Examination Matter 3: Overall Housing Provision

Issues: 3.1 – 3.5
Milton Keynes Core Strategy Examination  
RPS Planning & Development on behalf of Old Road Securities  

MATTER 3: Overall Housing Provision

Introduction and Background

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 (SR5) at Tickford Fields Farm to the east of the settlement. ORS controls the northern part of the Strategic Reserve site with Milton Keynes Council owning the southern part. ORS was instrumental in securing the land's status through participation in the Milton Keynes Local Plan process. Plan RPS 1 identifies the location of this land for the avoidance of doubt.

2. The focus of ORS' concerns in relation to the Core Strategy (MKCS) is within the context of Policies CS1, CS2, CS5 and CS9 and the adequacy of the proposed vision for the rural area in particular.

3. ORS has sought:
   - allocation or identification as a strategic location for growth of the Newport Pagnell Strategic Reserve to accommodate rural housing growth through the Core Strategy; or
   - at the very least, recognition of the saved Local Plan policy EA4A (4) through the text of the document.

4. 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 (after March 2011) as the site
Milton Keynes Core Strategy Examination  
RPS Planning & Development on behalf of Old Road Securities

could be developed in a way that would relate acceptably 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]

Matter 3 – Overall Housing Provision – Rural Area

5. The Core strategy does not provide sufficiently for the rural areas in relation to housing provision, with overreliance on windfall and in fill developments that is considered to be contrary to the thrust of the NPPF. Ensuring the delivery of a realistic affordable housing supply and infrastructure delivery specific to the rural population is critical to achieving a viable spatial strategy, of which the Core Strategy is currently devoid.

6. The lack of strategic guidance for the rural area is startling given the scale of development currently afforded to the rural area, currently 1,760 with remaining requirement of 1,236 dwellings up to 2026. Given that the vast majority of windfall development in previous years has occurred within the rural area, development opportunities within existing settlements are now slim as recognised by the Council’s SHLAA. Furthermore the majority of past windfall sites are identified as involving development on gardens and existing residential areas which the NPPF specifically advises are no longer considered to be suitable for windfall sites. As a result, the expansion of rural settlement boundaries, such as at Newport, should be included within the MKCS as a requisite. Such expansion could still be delivered through any Site Allocation DPD, to ensure greater certainty in relation to housing distribution in order to facilitate the provision of rural affordable housing and infrastructure requirements.

7. 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
Milton Keynes Core Strategy Examination
RPS Planning & Development on behalf of Old Road Securities

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 planning period 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 national guidance of the NPPF.

Housing Supply

8. The housing technical paper seeks to justify the overall reduction in the level of housing supply at paragraph 2.1. The paper’s reasoning is based upon the level of housing need in Milton Keynes, 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 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.

9. Moreover, RPS would advance that the overall housing supply figure provided through Policy CS1 does not represent a true 15 year housing supply as required the NPPF, taking into account the delays that are likely to be caused by the CS adoption procedures. These delays will necessitate the plan period to be extended to 2028, assuming the plan is adopted by March 2013. 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 to 2028. Taking this practicality into account the housing supply figure should be increased accordingly by two years to 31,500 homes and consequently the rural area to 2,160 homes to account for the extra years and the requirement to provide 120 dwellings a year.

10. The Housing Supply figure does not provide any accountability to non-implementation of consents and therefore is not sufficiently flexible. Demonstration of this is the rural allocations that have not come forward yet and the preference to other windfall development such as infill sites. As advised by the NPPF an allowance of at least 5% should be factored in to ensure delivery and to take account of non-implementation especially taking into account the market delivery difficulties. This would equate to an additional 108 dwellings in the rural area alone.

11. As a result of this recalculation the MKCS should be amended to refer to a need to deliver a further 1,636 dwellings in the rural area up to 2028, assuming the plan is adopted by March 2013. 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 Reserve allocation through the MKCS would ensure that a sustainable strategy 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.

12. 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 SRA at Newport Pagnell and
the fact that the other SRs around Woburn Sands are to be identified for development to accommodate 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 RCS.

**Affordable Housing**

13. Crucially, the NPPF advises that Local Plans should allocate sites to promote development and the flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and providing for a quantum of development where appropriate. As such the MKCS should be expected to identify an overall vision for how the whole area and the places within it should develop. Paragraph 50 of the NPPF specifically requires Local Plans to actively plan to provide a mix of homes whilst responding to specific area needs, an example of this is the need for rural affordable housing which will not be satisfied through the MKCS’ current over reliance upon housing delivery through windfall sites.

14. However, the vast majority of windfall sites developed within the rural area of Milton Keynes involves the redevelopment of existing residential plots and their gardens and are below 11 dwellings in size. Accordingly, such sites do not deliver affordable housing as the current Local plan policy and Affordable Housing SPD requires an affordable housing contribution on developments of between 15 – 25 dwellings within the rural area, dependent upon settlement size. Taking into account past trends of small scale site development and the lack of available brownfield sites within the rural area, the reliance on windfall sites for rural housing delivery and the failure to allocates a strategic development site within the rural area, means that the MKCS will not succeed in providing rural affordable housing or housing to meet specific needs within the rest of the borough.
15. The current strategy provides insufficient analysis of the rural area and its constituent parts, whilst the key issues and challenges that face the rural area are not appropriately considered through the proposed strategy or a specific Vision for the Rural Area. The most up to date evidence for the Rural Area is understood to be the Core Strategy Preferred Options: Rural Area Spatial Options Technical Background Paper in June 2007.

16. RPS considers the lack of detail within the MKCS’s Vision for the Rural Area, including for places within it, is a weakness in the Plan that goes to question its soundness. The published guidance of the NPPF reinforces this concern by advising that Local Plan policy should take account of different geographic areas and in rural areas actively plan to meet local housing needs. RPS’ concern about the lack of rural strategy has been consistently presented through the consultation stages of the Plan on behalf of ORS.

17. The Introduction of the MKCS identifies in paragraph 1.8 that the Plan seeks to set out a rationale for identifying new sites in the rural area. However, this foundation for establishing rural sites is not apparent in the document, apart from the identification of a rural housing delivery target and little reference is made to the geographic location or scale of such sites.

18. RPS contends that ensuring the delivery of a realistic affordable housing supply and infrastructure delivery specific to the rural population, it is critical to provide a viable spatial strategy for the Rural Area. This cannot best be delivered through piece-meal dispersed development and an apparent willingness to rely on a high yield of windfall development. A stronger commitment to formal allocation of land is sought by ORS and the starting point for this should be the identification of the existing SR5 site for planned delivery of growth to address the immediate shortfall in supply as well as delivering required new homes across a significant part of the plan period. As stated above, this will be consistent with national and sub-regional policy.