Examination Matter 2: Development Strategy and Settlement Hierarchy

Issues: 2.1 – 2.4
Milton Keynes Core Strategy Examination
RPS Planning & Development on behalf of Old Road Securities

MATTER 2: Development Strategy and Settlement Hierarchy

1. RPS Planning & Development (RPS) is retained by Old Road Securities (ORS) to present evidence on several Examination Matters in relation to their specific land interests at Newport Pagnell concerning residential development proposals on the Strategic Reserve site at Tickford Fields Farm to the east of the settlement. The focus of ORS' concerns in relation to the Core Strategy is within the context of Policies CS1, CS2, CS5 and CS9 and the proposed vision for the rural area in particular.

2. ORS has sought allocation of the Newport Pagnell Strategic Reserve to accommodate rural housing growth through the Core Strategy or at very least recognition of the saved Local Plan policy through the text of the document. ORS is prepared to work with the Council as part owner in delivering the Strategic Reserve site and has sought collaboration on initial technical investigations so that a development brief for the site can be prepared. The confidence in promoting this Strategic Reserve site is borne about from its previous assessment through the Local Plan Inquiry and the conclusions of the Plan Inspector who considered that the reserve land would be a reasonable expansion area for the town in the longer term as the site could be developed in a way that would relate in an acceptable way to the existing urban area:

“Further, Newport Pagnell and Milton Keynes are geographically closely related and there are opportunities for extending public transport facilities in association with development on the land. For these reasons I consider that housing on the reserve land could reasonably be regarded as sustainable in the context of some growth in the rural area after 2011.”

[Milton Keynes Local Plan – Inspector’s Interim (Part1) Report. Section 1 para 19.5]

3. The Sub-regional context for Milton Keynes recognises the city’s growth potential and paragraph 23.9 of the RSS that housing growth will be delivered through the expansion areas identified in the Local Plan with specific mention to the ‘other areas’ as accommodating growth. The MKCS does not provide an adequate
strategy for the accommodation of this rural growth and therefore is not compliant with the themes of the RSS.

4. Specifically paragraph 23.10 advises that strategic growth sites directly east of the M1 should only be considered in the longer term on review of the local development plan. These references are not considered to relate to the Strategic Reserve Site at Tickford Fields, rather the areas of the assessed sites MKSA2 and MKSA3 for which the Sustainability Appraisal demonstrates their unsuitability at this stage of housing delivery.

5. The Core Strategy does not provide sufficiently for the rural areas in relation to housing provision, with overreliance on windfall and infill developments that can no longer be taken into account if they are on garden land [NPPF paragraph 48]. However ensuring the delivery of a realistic affordable housing supply and infrastructure delivery specific to the rural area is critical to achieving a soundly based spatial strategy.

6. Given that the scale of development identified for the rural area is in excess of 2,000 homes it should not be referred to as ‘limited development’ [Spatial Vision point 14] when taking into account the characteristics of the rural area. Such a level of provision will necessitate the revision of settlement boundaries as it cannot be delivered within existing villages and requires guidance through the Core Strategy.

7. In terms of aiding the delivery of a rural site the Council has had the option of promoting the Tickford Fields Strategic Reserve site (SR) at Newport Pagnell, of which it owns roughly half. Securing delivery of the Tickford Fields SR through recognition of its contribution to rural housing delivery would be in accordance with the South East Plan (RSS) Policy CC9 that applies to the use of public land. This regional policy encourages Councils to engage with developers in relation to their land assets and use such linkages to secure positive development scenarios in relation to housing and infrastructure delivery. However despite RPS and Old Road Securities’ efforts Milton Keynes Council have resisted
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attempts to provide a Comprehensive approach to delivery of the Tickford Fields SR accordingly its allocation through the MKCS. The site's recognition through MKCS policy would provide a greater level of certainty in rural housing provision as well as aiding its delivery and contributing toward affordable housing needs. The MKCS' lack of recognition of the Tickford Fields SR's potential is therefore considered not to be in conformity with Policy CC9 of the South East Plan.

