

Mr John Cheston
Development Plans Team Leader
Milton Keynes Council

26 September 2017

Milton Keynes Site Allocations Plan Examination

Dear Mr Cheston

As indicated in the final session on 13 September 2017, I am writing to set out formally my further questions arising from the Milton Keynes Site Allocations Plan (SAP) hearings.

I have given full consideration to all of the representations made about the SAP, including those made orally at the Hearings. Any final conclusions on soundness and procedural compliance will, however, be given in the report to be produced following any consultation, as necessary, on Main Modifications.

There are four areas about which I remain concerned and I address them, in no particular order, below.

The role of the SAP

The Milton Keynes Core Strategy (the Core Strategy) is not specific with regard to its expectations for the SAP. Nonetheless, it is important for the soundness of the SAP that the Council is able to set out its role and the rationale behind the expected level, type and location of development that it should bring forward. Effort has been made to do this and, as the Core Strategy Inspector's report indicates that around 1000 new homes should come forward through the SAP, this could form a sound basis for the role of the SAP.

Can the Council please confirm that the role of the SAP is to make provision for some 1000 new homes. If not, it will need to clearly justify and redefine the role of the SAP in order for it to be effective.

Consistency with the Core Strategy and Local Plan

It came to light at the Hearings that the Council is proposing to allocate in the SAP, for housing, three sites (SAP18, SAP19 and SAP20) that are already allocated for employment uses in the Core Strategy. Similarly, it is seeking to allocate a site (SAP7) for housing that is covered by a local retail centre policy in the still extant 2005 Local Plan, which appears to restrict uses within that centre.

Can the Council please provide further information to explain the rationale behind these proposals. Have the effects that this loss of employment and retail land would have on the strategic aims of the Core Strategy and Local Plan been properly considered? Without this evidence it would be difficult to conclude that these policies have been positively prepared or are effective.

Sustainable development opportunities

There are two proposed allocations (SAP7 and SAP2) that do not appear to provide a satisfactory residential environment due to their proximity to, respectively, i) a supermarket and ii) light industrial uses (through which the site is accessed), and the commensurate noise and outlook issues that would be likely to arise. Care home proposals on the former have been refused twice on appeal in the past for such issues. The latter has consent for offices, which is the use favoured by the highways authority in their comments, due to the poor pedestrian access.

These sites would not appear to provide the sustainable development sought by the National Planning Policy Framework. Please can the Council justify why these sites have been included, demonstrating that noise, outlook and access would not be unacceptably poor.

Site availability

Two proposed housing allocation sites (SAP 11 and SAP13) are in active use as commercial sites, occupied by retailers. In addition, the policy in relation to one proposed allocation (SAP14) says that its allocation for housing is dependent on it not being needed for other uses, as part of a regeneration plans for the area. Evidence to date suggests that work on the regeneration plans will not start until next year, with no firm end date set.

Can the Council please provide further information on these allocations, having regard to the guidance on deliverability in the Planning Practice Guidance. If there is no reasonable prospect of the sites coming forward within the life of the SAP¹, it is clear that they would not be effective. In order for them to contribute to the aims of the SAP, there needs to be robust evidence that the sites would be delivered.

Next steps

I will be grateful if the further information required can be supplied to me by 5.00pm on 23 October 2017. I am not inviting comment from other parties at this stage. On receipt of this information, I will consider whether any or all of these sites need to be deleted from the SAP. If this is the case, I will give the Council the opportunity to explain what could be done to make the SAP sound.

Yours sincerely

Richard Schofield

INSPECTOR

¹ Which would appear to be limited, given the Council's ambition of adopting PlanMK in 2018.