



Plan:MK Examination Hearing Sessions July 2018

On Behalf Of

Wyevale Garden Centre – ID665018

Hearing Statement – Matter 3

June 2018

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1.0 Introduction

- 1.1.1 This Hearing Statement is submitted on behalf of our client, Wyevalle Garden Centre, who have been promoting their site at Newport Road, Woburn Sands, through the emerging Plan:MK process.
- 1.1.2 It is considered necessary to provide updated comment around previously submitted representations given the changing housing supply context in Milton Keynes, ahead of the upcoming Hearing sessions.
- 1.1.3 Please note that specific site references to Wyevalle are only in respect of their Woburn Sands site, and not the allocated CMK site.

2.0 Matter 3 – Issue 1: Context and potential transformational growth

- 2.1.1 The issues that our client wishes to focus on below are all framed around the initial questions raised in respect of this issue.
- 2.1.2 Whilst Plan:MK makes reference to and recognises the hugely important role that MK will play as the CaMKOx growth corridor progresses, this serves to demonstrate how crucial it is that Plan:MK as a strategic document ensures that sufficient housing numbers are identified and allocated through the Plan, and the importance of a robust examination around these issues.
- 2.1.3 It is acknowledged that full details of the CaMKOx are yet to emerge in final form, but various analysis around the area has highlighted the need for emerging plans across the corridor to plan for significantly greater levels of housing in order for its aspirations to be delivered, with 1m homes to be built in the corridor by 2050 is the area is to maximise its economic potential.
- 2.1.4 Plan:MK must be ambitious and positive in its planning for housing in this regional context, as well as the more localised issues around housing land supply.
- 2.1.5 Whilst an early review is proposed, this must be considered with caution as a means of securing any required uplift in numbers, not least given the previous delays encountered in respect of what was previously intended to be an early review of the Core Strategy – Policy CSAD1 of the 2013 Core Strategy was clear in its aim of having a replacement policy document (Plan:MK) in place in 2015. Whilst such an aspiration is a positive one, and indeed one that is supported in principle, in practice



it is clear that this is an unreliable method of ensuring an early review.

- 2.1.6 Suitable, available and deliverable sites should be considered as additional allocations within the Plan, to ensure that the document plans for sufficient additional growth.

3.0 Matter 3 – Issue 5: Housing Land Supply

- 3.1.1 Wyevale are not submitting representations specifically on issues two and three.
- 3.1.2 However, reference is made to their previous representations from June 2017, in response to the various housing land supply challenges, and with reference to the March 2018 Housing Topic Paper.
- 3.1.3 Plan:MK continues to propose to calculate housing land supply using the 'Liverpool' method. However, Inspectors in recent appeal decisions have suggested that the 'Sedgefield' approach is more appropriate.
- 3.1.4 The first of these appeals was the Long Street Road, Hanslope, appeal (Ref 3177851) which was allowed in March 2018. The decision highlighted that using the Liverpool method at that time resulted in a supply of 5.15 year's supply – which dropped to a significant level below the 5 year supply requirement, to 4.53 years.
- 3.1.5 The Inspector concludes that it was appropriate to adopt the Sedgefield approach, which is consistent with the aim of the NPPF to boost significantly the supply of housing, and also the NPPG which encourages LPAs to address undersupply issues within the first 5 years of the plan period.
- 3.1.6 On this basis, and given the recent track record of a shortfall of supply, it is considered that the Sedgefield approach to calculating housing land supply is most relevant and should be applied in respect of arriving at a housing number for Plan:MK.
- 3.1.7 Given the recent track record of under supply, it is clear that a 20% buffer needs to be applied to the deliverable supply.
- 3.1.8 Paragraph 2.5.1 of our client's representations to the Preferred Strategy set out a clear summary of the credentials of their site at Newport Road in Woburn Sands. This highlighted the clear brown field credentials of the site, the positive SHLAA analysis, and the fact that it would be fully enclosed by residential development should the current Wavendon Properties appeal (an application that was



originally recommended for approval by MKC) be allowed, for 203 dwellings.