8. This factor is especially relevant when considering the ‘Planning for Growth’ statement by the Minister for Decentralization Mr. Greg Clark and the related requirement for flexibility in the approaches of plan documents. This statement introduced a commitment for the strong presumption in favour of sustainable development, alongside the Government's expectation that development and growth should wherever possible be supported. Accordingly the Council’s failure to recognise the significance of the Tickford Fields SR and the contribution therefore that its land interest could have in delivering rural affordable housing and infrastructure, is considered to conflict with the Minister’s statement.

9. The Core strategy should plan for rural growth by recognising the sustainability of Newport Pagnell and the delivery of a settlement expansion through the Strategic Reserve Area at Tickford Fields. The extent or at very least location of the Tickford Fields Strategic Reserve should be recognised as a growth location through the Core Strategy

Policy CS1

10. The Development Strategy outlined by Policy CS1 identifies where growth will take place through the settlement hierarchy in Table 5.1, which seeks to concentrate development in the most sustainable locations. RPS supports the graphical presentation of the table which identifies Newport Pagnell as the most significant Key Settlement through allocation of half of the row. However, this is not to say that Sherington in the row below should have equal importance or preference to Newport Pagnell given that it is in a different settlement classification and far less sustainable location for accommodating growth.
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11. In terms of the text of Policy CS1 this should provide greater clarification of the direction of rural development, specifically that Newport Pagnell should have precedence over the other key settlements. RPS suggests that under the first bullet point (i) the text should read “Development will be concentrated in the Key Settlement of Newport Pagnell and to a lesser extent in Olney and Woburn Sands...” taking into account the existence of the Strategic Reserve Allocation (SRA) at Newport Pagnell and the fact that the other SRs around Woburn Sands are to be identified for development to accommodate Milton Keynes' urban housing and not for rural growth needs. In addition bullet point (ii) should be revised to refer to a ‘very’ limited amount of housing at Sherington to reflect the level of local need and localism references elsewhere in the MKCS.

12. To reinforce the importance of Newport Pagnell and to acknowledge the saved policy status of the Tickford Fields Farm SRA, a reference to the site should be included in the text of Policy MKCS1 in a similar way that the SRs surrounding Woburn Sands are referenced in relation to urban housing delivery. Confirmation of the site’s consideration through the forthcoming Site Allocation DPD can then also be referenced. To reinforce the significance of the settlement to the rural housing delivery, a footnote should be added to Newport Pagnell in the settlement table recording that Local plan Policy EA4A is saved in respect of the delivery of the Tickford Field SRA through the Site Allocation DPD.

13. Such surety in the delivery of the Tickford Fields Farm SR at Newport Pagnell is required given that it will accommodate about a third of the required rural housing supply. As such direct reference to the site through the MKCS is required to ensure that delivery of the site is not delayed. Without such certainty the ability to provide adequate levels of rural housing, affordable homes and local infrastructure is severely constrained. This is especially relevant given the constraints to alternative rural locations, such as the landscape setting limitations around Woburn Sands and limited growth opportunities at Olney.

14. The lack of strategic guidance for the rural area is startling given the scale of development afforded to the rural area, currently 1,760 with remaining
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requirement of 1,236 dwellings up to 2026, which should be increased to take into account the required rate of provision of 120 dwellings a year, the additional two years for the plan to 2028 and the minimum 5% buffer suggested by the NPPF. Given that the vast majority of windfall development in previous years has occurred within the rural area (in the absence of many delivered allocations), development opportunities within existing settlements are limited as recognised by the Council’s SHLAA. Therefore expansion of settlement boundaries is a requisite that although will be delivered through any Site Allocation DPD, requires greater certainty in relation to housing distribution in order to facilitate the provision of rural affordable housing and infrastructure requirements.

