Fox Land and Property

Written Submissions to the Hearing of the Independent Examinations of the Milton Keynes Core Strategy DPD

Matter 2: Development Strategy and Settlement Hierarchy. (Policies CS1 and 9, area based policies generally, Table 5.7)
Introduction

These submissions have been prepared by Fo x Land and Property on behalf of the Bow Brickhill Consortium. They do not seek to replicate those written submission provided for the Core Strategy Consultation during the period 6th October to 17th November 2010 or the additional consultation submissions\(^1\) although where relevant and important to assist the Inspectors understanding appropriate references will be made.

Matters 2: Development Strategy and Settlement Hierarchy (Policies CS1 and 9, Table 5.7)

2.1 In general, does the Core Strategy provide clear, sound guidance about the roles that will be played by various parts of the Borough in its future development?

2.1.1 Core Strategy Policies CS1 – CS5 do provide a clear guidance on the roles to be played by various parts of the Borough in its future development. However, this policy framework is ‘justified’ solely in the context of the substantially reduced housing provision proposed by this CS of 28,000 dwellings (1,750dpa). Policy MKAV1 of the SE Plan (RS) sets out a significantly higher housing target for Milton Keynes, both on sites within MK and also in Sustainable Urban Extensions in adjacent local authority areas (3rd paragraph of CS1) The situation regarding proposals adjoining the City, as set out in this paragraph, is however at odds with the current position with the neighbouring authorities. The current perceived intention of Aylesbury Vale or Central Bedfordshire is not to allocate 5,390 & 5,600 homes respectively adjacent to the Borough Boundary.

2.1.2 MKC themselves in June 2010 formally opposed the SW Development Area (Known as Salden Chase). On the 8th September 2010 Aylesbury Vale (at the same meeting in which they requested the withdrawal of their Core Strategy by the SoS) resolved to withdraw the Salden Chase Masterplan & Delivery Supplementary Planning Document (2010) on receipt of the direction from the Secretary of State on their CS. At present, AVDC are proposing to embark on a new Vale of Aylesbury Plan, indicating a housing supply of around 16,300 dwellings (including 7,300 already in the delivery pipeline), substantially below the 26,890 dwellings proposed in the South East plan, and no contiguous extension to the south west of Milton Keynes.

\(^1\) MKC Post Submission Response Alternative Sites July 2011
MKC Post Submission Response Employment Technical Paper July 2011
MKC Post Submission Response Housing Technical Paper July 2011
MKC Post Submission Response Strategic Land Allocation November 2011
2.1.3 A recent enquiry to planning officers confirmed that neither Milton Keynes Council, Central Bedfordshire Council nor Aylesbury Vale Council are currently proposing any cross boundary development proposals which means that in their opinion there is no need for any such joint working/cross boundary planning arrangements instigated.

2.1.4 Against this likely backdrop of ‘lost’ housing numbers in the neighbouring authorities, the question that it raises turns on whether MKC has adopted an unsound approach in severely reducing its own housing supply from the 41,360 homes required by the RS and indeed whether the housing supply within the Borough should in fact be increased further to deliver the extant requirement which was to be provided in Aylesbury Vale and Central Beds.

2.1.5 Should the Housing Supply be increased to the RS requirement of AT LEAST the 41,360 homes (which we believe is the fundamental issue in finding this plan sound) there is then insufficient clarity of guidance within CS 1 and CS 2 as to where strategic allocations are to be identified. It is unsound to leave the decision making process to a matter of future DPD Allocations as suggested in the CS given the scale of additional housing land that would now be needed, and concerns in respect of the reliability of delivery assumptions from the existing allocations and committed supply. A substantial quantum of the current housing supply to 2026 is reliant on very large allocations and if these are not delivered as envisaged owing to the greater length of time needed to bring forward infrastructure and/or over optimistic assumptions on delivery rates (as is the case with the CMK apartment schemes and the Western Expansion Area), then clear guidance is necessary in the Core Strategy regarding the scale and location of further strategic land allocations, and any consequent adjustments to the geographical definition of the rural areas.

2.1.6 As can be seen from our submitted Masterplan document the land to the South of the City at Bow Brickhill is an example of both a deliverable alternative to the Council’s current preferred Strategic Land Allocation (SLA) or an additional supply capable of delivering up to 2,500 dwellings (taken in further surrounding land within the MKSA8 tested area). This site has already formed part of the Core Strategy Consultation process and is available and deliverable as a sustainable urban extension, contiguous with the southern edge of the urban area (NB. although contiguous with the city boundary, site MKSA8 falls within the administrative rural parish boundaries of Bow Brickhill, Woburn Sands and Wavendon), a location where

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2 Email correspondence 30th April 2012
3 Policy CS1 & Paragraph 5.3
4 Appendix 1: Bow Brickhill Masterplan Document
there are few competing development sites that would materially impact upon housing delivery rates. In responding to Matter 6, FLP will set out how the Council’s assessment of this site\(^5\) is flawed and how Bow Brickhill can deliver much needed housing growth, transport improvements and wider sustainability benefits to the local communities.

2.2 **Is the settlement hierarchy and broad scale and direction of growth as set out in Policy CS1 properly justified?**

2.2.1 There would be conflict with the directions of growth and the settlement hierarchy should CS overall housing numbers be significantly increased to make the plan sound as described above. There would need to be specificity in terms of identifying additional directions of growth that can deliver additional housing within the plan period.

