



Strategic Planning & Research Unit

For and on behalf of
Templeview developments

Examination of Milton Keynes Council
Site Allocations Plan DPD
Response to Inspectors Questions Matter 3

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MATTER 3 INDIVIDUAL ALLOCATIONS

Issue - Are the individual allocations policies clear, justified, effective and consistent with national policy?

Questions

6. Is it effective to allocate sites, which already have planning permission, within the SAP?

3.1 No.

3.2 There is little point in allocating such sites as the principle of development has already been established.

7. The SAP should set out which extant development plan policies, if any, are being superseded by it. Is there a reason why it does not (e.g. no policies are being so superseded)?

3.3 The SAP should set out any development policies including allocations which are proposed to be superseded.

8. Can policy that cross refers in general terms to an 'adopted development brief' be regarded as effective?

3.4 In the case where there is already a development brief there is little point in simply referring to such a brief in a development plan policy.

9. Should policy allowing for mixed uses be more specific about the uses and mix expected? In its present form is such policy sufficiently appropriate and effective?

3.5 SAP 11 & 12 should have the acceptable uses identified as per SAP 6.

10. SAP2 - What certainty is there that any noise from the neighbouring light industrial uses could be successfully mitigated by a future residential development?

3.6 Our Regulation 19 submissions have identified the lack of a detailed evidence base to support the proposed allocations as being a fundamental flaw to both the soundness of the SAP and the failure of the EA to properly assess both allocations and their reasonable alternatives. Again in this case as the SAP SA report appendix 3 page 295 refers to potential noise sources being the railway and industrial uses as potentially limiting the suitability and/or marketability of residential uses but simply infers that such issues could be dealt with in the design of the scheme.

3.7 Our extensive experience of dealing with urban regeneration sites and in particular development adjacent to industrial noise sources and railways (especially in the north of England) is that such issues are not always able to be resolved satisfactorily at the residential receptors and could require attenuation at source to resolve noise issues. In some cases the issues cannot be resolved satisfactorily.

3.8 There is simply not the evidence base to support the allocation of this site as being sound the evidence deficit is a fatal flaw to the soundness of the SAP and the supporting SA.

11. SAP4 - What is the justification for allocating a site that is in conflict with part of the adopted development plan? Is it reasonable to take this approach? Would the allocation of the site give rise to adverse parking issues?

- 3.9 The availability of the site is dependent upon the delivery of the multi storey car park and then a survey of car parking requirements. At present this is not a deliverable site.

12. SAP7 - Given the dismissal on appeal, twice, for residential development on this site (albeit not for housing) for factors including inadequate living conditions for future occupiers, what certainty is there that any noise and/or outlook issues could be satisfactorily overcome?

- 3.10 The fact that the site was considered unsuitable for a residential care home strongly suggests that this constrained site cannot be delivered as a housing site. As with our overarching criticism of the SAP and SA evidence base in our regulation 19 submission there is simply no technical assessment to support the suggestion that the site is suitable for residential development.

13. SAP11 and SAP13 -Can these sites reasonably be regarded as available for development?

- 3.11 The fact that part of SAP 11 has been previously identified for residential development but has not been delivered is an important indicator as to the potential for this site to be delivered especially in the context of the SAP which is supposedly addressing the short term.
- 3.12 The site has not been actively promoted by the existing user and as such the need for relocation and a lack of active promotion would suggest that the SAP 11 will not be delivered in the short term.
- 3.13 The same is the case for the SAP 13 which is a commercial site and while the owner has stated they are willing to consider a range of future uses this is a long way from the positive promotion of the site for residential use. The constraints (noise and contamination) and location of the site suggest that this is not a prime residential site and it is far from obvious that the residential development of the site would be the preferred future use for the landowner as the one off receipt for the sale of the land has to be balanced against the value of long term rental income.

14. SAP14 - Is it reasonable to allocate this site for residential development given the explicit uncertainty within policy about whether it is deliverable, potentially being required for 'other purposes'?

- 3.14 The proposed allocation describes the previous use of this site as an "unused residential allocation". So, it is clear that it is not the first time this site has been considered for residential use.
- 3.15 The key principles for the development of the site in policy SAP14 include the criteria that development should not commence until the wider regeneration plan is formalised and the site is confirmed as not being required for other purposes.
- 3.16 As the regeneration plan has yet to be formalised this site cannot be regarded as being available or deliverable.

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15. SAP15 - What evidence is there to support the view that the site is not needed for higher education purposes?

- 3.17 Site A is currently allocated for commercial uses. Site C is allocated for higher education uses. The growth of Milton Keynes would suggest that there will be a continuing need to expand education provision however the evidence base for the SAP including the SA does not deal with the longer term need for such facilities.

16. SAP16 - Can policy that seeks only to 'discourage' on-street parking be regarded as effective?

- 3.18 No.

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