15. The MKCS identifies a level of housing for the rural area that equates to 110 dwellings a year. However, this level of rural growth is not in accordance with Regional Strategy Policy MKAV1 that requires delivery of 2,400 dwellings within the rural area at a rate of 120 dwellings a year, which is defined in paragraph 23.9 as meeting only local needs. An annual scale of development of 120 dwellings within the rural area is demonstrated to be appropriate as it reflects past delivery rates by paragraph 9.1 of the MKCS, which documents that 120 dwellings a year have been delivered over the past 10 years. Therefore the housing level for the rest of the borough should be increased by a minimum of 160 dwellings to reflect the required 120 dwelling annual supply. No justification is given for this reduction in rural housing provision despite recognition that such development only meets local needs and is the only way of delivering rural affordable housing. Failure to provide the required level of rural housing is a non conformity with Regional Strategy Policy MKAV1 and conflicts directly with the new national guidance of the NPPF which seeks for Local Plans to provide for growth.

Housing Supply

16. The housing technical papers seek to justify the overall reduction in the level of housing supply at paragraph 2.1 in respect of the level of housing need in Milton Keynes City, current rates of house building, the land supply position,
relationship to economic growth, the sub-regional house market and the
continuity of plan making so that updates to the development plan could take
account of any growth surges in the future. None of these factors however are
applicable to the rest of the borough given the sustained rate of house building
over the last ten years and the need for any development plan to actively plan to
meet rural infrastructure requirements and provide suitable levels of affordable
housing.

17. Moreover, RPS would advance that the overall housing supply figure provided
through Policy CS1 does not represent a true 15 year housing supply horizon as
sought by the NPPF, taking into account the delays that are likely to be caused
by the MKCS adoption procedures. These delays will necessitate the plan period
to be extended by two years to 2028. Such an extension of the plan period to
ensure an adequate housing supply has been recognised recently by other local
planning authorities, such as South Staffordshire Council who have extended
their plan period by two years to 2028. Taking this practicality into account the
housing supply figure should be increased accordingly by two years 31,500
homes and consequently the rural area to 2,160 to account for the extra year and
the requirement to provide 120 dwellings a year.

18. The Housing Supply figure does not provide any accountability to non-
implementation of consents and therefore is not sufficiently flexible. Evidence for
this is that several rural allocations have not been delivered. As advised by the
NPPF, an allowance of at least 5% should be factored in to the identified housing
supply to take account of non-implementation especially taking into account the
market delivery difficulties, equating to an additional 1,575 dwellings.

19. As a result of this recalculation the MKCS should be amended to refer to a need
to provide for 2,160 dwellings in the rural area up to 2028 plus a 5% buffer of 108
homes. Such a level of provision is not unattainable when taking into account
the Strategic Reserve Site at Tickford Field, Newport Pagnell, which has the
capacity to accommodate 600 dwellings. The recognition of this strategic
allocation through the text of the MKCS would ensure that a sustainable strategy
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is promoted for the rest of the borough and ensure some certainty in the site’s delivery rather than the reference to the site being restricted to the current Appendix footnote on page 129 of the MKCS and the saved local plan policy EA4A.

Alternative Sites

20. The MKCS’ consideration of alternatives has not sufficiently considered all of the previous Strategic Reserve sites as previously allocated through the Local Plan. No analysis of need/delivery or site assessment has been made of the SRA at Newport Pagnell and no explanation given of why the growth of the town is not appropriate for consideration through the MKCS as has been done with urban extensions to the MUA, especially when taking into account the extent of housing supply required within the rest of the district. Therefore the consideration of alternatives has been flawed and the Local Planning Authority has not considered all suitable site options. Indeed the size of theTickford Fields SRA is comparable to others that have been included and therefore of a scale sufficient to be considered through the Core Strategy policy and not left to be resolved through the Site Allocation DPD.

