



Milton Keynes Site Allocations Plan (SAP) Examination

Council Response to Inspector's Post-Hearing Note of 3 November 2017 (Part 1)

17 November 2017

The role of the SAP

The Council confirms that it does not intend to seek additional sites to replace those which are proposed for deletion (SAP 2, 7, 11 and 13). The Council will instead ensure, through the Main Modifications, that the Introduction/Context sections of the document are clear in affirming the role of the SAP.

Allocation of Employment Land for Housing

In the context of the SAP, the Employment Land Study (ELS), produced in November 2015, was not used as a source for identifying sites which could come forward for assessment. All sites that were assessed through the SAP process were identified from the Council's 2012 Strategic Housing Land Availability Assessment (SHLAA) and via a 'Call for Sites' process carried out between September and November 2014. This included sites SAP18, SAP19 and SAP20, all of which had support for their allocation from the respective landowners at that stage.

Where sites within the SAP assessment were existing employment allocations, the ELS was used to assess their relative value as an employment allocation and as to whether a reallocation to residential use, via the SAP, could be achieved.

As a general comment, the ELS recognised that, whilst the existing stock of employment land within Milton Keynes is outstanding in terms of quality, there is a surplus, and therefore it was recommended that consideration be given to disposing of some stock for other uses.

On this basis, each of the proposed SAP sites which were existing employment allocations were assessed against the ELS ranking of sites. If a site was ranked within the top 50% of employment sites, it was assumed that residential use would not be appropriate and a 'red' rating was given to it due to the existing use providing a deliverability constraint. If the site was ranked in the bottom 50%, it was assumed that residential use might be appropriate and an 'amber' rating was given to it. These sites were given 'amber' and not 'green' ratings, as it was recognised that the ELS ranking list is not a definitive judgement of a site's value.

Of the sites within the SAP assessment, only four fell within the bottom 50% of the ELS ranking. One of these sites, Wolverton Mill Site G, was subsequently ruled out due to a lack of school capacity in the local area. The remaining three sites (SAP18, SAP19, and SAP20) were all deemed suitable for reallocation to residential use, as outlined within “MKC Response to PC3 (October 2017)” (PC3A), and were therefore progressed as proposed site allocations.

Whilst there may be other extant employment sites that also scored poorly within the ELS and could, in theory, have been appropriate for consideration for a change of use to residential, as the ELS post-dates the initial SAP site selection process, it was used as a distinct piece of evidence to inform policy, not to select sites for assessment.

Main Modifications

The Council will provide a further response outlining a full scheme of Main Modifications for consideration, by the deadline of 5.00pm on 6 December 2017. This will also include a reconsideration of the Environment Agency’s consultation responses for each site, as requested.