Milton Keynes Core Strategy - Response to Inspector’s main matters and questions on behalf of O&H Properties Ltd

6.1 Strategic land allocation

Our client supports the allocation of Strategic Reserve Areas (SRAs), but is concerned that the proposed 2,500 housing cap, may unnecessarily restrict development. The plan acknowledges the need to comprehensively plan the SRAs and it is believed that this process should logically inform the appropriate quantum of development that can occur. Furthermore, the council’s approach fails to consider the future development that will inevitably be required, particularly to the south east of Milton Keynes.

We believe that the Core Strategy should have provided an opportunity for the council to fully consider the short, medium and long-term requirements for growth and set out how this should be achieved. The current approach is therefore believed to be short-sighted and represent a missed opportunity.

We have previously commented on the overall housing strategy and the council’s housing target, which we consider is unjustified and too low to meet the clear need. We believe that the impact of this issue is to undermine the other elements of the housing strategy including the strategic land allocation. On this basis, while we believe that the council needs to fundamentally review their housing strategy, if the Inspector is content with this aspect of the plan, then we would ask her to at least question, what we consider to be an artificial cap on the strategic land allocation.

In this way we consider that the plan would be more consistent with the overarching objective of the NPPF to ‘boost significantly the supply of housing’.

6.2 Reasonable alternatives assessment stage

The council produced an addendum to their Sustainability Assessment (SSA) and a Strategic Site Selection (SSS) report in September 2011 to consider alternative options for delivering the required housing over the plan period. This evidence was produced on the premise of a fixed housing target (2,500 dwellings), despite the clear conflict with the housing policies in the South East Plan and the questionable evidence base.

The council’s evidence continues to support the historic assertion that further expansion of the city to the south east performs better in sustainability terms than other directions of growth. Furthermore the council’s own monitoring work suggests that the housing market in the east of the city has remained resilient, despite the economic downturn. Although the council’s own work showed that the site identified as MKSA6 (in which our client has a land interest) performed best in sustainability terms, based on the criteria within the SSA, the council used this work to justify the partial inclusion of MKSA4 (Wavendon Golf Course) at the post submission stage. We fail to understand how this process can be deemed objective, if the council is ignoring the results of their own assessment criteria within the SSA.
In the SSS the council justified the partial inclusion of MDAS4 by stating:

“The solution of choosing most of MKSA4 provides the opportunity to overcome the criticism levelled against the separate Strategic Reserve Sites in the consultation on the Sustainability Appraisal in June and July of 2011.”

We believe that this statement simply confirms that the council has undertaken further work to try and justify a pre-determined view in respect of the location and level of future housing being allocated in the Core Strategy. This approach is clearly at odds, with the NPPF, which states in paragraph 182 that ‘the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’.

6.3 Timing of SLA assessment

As set out in our response to 6.2, we consider that the timing of the SLA assessment (over a year after the Core Strategy was published for consultation) undermines the plan making process that the council has been through in order to prepare the Core Strategy. We suggest that this in itself raises significant questions over the appropriateness of the process and the strategy itself.

Paragraph 158 of the NPPF states that ‘Local planning authorities should ensure that their assessment of and strategies for housing employment and other uses are integrated, and that they take full account of the relevant market and economic signals.’ It is difficult to understand how this can be the case in Milton Keynes, when most of the assessment to support the Core Strategy has taken place after the strategy itself was produced.

6.4 Robustness of SLA

Since the publication of the Revised Submission Core Strategy in October 2010 the council has undertaken a number of pieces of work to justify their housing target and the allocated sites. We continue to question the process and robustness of this work, which appears to have been undertaken retrospectively. Notwithstanding the council’s comments about delivery, it is clear that the housing target of 1,750 homes per annum, will fall significantly short of the identified need in the SHMA of 3,366 homes per annum.

Paragraph 52 of the NPPF acknowledges that housing delivery can be assisted through the allocation of larger sites. It states:

‘The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns...’

It is argued that the council’s decision to omit the South East Strategic Development Area (SESDA) from the Core Strategy will limit housing development over the plan period, rather than assist it, in a time when a shortfall in housing delivery against need is almost inevitable. In this context it is considered that the council’s target is not
justified by the evidence (particularly the SHMA), is contrary to the South East Plan and the approach set out in the NPPF. Overall we consider that the shortcomings of housing strategy and the lack of evidence to support it render the plan unsound.

6.5 Principles of CS 5

Policy CS5 brings forward the strategic reserve areas (SRAs) from the adopted Local Plan. We consider that the simplicity of this approach is short-sighted, as it fails to consider whether a more sustainable holistic solution, would better meet today’s housing need. Although the policy contains a number of appropriate development aspirations for the SRAs themselves, we consider that the policy presents a missed opportunity and therefore does not accord with current government guidance.

Fundamentally it is considered that policy CS5 is unsound, as it relies on a floored evidence base to justify the overall housing target and identified sites. This approach is contrary to plan making guidance set out in the NPPF.

6.6 SLA boundary

As set out in our responses to 6.1 and 6.2 we consider that the council’s own evidence does not support the identified strategic land allocation or the housing target that it is based on. We consider that the council needs to undertake a complete review of their housing strategy to inform CS1 (Milton Keynes Development Strategy) and CS2 (Housing Land Supply). By undertaking this process, they could then produce a clear and justifiable strategy for meeting the required housing over the remaining plan period.

6.7 Non-residential uses in the SLA

Our client has no comments on this issue.