21. Indeed RPS expected that the Tickford Fields SRA site would be scrutinized alongside the other SRs, as recorded in a report to the LDF Advisory Group on 26 August 2010:

“The Strategic Reserve Areas are effectively the first areas of search for new development after 2011. However, they are not allocated for development in the Local Plan. Policy EA4A states ‘they will only be considered for additional housing, employment or other development in a review of or alteration to this Plan’. Before the Strategic Reserve Areas can be advanced by way of development briefs they need to be allocated and this could be done through the Core Strategy. However, each Strategic Reserve Area is considerably smaller than the South East Strategic Development Area (SDA) as a whole and so should therefore be assessed against other similar sized sites around the edge of the urban area, to check that they remain the most sustainable locations for growth. This will introduce a new element into the Core Strategy given the fact these sites are smaller than the SDA. Effectively it is moving into the scale of development anticipated for the Site Allocations Development Plan Document. Therefore a decision about whether the Strategic Reserve
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Areas are allocated in this document or the Core Strategy will be required. There is another Strategic Reserve Area at Tickford Fields, Newport Pagnell which should be included in this process.

It is important to decide whether the Strategic Reserve Areas should be developed in isolation or in combination. The question about whether these sites should be future proofed (to allow for more development in the surrounding area at some time in the future) should also be addressed.”

[Response to ‘motion’ presented to Core Strategy item, LDF Advisory Group on 26 August 2010] (RPS Emphasis.)

22. The Council’s approach to development on its own land is delaying associated land from being developed and has demoted consideration of the Tickford Fields SRA. Failure to fully assess this site through the alternative sites paper and to actively promote the site through the strategy as a long term solution for delivering rural affordable housing and infrastructure needs is contrary to the South East Plan Policy CC9 and government aspirations contained in the Planning for Growth statement. Recognition of the Tickford Fields SRA site should be incorporated to resolve this alongside appraisal of its suitability in regard to accommodating rural housing growth.

Newport Pagnell

23. Newport Pagnell’s role and contribution to the rest of the rural area should be appropriately identified through the MKCS including reference to its suitability for expansion above the other Level Two settlements. Currently development at Woburn Sands is effectively only infill plots yet there are disproportionately more references to it in the MKCS text. RPS instead seeks a revised rural approach to allocate more land within the rural area through the Site Allocation DPD and that, due to the required scale of rural housing and the need for dwellings; the MKCS should seek to identify a SR at Newport Pagnell as part of the spatial strategy.

24. Text recognising the Tickford Fields SR as a viable option to accommodate rural growth and infrastructure to be allocated through the Site Allocation DPD would be a significant measure to ensure delivery of the necessary rural growth strategy. As the Council has confirmed that the Tickford Fields SR is to be
considered for allocation through the Site Allocation DPD, providing certainty through reference in the MKCS will ensure that a strategic approach for rural housing is provided and will be deliverable over the plan period.

**Policy CS9**

25. RPS takes issue with the description of rural development as ‘limited’ despite it equating to 1,200 dwellings to be accommodated within the plan period. This must be considered to be a significant amount which requires a clearer approach to its delivery through specific and an increased level of allocations, instead of an over reliance on windfall site delivery within the rural area. The resulting strategy for the rural areas is misleading, ineffective and avoids making the required recommendation for settlement expansion as a resource for meeting community infrastructure and affordable housing needs.

26. Furthermore, RPS raises objection to MKCS9 in respect of its reference to 110 dwellings to be delivered within the rural area on an annual basis when past trends and delivery patterns indicate that it should be at least 120dw. Instead the reference to ‘an average of 110’ should be revised to ‘at least 120’ whereby both housing land allocations and windfall sites provide a robust delivery strategy for the rural area and ensure housing provision in the most sustainable locations as required by the NPPF.

27. The development strategy proposed through the MKCS and for the rural area set out in Policy MKCS9 is not considered to be in accordance with the NPPF or able to provide a deliverable and appropriate level of housing within the rural area. An illustration of this is inclusion of “lesser extent” in regards to development within other rural settlements when rural housing delivery appears to be most reliant upon windfall sites that cannot be planned for or attributed to individual settlements.