

PLANNING STATEMENT

Land at South West Milton Keynes

South West Milton Keynes Consortium

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Januarys on behalf of the South West Milton Keynes Consortium (SWMK Consortium) to support an outline planning application for a mixed use development at South West Milton Keynes (SWMK). The SWMK Consortium comprises Hallam Land Management, William Davis Ltd, Taylor Wimpey, Connolly Homes and Bellcross Homes. The SWMK Consortium control land to the south west of Milton Keynes, south of the A421 and north of the disused former Oxford to Bletchley railway line (due to be reopened as part of the East West Rail project) – the Application Site. The Application Site is shown on Drawing No. SWMK03-079-C – see **Appendix 1**.
- 1.2 The Proposed Development area is wholly located within the area of Aylesbury Vale District Council (AVDC), but the principal access points to the A421 will be within the area of Milton Keynes Council (MKC). The planning application has been submitted to both AVDC and MKC, so that each planning authority can determine the elements of the Proposed Development that fall within their respective administrative areas.

Description of Development

- 1.3 The Proposed Development is described as follows:

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on 144.77 Ha of land to the south west of Milton Keynes, to provide for the following:

- *up to 1,855 mixed tenure dwellings (C3) on 54.16 Ha of land;*
- *an employment area (B1) on 2.07 Ha of land;*
- *a neighbourhood centre on 0.67 Ha of land accommodating retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses;*
- *provision of a primary school on 3.0 Ha of land;*
- *provision of a secondary school on 5.2 Ha of land;*
- *allotment space on 1.22 Ha of land;*
- *ground remodelling;*
- *55.75 Ha of multi-functional green open space including: parkland, sports and recreational facilities with pavilion/changing facilities; play areas, wildlife areas, a range of strategic open spaces including a community orchard and new landscaping;*
- *a Sustainable Drainage Scheme including 5.05 Ha of land for surface water attenuation measures;*
- *associated infrastructure including new junctions to the A421, Whaddon Road and Buckingham Road, primary streets, residential streets, pedestrian footpaths and cycle routes, foul water pumping stations and statutory undertakers equipment;*
- *A Grid Road Reserve of 7.24 Ha;*
- *Highway improvements on 5.56 Ha;*
- *public transport infrastructure, car and cycle parking for all uses; and*
- *undergrounding of 132Kv overhead power lines.*

Supporting Documents

- 1.4 The application is supported by the following documents:
- Application Forms/Ownership Certificates
 - Planning Statement
 - Design & Access Statement
 - Sustainability Strategy
 - Flood Risk Assessment
 - Retail Assessment
 - Employment Assessment
 - Statement of Community Involvement
 - Arboricultural Assessment
 - Transport Assessment & Framework Travel Plans
 - Energy Strategy
 - S106 Heads of Terms
 - Draft Construction Environmental Management Plan
 - Environmental Statement & Non-Technical Summary.
- 1.5 The planning application is accompanied by an Environmental Statement (ES), which has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 – referred to as the EIA Regulations.
- 1.6 Before the planning application was submitted an ES Scoping exercise was undertaken with AVDC. This process confirmed the matters to be addressed in the ES. The ES will comprise the following chapters:
1. Introduction
 2. Application Site & Project Description
 3. Policy Context & Alternatives
 4. EIA Methodology
 5. Archaeology & Cultural Heritage
 6. Agricultural Land
 7. Ecology
 8. Drainage
 9. Landscape & Visual
 10. Traffic Movement & Access
 11. Air Quality
 12. Noise
 13. Socio-Economics
 14. Services & Utilities
 15. Waste
 16. Soil & Ground Conditions
 17. Significant Interactive & Cumulative Impact
 18. Conclusions

Report Structure

- 1.7 **Section 2** sets out the relevant planning background to the Proposed Development and the emergence of land to the south west of Milton Keynes as a suitable location for a sustainable urban extension. In particular we highlight the findings of numerous background studies which concluded that the SWMK area is a suitable and sustainable location for development, and the fact that the site previously passed through the sustainability appraisal processes of various development plan documents (which were subsequently revoked or withdrawn).
- 1.8 **Section 3** describes the Proposed Development and identifies the key parameters.
- 1.9 **Section 4** contains an assessment of the Proposed Development against national guidance and relevant development plan policies. In this case the relevant statutory development plan is time expired, and is out of date in terms of housing land policies.
- 1.10 **Section 5** identifies the material considerations that are relevant to the determination of this application in the absence of an up to date development plan, namely the housing land supply position.
- 1.11 **Section 6** identifies the key benefits of the Proposed Development, in terms of social, environmental and economic matters.
- 1.12 **Section 7** identifies the delivery timetable for the Proposed Development, and highlights the factors that should ensure that the development is deliverable. The Application Site is controlled by experienced housebuilders and developers who have delivered other large sustainable urban extensions.
- 1.13 **Section 8** identifies the S106 Heads of Terms.
- 1.14 **Section 9** sets out our conclusions. We conclude that the Application Site is a sustainable location for development. The technical studies submitted with the application propose mitigation measures to deal with any adverse impacts, and overall demonstrate that there are no constraints to development. The Proposed Development is well-designed and has taken into account the characteristics of the surrounding area. This planning application is a positive response in the absence of an up to date plan. Therefore, for these reasons planning permission should be granted.

2. BACKGROUND

Introduction

- 2.1 The planning background to development in the SWMK Area – including the Application Site - provides the context for this planning application. The SWMK Area refers to the broad area on the south western edge of the urban area of Milton Keynes, between the A421 to the north and the disused former Oxford to Bletchley rail line to the south. This broad area was assessed in the technical studies described below. The identification of an urban extension in the SWMK Area has emerged from a series of technical studies over the last twenty two years. The former SWMK SDA Area successfully passed through the sustainability appraisal process of the South East Plan, and was specifically identified as a suitable location for development on the edge of Milton Keynes.
- 2.2 We highlight below some of the relevant background, which identified land in the SWMK Area as a suitable and sustainable location for development, and which demonstrate that further housing and economic growth will take place at Milton Keynes.

