Core Strategy - Post Submission Consultation, September-November 2011

Summary of key points raised during the consultation

This note summarises the contents of the comments received from 35 individuals and organisations on the post submission change to the Core Strategy. It does not cover all of the comments in detail but draws out the key areas of support and objection to the change.

Support

- There is general support for the principle of the new land allocation in so far as it joins up and improves the original proposal.
- Comments considered that the revised allocation will allow more effective planning of the area, particularly in terms of open space, education and transport.

Objections

There were several points raised in objection to the allocation. These objections relate primarily to:

- the process for identifying the allocation, including the consideration of alternatives; and
- the detail of the allocation itself.

The Process

Comments considered that the Sustainability Appraisal Report is not legally compliant because:

- It fails to assess reasonable alternatives to key policy decisions (e.g. alternatives to a single allocation of 2,500 homes).
- Not all reasonable alternative sites put forward through the process of preparing the Core Strategy have been assessed and the report does not state why this is the case. (SE SDA, full South East Plan requirements).
- It does not clearly set out why all reasonable alternative sites that have been assessed have been ruled out (such as the excluded part of MKSA4).
- It is not clear how the sites that haven’t been assessed and all ruled out sites compare to the selected Strategic Land Allocation (SLA).
- The final SLA is not one of the alternative sites assessed.
- It does not justify why SR4 remains in the final allocation as a separate land parcel, particularly when considered against the excluded part of MKSA4. The reasons for rejecting the alternative option are not clear.
- There is no clear explanation as to why the preferred option has been chosen.
- It is contrary to the ‘paper chase’ principle (Re Seaport Investments Ltd application for Judicial Review [2008] Env. LR. 23) i.e. the Council has failed to pull together all of the relevant evidence that comprise the Sustainability Appraisal report.
Comments suggested that the alternative options considered were inappropriate as they:

- Did not include the full South East Plan requirement.
- Only considered delivery of 2,500 homes in one allocation, no alternative approaches.
- Did not consider an alternative housing target to the 28,000 (2010-2026).
- Did not consider specific sites promoted through previous rounds of consultation.
- Only considered sites as alternatives, not as potential reserve sites.

Comments suggested that the outcome of the assessment is flawed because:

- For the reasons set out above, the full range of options have not been considered.
  The approach means that the outcome:
  a) Does not recognise the potential benefits of smaller land parcels as they are only
     considered as part of larger development areas; and
  b) There is no recognition of the benefits of either a larger site, in terms of
     supporting a sustainable form of development, or a range of smaller sites, from
     the point of view of deliverability.
- More weight should be given to delivery and market differentiation in prioritising
  sites.
- The process is too reliant on anecdotal views rather than evidence.
- There has been no detailed viability work to inform conclusions regarding the relative
  deliverability of sites (e.g. the costings of site specific infrastructure have not been
  carried out to enable a proper comparison of the deliverability of sites).
- The assessment assumes that being able to support an element of employment land
  provision is a benefit when the allocation is for housing. Therefore favouring a site
  because it can support an element of employment land is irrelevant.
- It does not consider the delivery of all relevant Core Strategy objectives, just a select
  few.
- The interpretation of the Core Strategy objectives is incorrect, leading to misleading
  conclusions.
- There is not enough consideration of accessibility to key facilities in scoring sites.
- It supports a pre-determined Council position.

The allocation is not justified based on the evidence because:

- It still contains two separate land parcels, which the Council has said is
  unsustainable. There are alternatives available which are formed from one land
  parcel.
- There are sites which perform better against the Core Strategy objectives.

Comments suggested that the assessment also had the following problems:

- There has been a lack of consideration of the wider transport impacts, positive and
  negative, of alternative sites. This includes lack of consideration for supporting East
  West Rail.
- There has been no consideration of the likely impact on existing social and physical
  infrastructure and its capability for mitigation in the 'south east quadrant' of Milton
  Keynes. This could be to the detriment of existing sites, such as Brooklands, where
  efforts have been made to provide a sustainable development.
• Too much reliance on historic evidence which was considering the delivery of a much large allocation. A more local approach is now needed separate to the past regional planning process.

Details of the allocation

Comments have raised the following specific comments about the final allocation:

• There has been a lack of detailed consideration of the site boundary, particularly:
  a) the non-inclusion of the western part of MKSA4; and
  b) the non inclusion of the wooded areas adjacent to SR1.
• Alternative uses for the site have not been taken into account. Its location would better suit an employment site.
• There is a conflict between the requirement to determine long term boundaries and future-proof the site. The approach needs clarification.
• The capacity of the site is not big enough. More land is needed to:
  a) support the delivery of a sustainable development; and
  b) support the delivery of the housing target.