- 3.1.9 That previous representation was submitted at a time when MKC could demonstrate a five year housing land supply, a position that has fundamentally changed ahead of the examination of Plan:MK.
- 3.1.10 In the Council's March 2018 Housing Topic Paper (MK/TOP/002), MKC seek to proactively address the potential shortfall in supply that may be identified in examination, an action that is welcomed. This has included a summary of the approach to the identification of omission sites as potential additional housing allocations.
- 3.1.11 Whilst such an approach is not objected to, the recent appeal decisions have highlighted the difficulty in relying on large sites to deliver housing numbers, with issues around land ownerships and delivery of required infrastructure to unlock housing. Whilst there is no objection to the detailed consideration and potential inclusion of other sites, non-strategic sites should not be disregarded.
- 3.1.12 In summary, Plan:MK should consider the allocation of additional, suitable non-strategic sites for housing in order to sufficiently, positively and proactively plan for increased growth.
- 3.1.13 It is clear that an additional important source of housing is the small and medium sites, outside the urban area. Those that have been previously submitted to MKC will have been considered within the SHLAA work, a key part of the evidence base for Plan:MK. However, the Plan then declines to allocate deliverable sites in non-urban locations, instead looking to emerging Neighbourhood Plans to secure such allocations.
- 3.1.14 The reliance on Neighbourhood Plans to allocate small to medium sites in locations outside of the urban area is a potentially prohibitive policy approach. In locations such as Woburn Sands, who already have a Neighbourhood Plan in place (the first in MK from 2014), these policy documents will immediately become out of date upon adoption of Plan:MK.
- 3.1.15 It is important that Neighbourhood Plans – including when reviewed post-Plan:MK adoption – are informed by a clear district level policy-led housing requirement. At present this is missing from Plan:MK, in terms of total numbers even across the area, let alone on a settlement specific basis.
- 3.1.16 In order to ensure that MK's significant housing need is met, the Plan should consider proposing 'reserve' housing sites in the non-urban areas, informed by the SHLAA work, where should Neighbourhood Plan's not progress in a timely manner, it is clear where appropriate locations to development sites for housing are.



- 3.1.17 At present, there is nothing in Plan:MK to encourage allocation of sites though Neighbourhood Plans, with the lack of any guidance as to what individual Neighbourhood Plans would need to seek to secure, in order to facilitate growth. There is the real risk that settlements outside the urban area do not deliver suitable, available and deliverable sites, to the detriment of supply across MKC.
- 3.1.18 Paragraph 1.10 of Plan:MK states that several existing Neighbourhood Plans allocate housing sites, and that “this approach is strongly encouraged for future plans”.
- 3.1.19 This is not robust enough. Plan:MK needs to provide a suitably strong mechanism to ensure that Neighbourhood Plans deliver, and that suitable sites are not from the potential housing supply as a result.
- 3.1.20 In summary, and to reiterate conclusions from previous representations in response to the current housing supply and likely need position in respect of our client’s site, the Wyevale Garden Centre at Newport Road, Woburn Sands, is:
- Brownfield and previously developed land;
 - Is in a sustainable location with convenient access to key services and facilities;
 - Has good transport links and use of existing public transport infrastructure, and walking / cycling networks;
 - Has no physical constraints restricting residential development;
 - Could provide properties of varying size and tenure in order to meet local needs, and those arising from caMKox ambitions;
 - Is not within any special landscape, biodiversity or habitat protection areas and suitable mitigation would ensure that there would be minimal impact to any biodiversity at the site;
 - There would be no detrimental impact on the setting of any designated heritage assets and the scheme would not appear visually intrusive in the landscape;
 - Could contribute to the increasing housing requirements in MKC, by providing circa 87 dwellings.
- 3.1.21 Plan:MK needs to include a mechanism to ensure that such sites, outside the urban area, are properly considered for potential development. Reserve allocations in non-urban settlements should be considered; and / or a proposed housing figure for each of the non-urban settlements



should be set out, to ensure that all emerging Neighbourhood Plans are in conformity with and Plan:MK.

3.1.22 This will assist MKC in meeting the anticipated growth in housing need, in the context of a track record of recent under-delivery.