Technical Studies

- 2.3 Three studies were commissioned from Llewellyn Davies (1992, 1996 & 1998) by a consortium of public sector bodies comprising Buckinghamshire, Bedfordshire and Northamptonshire County Councils, Milton Keynes Borough Council, Aylesbury Vale, Mid Bedfordshire and South Northamptonshire District Councils, the then Commission for New Towns and the Government Office for the South East. The studies consistently identified the SWMK Area as a development area without major problems. Llewellyn Davis concluded that no overriding constraints stood in the way of the site and that the juxtaposition of road and rail created opportunities for public transport options, constituting significant advantages in the site's favour. Section 6.3 of the 1998 Study is contained in **Appendix 2**. The SWMK Area (described as Area 8 – West of Bletchley) is identified as a medium term growth opportunity.
- 2.4 A discussion paper was commissioned from David Lock Associates (1999) by Milton Keynes Chamber of Commerce that addressed the potential for development in and around the City. The report recommended that the City's future growth should be concentrated on the A421 axis, reinforced by East-West Rail. The report concluded that an east-west axis of growth complemented the existing development form and created opportunities for public transport enhancement. The relevant extracts from the 1999 Study are contained in **Appendix 3**.
- 2.5 In July 2001 Roger Tym & Partners were commissioned by the Government and Regional Assemblies and Regional Development Agencies for the South East, East of England and East Midlands to study the growth potential of the Milton Keynes & South Midlands area. The study report was published in September 2002 and recommended a preferred spatial strategy for Milton Keynes based on growth to the west and south west of the urban area (i.e. the SWMK Area). The relevant extract of the 2001 Study is contained in **Appendix 4**.
- 2.6 Subsequently a further study was commissioned from Roger Tym & Partners. The Milton Keynes Growth Area Assessment, published in 2003, was prepared to inform the Examination in Public of the Draft Milton Keynes & South Midlands Sub-Regional Strategy.

The final study report identified the SWMK Area as one of only three locations to meet development requirements to 2016. Section 6 of the 2003 Report identifies the preferred directions for growth, and Figure MK4 shows the preferred spatial strategy. The relevant extracts of the 2003 Report are contained in **Appendix 5**.

- 2.7 The Faber Maunsell (2003) Milton Keynes Public Transport Long Term Vision further reinforced the importance of an east-west growth corridor embracing the A421, together with development of SWMK, involving public transport and the provision of a park and ride interchange. Section 11 of the 2003 Report provides a summary of the recommended public transport measures, including those measures to be delivered in the long term (post-2011) – contained in **Appendix 6**.
- 2.8 In 2006 Colin Buchanan was asked by Buckinghamshire County Council and AVDC to review the expansion proposals put forward by the Milton Keynes Partnership in the draft Milton Keynes 2031 Strategy. Colin Buchanan's Milton Keynes Long Term Growth Strategy Review (2007) suggested alternative strategies for the growth of Milton Keynes, including an allocation for 2,700 dwellings in the SWMK Area. The study noted that there is capacity in landscape terms to absorb development in this location. Section 4 of the 2007 Report and maps showing the location of the expansion areas promoted in the alternative strategies are contained in **Appendix 7**.
- 2.9 In conclusion, all of the technical studies which have considered the growth of Milton Keynes conclude that the SWMK Area represents a suitable location for development, including those studies undertaken for AVDC.

Development Plans

- 2.10 The Aylesbury Vale District Local Plan was adopted in January 2004, and sought to deliver the broad strategic framework of the former Buckinghamshire County Structure Plan (adopted in 1996). The Structure Plan pre-dated most of the technical studies that considered the future growth of Milton Keynes. The Application Site is not allocated for development in the Local Plan 2004 and it is not covered by any other site specific designations. Policy RA34 and RA35 relate to the redevelopment of the Newton Longville Brickworks site, and of particular relevance to the Proposed Development, these policies safeguard a road corridor to the A4146 and protect a future road link to the A421 from development.
- 2.11 The Milton Keynes Local Plan was adopted in December 2005. While MKC is a Unitary Authority it produced a Local Plan because the Buckinghamshire County Structure Plan was to remain part of the development plan for Milton Keynes. At that time, the future growth of Milton Keynes beyond its boundaries was not reflected in adopted planning policy. Policy KS1 of the Local Plan 2005 requires that the development at Newton Leys safeguards a route for a link road between the A4146 Fenny Stratford bypass and the A421 Buckingham Road / H8 Standing Way. The logical route of the link road is through the Application Site, and land is reserved within the Proposed Development for a grid road to accommodate that link.

Regional/Sub-Regional Development Plans

- 2.12 The Milton Keynes and South Midlands Sub-Regional Strategy published in 2005 identified land to the south west, between the A421 and the railway line to Oxford as a growth location.
- 2.13 The Draft South East Plan was submitted to Government in March 2006 and an Examination in Public was held between November 2006 and March 2007. The Milton Keynes Long Term Growth Strategy Review 2007 prepared by Colin Buchanan – referred to above - was submitted to the South East Plan examination on behalf of Buckinghamshire County Council and AVDC, which demonstrated that SWMK was supported by the authorities and represented a suitable location for long term development.
- 2.14 The South East Plan (Regional Spatial Strategy for the South East of England) was adopted in May 2009. **Appendix 8** contains an extract from the adopted Milton Keynes and Aylesbury Vale Strategy from the South East Plan, including Diagram MKAV1 which specifically identified a Strategic Development Area at SWMK – the SWMK SDA Area. Policy MKAV1 includes a requirement for an urban extension to the south-west of Milton Keynes.

