



Milton Keynes Site Allocations Plan (SAP)

MKC response to Inspector's further questions arising from the Milton Keynes SAP hearings (23rd October 2017)

This note provides responses to the four areas of concern highlighted in the Inspector's letter dated 26th September 2017.

The role of the SAP

The Core Strategy glossary simply defines the SAP as "a Development Plan Document that allocates land for development". Whilst the Core Strategy is not specific with regard to its expectations for the level of development in the SAP, throughout the plan there are multiple references¹ to the SAP's primary role: *the allocation of non-strategic sites to provide short term flexibility to existing supply and contingency to ensure that at least 28,000 homes will be provided by 2026.*

The Core Strategy Inspector's report indicated that around 1,000 new homes should come forward through the SAP. The Council confirm that the SAP was prepared to make provision for some 1,000 new homes. However, should this figure be reduced below 1,000 homes in order to make the SAP sound, this would not disturb the primary role of the SAP to bolster the housing land supply and provide an additional level of choice and competition in the local housing market (to help meet the target of 28,000 homes by 2026).

Government has a commitment to build a million new homes by 2020, and to supply a further half a million by 2022. The Government's Housing White Paper, 'Fixing our Broken Housing Market' set out four main areas where action is needed, including:

1. *planning for the right homes in the right places - to make sure that enough land is released, that the best possible use is made of that land, and that local communities have more control over where development goes and what it looks like;*
2. *building homes faster – where communities have planned for new homes, ensuring those plans are delivered to the timescales expected;*
3. *diversifying the market – to address the lack of innovation and competition in the home-building market; and*
4. *helping people now – tackling the impacts of the housing shortage on ordinary households and communities.*

¹ ¶5.3, Policy CS1, Policy CS2, Table 5.2, ¶5.25, ¶8.3, ¶8.9, ¶9.12, ¶12.6

At the heart of this is an ambition to get more homes for communities across all housing tenures; to attract small builders and new players to diversify the market on a sustainable basis; and to increase the scale and pace of house-building. The allocation of non-strategic sites in the SAP is entirely consistent with these national aims.

A full review of the Core Strategy is taking place via the emerging Plan:MK. However, Plan:MK is yet to be submitted and there is no guarantee that the plan would be found sound. Accordingly, the SAP provides much needed additional housing land in the short to medium term.

Consistency with the Core Strategy and Local Plan

SAP18, SAP19 and SAP20 are identified as vacant employment land in the Core Strategy. Allocating these sites for residential use through the SAP is not considered to materially affect the ability of the Council to plan for the strategic needs of the Borough, in alignment with the vision and strategic objectives set out within the Core Strategy.

The justification for permitting residential uses on these sites is based upon up to date evidence (employment land evidence published post adoption of the Core Strategy) and the professional judgements of MKC officers monitoring the activity on the sites and throughout the Borough over a number of years (decades of lying fallow in the case of some of the sites under discussion).

Following the SAP hearings, officers performed a more detailed analysis of the Core Strategy. This highlighted a series of 'hooks' (see **Table 1** below) contained within the Core Strategy that allow for alternative uses to be proposed via the SAP on existing non-residential sites, where it would contribute to the overarching objectives of the Core Strategy and is based on new evidence.

Table 1 Core Strategy SAP references

| Core Strategy Reference | Extracts of relevance to the Site Allocations Plan (our <i>emphasis</i>) | Notes |
|--------------------------------|---|---|
| 4.4 | Progress must be measured towards achieving the Core Strategy objectives. We will do so by using the targets and indicators in the monitoring framework in Chapter 17 'Monitoring and Managing'....if any policies and strategies need to be reviewed to address any shortcomings in certain areas. If we were to discover there was a significant under-performance in delivery of the Vision, it would lead to a review | ¶4.4 sets out that the Site Allocations Plan can be used to address shortcomings against Core Strategy Objectives (including objectives 1 and 8 that include the target for 28,000 new homes and 'Providing sufficient developable land for new housing'. Officers recognised the risk of a |

