



Strategic Planning & Research Unit

For and on behalf of
Bloor Homes Ltd

Representation to the Plan:MK Examination
Matter 5

on behalf of
Bloor Homes Ltd

Prepared by
**Strategic Planning Research Unit
DLP Planning Limited**

Date: June 2018



Strategic Planning & Research Unit

Prepared by: Roland Bolton Bsc (Hons)
MRTPI Senior Director

Approved by: Roland Bolton Bsc (Hons)
MRTPI Senior Director

Date: June 2018

Strategic Planning & Research Unit

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Tel: 01234 832740
Fax: 01234 831 266

Tel: 01142 289190
Fax: 01142 721947

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Limited accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

1.0 INTRODUCTION

1.1 These responses to the inspectors matters and questions are made on behalf of Bloor Homes Ltd who have land interests to the south of Newport Pagnell east of Milton Keynes and the M1. These interests consist of three parcels which are identified by the plans in Bloors/DLP Reg19 submission. The larger of the three areas is allocated as part of the Reserve Site to come forward after 2031 or earlier if government funding is available. The other two areas of land are between the identified Reserve Site and the settlement of Newport Pagnell and are not identified for development.

2.0 MATTER 5: STRATEGIC SITE ALLOCATIONS AND URBAN EXTENSIONS

a) **Issue 1 – general approach and principles (Policies SD1, SD11, SD12 & SD17)**

i. ***Q5.1 Are the strategic site allocations as a whole consistent with the strategic objectives for Milton Keynes Borough? Are all the strategic sites technically ‘allocations’ or do some now have planning consent (particularly those carried forward from the Core Strategy and Eaton Leys)? What is the planning status of sites SD6, SD7, SD8, SD9 and SD15?***

1.2 Yes

1.3 The following have at least outline consent either in whole or in part

- a. Policy SD6 EASTERN EXPANSION AREA
- b. Policy SD7 WESTERN EXPANSION AREA
- c. Policy SD8 STRATEGIC LAND ALLOCATION
- d. Policy SD9 NEWTON LEYS
- e. Policy SD15 LAND AT EATON LEYS, LITTLE BRICKHILL

1.4 In terms of Milton Keynes East (MKE) which is also referred to as “Reserve Site Land East of the M1” this is identified on the key diagram and referred to in policy DS2, and allocated for development in SD14, albeit with the proviso that commencement prior to 2031 is dependent upon the availability of Government funding. Nevertheless, it is our view that MKE should be regarded as an allocation for the reasons set out in our reg19 submission and expanded upon in our responses to matters 2 and 3. The plan references that up to 3,000 dwellings might be delivered on this site during the plan period and it is possible that some of this maybe delivered prior to provision of all of the infrastructure including the crossing of the M1.

ii. ***Q5.2 Overall, has the approach to the allocation of the new strategic housing sites in Policies SD13-15 been based on a clear, robust process of site assessment and informed by sustainability appraisal? Are the reasons for selecting the preferred strategic sites and rejecting others clear and sufficient? Would any inaccuracies in the assessment significantly undermine the overall conclusions?***

1.5 The SA considered 8 options for strategic development. This included MKE described as Option B - Land East of the M1 motorway (Milton Keynes East) (SA pages 48 to 51). The SA assessment identified no likely significant negative impacts although there will need to be mitigation measures.

- 1.6 The site selection process is set out in the conclusions on page 65 of the SA.
- 1.7 Sites A, D and E were considered potentially difficult to develop on due to significant constraints and/or significant investment in infrastructure needed to support development. Large parts of site A are also located in flood risk zones 2 and 3, and it was considered that significant investment in transport infrastructure is likely to be needed.
- 1.8 Significant investment in transport infrastructure was also considered likely to be necessary to make site E a viable option as well.
- 1.9 Site G extends into Central Bedfordshire and so the SA considered that further work would be required in order to assess the practicalities of developing on this site.
- 1.10 Sites F and G were considered potentially be suitable in the longer-term depending on the outcomes of further work and additional evidence collected.
- 1.11 The Sustainability Appraisal, concludes:
“Site B and C are considered to be suitable for allocation over the plan period if implemented appropriately, if planning constraints are taken into account when designing the scheme and if mitigation measures are incorporated where necessary. Site I is considered suitable for allocation as it has an application submitted which was granted by the Council, the final decision dependent on the SoS”
- 1.12 The SA appears to have made the recommendation for site selection based on available information and judgements regarding deliverability. From the approach taken it would appear unlikely that any marginal adjustments to the SA outcomes would result in a different conclusion by the council.

iii. Q5.3 Are the generic policy requirements for strategic sites in policies SD1, SD11, SD12 & SD17 justified and effective? Are the various proposed modifications to Policies SD1, SD11, SD12 and SD17 necessary for plan soundness (See PMs 23, 24, 34, 35 & 50 in MK/SUB/004)?

