). Further, the HCA bank of publicly owned land has also not come forward for development as quickly as it
should have. The HCA control 56.6% of all existing allocations or ‘identified’ land (Full Council Paper, 14 September 2010). This is a significant amount of land under the control of one organisation, and not under the control of house builders. Any delay in bringing this land forward through the planning system has the potential to impact on land supply in the medium to long term.

The Burford Group and Merton College are aware that past completion rates were very low and a 20% buffer based on under performance against housing targets would be a sensible step. It is agreed that ‘prompt delivery’ on the Strategic Allocation is important to supplement land supply to the east of the city (para 3.39).

**Affordable Housing**

MKC recognise that housing affordability has worsened over the past 13 years. The proposed Core Strategy seeks to deliver affordable housing on the back of market housing delivery. On the basis that this approach continues in the future then the quantum of housing land identified should therefore be more not less to meet the need for such housing as identified in the current Strategic Housing Market Assessment.

A reduced supply of housing will lead to an increase in the price of market housing if demand is assumed to stay the same. This has the potential to further exacerbate the problem of providing affordable homes.

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