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| | of major parts, or all of the Core Strategy in the new Local Plan (Plan:MK), <u>in addition to the work on the Site Allocations Plan.</u> | jobs / homes imbalance and reliance on large strategic sites. |
| 5.25 | The Site Allocations Plan will consider the allocation of non-strategic sites... <u>Policies CS5 - CS9 provide the context within which these allocations will be made.</u> | Policy CS8 covers 'Other areas of change' in the city, Bletchley, Wolverton and other non-strategic sites (see CS8 and section 8 extracts below and overleaf). |
| 5.29 | The proposed review of the Core Strategy (Plan:MK) will reassess the adequacy (both quantitative and qualitative) of the existing portfolio of employment land and take forward the need, if evidenced, for new strategic employment allocations to meet the economic and housing growth potential of MK... <u>If monitoring shows that new jobs are growing faster than new homes, we would seek ways to increase the rate of housing construction rather than restricting employment growth.</u> | ¶5.29 explicitly allows for remedial action (re: the employment land portfolio) where a job / homes imbalance is identified in monitoring (as it has). |
| 5.32 | If land that is identified in Table 5.3 'Jobs potential of existing employment locations in Milton Keynes Borough' is reallocated for office and technology uses, more jobs can be produced from the available stock of employment land. <u>This would create the opportunity to consider different uses for any employment land that is no longer required for its current purpose, or where the buildings have become obsolete.</u> | Table 5.3 outlines the vacant employment land (216.3ha.) in 2013 broken down by grid squares. ¶5.32 is an introductory paragraph to policy CS3 and explicitly encourages the consideration of alternative uses where employment land is no longer required. |
| Policy CS8 Other Areas of Change | Development in the city will be shaped by the topic-based policies in the Core Strategy, <u>the Site Allocations Plan</u> , the Plan:MK and Neighbourhood Plans. <u>Where the need for major change is identified, new policy guidance to co-ordinate areas of change will be prepared through the Development Plan.</u> | The Core Strategy has been successful at bringing forward 'major change' in the delivery of a significant amount of new employment floorspace. Officers recognised that new policy was required to |

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| | | <p>deliver more flexibility and contingency in the housing land supply. In advance of Plan:MK the SAP (which is a part of the Development Plan) allocates land for housing, including vacant employment land that is no longer required.</p> |
| <p>8.12</p> | <p>The Joint Housing Monitoring Team (JHMT) will continue to monitor development on major sites. If JHMT monitoring identifies a significant shortfall in housing development, <u>we will consider options for increasing housing</u>. This could be a review of the Core Strategy, <u>revising other planning policies, or bringing forward new sites in the Site Allocations Plan</u> and Plan:MK.</p> | <p>¶8.12 permits officers to consider options for increasing housing, which has included the consideration and release of vacant employment land no longer required to meet Core Strategy objectives.</p> <p>¶8.12 permits revisions to extant policies via the SAP.</p> |
| <p>Table 17.1 Core Strategy Objectives, Critical Success Factors and Monitoring Indicators</p> | <p>Objective 1 Risks and Events</p> <ul style="list-style-type: none"> ▪ Large strategic sites not being delivered or are <u>being delivered too slowly</u> due to market conditions ▪ Housing demand improves significantly <u>but the supply of land does not provide an adequate buffer or range of sites</u>. <p>Objective 3 Risks and Events</p> <ul style="list-style-type: none"> ▪ <u>Mismatch</u> between available employment sites and Plan (or <u>future reviews</u>) those required by business ▪ <u>Available employment locations not desirable to developers</u> <p>Objective 1 Actions and Contingencies <u>Consider allocation of dwellings</u> per additional sites in a potential future review of the Plan:MK (new Local Plan) / <u>Site Allocations Plan if further land release is deemed</u></p> | <p>The risks and events in Table 17.1 are directly addressed through the changes of use and allocations included within the SAP (SAP18, SAP 19, and SAP 20).</p> |

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| | <p><u>necessary</u></p> <p>Objective 3 Actions and Contingencies</p> <p><u>Consider changing employment allocations through the Plan MK (new Local Plan) / <u>Site Allocations Plan</u></u></p> | |
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The approach to these sites is consistent with paragraph 22 of the National Planning Policy Framework which states that:

‘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’.

