MILTON KEYNES CORE STRATEGY

MATTER 2 DEVELOPMENT STRATEGY,
SETTLEMENT HIERARCHY

REPRESENTATIONS ON BEHALF OF
PERSIMMON SPECIAL PROJECTS

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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?*

1.1 Persimmon Homes have in principle supported the settlement strategy, but the Core Strategy does not provide a sound evidence base to support the settlement strategy, in terms of delivering the levels of growth which should be provided to support the vision and in terms of developing Milton Keynes as a major 21st century city, one of the UK’s twenty biggest cities.

1.2 Milton Keynes needs to grow to fulfil its sub-regional role, requiring not only the identification of new housing development areas, but also the need to grow its role in terms of social and infrastructure facilities.

1.3 Persimmon Homes consider that the requirement for an increased scale of development is corroborated by the 2009 SHMA. Whilst it is correct to acknowledge the effect of recent market conditions, it is important to recognise that these will not persist over the plan period or indeed for the length of time that the text indicates i.e. 2014/15. There is a concern that basing the strategy on past rates of housing provision during an economic downturn may artificially depress the overall scale of housing provision. It is the nature of housing land supply that it cannot simply be turned on and off, but that a pipeline of suitable and available land must be identified so as to meet the identified requirements. Indeed the NPPF states that the Government is committed to securing economic growth (paragraph 18); significant weight should be placed on the need to support economic growth through the planning system. Local planning authorities should significantly boost the supply of housing and ensure that their Local Plans meets the full, objectively assessed needs for the market area.

1.4 It is important that if the growing need for housing in the Borough is to be satisfied then the scale of the committed land supply should be substantially increased.
2.2 Is the settlement hierarchy and broad scale and direction of growth as set out in Policy CS 1 properly justified?

1.1 Persimmon Homes have made representations that whist supporting in principle that the majority of new homes provided will be focussed on, and adjacent to, the existing urban area of Milton Keynes, the Core Strategy is subsequently unsound in that this approach only proposes to allocate and deliver one additional expansion area, the Strategic Reserve Areas to the south east of the city (as allocated in the 2005 Local Plan). The Strategic Reserve Areas are now referred as Strategic Allocations this was Minor Change 22 (July 2011).

1.2 The Core Strategy relies on completion of development on existing Local Plan sites and land with planning permission comprising 24,000 homes i.e. 85%, these sites have failed to deliver sufficient rates of housing, whilst this is not unique to Milton Keynes, it is considered to be of greater significant given that the vision is:

“...to enable Milton Keynes to become one of the country’s top ten cities, whether measured by job creation, architectural design, lifestyle, or personal aspiration and well being.”

1.3 The objectives in Table 2.1 support the vision.

1.4 Persimmon Homes objected to the Sustainability Appraisal of Reasonable Alternative Sites on the basis that it only considered sites with a capacity of 2,500 dwellings, rather than examining all sites in the SHLAA. The Council have dismissed this as an alternative, as they consider that there are insufficient smaller sites which are deliverable and this would have implications in terms of infrastructure provision. Persimmon Homes objected to the methodology used. Land at Shenley Dens MKSA1) was considered along with another site which also related to the Western Expansion Area, whereas other sites have been considered separately. Land at Shenley Dens is a suitable site; it does not have any of the disadvantages of crossing the ridge and relates well to the existing urban area of Milton Keynes.

1.5 This repeats the approach, and mistake previously made by M.K.B.C. When the current Local Plan was prepared land north of Milton Keynes at Stantonbury was not allocated for development. The site was, nevertheless promoted as an omissions scheme and the supporting arguments concerned, inter alia, flexibility and choice and
were accepted by the Local Plan Inspector who recommended its allocation. The Council duly accepted the allocation and development is now nearing completion. By contrast the Western Expansion area remains substantially delayed. Smaller sites can contribute to the housing needs and provide greater choice and assist in housing delivery, especially a more flexible approach to meeting housing needs which given the underperformance on the larger sites is entirely appropriate.

1.6 By focussing development at the Strategic Reserve Sites to meet the allocation of 2,500 dwellings, the land supply is going to be heavily concentrated in a few large sites which have long lead in times on infrastructure.

1.7 It is unsound to place reliance on the Strategic Reserve Areas when the SDA have failed to deliver. The Core Strategy needs to ensure flexibility of other sources of housing supply.

1.8 Additional smaller expansion areas of between 500 – 1000 dwellings should be allocated adjacent to Milton Keynes City. This will allow a more flexible approach and assist in delivery rates.

1.9 Policy CS1 does not fully reflect the Council's Vision that the City should grow to a sub-regional city and be amongst the UK’s twenty biggest cities, able to attract 1.5 jobs to every new home, (based on the 2007 MK Employment Land Study). The reduction in new jobs as a result of a lower housing target has not been adequately assessed.
2.3 *Is there a sound policy framework for the rural areas of the borough?*

1.1 Persimmon Homes have no comments on this question.
2.4  *In terms of their guidance and specificity, is the balance between the area-based policies and Table 5.7 appropriate?*

1.1  Persimmon Homes have made representations that the identification of Stantonbury Park within the Revised Core Strategy and objected to the reduction from 600 dwellings a previously supported within the Pre-submission Version (February 2010) to 530 dwellings in the Revised Proposed Submission Core Strategy.

1.2  Taking into account the detailed design work which has informed the submission and approval of reserve matters on earlier phases, 600 dwellings should now be regarded as appropriate capacity for the site. Development at Stantonbury is well underway.

1.3  Table 5.7 should be amended to reflect the capacity of the site is 600 dwellings.