- 1.13 **Policy SD12** sets out how the SUEs should be bought forward. This establishes that the Council must first approve a ‘comprehensive development framework, incorporating any necessary design codes, or phasing of development and infrastructure delivery, for the Strategic Urban Extension as a whole’ prior to an individual application being approved.
- 1.14 Whilst we broadly agree with the intention of this policy and the understand the need to produce an overarching development framework for each SUE, we question the soundness of the level of detail required by the policy and the additional procedure for approvals prior to the site becoming available for development. It is important that the policy makes it clear that the Framework is a non-statutory SPD and that this will be in accordance with the plan and therefore decisions will be made in accordance with the plan with reference to the SPD. In particular we would highlight that in the case of SD14 there are substantial elements of the site that are suitability located, available and deliverable, that could be bought forward on an individual basis, without prejudicing the wider strategic objective of the allocation.
- 1.15 In our Reg19 Submission we suggested the following amendments to SD12 in light of the above we suggest the following amendments with the new **text bold**):

1) To ensure that Strategic Urban Extensions are brought forward in a strategic and comprehensive manner, planning permission will only be granted for land within Strategic Urban Extensions, following the approval by the Council of **Supplementary Planning Guidance setting out a comprehensive development framework, incorporating any necessary design codes, or phasing of development and infrastructure delivery, for the Strategic Urban Extension as a whole; **unless it can be demonstrated that development of part of a site would be:****

- i. consistent with the aims and objectives of the allocation;**
- ii. would not prejudice the deliverability, viability, integrity or interconnectivity of neighbouring land and/or the wider site; and**
- iii. would wholly integrate with and facilitate future connections to adjacent development parcels (including social, grey and green infrastructure).**

2) Development frameworks will be produced by the Council in conjunction with and with the support of the developer(s). Development frameworks will also be prepared in partnership with landowners, adjoining local planning authorities, parish or town councils, infrastructure providers, regional and local agencies and services, statutory consultees, the Parks Trust and other stakeholders. Development frameworks will be prepared in consultation with the local community. The Council will adopt development frameworks as supplementary planning documents to guide future planning applications.

1.16 The change from the need to provide rapid transport solutions to making provision for them in the Strategic Grid Road is a modification that is required to ensure soundness (PM24 para 17). The others are not.

- iv. Q5.4 Are any of the strategic sites in Flood Zones 2 or 3? Are the allocations consistent with paragraph 100 of the NPPF which states that Local Plans should apply a sequential risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change?**

1.17 Yes, according to the SA the most affected is Northern Growth Area option A.

1.18 There are small areas of food zone 2 and 3 in the Milton Keynes East allocation but this does not impede the development of this site.

b) Issue 2 – Milton Keynes East (MKE) (Policy SD14)

- v. Q5.5 Based on all the evidence, is the Plan positively prepared in respect of MKE and is the identification of this long term strategic site/direction of growth adequately justified? Are the references to MKE as a long term option post 2031 justified?**

2.1 Although DS2 and SD14 both state that the site will be delivered after 2031 this is on the basis that funding has yet to be secured, however both policies go on to indicate that the site could come forward earlier.

2.2 The conclusion of the SA was that the site was suitable for development now. While we acknowledge sites of this scale do take a considerable time to be brought though the

plan process it is still considered that this allocation could make a contribution to meet future housing need prior to 2031.

- 2.3 The reference to the site being a long term strategic reserve while correct must be tempered against the fact that with the housing requirement in our case running at over 2,000 dpa the whole reserve only represents 2.5 years supply.
- 2.4 These responses and our Reg19 submission argued that this site should be a full allocation to come forward at least in part before 2031 in order to assist in meeting what we consider to be the full OAN.
- 2.5 While we agree that the delivery of the whole urban extension will require appropriate infrastructure investment, we do not accept that this provides the justification to restrict the delivery of all sites within the identified urban extension. Land, such as that within our client's interest, is able to come forward in isolation, providing the necessary levels of infrastructure required, without prejudicing the deliverability or integrity of the wider strategic extension. As such the release of smaller phases of the allocation for development should not be unduly restricted, based on the ability of other sites (outside of their ownership) to overcome wider constraints or to the receipt of funding from the Government.
- 2.6 As is shown on plans in the DLP Reg19 Submission, our client's land is located on the northern edge of MKE, with direct access to both the A422 to the north and Willen Road to the west. Therefore, whilst being accessible, the land does not border the M1 where it is likely new connections into the existing urban area will need to be created to serve the wider allocation. The development of the site would therefore not preclude the future delivery of these links as part of the wider development.
- 2.7 As set out in our Reg19 submission and confirmed in the SA assessment of the wider site, there are no other constraints which would further preclude the development of the site ahead of the remainder of the SUE. Indeed, the early release of our client's land ahead of the remainder of the SUE, subject to amendments to the site boundary discussed below, would provide opportunities to realise other objectives for the area, including those of the made Newport Pagnell Neighbourhood Plan.
- 2.8 On this basis we recommend the following modification to Policy SD14 (changes are in **bold**):