Draft Aylesbury Vale Core Strategy & Draft Salden Chase Masterplan & Delivery SPD

- 2.15 AVDC intended to carry the South East Plan strategy forward. In June 2009 AVDC published a Vale of Aylesbury Proposed Submission Core Strategy and in January 2010 it published the Consultation Draft Salden Chase Masterplan & Delivery SPD. These documents contained draft policies that specifically allocated land at the SWMK SDA Area. **Appendix 9** contains the draft AVDC Core Strategy policy and supporting text for the North East Aylesbury Vale SDA i.e. the SWMK SDA Area. **Appendix 10** contains the Location Plan for NE Aylesbury Vale SDA from the Masterplan & Delivery SPD.
- 2.16 The Draft Aylesbury Vale Core Strategy and the Draft Salden Chase Masterplan & Delivery SPD sought to deliver strategic growth to the south west of Milton Keynes. Draft Policy CS4 (North East Aylesbury Vale SDA) supported the allocation of 5,390 dwellings plus infrastructure to the south of the A421 and north of the railway line to the west of Far Bletchley and to the north of Newton Longville.
- 2.17 The SWMK Area also successfully passed through the preliminary sustainability appraisal processes for the draft Core Strategy and draft NE Aylesbury Vale SDA SPD. **Appendix 11** contains Section 7: Conclusions from the AVDC Core Strategy Evidence Paper North East Aylesbury Vale Strategic Development Area (SDA) (March 2009). The Evidence Paper compared the three potential sites in SWMK against place-shaping principles and the outcome of the SA results. The former SWMK SDA Area was referred to as Site B, and was selected as the preferred location for the SDA at SWMK, based on its sustainability credentials.
- 2.18 It is clear that Aylesbury Vale District Council accepted strategic development to the south west of Milton Keynes, within Aylesbury Vale; and it was in this context that an outline planning application was prepared and submitted.

- 2.19 In June 2010 the Inspector for the Core Strategy published an Interim Report; the report dealt solely with growth at Aylesbury. In July 2010 the Secretary of State announced that Regional Strategies were revoked with immediate effect. AVDC, encouraged by the Secretary of State's announcement, resolved at its meeting on the 8th September 2010 to formally request that the Core Strategy be withdrawn from examination. On 5th October 2010, the Core Strategy was withdrawn from examination. The draft Masterplanning & Delivery North East Aylesbury Vale SDA SPD was withdrawn at the same time as the Core Strategy. It was AVDC's decision to withdraw the Core Strategy.

Salden Chase Planning Application

- 2.20 In April 2010 an outline planning application was submitted for development to the south west of Milton Keynes, for a mixed-use sustainable urban extension for up to 5,311 dwellings, employment, community facilities, schools, transport infrastructure, and green infrastructure. The application was accompanied by a full range of technical documents to determine the potential impact of the Proposed Development and to identify mitigation measures where those impacts would be significant.
- 2.21 The planning application was withdrawn by the SWMK Consortium following AVDC's decision to withdraw its Core Strategy from the examination process, and uncertainty at the time over the new Coalition Government's amendments to national planning policy.

Milton Keynes Core Strategy

- 2.22 In July 2013 the Milton Keynes Core Strategy was adopted, which contains two policies that are relevant to this planning application. Firstly, Policy CSAD1 makes a commitment to an early review of the document by 2015, in order to determine the full objectively assessed development needs in accordance with the NPPF. Secondly, Policy CS6 identifies the principles for development located on the edge of Milton Keynes within the administrative boundary of a neighbouring authority e.g. AVDC. It is clear that additional development is anticipated in Milton Keynes, and that sustainable urban extensions are expected to contribute towards those future development needs. The Inspector for the Core Strategy acknowledged the key role of Milton Keynes for the surrounding area, and the need to accommodate further growth in the near future.

Draft Vale of Aylesbury Plan

- 2.23 Between late-2010 and mid-2013 AVDC prepared a new development plan document – the Draft VAP. There was a significant amount of objections to the proposed document, which largely resulted from the decision to ignore the growth status assigned to Aylesbury Vale and the role that the District had always played in meeting the housing needs of neighbouring areas. Concerns were raised about the proposed housing target being insufficient to meet objectively assessed needs and also being too low to support the economy, and of particular relevance to this application was the failure to consider land adjacent to settlements located outside the District as a realistic option for the distribution of development e.g. land at SWMK. In August 2013, the Draft VAP was submitted for examination to the Secretary of State. In December 2013 two hearing sessions were held to consider the key matters associated with the legal compliance and soundness of Draft VAP; the duty to co-operate and the overall provision for housing and jobs. In January 2014, the Inspector appointed to

examine the Draft VAP wrote to AVDC setting out his conclusions on these two matters – letter contained in **Appendix 12**. Firstly, AVDC had not engaged constructively, actively and on an ongoing basis which undermined the effectiveness of planning for key strategic issues, which led the Inspector to conclude that duty to co-operate had not been complied with. Secondly, the Inspector concluded that the proposed approach to the overall provision for housing and jobs was not sound. Therefore, as recommended by the Inspector, AVDC decided to withdraw the Draft VAP.

2.24 Since the Draft VAP has failed in the duty to co-operate and was found not sound, and has been withdrawn, we give the document no weight.

