



Examination of the Milton Keynes Site Allocations Plan ~ Written on behalf of the Homes and Communities Agency (August 2017)

Matter 2: The role of the SAP

Issue – is the SAP consistent with, and does it positively promote, the objectives and spatial policies contained within the Core Strategy?

Question 2. Does the scale, type and distribution of the proposed allocations conform to the stated expectations of, and any relevant policies included within, the Core Strategy?

The HCA's Response

It is considered that the scale, type and distribution of the allocations proposed in the SAP conform to the relevant policies and spatial strategy within the Core Strategy, particularly Policy CS1 'Milton Keynes Development Strategy' which seeks to focus growth on the main urban area, including the existing expansion areas and the Strategic Land Allocation. The allocations proposed in the SAP will assist the Council in delivering 28,000 new homes by 2026 to meet the housing target for the Borough outlined in Policy CS2 (Housing Land Supply) and ensure a deliverable five-year supply of sites is maintained in accordance with Paragraph 47 of the NPPF.

Policy CS5 allocates sustainable urban extensions adjacent to the Milton Keynes Urban Area as previously identified in the 2005 Local Plan along the south-eastern edge of Milton Keynes. This includes a number of areas immediately to the east of Towergate A (site reference SAP 18 owned by the HCA). The Council has subsequently prepared a development framework document to set out how these sites might be delivered¹. The Strategic Land Allocation covers an area of approximately 150 hectares and will deliver approximately 2,900 new homes as well as a range of social infrastructure to meet the needs of existing and future communities. Site SAP18 is located adjacent to the existing residential area of Wavendon Gate to the west and abuts the Strategic Land Allocation area to the east (including site east of Groveway which received planning permission in summer 2017 – Council reference 15/02768/OUT). Therefore, the site is located within an area of established and planned neighbourhoods and is entirely appropriate to this context and is consistent with the spatial strategy contained in Policy CS1.

Furthermore, the Walton Neighbourhood Plan also identifies the site as a suitable location for residential development for up to 147 dwellings under Policy WNP2. Due to the site's inclusion as a residential allocation in the Walton Neighbourhood Plan, it is considered that the principle of residential development on the site is already established.

The Core Strategy also recognises (Paragraph 5.34) that the SAP will reallocate some existing employment sites. However, the emerging Local Plan review (Plan:MK) will contain a criteria-based policy against which

¹ Milton Keynes Council (2012) Strategic Land Allocation Development Framework Supplementary Planning Document – Draft



any sites no longer required for employment use will be considered. As the Plan:MK is an emerging document, the proposed reallocation of Site SAP18 in the SAP for residential uses is considered to accord with the policies contained in the Core Strategy.

The HCA considers the SAP is based on a sound site selection process giving preference to well-located and accessible locations such as land at Towergate A. The allocation of Site SAP 18 is 'justified' and presents the most appropriate site when compared against other reasonable alternatives. It is considered that this provides a highly developable location and is deliverable within the Plan Period. The site is not covered by any strategic constraints which would prevent it coming forward for development. The site is currently an arable field of limited ecological value and landscape quality, and with a high potential to accommodate development. The site provides a highly deliverable and developable site in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing will be delivered within five years. The site is deliverable because:

- ▶ It is not covered by any strategic constraints which would prevent development: the site is not at risk of flooding and the area proposed for development is entirely located in Flood Zone 1 (lowest probability of flooding).
- ▶ It presents a logical and sustainable location for new housing provision. The site can deliver a quality development to assist in meeting the significant development needs in Milton Keynes. It also has the ability to deliver development on land free of any overriding constraints. This is likely to be an attractive location for new housing and would be likely to attract market interest by local or regional developers.
- ▶ The HCA is willing to bring the site forward and also has a track record of delivering land for development at Milton Keynes. The site can deliver a quality development to assist in meeting the Local Plan requirement, including a mix of dwellings to respond to local needs.