*Land is allocated at Milton Keynes East – as shown on the Key Diagram and Policies Map – for a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes. Development will not commence until after 2031 unless the Council's bid to the Government for infrastructure funding is successful; **or an appropriate level of infrastructure can be secured and delivered through individual development site(s) (where in compliance with Policy SD12 and INF1).** In ~~that~~ **these** circumstance, the development of the site will be allowed to proceed within the plan period as an additional source of housing and employment land supply.*

- vi. **Q5.6 Is the overall size of the allocation and the quantity of development proposed appropriate? Is the proposed extension of the allocation in the proposed modifications (PM44) necessary for plan soundness? What would this modification mean in terms of site capacity and any delivery within the plan period?**

- 2.9 While the modification is not required to make the plan sound the inclusion of additional land in order to provide for a more comprehensively designed scheme is supported.

- 2.10 In Bloors Reg19 submissions it was proposed that two additional areas of land between the SD14 allocation and the existing edge of Newport Pagnell be included within the allocation to deliver both recreation space but also additional development. These Parcels B and C are highlighted in our reg19 submission.
- 2.11 The proposed alteration to SD14 above would assist the early delivery of part of this allocation and as such would make the policy effective.
- vii. Q5.7 What is the latest situation on the HIF funding bid in relation to this site? Does this provide a justification for revisiting the development trajectories for this site for both homes and employment? With or without HIF funding is there any certainty that some development could be bought forward at MKE within the plan period?**
- 2.12 On Wednesday 21 March 2018 the Government confirmed that Milton Keynes was successful in their bid for Forward Funding passing part 1 of the 2 stage process. Stage 2 requires the business case for MK's proposals to be developed in detail, including the number and location of new homes that could be built. At the end of stage 2 ministers will make a final decision on which areas will receive the funding.
- 2.13 If successful the bid will secure some £76 million of investment towards a new bridge over the M1 and other infrastructure, including schools and GP surgeries.
- 2.14 A decision on the submitted bids is expected in the summer of 2018.
- 2.15 We consider that even without the HIF funding the early phases of the scheme could still be delivered prior to 2031. This is because the land under the control of Bloors would not need the proposed link over the motorway to secure sustainable access to higher level services that might not be available on site.
- viii. Q5.8 Noting the proposed modification, are there any other reasonable options for consolidating this strategic option that could expand delivery east of Milton Keynes, including in the short to medium term?**
- 2.16 As highlighted above Bloors reg19 submission promoted two locations (parcels B and C) between the existing edge of Newport Pagnell and the proposed allocation which could logically come forward as part of the wider allocation but would not require the upfront infrastructure. In such circumstances extending the allocation will allow these smaller sites to come forward early to assist in meeting the housing requirement.
- 2.17 In addition, the larger site (parcel A) which is wholly under Bloors control can be delivered as an early phase of the allocation as it would not require the higher order infrastructure to support its release, in that it can fund its own infrastructure requirements.
- 2.18 We believe that this can occur within an overall framework for the allocation which would not inhibit the delivery of a comprehensive urban extension as the final outcome. A similar approach has already been accepted on the Strategic Reserve land where individual land ownerships are being developed independently but on the basis of a Development Framework

ix. Q5.9 Are the criteria in Policy SD14 justified and effective? Are the infrastructure requirements clearly set out and is it clear what developers are expected to provide to overcome constraints?

2.19 There are no actual constraints set out in SD14. There are a number of requirements that are listed to be delivered as part of the scheme and the area is of such a size that these can be delivered.

x. Q5.10 How will the site connect, particularly by walking, cycling and public transport, to (a) CMK and Newport Pagnell; (b) other strategic employment areas; and (c) potential Expressway corridor?

2.20 It is considered that connections from the site might be phased. If as suggested development is started at the northern end of the allocation, then this is the closest to the existing facilities in Newport Pagnell via Willen Road/Marsh End Road. This is already a public transport corridor and as such these services could be enhanced and extended. The highway while not presently providing footpaths or cycle ways does have additional highway land which could allow for the provision of paths and cycleways.