2.25 The Inspector's letter identifies the failures of the Draft VAP that will need to be addressed in a future development plan document, including strategic growth, levels of housing and employment growth, and the growth of Milton Keynes. These matters are relevant to this application. We highlight below, the key paragraphs:

- Paragraph 9: Milton Keynes will continue to be a major focus for housing and economic growth, and there is a relationship between Aylesbury Vale and the future growth of Milton Keynes beyond its boundaries.
- Paragraph 21: There is a need to address the growth of the urban area of Milton Keynes into Aylesbury Vale, and that joint working on this matter will be required.
- Paragraph 27: There are significant issues in terms of accommodating potential unmet needs from other authorities, including Milton Keynes.
- Paragraph 33: There are no fundamental environmental or infrastructure constraints to higher levels of growth.
- Paragraph 37: There is a clear and substantial mismatch between the level of housing and jobs planned, and significantly more housing is required to support job growth.
- Paragraph 40: A number of key strategic issues remain unresolved.

Conclusion

2.26 This background demonstrates that the SWMK Area has been assessed as a suitable location for development.

2.27 It is also clear from the above that AVDC previously accepted the SWMK Area as an acceptable location for development, and that this approach was supported by sustainability appraisal work which concluded that it was suitable. However, since the Secretary of State announced his intention to revoke regional strategies, AVDC has fundamentally changed its approach to development; AVDC has taken the localism agenda to mean lower housing targets and planning for local housing needs only. This approach ignores the needs of the wider housing market area, and the impacts of continued in-migration and housing affordability. It also ignores the acknowledged sustainability credentials of development in the SWMK Area, and in particular directing residential development close to key employment centres.

3. PROPOSED DEVELOPMENT

The Site

- 3.1 The Application Site covers an area of 144.77 Ha and is located immediately to the west of Far Bletchley, at the south western edge of Milton Keynes. The boundary of the site is formed by the A421 (H8 Standing Way) and Buckingham Road (A4034) to the north, the disused former Oxford to Bletchley rail line to the south (due to be reopened as part of the East West Rail project), Whaddon Road to the west, and the existing residential area of Far Bletchley to the east. Weasel Lane – an existing restricted byway and cycle route – cuts through the site from Whaddon Road to Buckingham Road. There are other public rights of way across the site, including the Milton Keynes Boundary Walk.
- 3.2 The site currently comprises agricultural land. There are hedgerows and trees at some of the field boundaries. There are agricultural buildings on the site. There are adjoining buildings that are in residential use.
- 3.3 An oil pipeline crosses the middle of the site in a north south direction; a 10m wide exclusion zone for the pipeline is incorporated into the layout of the Proposed Development. There are high voltage overhead power lines crossing the north western part of the site; the power lines will be placed underground as part of the Proposed Development. An intermediate pressure gas main passes through the eastern part of the site in a north south direction; the gas main will fall within land set aside for the grid road reserve.

The Surrounding Area

- 3.4 The Application Site straddles the boundary between the rural hinterland of Aylesbury Vale and the urban area of Milton Keynes. To the north is the industrial area of Snelshall West and to the east is the established residential area of Far Bletchley. To the west and south of the site is farmland and open countryside. The village of Newton Longville is located to the south of the site.
- 3.5 The Application Site is located adjacent to Milton Keynes, which is a main centre in the region providing significant employment opportunities and containing a broad range of services and facilities. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 3.6 The surrounding area possesses an undulating land form characterised by a ridge running across the central length of the site from east to west. The predominant topographic features are shallow ridges and valleys sloping away from this focal ridge line, which run broadly on a south west alignment.
- 3.7 The site is well connected on a local, sub-regional and regional scale. The A421 immediately north of the site enables connections to the established Milton Keynes grid road network also linking to the A5 and M1 which provide connections to the wider city and region respectively.

Proposed Development

- 3.8 The rationale for the design and layout of the Proposed Development is described in more detail in the **Design & Access Statement**. In summary, the form and layout of the Proposed Development is strongly influenced by principles that have governed the planned expansion of Milton Keynes. The Proposed Development includes a primary road grid structure, local routes with pedestrian/cycle route connections, a neighbourhood centre at a prominent east west junction of the main connecting route, which would create lively, well used streets and walkable neighbourhoods which encourage linked trips and foster community cohesion. In addition, development in this location would reduce in-commuting and provide opportunities for residents to access employment, services and facilities elsewhere in Milton Keynes by non-car modes of transport.
- 3.9 The design of the Proposed Development seeks to respond to the specific spatial context of both Milton Keynes and Aylesbury, and in particular the characteristics (density, built form, and open space) which define the built form of the residential areas located around or in close proximity to the Application Site. The three areas which have informed the design and layout are: the traditional grid square of Tattenhoe; the neighbourhoods in the southern part of Newton Longville; and, the western neighbourhoods of Far Bletchley.

Land Uses

- 3.10 In summary, the Proposed Development will comprise the following uses: up to 1,855 dwellings; employment area; neighbourhood centre; land for a three form entry primary school with early years provision and four form entry secondary school; green infrastructure; and associated drainage, highway and transport infrastructure. The proposed land uses are shown in Table 3.1 below.

