STATEMENT PREPARED BY VAIL WILLIAMS LLP
FOR
SHL HOLDINGS LIMITED (REFERENCE 415008)

WRITTEN RESPONSE TO INSPECTOR’S MAIN
MATTERS AND QUESTIONS IN RELATION TO MAIN
MATTER 2: DEVELOPMENT STRATEGY AND
SETTLEMENT HIERARCHY

MILTON KEYNES BOROUGH COUNCIL CORE
STRATEGY DPD

Ref: DRA/LD/JR038639
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2.0 REPRESENTATIONS

Principle of the Housing Strategy

2.1 SHL Holdings Limited supports the rural/urban area split for the Borough’s Housing requirements, in principle as detailed in Core Strategy Policies CS1 and CS2, which recognises the need for additional housing development in the rural area. It highlights the significant Housing Land Supply Deficit in the rural area (which was minus 1,236 at the time of the draft Core Strategy).

2.2 We consider that a significant shift in the strategy for the provision of housing in rural areas is clearly needed to encourage house building in the rural area, in sustainable locations. This is key to maintaining the vitality and viability of services and facilities in the rural area, including the maintenance and improvement of the rural economy.

2.3 As detailed in our representations submitted in November 2010, SHL Holdings Limited wholly supports the Council’s proposal for the review of village envelope boundaries, especially in those villages with a variety of facilities which makes them more sustainable. The aim of this would be to encompass suitable sites for development to ensure that local housing need can be met, affordable housing can be provided and to give people who live in the rural settlements housing choice.

2.4 Limiting new development in villages to small scale redevelopment (without the review of village envelopes) and infilling overlooks the potential of new development to support and maintain key rural services, an approach supported by the National Planning Policy.
Framework (2012), paragraphs 28 and 55 which supports sustainable development in rural areas.

2.5 The NPPF seeks to promote a prosperous rural economy.

2.6 Paragraph 28 states:

"planning policy should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development".

(Paragraph 28).

2.7 It also goes on to state that local and neighbourhood plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. We consider that the retention of local services will only be secured if there is enough demand for them. This will only come from maintaining the levels of residents including the retention of existing and encouragement of additional residents to the rural area. Clearly this will have to be undertaken in a sustainable way and part of achieving sustainability is to maintain local services to avoid unnecessary long trips to remote town centres.

2.8 Paragraph 47 encourages Councils to use their evidence base to ensure that their local plan meets the full, objectively assessed needs for affordable housing in the housing market area.
2.9 Paragraph 47 also highlighted the need for Councils to illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a 5 year supply of housing land to meet their housing target.

2.10 Paragraph 55 states the following:

"to provide sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support the services in a village nearby". (Paragraph 55).

2.11 Furthermore, Paragraph 70 states that in order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should [inter alia] ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

2.12 It is pleasing to see the objectives set out in Table 4.1 which include that the Council will seek the protection of existing key services and facilities in sustainable rural settlements and to encourage the development of further provision, including shops, education, community and health services and also to facilitate the delivery of housing that meets the needs of all sections of the community through:

- Providing the sufficient developable land for new housing;
- Construction of viable levels of diverse housing including affordable, supported and specialist housing;
• Taking account of the need for houses in multiple occupation.

2.13 These objectives are in line with the views of SHL Holdings Limited. However, SHL Holdings Limited’s objections mainly lie in how this is transposed into policy. It is considered that the points above are not fully addressed in the Core Strategy.

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?

2.14 The Core Strategy development strategy centres on Milton Keynes City (MKC), and is less prescriptive about development in the rural areas, opting to defer to the forthcoming Site Allocations DPD for allocations and a review of the village envelopes to deliver much needed housing for rural settlements.

2.15 The rural area has an important role to play in the Borough economy and it is important to provide for the housing needs of the rural population to avoid the decline of rural settlements. This has been somewhat underplayed or ignored in the Core Strategy such that it is considered that guidance on development in the rural area is largely unclear.

2.16 It is considered that strategic options for the development within the rural area could be outlined in the Core Strategy such as broad areas for growth, guidelines on levels of development in sustainable settlements and more detail on how the Council will seek to address the significant housing deficit in the rural area. The urban area should not be relied upon to make up the shortfall as the housing needs of urban and rural areas are very different.
Is the settlement hierarchy and broad scale and direction of growth as set out in Policy CS1 properly justified?

2.17 Table 5.1 "Settlement Hierarchy" sets out the proposed hierarchy and development levels that should be attributed to the various settlement sizes.

2.18 MKC, being the principal settlement in the Borough, is rightly at the top of the settlement hierarchy. Beneath MKC in the hierarchy are the settlements of Newport Pagnell, Olney and Woburn Sands which is understandable given these are the next largest settlements in the Borough. It is with the selected villages that SHL Holdings Limited has the most objections. I refer to the "Core Strategy Preferred Options: Rural Area Spatial Options Technical Background Paper (June 2007)" which analyses the availability of rural services and facilities in the villages.