2.21 Similarly, public transport and footpaths and cycleways can be provided going south along Willen Road into Milton Keynes (using the present bridge crossing the M1) giving direct access to the Tongwell Roundabout and the largescale employment area.

2.22 In terms of access to services and large scale employment the northern part of the proposed allocation is very well located physically, better possibly than some existing areas in the city and as such there is limited infrastructure required to deliver connectivity during the early phase of development of this allocation.

xi. Q5.11 What is the 'fast mass-transit system' and is safeguarding a route for it justified?

2.23 The term 'fast mass-transit system' is not defined in the plan. The general theme within the plan is that the grid road system should be capable of accommodating some undefined form of mass transit. While this may be a laudable objective it is simply too vague to be justified for inclusion into policy at the present time especially as there is no feasibility study to support its inclusion.

xii. Q5.12 Are there potential transport implications arising from MKE for communities in Central Bedfordshire and, if so, has this formed part of the Duty to Co-operate dialogue?

2.24 The relationship between CBC and MK is one of net migration into MK from CBC (see table 3 of Reg19 Submission Various Clients). At 2011 there were some 8,061 commuters into MK from CBC and 4,100 commuters flowing the other way. Given that both the EEFM and the SHMA project an increase in the level of in commuting then provision of housing on the eastern edge of Mk might encourage those workers presently commuting in from CBC to actually move into MK.

2.25 Increased out commuting into CBC is only likely to occur if CBC undersupply the level of housing needed to meet their own job growth forecasts. According to the most recent SHMA and evidence produced for their Local Plan examination the council have taken the position that they can allocate sufficient land to meet their growth aspirations and as such there should be no additional pressure for out commuting from MK (including this new allocation) into CBC.

- xiii. Q5.13 Has the MKE location been considered as part of the MKMMM Local Model validation work and the Traffic Forecasting Report?**
- 2.26 No
- xiv. Q5.14 Are there any implications of growth to the east of MK on air quality in Olney (A509 traffic)? What is air quality monitoring revealing at Olney and would growth at MKE be at odds with measures identified in any relevant Air Quality Action Plan?**
- 2.27 No comment
- xv. Q5.15 What will be the impact on the landscape character, biodiversity or any other special interests? Can any potentially adverse impacts be satisfactorily addressed?**
- 2.28 According to the SA assessment of the site there will be very limited impacts on biodiversity and other special interests.
- 2.29 The area is not identified as an area of special landscape character, or as a valued landscape, therefore while the development will have a local impact the wider impact can be suitably mitigated.
- xvi. Q5.16 Does Policy SD14 provide sufficient content to inform the preparation of a comprehensive development framework as required Policy SD12?**
- 2.30 Yes - however the suggested changes we consider would be beneficial in securing the early delivery of parts of the site.



Strategic Planning & Research Unit

Representation to the Plan:MK Examination
Matter 5
on behalf of
Bloor Homes Ltd

BEDFORD - BRISTOL - CARDIFF - LEEDS - LONDON - MILTON KEYNES - NOTTINGHAM - RUGBY - SHEFFIELD

BEDFORD

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832 740
Fax: 01234 831 266
bedford@dlpconsultants.co.uk

BRISTOL

Broad Quay House (5th floor)
Prince Street
Bristol
BS1 4DJ

Tel: 0117 905 8850
bristol@dlpconsultants.co.uk

CARDIFF

Sophia House
28 Cathedral Road
Cardiff
CF11 9LJ

Tel: 029 2064 6810
cardiff@dlpconsultants.co.uk

LEEDS

Princes Exchange
Princes Square
Leeds
LS1 4HY

Tel: 0113 280 5808
leeds@dlpconsultants.co.uk

LONDON

The Green House
41-42 Clerkenwell Green
London
EC1R 0DU

Tel: 020 3761 5390
london@dlpconsultants.co.uk

MILTON KEYNES

Midsummer Court
314 Midsummer Boulevard
Milton Keynes
MK9 2UB

Tel: 01908 440 015
Fax: 01908 357 750
miltonkeynes@dlpconsultants.co.uk

NOTTINGHAM

1 East Circus Street
Nottingham
NG1 5AF

Tel: 01158 966 620
nottingham@dlpconsultants.co.uk

RUGBY

18 Regent Place
Rugby
Warwickshire
CV21 2PN

Tel: 01788 562 233
rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD / SPRU

Ground Floor
V1 Velocity Village
Tenter Street
Sheffield
S1 4BY

Tel: 0114 228 9190
Fax: 0114 272 1947
sheffield@dlpconsultants.co.uk