Table 3.1 Land Use

Land Use	Ha
Allotments	1.22
Employment	2.07
Green Open Space	55.75
Grid Road Reserve	7.24
Infrastructure	4.87
Neighbourhood Centre	0.67
Primary School	3.00
Secondary School	5.20
Water Attenuation	5.05
Residential	54.16
Sub-Total	139.21
Highway Improvements	5.56
Total	144.77

- 3.11 The Development Framework Plan (Drawing No. SWMK03-073-H) shows the proposed distribution of uses across the site. The proposed distribution of uses is as follows:

- Residential on southern part of site and in north western quadrant

- Mixed-use in north eastern part of site, comprising employment, neighbourhood centre and residential uses.
- Employment uses in north eastern part of site, opposite Snelshall West employment area, in a visible location and providing good access to the A421 and the wider strategic highway network.
- Land for a four form of entry Secondary School on the eastern boundary of the site, providing good access to and from existing and proposed residential areas and also good connections to the highway network and walking, cycling and public transport networks.
- Land for a three form entry Primary School with early years provision located towards the centre of the site, making it accessible to all residents of the Proposed Development.
- The main areas of open space, sport and recreation are located in the centre of the site, making them accessible to all residents of the Proposed Development, and with good connections to existing cycling and pedestrian routes. The formal sport and recreation areas comprise a local park and district park, football pitches, a cricket pitch, tennis courts, a Multi-Use Games Area (MUGA), and a skateboard park.
- A number of children's play areas have been provided throughout the site, within and close to the proposed residential areas.
- Allotment land is provided in the north eastern corner of the site.
- New highway access points at three locations on the A421.
- Land for a Grid Road Reserve located towards the eastern part of the site, which would be a continuation of Snelshall Street.

Employment

- 3.12 The Proposed Development includes 2.07 hectares of land for employment uses, comprising small scale starter business units. There is a need and demand for these types of units in Milton Keynes, and they are not typically provided within the established employment areas or in central Milton Keynes at rental levels that suit small businesses. It would be appropriate to include small scale employment uses within the mix of uses provided at a sustainable urban extension. The employment provided at the Application Site would represent a marginal employment location, and as such it would not divert jobs or businesses from the main industrial and employment areas. The scale of the proposed employment uses would not generate significant traffic movements.

Retail

- 3.13 The proposed neighbourhood centre would include a small convenience store, intended to meet the day to day needs of local residents. The convenience store would be part of a neighbourhood centre alongside other retail and service uses; all neighbourhoods within Milton Keynes include a neighbourhood centre. The proposed convenience store would not be a supermarket attracting customers from elsewhere in Milton Keynes or the surrounding area. We anticipate that most local residents of the Proposed Development would continue to shop at the existing supermarkets for their main weekly food shopping.

Grid Road Reserve

- 3.14 The adopted development plan for AVDC and MKC includes a requirement for a link road between the A4146 and A421. We understand that both Councils have an aspiration for the link road to be delivered, and it is also desirable politically. The link road would remove through traffic from the surrounding villages, which would be a benefit for the residents of those villages. The Proposed Development reserves sufficient land to accommodate a dual carriageway grid road, providing a link between Snelshall Street (V1) under the proposed East West railway line and connecting to the A4146 Stoke Hammond By-pass. The land has been reserved within the Application Site, but the link road would in due course be designed and delivered by third parties and not the SWMK Consortium.

Density

- 3.15 The Proposed Development includes a variety of residential densities, as shown on the Residential Density Plan (Drawing No. SWMK03-082-C). The average density is 35 dwellings per hectare (dph). Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The variety of densities across the site is as follows:

- 20-25 dph – southern and eastern edges in more visually sensitive locations
- 25-35 dph – within locations not visible from public vantage points
- 35-40 dph – edge of site adjacent to primary routes
- 40-45 dph – close to employment and neighbourhood centre

Building heights

- 3.16 The height of buildings within the Proposed Development is shown on the Parameter Plan (Drawing No. SWMK03-074-G). The plan shows the maximum building heights within the Proposed Development. The proposed building heights for the different uses are as follows:

- Residential: – 2 to 3 storeys up to 11m, with 3 storeys along primary routes and at key entrances or intersections in order to provide landmark or gateway buildings.
- Employment Area: – up to 12m, which is similar to other employment sites opposite and adjacent to A421.
- Neighbourhood Centre – up to 13m, with retail and community uses at ground floor and residential above.
- Primary School – up to 10m and 2 storeys for efficient use of site.
- Secondary School – up to 12m.

Access

- 3.17 The Proposed Development includes improvements to the existing highway network, comprising the following: new highways access points to Whaddon Road, Buckingham Road, and a left in/left out junction onto the A421; junction improvements to Tattenhoe Roundabout and Bottle Dump Roundabout close to Central Milton Keynes and on the A421 (including revised access arrangements to the Pearce Recycling site); traffic calming in adjacent villages such as Newton Longville to discourage rat-running and high-speed traffic; and, a grid road reserve for the A4146 and A421 link road. At this stage the primary access points and the primary and secondary routes through the site are identified, although in due

course a local streets and neighbourhood network will also be identified. Weasel Lane – an existing restricted byway and cycle route – cuts through the site from Whaddon Road to Buckingham Road. There are other public rights of way across the site, including the Milton Keynes Boundary Walk. These rights of way will be retained and incorporated into the Proposed Development. Sustrans Route 51 crosses the Application Site. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport.

Open Space & Recreation

- 3.18 The Proposed Development includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children’s play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and eight Local Equipped Area of Play (LEAP), and allotments. These facilities are located where they are easily accessible to residents within the Proposed Development and also from neighbouring areas.

Sustainability

- 3.19 The Proposed Development has the characteristics of sustainable development in the following matters: energy efficiency and carbon reduction; sustainable transport; water resource management; information and communications technology; business and employment; healthy community; social well-being and governance; landscape and biodiversity; materials, waste and recycling; and, housing.

Waste Management

- 3.20 The Proposed Development would generate construction, household, commercial, and organic waste. The appointed contractor will prepare a voluntary Site Waste Management Plan (SWMP). The SWMP will include measures to minimise the amount of waste generated and disposed of during the site clearance and construction phase of the Proposed Development.
- 3.21 The Proposed Development will include both internal and external waste and recycling storage facilities. These facilities will be located within the curtilage of each house, and in suitably designed enclosures on ground level for flats. These facilities will be design to be convenient and easily accessible for residents and waste collection crews. Sufficient exterior storage space will be provided to enable the installation by residents of a home composting bin/food digester in the gardens of private houses, and community composting facilities may also be an option.
- 3.22 Bring Sites will be required within the Proposed Development to provide additional recycling opportunities. Bring Sites are generally located within publicly accessible areas such as supermarkets and public car parks and typically comprise a number of containers allowing separate collection of materials for recycling.

