



**MILTON KEYNES COUNCIL: EXAMINATION OF PLAN:MK.**

Response on behalf of the Guinness Partnership. Representor ID1147068.

**Matter 5: Strategic Site Allocations and Urban Extensions**

*Please note the strategic employment site (Policy SD16) will be considered under Matter 4.*

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

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?

1.1 Our statement on question 3.xx in matter 3 details why we do not consider approach has been robust.

Issue 4 – Campbell Park and Central Bletchley (Policies SD18 & SD19)

Q5.32 What scale of development is anticipated at Campbell Park within the next five years and is this reasonable?

1.2 Our representations (pages 7 & 8) detail the concerns regarding the forecast delivery at Campbell Park. As explained in our response to question 3.xx in our matter 3 statement, we do not consider that robust evidence (as required by the NPPF and PPG) to demonstrate the delivery rates forecasted by the authority have been provided generally. These concerns also apply to the projected delivery at Campbell Park, especially as there is no evidence within the table of developer involvement.

1.3 In the appeal for the erection of up to 95 dwellings on land off Olney Road, Lavendon (extract included as appendix 1) allowed on 4 May 2018 (PINS ref APP/Y0435/W/17/3182048), the Inspector reviewed the Council's delivery forecasts at Campbell Park and the associated Canalside Marina (see page 2 of trajectory in MK/SUB/004a2.) In paragraph 105 of the decision, the Inspector concluded:

**“From the evidence in front of me I consider that in Y3 [2019/20] there are only likely to be 60 completions, and thereafter 80 per year. When compared to the Council's projection for the five year this would reduce the realistic prospect of the number of completions by 60 dwellings.”**

1.4 Table 1 below compares the trajectory of the Canalside Marina from that in MK/SUB/004a2 with the conclusions above by the Lavendon appeal Inspector. This indicates that the Council's current forecast for delivery at the Canalside Marina is for 170 more dwellings within 5

years (2017/18 – 2021/22) than deemed justified by the evidence at the Lavendon appeal. This reinforces our view regarding the robustness of the overall forecasts of the authority.

**Table 1 – Comparison of delivery rates at Canalside Marina, Campbell Park, Central Milton Keynes**

Trajectory source	Forecast completions					
	2017/18	2018/19	2019/20	2020/21	2021/22	Total within 5 years
MK/SUB/004a2	0	0	100	150	130	380
Lavendon appeal (para 105)	0	0	60	80	80	210
Difference	0	0	40	70	50	170

- 1.5 Without provision of robust evidence, Woolf Bond Planning on behalf of the Guinness Partnership consider that further medium sized allocations must be included in the Plan (such as the land at Levante Gate). The involvement of the Guinness Partnership in Levante Gate means that there is an important and experienced affordable housing provider involved who is fully committed to building homes on the site within the next 5 years. This commitment was confirmed in writing to the Council as part of the current application (see appendix 2).

Issue 5 – Other Strategic Sites (Policies SD9, SD15 & SD19-21) and medium/small housing allocations (Appendix A)

Q5.36 What is the planning status of the housing allocation at Eaton Leys (Policy SD15)? Have the proposed modifications in MK/SUB/004 satisfied Historic England’s concerns regarding archaeological assets and consistency with paragraph 141 of the NPPF?

- 1.6 The housing allocation at Eaton Leys had an outline planning application (with all matters reserved) (15/01533/OUTEIS) for the erection of up to 600 dwellings approved on 2 June 2017. A reserved matters application for the primary infrastructure (17/03213/REM) was approved on 14 May 2018.
- 1.7 Upon approval of the Eaton Leys proposal, our clients site at Levante Gate now adjoins the approved development area of Milton Keynes and is subject to a current planning application (17/03233/OUT) for 500 dwellings that is being recommended for approval by planning officers at the 5<sup>th</sup> July 2018 Planning Committee.