Appendix B in the 2015 Employment Land Study (Employment Land Review & Economic Growth Study, Phase 1, Technical Analysis Final Report, November 2015) evaluated and ranked all of the existing and vacant employment sites within the Borough from best to worst in terms of employment use. All of the SAP sites put forward for allocation as housing had support from the respective landowners and were all within the bottom 50% of ranked employment sites. Some sites such as SAP 19 Land at Walton Manor and SAP 20 Land at Broughton/Atterbury were in the bottom 25% of ranked employment sites.

As one of the most economically successful areas in the UK, Milton Keynes has experienced rapid growth in the number of full time and part-time jobs in recent years but housing delivery has not kept up with jobs growth². Between 2010 and 2015, around 4.2 jobs have been delivered for every one dwelling. The Core Strategy target was to deliver a minimum of 1.5 jobs for every house built in the Borough of Milton Keynes. If these significant imbalances between the provision of jobs and homes persist, the consequences of this will be upward pressure on house prices and rents eroding the city’s attraction as a lower cost housing location. Another consequence of this rapid employment growth has been increased in-commuting into the city putting additional pressure on local transport infrastructure and worsening traffic congestion at peak times. From 2013 to 2016, the Borough has successfully delivered over 327,700m² of employment floorspace, creating approximately 11,420 jobs.

Loss of these non-strategic employment sites to residential use will not undermine the Council’s overall development strategy; rather it will help to increase housing delivery and achieve a better balance between housing and employment within the city. Further site-specific reasons for the changes of use of the above mentioned sites are provided below.

² From 2010-2015 the growth of employee jobs (full and part-time) in the Borough has been 28,000 compared to the delivery of around 6,600 dwellings. (Source: Office of National Statistics for job numbers; MKC for housing completion figures.)

SAP 18 - Land at Towergate, Groveway, Wavendon Gate

The site (5.6ha.) is encircled by existing and emerging residential developments. The adjacent sites in the 'Wavendon Triangle' include the land at Hewlett Packard site (WNP 3) to the south and the Fairfield's Partnership development to the east. Both sites have outline planning permission for residential development with development expected to start on both sites in 2018/19.

This site is identified in Appendix B of the 2015 Employment Land Study (ELS) as site P39 and is in the bottom 50% of employment sites (ranked 75th of 118 sites).

SAP 19 - Land at Walton Manor, Groveway/Simpson Road, Walton Manor

Walton has a 'made' Neighbourhood Plan supporting the principle of mixed use on SAP19. The SAP is therefore consistent with the most up to date policy in the Development Plan. The SAP shall retain the land needed for employment purposes to allow for the expansion of the MSD Animal Health establishment, as detailed in the 'Land adjoining Walton Manor, Walton Development Brief' (DB5³) produced by MKDP and supported by the landowner.

If it would help to improve the clarity of the allocation, MKC could make a Main Modification to the map on page 55 of the SAP. This would illustrate the approximate locations for residential and employment uses taken from Figure 4 Parameters Plan (DB5, page 21).

This site is identified in Appendix B of the ELS as site P37 and is in the bottom 25% (ranked 89th of 118 sites) of employment sites.

SAP 20 - Land at Broughton Atterbury, Oakworth Avenue, Broughton

The vacant employment land at Broughton/Atterbury (4.5ha.) has been identified as far back as the Core Strategy examination as potentially unsuitable for employment use. During the Core Strategy examination Broughton/Atterbury was one of the sites excluded from calculating jobs capacity⁴ (see extract of ¶3.2 below) because the Council acknowledged there were constraints to its development.