Comments criticised limiting the capacity of the site to 2,500 because it:

• Prevents the delivery of a sustainable development.
• Unnecessarily constrains the land supply needed to deliver the overall housing target.
• Will lead to piecemeal development of the wider area in the future and creates a risk to achieving a comprehensive development.
• Does not allow for any flexibility in land supply if housing targets are not being met.
• Will not provide enough homes to support job growth. This will lead to an increase in commuting.

Other issues raised

• Concern over the emerging detailed planning framework for the area including the requirement for a secondary school site, a lorry park and a canal corridor.
• Concern that the policy wording of CS5 has not changed to reflect the increase in land area. Suggested that the capacity should be changed from ‘a maximum of’ to ‘around’, with the final capacity to be determined through the development framework process.
• No update to reflect the draft National Planning Policy Framework, particularly the requirement for a five year land supply plus 20%.
Site specific comments

The following section summarises views on the approach taken to assessing the reasonable alternative sites and the outcomes of the assessments. Comments have been received from both site promoters and other bodies with an interest in specific areas.

MKSA1

- The assessed site should be split to recognise the benefits of each part.
- The north area attracts less negative attention than the south.
- Development of the northern area would enable grid roads to be extended into the Western Expansion Area (WEA), but a decision is needed quickly before land is sterilised by the development of the WEA.
- The assessment needs to recognise the benefits of smaller sites to meeting housing needs. They can provide choice and deliverability as opposed to larger sites.
- The land to the south (Shenley Dens Farm) is not constrained by or reliant on development of the WEA.
- The land to the south would have scored more favourably if it was considered on its own rather than alongside land to the north.
- The assessment needs to more clearly recognise the impact of development crossing the Shenley Ridge, after which there is no defensible boundary.
- The assessment needs to recognise the impacts that development in this area would have outside the MK borough boundary, not just within MK itself.

MKSA2 and 3

- By not positively considering any development east of the M1, an unnecessary burden is placed on smaller sites and other areas around Milton Keynes.
- The sites are constrained by a lack of crossings over the motorway. Should existing plans be amended to make sure crossings can be provide in the future if necessary?
- The conclusion that recognises the M1 is not a long term barrier to growth is welcomed.

MKSA4

- The whole site should be included in the final allocation. No justification for exclusion of land parcel to the west, particularly when SR4 is included in the allocation.
- A landscape buffer to Wavendon could easily be provided in the site. Part of site could be used for a secondary school, with playing fields providing the landscape buffer.
- Development of the site would enable improved integration with the city. Its close proximity to Kingston District Centre would be beneficial.
- The western parcel of the site compares favourably to SR4, which is included in the allocation despite being a separate land parcel.
- Development of the site would have no greater impact on Wavendon than the development of SR2 or SR4.

MKSA6

- The site should be included in the strategic land allocation as it is the only way to enable a sustainable urban expansion to be planned.
The site meets the most number of Core Strategy Objectives (7).

**MKSA8**

- The configuration of land considered is not in line with previous responses to the Council. The land nearest Woburn Sands should have been removed which would have resulted in a more favourable assessment.
- Conclusions in the assessment are questioned by the site promoter as:
  a) Not all Core Strategy objectives have been considered; and
  b) Those that have been assessed have been over simplified and misinterpreted.
- The site would not have a significant landscape impact as suggested.
- A revised site boundary would prevent coalescence with Woburn Sands.
- The impact of needing to cross the railway line has been overstated. A crossing would not be financially prohibitive and would actually have benefits for existing level crossings at Woburn Sands and Bow Brickhill.
- The assessment should recognise the ability of the site to support the delivery of East West Rail.

**MKSA9**

- The site is promoted as a contingency site/reserve to the SLA, not an alternative.
- The Eaton Leys site (southern part of the site - 50%+ of which is in Aylesbury Vale district) is less affected by the constraints identified for MKSA9. The south part of the site should be considered separately.
- The Local Plan Inspector recognised that the site was suitable for housing.
- Development of the site offers benefits in terms of wider regeneration of Bletchley and Fenny Stratford.
- The southern part of the site is not in the Area of Attractive Landscape and is of poor environmental quality.
- The site has good access to railway stations, bus services and major roads.
- The conclusion that the site would have limited integration with the urban area is questioned.
- Neither the area of flood risk nor the Scheduled Ancient Monument would prevent the wider site being developed.

**MKSA10**

- Development would create an arbitrary development boundary based only on land ownership. It would not create a logical edge to the city.

**MKSA11**

- Disagree that it wouldn’t be possible to provide strategic landscape buffers around existing settlements to prevent coalescence with new development.
- The separate land parcels would create walkable neighbourhoods and would be no different from the preferred SLA.