Utilities & Infrastructure

- 3.23 The site contains a variety of utilities infrastructure. Exclusion zones are required for the oil pipeline and intermediate pressure gas main, and these areas are kept free of development within green infrastructure and highway corridors. The high voltage overhead power lines which cross the site would be placed underground as part of the Proposed Development. The Application Site does not currently have utility supplies, but water, electricity, gas and telecommunications services exist in the neighbouring areas, so it would be possible for utilities connections to be made to the Proposed Development. The Proposed Development would incorporate drainage infrastructure, foul water pumping stations, statutory undertakers equipment, and surface water attenuation measures.

4. PLANNING POLICY

4.1 This section of the Planning Statement sets out the planning policy background against which the Proposed Development is to be considered. It sets out the relevant statements of planning policy within the statutory development plan and the National Planning Policy Framework (NPPF) that influence the scheme. On 6th March 2014, the Government published the national Planning Practice Guidance (NPPG) to explain how the NPPF policy should be implemented. We refer to parts of the NPPG when discussing the relevant paragraph and section of the NPPF.

4.2 S38(6) of the Planning and Compulsory Purchase Act 2004 states that '*If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise*'. Therefore, the development plan is the starting point for the determination of planning applications.

4.3 ID 12-001-20140306 of the NPPG explains the role of a Local Plan. It states:

“National planning policy places Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been made) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.”

4.4 It is clear that the successful operation of the planning system requires local planning authorities to maintain an up to date development plan. As set out below, the development plan for Aylesbury Vale – the Aylesbury Vale District Local Plan (January 2004) – is both out of date and time expired, and does not comply with the NPPF. AVDC has attempted unsuccessfully to replace the Local Plan twice in recent years; the draft Vale of Aylesbury Plan was recently considered to be not sound by an Inspector and was withdrawn.

4.5 Section 109 of the Localism Act 2011 made provision for the Secretary of State to abolish Regional Spatial Strategies. The Regional Strategy for the South East (Partial Revocation) Order 2013 formally abolished the South East Regional Strategy, and the relevant Structure Plans, on 25th March 2013. As a consequence the South East Plan (2008), the relevant parts of the Milton Keynes & South Midlands Sub-Regional Strategy (2005), and the South East Regional Economic Strategy (2006) no longer form part of the adopted development plan for Aylesbury Vale District. The Order also revoked the Buckinghamshire County Structure Plan 1991-2011 (adopted March 1996).

4.6 The statutory development plan insofar as it relates to this application currently comprises:

- Aylesbury Vale District Local Plan (adopted January 2004) – saved policies.

- 4.7 In September 2007 the Secretary of State issued a Direction, under Paragraph 1(3) of Schedule 8 to the Planning & Compulsory Purchase Act 2004, which identified those policies in the Aylesbury Vale District Local Plan 2004 which were 'saved' after 27th September 2007.
- 4.8 The Buckinghamshire Minerals and Waste Local Plan 2004-2016 (adopted April 2006) and the Buckinghamshire Minerals and Waste Core Strategy (adopted November 2012) also form part of the development plan, but are not relevant to the determination of this application since the site is not affected by either of these matters nor is it safeguarded for minerals or waste development.
- 4.9 The adopted Aylesbury Vale District Local Plan has an end date of 2011, and therefore is time expired. The document did not take into account growth strategy for Aylesbury Vale identified in the South East Plan and the Milton Keynes South Midlands Sub-Regional Strategy, and it did not allocate sites to meet development needs beyond 2011. On this basis, we conclude that the development strategy and the housing requirements in the adopted Local Plan are out of date.
- 4.10 The Milton Keynes Local Plan 2001-2011 (December 2005) and the Milton Keynes Core Strategy (July 2013) are relevant because part of the Proposed Development (the highway access) is located within Milton Keynes.
- 4.11 As set out in Section 2, the draft Vale of Aylesbury Plan failed in the duty to co-operate and was found not sound, and has subsequently been withdrawn. On this basis, the Draft VAP is not part of the development plan and is not relevant to the determination of this application. It is clear from the examination into Draft VAP that Milton Keynes will continue to be a major focus for housing and economic growth, there is a need to address the growth of the urban area of Milton Keynes into Aylesbury Vale, and there are no fundamental environmental or infrastructure constraints to higher levels of growth. If the Inspector's conclusions are taken into account then the Application Site should be allocated for the Proposed Development in a future development plan strategy.

National Planning Policy Framework

- 4.12 The NPPF was published on 27 March 2012. It sets out the Government's planning policies for England and how these are to be applied in plan making and development management. It is a material consideration in determining planning applications. ID 21b-010-20140306 of the NPPG explains the role that the NPPF has in decision-taking, and confirms that it must be taken into account where it is relevant to a planning application. If decision takers choose not to follow the NPPF policies then they must explain their reasoning. The following paragraphs of the NPPF are relevant to the determination of this application.

Achieving sustainable development

- 4.13 Paragraph 7 identifies the three strands of sustainable development; economic, social and environmental. The delivery of employment land and infrastructure, providing housing to meet current and future needs, and protecting and enhancing the environment are all sustainable development related matters that are relevant to this application.