The HCA is currently preparing a planning application for the site to be submitted later in 2017, including a full suite of environmental and design work to support the proposals. Whilst Policy SAP18 identifies, land at Towergate A as being suitable for up to 147 dwellings. The technical and design work has demonstrated that a higher level of housing could be achieved on the site. As such, the allocation should be increased to up 170 dwellings, to provide flexibility and boost the supply of housing within Milton Keynes.

Question 3. Is the amount of land allocated for housing in the SAP sufficient to contribute to meeting the housing needs of the borough over an appropriate timeframe?

The HCA's Response

The Council considers it currently has 5.16 years' supply of deliverable housing sites². We have not analysed the housing supply and as such have no comments in relation to overall housing delivery, however the supply is clearly marginal. In order for the Plan to be found sound, the Council will need to demonstrate a positive position in terms of the five year supply requirements in accordance with Paragraph 47 of the NPPF, otherwise housing policies contained in the plan will be immediately out of date. This emphasises the need for all of the proposed housing sites in the SAP to be delivered to boost supply and demonstrate a favourable five year supply position. Towergate A is included in the Council's five year supply.

As such, it is suggested that the numbers proposed for these allocations is increased where possible, to allow for greater flexibility particularly in the early part of the Plan, if the situation occurs where sites do not come forward for development as anticipated. This will assist the Council in resisting unwanted applications in less sustainable locations which do not support the Council's spatial strategy.

² Milton Keynes Council (July 2017) Assessment of Five Year Land Supply 2017 - 2022



In summary, the HCA considers the proposed allocation of land at Towergate A through Policy SAP18 to be sound and the site can make a significant contribution to increasing the supply of housing and assist the Council in maintaining a five-year supply of land.

Question 5. Is the use of employment land, whether brownfield or otherwise, for housing allocations justified?

The HCA's Response

The use of employment land for housing allocations is considered to be justified, on sites which have proven difficult to market for employment use, for example SAP18 Land at Towergate (referred to as Towergate A). The Milton Keynes Economic Growth and Employment Land Study Supply & Demand – Partial Update June 2017 indicates that in quantitative terms, there is sufficient supply in Milton Keynes to meet forecasted demand of 87ha by 2031. Since the original 2015 study, there has been an increase in employment land supply of 18.51ha totalling 1,204.02ha. This figure takes into account the release of some vacant employment sites for alternative uses and residential allocations in the SAP. It is, therefore, considered that the release of vacant employment sites for much needed new housing, such as site SAP18, is more appropriate than retaining them as potential employment sites when there is a proven lack of demand for these locations and where sufficient alternative sites exist to meet current and future employment needs. In line with the Council's employment strategy, existing sites proposed to be retained for employment use should be altered/redeveloped to provide more efficient facilities to meet the requirements of current market and occupier demand.

Site SAP18 is allocated within the Milton Keynes Local Plan for Light Industrial/Office Development (B1), Residential Institutions (C2) and Non-Residential Institutions (D1) uses. However, a planning application for B2 use on the site was refused in 2010 (reference 09/02263/FUL), over concerns about the compatibility with neighbouring land uses and there has been a lack of interest in the site for employment use with the site remaining vacant. As such, the site has been identified in the Walton Neighbourhood Plan as a suitable location for a residential development of up to 147 dwellings under Policy WNP2.

Although currently vacant, the adjacent land to the east of SAP18 is subject to an outline planning permission for 240 dwellings (reference 15/02768/OUT), and outline planning permission was granted in February 2017 for land north and west of Wavendon Business Park, adjacent to the south of the Towergate A site, for 134 dwellings and 75-100sqm of A1 retail use (reference 15/02337/OUT). Therefore, the site would be surrounded by residential development to the south and east if these developments are delivered. As such, it is considered that this site is a highly sustainable location, and release of this employment site for residential development is, therefore, justified. Without the release of this site for residential use, it is questionable whether the Council would have a deliverable five year supply of housing.



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