2.19 Having analysed the performance of the three Selected Villages (Sherrington, Hanslope and Bow Brickhill) as stated in the above Technical Background paper against Lavendon which is currently included within the lower category "Other Villages" within the hierarchy, it is apparent that Lavendon out-performs Bow Brickhill and is on a par with Hanslope and Sherrington in terms of facilities. It is therefore considered that Lavendon should be included within the Selected Villages either in addition to, or at the expense of Bow Brickhill. It is our opinion that the policy and guidance should be amended to reflect this.
2.20 The villages with the most facilities as detailed in Annex D of this document and that are considered to have good public transport links (Bow Brickhill only has medium public transport links) should be considered above those selected villages with lower scores in this regard.

2.21 Given that Lavendon is clearly a village with good facilities and good public transport links as evidenced above, it would be a suitable location for additional development and therefore could provide a valuable contribution to rural housing numbers. Given the number of SHLAA sites located in and around the villages this could be achieved by a review of the village boundaries in the forthcoming Site Allocations DPD to ensure that sufficient expansion space is provided within the village envelope to allow for further housing growth.

2.22 Again, Annex D of the Rural Area Spatial Options Technical Background Paper sets out that of the six larger rural settlements (Sherrington, Castlethorpe, Lavendon, Hanslope, Woburn Sands, Olney and Newport Pagnell) Lavendon has the second lowest housing completions between 1998 and 2006. Given the facilities within the village and good public transport links and the sites available in the Strategic Housing Land Availability Assessment (SHLAA) the potential for the provision of sustainable housing sites in Lavendon would appear to be significant. We consider that increasing housing supply for the settlement is vital to continue to support the existing facilities.

2.23 Whilst it is appreciated that the Core Strategy makes reference to the settlement hierarchy which is contained in Table 5.1, it is not clear how the selected village tier and the other village tier have been differentiated. Given the case made above for the inclusion of Lavendon within the selected villages tier and also the case put forward for a review of
village envelopes, further work should be undertaken by the Council to provide details on the methodology behind the settlement hierarchy and the inclusion of the villages within the tiers.

2.24 Although the Core Strategy is not site specific, an analysis of the SHLAA illustrates that there are a number of sites around Lavendon, including that which my client controls, that could come forward for development. It is considered that those which form natural extensions to the village that are naturally enclosed and that have existing access, such as my client's site, should be considered for development in this regard and could form an allocation in the forthcoming Site Allocations DPD when the settlement boundary is altered to include the site.

2.25 Notwithstanding the above, additional development within the sustainable rural settlements is needed to support the existing facilities and services and therefore avoid a depletion of services and the decline of the villages in favour of the main Milton Keynes urban area. This is a key point which is highlighted by the NPPF and somewhat missed by the Core Strategy.

2.26 Policy CS9 is far too wide-ranging and provides little guidance on the development of rural areas, simply seeking to rely on a Site Allocations DPD. A re-drafted policy with further detail on where the Council thinks development should be directed is required.

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

2.27 Whilst the establishment of a settlement hierarchy is understandable, and it provides the basis of a framework for development in the rural area, the justification for the settlements
within each tier is unclear. Given the sustainable nature of some of the villages in the "Other Villages" tier, being more sustainable than at least Bow Brickhill in the "Selected Villages" category it is questionable whether the Council's strategy for the rural areas is sound.

2.28 I note that the technical paper dates back to 2007. Without undertaking a detailed study of the settlements to see the capacity to absorb development until 2026, it is difficult to see how the Council came to the conclusions that it has regarding the rural settlement hierarchy.

2.29 In order for the framework for the rural areas of the Borough to be considered sound, a great deal more guidance and evidence is required before the strategy for development in rural areas can be considered acceptable.

3.0 SUMMARY AND RECOMMENDATIONS

3.1 In summary, SHL Holdings seeks amendments to this Core Strategy at Paragraph 3.4, second bullet point to read that "to ensure delivery of new homes up to 2026 in the rest of the borough will require a review of village envelope boundaries".

3.2 Furthermore, Table 5.1 of policy CS1 should be amended to include Lavendon within the "Selected Villages" category given the level of facilities and public transport links currently available, and the potential for sustainable development at the site to provide for the rural community.
3.3 Policy CS9 should be amended to reflect the change suggested in paragraph 2.25 above, and further work undertaken by the Council to identify the settlements with the capacity to accommodate the 1,760 dwellings required by the rural housing target to ensure that this can be met. This is notwithstanding the assessment of the settlements to accommodate housing development over and above the housing target as discussed in the Core Strategy in line with housing need.