- 4.14 Paragraph 14 explains the presumption in favour of sustainable development. For decision-takers, this means approving development proposals that accord with the development plan without delay, but where the plan is absent, silent or out of date, granting permission, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF. Footnote 9 of Paragraph 14 identifies the policy designations where the presumption in favour of sustainable development does not apply e.g. sites within designated SSSI, AONB or Green Belt, or a designated heritage asset. The Application Site is not affected by any of the exempt landscape or nature conservation designations, and therefore the presumption in favour of sustainable development does apply. In this case the development plan is out of date in terms of the development strategy and the housing requirement. The presumption in favour of sustainable development requires that planning permission is granted unless the negative effects of doing so significantly and demonstrably outweigh the benefits of doing so.
- 4.15 The technical studies and the ES submitted with the application demonstrate that after mitigation measures have been implemented there are no unacceptable adverse impacts arising from the Proposed Development. In these circumstances, the proper application of the presumption in favour of sustainable development means that the Proposed Development should be granted planning permission. Furthermore, the **Sustainability Statement** demonstrates that the Application Site is a sustainable location for development and the Proposed Development has all the attributes of sustainable development, by including landscape and biodiversity features, providing a mix of uses, additional housing, and being accessible by walking, cycling and public transport.

Core Planning Principles

- 4.16 Paragraph 17 identifies the twelve core land-use planning principles, most of which are relevant to this planning application. The principle of a plan-led system is reiterated, as is the requirement for an up to date plan to be maintained (1st bp). Sustainable economic development should be supported (3rd bp). High quality design should be secured (4th bp). The character of the countryside should be protected (5th bp). Renewable energy should be encouraged (6th bp). The natural environment should be conserved and enhanced, and pollution should be reduced (7th bp). Mixed use development should be promoted (9th bp). Heritage assets should be conserved (10th bp). Patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling (11th bp). Community facilities should be delivered (12th bp).
- 4.17 AVDC does not have an up to date plan and has failed on two separate occasions to prepare one. This planning application is a positive response to the core planning principles of the NPPF, in the absence of an up to date plan. The technical studies submitted with the application demonstrate that the Proposed Development meets the core planning principles. The design and layout of the Proposed Development is well-designed and has taken into account the characteristics of the surrounding area.

Building a Strong, Competitive Economy

- 4.18 Paragraph 19 gives significant weight to the need to support economic growth. Milton Keynes is a key driver of the regional economy and a focus for employment and jobs, and

development which supports that economic role should be encouraged. The Proposed Development includes employment development and other uses that would generate employment opportunities.

Promoting Sustainable Transport

- 4.19 Paragraph 32 expects transport matters to be assessed for developments that generate a significant amount of movements. A **Transport Assessment** has been submitted with the application to assess the traffic and transport related impacts of the Proposed Development. The Transport Assessment recommends improvements to various junctions and roundabouts that would operate above capacity as a result of the Proposed Development including the Tattenhoe Roundabout and Bottle Dump Roundabout. Traffic calming would be provided in adjacent villages. A Travel Demand Management Strategy would be implemented for the Proposed Development, which is aimed primarily at maximising the opportunities for travel by non-car modes of travel and minimising the impact of traffic generated by the Proposed Development. A **Framework Travel Plan** is submitted with the planning application, which contains details of the initial targets and measures to achieve a modal shift towards non-car modes of transport. The Framework Travel Plan includes a commitment to prepare a Residential Travel Plan and Workplace Travel Plan to deliver the modal shift targets. The Public Transport Strategy comprising a new bus service through the Application Site, and the delivery of pedestrian and cycle facilities on site with connections to the wider footpath and cycle network, are key elements of the transport mitigation strategy. The developers would fund new vehicles to service the proposed new bus route.
- 4.20 Paragraph 34 seeks to ensure that development is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Paragraph 35 encourages the use of sustainable modes of transport modes, including by giving priority to pedestrians and cyclists and improving access to public transport, and by creating safe and secure layouts. As set out in Paragraph 36, a travel plan is one method through which sustainable travel can be delivered. Paragraph 38 encourages mixed use developments so that people can potentially walk between different uses because they are in close proximity to one another.
- 4.21 ID 42-006-20140306 of the NPPG identifies the benefits of preparing a Transport Assessment. It states:

“Travel Plans, Transport Assessments and Statements can positively contribute to:

- *encouraging sustainable travel;*
- *lessening traffic generation and its detrimental impacts;*
- *reducing carbon emissions and climate impacts;*
- *creating accessible, connected, inclusive communities;*
- *improving health outcomes and quality of life;*
- *improving road safety; and*
- *reducing the need for new development to increase existing road capacity or provide new roads.*

They support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable....”

- 4.22 The Application Site is located adjacent to Milton Keynes, which is a main centre in the region providing significant employment opportunities and containing a broad range of services and facilities. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport. The Proposed Development would accommodate a mix of uses – residential, community, retail, employment and education – making it possible for residents to travel within the development by sustainable modes. In all respects the Application Site represents a sustainable location for development.

