

Milton Keynes Borough Council Site Allocations Plan DPD Inspector's Draft Matters, Issues and Questions for Examination

Matter 2

Statement on behalf of Connolly Homes

Prepared by

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On behalf of

Connolly Homes Plc

Job reference

RG/SB/2075/2017

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Client: Connolly Homes

Title: Milton Keynes Council Site Allocations Plan Draft Matters, Issues and Questions for Examination, Statement on Matter 2

Project No: RG/SB/2075/2017

Date of Issue: 31 August 2017

Status: Final

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- 1 Woods Hardwick Planning Ltd is instructed by Connolly Homes to represent its interests in land at Oakgrove School, Middleton. The site was promoted for allocation in the Milton Keynes Borough Council's (MKC) original call for sites for a residential scheme and was identified as a suitable site in the emerging Preferred Options Draft of the Site Allocations Plan but is not proposed to be allocated in the Submission Site Allocations Plan (SAP).
- 2 Our client is of the view that the SAP as submitted does not meet the "effective" and "justified" tests of soundness in accordance with Paragraph 182 of the NPPF as will be explained in detail below in relation to Matter 2 of the Matters, Issues and Questions for Examination and in separate, but related statements on Matters 1 and 3.
- 3 Matter 2 refers to The role of the SAP. The Inspector has asked a number of questions, our client wishes to respond to the questions as below:

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?

- 4 Connolly Homes are of the view that the SAP does not conform to the Core Strategy.
- 5 In the Inspectors report on the Core Strategy the purpose of the SAP was noted as "*providing short term flexibility and contingency as well as ensuring that the housing requirement for both the urban and rural part of the Borough will be met by 2026*".
- 6 The housing requirement in the Core Strategy is a minimum of 28,000 new dwellings across the Borough to 2026, equating to 1,750 per annum. The SAP suggests sites for 22,000 new homes are already identified, either through existing planning permissions, allocations in the existing Local Plan/Core Strategy, or as part of a windfall allowance for small scale sites. This leaves a shortfall of 6,000 dwellings.
- 7 Despite this, Policy SAP0 sets out that planning permission will be granted for residential development on the allocated sites SAP1 to SAP21 provided that proposals meet the specified key principles set out for each site and are in accordance with other relevant policies. The total number of houses that would be delivered if all of these sites were to come forward is 1,133. This is nowhere near sufficient housing given the shortfall against the Core Strategy target

referred to above.

- 8 MKC state that the Site Allocations Plan is being prepared to meet the current shortfall of housing against the 5 year supply requirement, however, the NPPF requires Local Plans to be positively prepared. It states that the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. The Site Allocations Plan cannot be considered to be positively prepared when it leaves a shortfall of some 4,867 dwellings against the Core Strategy requirement.
- 9 Paragraph 47 of the NPPF sets out the need to boost significantly the supply of new homes. The SAP does not sufficiently provide for overall requirement set out in the Core Strategy and therefore would not boost the supply of new homes. As set out in the Statement on Matter 1 the intention of the SAP is to maintain MKC's 5 Year Housing Land Supply until such time that Plan:MK is adopted. However the SAP allows no contingency for any slippage in the timescale for adoption.
- 10 The housing allocations provided through the SAP need to be increased to ensure the 5 year housing land supply is continuously maintained should Plan:MK be delayed or found unsound at examination.

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?

- 11 In short, no. As already commented above, the Inspector examining the Core Strategy was of the view the purpose of the SAP is to provide short term flexibility and contingency as well as ensuring that the housing requirement for both the urban and rural part of the Borough will be met by 2026 (Emphasis added).
- 12 Our client is of the view that the SAP needs to be amended so that it includes sufficient site allocations to deliver the entirety of the shortfall of 6,000 dwellings against the Core Strategy target with a sufficient contingency to allow of any sites that suffer significant delays or do not come forward.
- 13 As the Core Strategy housing target is ultimately going to be replaced by a new target in Plan:MK MKC appear to be relying on Plan:MK proceeding in line with the most recently revised timetable in order to ensure the continual delivery of housing and are adopting the

view the SAP no longer needs to meet its intended purpose. However, this position and the Submitted SAP give no consideration to what would happen in circumstances where the timescale for adoption of Plan:MK slips, or worse still Plan:MK is found to be unsound. Failure to plan for sufficient houses will lead to a plan that has not been positively prepared or based on a strategy which seeks to meet objectively assessed development requirements.

- 14 Our client is also of the view the SPA should be amended to include the land at Oakgrove School, either as one of the further allocations to meet the Core Strategy, or instead of one or more of the sites currently included. Failure to do so would mean the Plan is not justified as required by the NPPF as it would not be the most appropriate of strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Should the SAP have clear and specific timeframes?

- 15 Our client is of the view that the SAP should adopted the clear and specific timescales identified by the Core Strategy, i.e. to 2026. Whilst adoption of Plan:MK is anticipated towards the end of 2018 and may ultimately replace the Core Strategy target, were this to be delayed the SAP would continue to play a role in ensure a continuous supply of housing to be drawn from.

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

- 16 Paragraph 22 of the NPPF states "*Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities*"

- 17 Whilst our client supports the re-use of employment land for residential use in principle, this should be where there is no real prospect of the employment use continuing on the site and where marketing evidence has been provided to support the claim. Residential allocations of existing employment land that is currently in use, and where evidence suggest the employment use will continue, cannot be considered as suitable for allocation is the SAP for example SAP11 (refer to Connolly Homes view in the Statement on Matter 3 – Individual Allocations)

where it is clear that the current employment use is operational and is to remain as such indefinitely. Other considerations, such as impact from existing noise sources on new residents, should also be thoroughly assessed before a site is considered suitable for allocation.

- 18 The approach is even less justified when the SAP has failed to include the allocation of land at Oakgrove School, which is redundant land not in any use and which was identified in the Emerging Preferred Options for the draft Site Allocations Plan as one of 11 sites likely to be suitable as a preferred option for housing. The SAP should be amended accordingly.