Q5.39 Have the medium and smaller Plan:MK housing allocations been based on a clear, robust process of site assessment and informed by sustainability appraisal? In particular:

- i) Has an appropriate methodology been used and has it been applied consistently?
- ii) Are the reasons for (a) selecting the sites in Policies SD19-20 and at Appendix A as the ‘preferred sites’ and (b) rejecting other potential options for medium/smaller housing sites been set out clearly and sufficiently?
- iii) Would any inaccuracies in the assessments significantly undermine the overall soundness of the Plan?

- 1.8 No. The concerns of Woolf Bond Planning (on behalf of the Guinness Partnership) to the robustness and transparency of the assessment process (including the sustainability appraisal) is covered in the response to matter 1.

- 1.9 As detailed in our Statement to matter 1, the authority rejected land at Levante Gate for allocation on the proposition that other medium sites were sequentially better. However, no

evidence of the sequential preference of all the assessed sites has been provided, Consequently, the Guinness Partnership is not convinced that the assessment process is therefore robust.

- 1.10 The Housing Topic Paper (March 2018) (MK/TOP/002) (paragraph 9.9) acknowledges with respect of the Levante Gate site (promoted on behalf of The Guinness Partnership):

**There is feasibly a need to reconsider this conclusion [that the site was sequential less preferable] to some extent, in the light of the detailed representations received from the site promoters, and in light of the detailed information recently submitted as part of a planning application for up to 500 homes.**

- 1.11 Since the statement in MK/TOP/002, the Council's planning officers have confirmed that the planning application at Levante gate is being reported to the 5 July 2018 planning committee with an officer recommendation for approval. The local plan needs to reflect this change in status.
- 1.12 Given the Council's recognition that the Levante Gate site should be reconsidered, we contend that the submitted Plan should be modified to include this site as an allocation for 500 dwellings.

Appendix 1 – Extract of appeal decision of 4 May 2018 concerning the erection of up to 95 dwellings on land off Olney Road, Lavendon (PINS ref APP/Y0435/W/17/3182048).

Appendix 2 – Copy of letter dated 19 March 2018 from the Guinness Partnership regarding application 17/03233/OUT confirming delivery rates

Brett Leahy, Director of Planning  
Milton Keynes Council,  
Civic Offices,  
1 Saxon Gate East,  
Milton Keynes,  
MK9 3EJ

Monday, 19 March 2018

Dear Mr Leahy,

**Levante Gate Planning Application 17/03233/OUT**

This planning application has been worked up with your planning officers in order to secure an implementable housing scheme designed to deliver much-needed new homes for Milton Keynes. One of the characteristics of the Council's housing land supply is the need for sites to be made available and be deliverable in the short term.

In this regard, Guinness Partnership Ltd has the capacity to build over 1,500 units a year. We are one of the 10 largest affordable housing providers in terms of the number of affordable homes delivered in the country. Having a regional headquarters based in Milton Keynes, we are fully aware of the housing issues facing the city. Being locally based we feel we are well placed to deliver new homes in a timely and efficient manner. In addition, we have a responsibility and incentive to work with and support one of the Councils key objectives of the delivering of new homes, including affordable housing.

The Guinness Partnership Ltd is a registered provider of social housing. In pursuit of this activity, we are a large-scale developer of housing for sale. We currently have the financial and technical capacity to build out the proposed scheme the moment planning permission is granted. At present we do not have enough sites ready to deliver new homes but the Levante Gate site is a genuine opportunity to secure a large number of units in the immediate term and would fit very well into our development program.

The site is owned by a single landowner and the company has full control of the site, enabling a speedy delivery of a permitted scheme. We are not reliant upon any third parties. All the necessary funding needed to build out this project is in place and ready to go.

In this regard, the company remains committed to preparing reserved matters and discharge of pre-commencement conditions within a year of the grant of planning permission enabling first completions of new homes to be available in 2020. Attached is a timeline that the company intend to work to in order to secure these objectives. I hope this provides sufficient comfort to the Council regarding the company's commitment to delivering much-needed new homes on this site as soon as possible.

Should you wish to discuss any matter arising please do not hesitate to contact either Douglas Bond, our planning consultant or myself.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Mark Hanson", with a stylized flourish extending to the right.

Mark Hanson  
Head of New Business