³ Available to view at: <https://www.milton-keynes.gov.uk/assets/attach/34321/walton%20development%20brief%20ADOPTED%20VERSION.pdf>.

⁴ See Appendix I – Core Strategy examination document MKC/35 (available to view at: file:///H:/MKC-35_3_NLPResponse_Matter_4.pdf)

'3.2 In calculating the jobs potential of remaining employment sites within the Borough the Council excluded any contribution of jobs from the development of:-

- Small sites of less than 1ha., with the exception of sites in Campbell Park which have planning permission for offices for which a separate calculation has been made.*
- Constrained sites such as Snelshall West site D (3 ha.) Wolverton Mill site G (3.2 ha) and **Broughton /Atterbury (4.8 ha.)**.*
- Any new jobs created as a result of the development of Eagle Farm North site SR1 totalling around a net 12 hectares.*
- Any jobs create by the occupation or redevelopment of vacant office and commercial buildings.'*

The Broughton/Atterbury site is identified in Appendix B of the ELS as site P51 and is in the bottom 25% (ranked 97th out of 118 sites) of employment sites.

The loss of employment land at Wavendon Gate (5.6ha.), Walton Manor (5.14ha.)⁵ and Broughton/Atterbury (4.5ha.) represents 7% of all vacant employment land identified in Table 5.4 of the Core Strategy totalling 216.3ha. (This figure excludes sites in Central Milton Keynes (CMK) and vacant employment sites of less than 1ha.). This is also not a significant loss of employment land when the supply of employment land identified in the proposed submission version of Plan:MK is around 191.3 ha. (This figure includes a new allocation of land for employment purposes south of Caldecotte but excludes land in CMK and vacant employment sites of less than 1ha.).

SAP 7 - Land to rear of Morrison's supermarket, Barnsdale Drive, Westcroft

MKC would wish to propose a Main Modification for the removal of SAP7, based on the Inspector's comments under the "Sustainable development opportunities" section of his Post Hearing Note to the Council (document PC3).

Sustainable development opportunities

As per the above comments, MKC would wish to propose a Main Modification for the removal of SAP 7.

With regards to SAP 2, MKC accepts the Inspector's comments on the unsuitability of this site in providing sustainable development as sought by the NPPF and therefore would wish to propose a Main Modification for the removal of SAP 2.

⁵ 5.14ha. representing the amount of residential land taken out of vacant employment land

Site availability

Kathryn Eames (Head of Regeneration, Your:MK) reaffirmed the organisation's commitment to regenerate North Bradville in the near future, noting that work will be starting in January 2018, as set out in the annual insight report⁶ (April 2017). The site allocation (SAP 14) will help to assist in these efforts and de-risk the site in advance of community engagement, detailed design and a formal planning application. The North Bradville area was first identified in the Cabinet report that approved the formation of Your:MK (21/12/2015⁷) and provided approval to initiate their regeneration programme. Annex H of the Cabinet report shows the full extent of the wider regeneration area in North Bradville, which is extensive and offers significant scope for a number of complementary uses.

Whilst redevelopment of North Bradville may take place over a number of the years, the SAP's allocations shall remain extant up to 2026.

MKC wish to propose a Main Modification for the removal of clause (ii) of SAP 14. The principal of the clause is already provided in clause (i) and, following discussion at the hearing sessions and further discussions with Your:MK, it is considered to be unnecessary.

With regard to SAP 11 and SAP 13, MKC can provide no further evidence in relation to the availability of these sites and therefore agrees with the Inspector's comments. In response, MKC would wish to propose a Main Modification for the removal of SAP 11 and SAP 13.

⁶ "Our teams will start working with the communities on North Bradville in January 2018 to develop a plan for their area. Watch out for more information towards the end of the year." – A Future Fit For You: Annual Insight Report (Your:MK, April 2017). Accessed at: <https://yourmk.co.uk/about/publications/publications>

⁷ Available to view at: <http://milton-keynes.cmis.uk.com/milton-keynes/Calendar/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/5250/Committee/1009/Default.aspx>