2.2.2 FLP’s concern is that without identifying broad scale directions of growth MKC will apply the same unsound practice of carrying forward local plan allocation pre-2006 which may now not be the most appropriate, deliverable or suitable locations as has been pursued with the original Strategic Reserve Allocations (now SLA). An attempt has been made to justify their inclusion by a retrospective Sustainability Appraisal\(^6\) (SA). Our previously submitted representations clearly disagreed that this study demonstrated that the SRA could be regarded as the most favorable option. Subsequently in September 2011 a further attempt was made to legitimise the sustainability credentials of the SRAs by boundary changes and advancing the golf course as a means of ‘linking’ these physically separate areas. This approach still does not address the major issues which will be highlighted in our Matter 6 response.

2.3 **Is there a sound policy framework for the Rural Areas of the Borough?**

2.3.1 FLP have no comment in respect of the policy framework for the rural areas of the Borough other than to indicate that should the Inspector be minded to recommend their sustainable contiguous urban extension proposal at Bow Brickhill, then the Key Diagram- Figure 5.2 and Table 5.7- Overarching Development Strategy, would need amending to reflect the situation that the Bow Brickhill site (MKSA8) does not form part of the rural area housing provision. This should not however prejudice any independent small scale housing provision for the existing rural settlements in this area being considered within the stated rural housing provision.

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\(^5\) Sustainability Appraisal of Reasonable Alternative Sites Jan 11

\(^6\) Sustainability Appraisal of Reasonable Alternative Sites Jan 11
2.4 **In terms of their guidance and specificity, is the balance between the area-based policies and Table 5.7 appropriate?**

2.4.1 MKC have recognised their reliance on the major allocations to deliver the CS housing provision. Indeed Broughton Gate has accounted for over a quarter of the total completions for Milton Keynes over the last three years\(^7\). There is a danger however, with reference to the figures in Table 5.7 (as shall be discussed in Matter 3), of housing market saturation both in the East and West of the City, and delays due to the servicing requirements of some of the very large remaining allocations, which could further constrain annual housing delivery.

2.4.2 This raises significant doubts in respect of the Council’s assumptions in respect of annual housing completions, certainty of full delivery from committed development sites within the plan period, and concerns that there is insufficient flexibility of fallback sites if those with extant consents do not deliver as envisaged.

2.4.3 Some of the individual large site delivery assumptions contained within Table 5.7 are very optimistic, even in healthier market conditions. For example the Western Expansion Area (WEA) sites are a major contributor to the housing supply potentially providing 6,550 Homes\(^8\) (6,320 dwellings by 2026). From a recent inspection of the sites there is no evidence of any primary infrastructure being implemented which is required far in advance of the first home, although Outline Planning Permission was granted in 2007. This issue of overreliance on large allocations to the East as well as to the West of the City will be dealt with in Matter 3.

2.4.4 There is a further issue in Central Milton Keynes, with a substantial commitment of high-density apartments proposed (around 5,000 set out in table 5.7). A substantial number of these central schemes were consented (in outline) between 2004-2006 before the recession and the major crash in demand for apartment schemes. In the last five years, only 100 units of the committed apartment schemes recorded in the Assessment of Five Year Land Supply 2012 -2017 have been completed. Thus Milton Keynes would now appear to have a top heavy supply of apartments (around 26% of total supply) that does not reflect current demands for this product type, and has consequent adverse affects on the delivery of overall housing numbers. The MKC five year supply forecasts that 1,147 apartments (nearly 230 apartments per annum) will be completed over the period to 2017, an assumption that FLP consider to be grossly

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\(^7\) Updated Housing Technical Paper (MK doc B126a) Paragraph 3.34
\(^8\) Milton Keynes Housing_Statistics_1991-2012_-_Q3 Jan12
unrealistic. This element of housing supply will be further questioned in responses to Matter 3.

2.4.5 With the current housing supply imbalances across the City as referred to in the preceding paragraphs, there are soundness issues in seeking to redress these shortfall supply problems elsewhere in the Borough due to the specificity of the CS as clearly there is an intended ceiling on

- The Rural numbers at 2,400 dwellings
- The SLA expressed as a Maximum of 2,500 dwellings; and
- The large Expansion Areas with planning consents that are unlikely to be able to deliver more (and arguably far less) housing in the plan period.

2.4.6 There is therefore no evident alternative or fallback supply source to make up any shortfall on the proposed CS housing provision, even before any consideration of restoring the previously supported RS targets and the latest SHMA figures which clearly confirm the upward trend. The Council maintain that they currently have a five year supply housing supply, yet this is compared against their CS target of 1,750 dwellings per annum as opposed to the 2,068 dpa (or 2,618 including the Borough’s previous supply situated in Aylesbury Vale and Central Beds) set out in the RS, which still currently forms part of the Development Plan. The figures available to the Inspector at the Newton Leys Appeal in neighbouring Aylesbury Vale District led him to conclude

“In this regard Milton Keynes housing figure show that it has a modest shortfall in the 5 year supply when assessed against SEP targets”

2.4.7 As such to set the land supply so tight around one of the nation’s most dynamic growth areas seems at odds, even with their own forward in paragraph a) ‘Further growth is essential to maintain and increase the economic prosperity of the Borough, to the benefit of everyone who lives here. Milton Keynes remains 'open for business’ 'There is a real need to identify more sites now to ensure their own vision is met.

Matter 2: Appendix

1. Bow Brickhill Masterplan document

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Matter 2 – Strategy & Hierarchy (CS1 & 9, Table 5.7)