Delivering a Wide Choice of High Quality Homes

- 4.23 Paragraph 47 seeks to “boost significantly the supply of housing” and to achieve this by using “their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,...”. The development plan for Aylesbury Vale – the Aylesbury Vale District Local Plan (January 2004) – is both out of date and time expired, and does not comply with the NPPF. AVDC has attempted unsuccessfully to replace the Local Plan twice in recent years. The Inspector appointed to examine Draft VAP concluded that the duty to co-operate had not been complied with, and that the proposed approach to the overall provision for housing and jobs was not sound. AVDC decided to withdraw Draft VAP as recommended by the Inspector.
- 4.24 In these circumstances, the full objectively assessed needs have not yet been determined. The proposed housing target in draft VAP was unsound, and it is clear from the Inspector’s letter that a higher housing target is required. In the absence of a tested housing target figure AVDC has proposed to use the 2011-based CLG Household Projections as an interim measure – see January 2014 Position Statement. An alternative housing figure that takes into account unmet needs from neighbouring areas, market signals, affordable housing need, and economic growth prospects has been prepared on behalf of the SWMK Consortium– see **Appendix 13**. The figure is more closely aligned with what would be required to determine objectively assessed housing needs. The housing requirement is considered in more detail in **Section 5**.
- 4.25 Paragraph 49 confirms that housing policies are not up to date if it cannot be demonstrated that a five year housing land supply exists. In the AVDC Five Year Housing Land Supply Position Statement June 2014 the Council conclude that there is a 5.6 years supply in the period 2014-2019 or 5.2 years supply in the period 2015-2020. The housing land supply position – using AVDC’s preferred interim housing target - is marginal at best. However, AVDC’s assessment is based on an interim housing figure that does not represent objectively assessed housing need i.e. the 2011-based CLG Household Projections. AVDC acknowledged in the June 2014 Position Paper that the CLG Household Projections does not represent a full objective assessment of housing need, and will determine planning applications for

residential uses against the presumption in favour of sustainable development – see Paragraph 1.15 and 1.45 of the June 2014 Position Statement. As set out in **Section 5**, if the housing requirement figure prepared on behalf of the Consortium is used then a five year housing land supply does not exist; the housing land supply lies between 3.7 years and 4.2 years. Therefore, we conclude that, in accordance with Paragraph 49, the adopted housing policy and interim housing requirement are out of date. In these circumstances, planning permission should be granted for sustainable development. As set out in this Statement, the Application Site is a sustainable location for development and the Proposed Development has all the attributes of sustainable development. Furthermore, numerous background studies have concluded that the SWMK Area represents a sustainable location for development.

- 4.26 Paragraph 52 states that *“the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”*. The Proposed Development represents an urban extension to Milton Keynes.

Requiring Good Design

- 4.27 Paragraph 56 stresses the importance of design in built development. A **Design & Access Statement** has been submitted with the application to explain how the design has evolved and the rationale behind the design and layout. As expected in Paragraph 66, the design and layout has been subject to consultation with the local community, local organisations, and Council officers. That consultation process is described in the **Statement of Community Involvement**.
- 4.28 ID 26-006-20140306 of the NPPG provides further information on design in the planning process. It states:

“Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered:

- *local character (including landscape setting)*
- *safe, connected and efficient streets*
- *a network of greenspaces (including parks) and public places*
- *crime prevention*
- *security measures*
- *access and inclusion*
- *efficient use of natural resources*
- *cohesive & vibrant neighbourhoods”*

- 4.29 In summary, the Proposed Development would be a part of Milton Keynes. It would in effect be an urban extension which includes some of the characteristic features of the City, such as self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping, and it would connect to the existing grid road network. The

Proposed Development has also been designed to be a standalone new neighbourhood with its own characteristics. The application is in outline but the submitted **Illustrative Masterplan** and **Design & Access Statement** clearly define future parameters of the Proposed Development to demonstrate that a high quality scheme could be delivered at detailed design stage.

Promoting Healthy Communities

- 4.30 Paragraph 69 expects development to facilitate social interaction and to create healthy and inclusive communities. These aims can be achieved by providing opportunities for residents to meet, and by creating safe and accessible environments. Paragraph 70 seeks to ensure the delivery of community and recreational facilities, and expects an integrated approach to be taken towards the location of housing, economic uses and community facilities. The Proposed Development includes a neighbourhood centre providing retail and community facilities.
- 4.31 ID 53-002-20140306 of the NPPG explains the links between health and planning. In summary, development should avoid adverse impacts on human health, create opportunities for people to make healthy choices, promote active travel and physical activity, and promote access to healthier food, high quality open spaces and opportunities for play, sport and recreation. A **Construction & Environmental Management Plan** would be prepared to deal with dust, noise, health and safety during construction. The footpaths, cycle routes and bridleways would be affected by partial closures during phases of construction which may discourage some physical activity, but this would be for a temporary period only and would not affect the whole network. The Proposed Development includes substantial areas of formal and informal open space and recreation, which would provide opportunities for physical activity. The network and public footpaths, cycle routes and bridleways would encourage walking and cycling within the Proposed Development, and to and from it. The design and layout seeks to ensure that a safe and secure environment is created. The proposed neighbourhood centre includes health facilities within the list of uses. In addition, jobs, skills and training opportunities would be created during the construction phase, and different employment opportunities would be available within the proposed employment area, neighbourhood centre and schools once the development is completed, which all create socio-economic benefits.
- 4.32 Paragraph 72 addresses the issue of education provision and school places, and in particular it seeks to provide support for the creation, expansion and alteration of schools. The Proposed Development includes land for a primary school and a secondary school. An **Education Statement** is provided in **Appendix 14**. The Proposed Development makes provision for a 3-form entry primary school providing 630 primary school places and land for a 600 place (four form of entry) secondary school to be provided.
- 4.33 Paragraph 73 seeks to ensure that new development provides access to high quality open space, sport and recreation. The Proposed Development includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children's play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and eight Local Equipped Area

of Play (LEAP), and allotments. These facilities are located where they are easily accessible to residents within the Proposed Development and also from neighbouring areas.

- 4.34 Paragraph 75 seeks to protect existing rights of way. Weasel Lane – an existing bridleway and cycle route – cuts through the site from Whaddon Road to Buckingham Road. There are other public rights of way across the site, including the Milton Keynes Boundary Walk. These rights of way will be retained and incorporated into the Proposed Development.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.35 Paragraph 96 recognises the role of planning in delivering a low carbon future, and expects new development to comply with local requirements for decentralised energy supply and to minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping. Paragraph 97 seeks to increase the supply and use of renewable and low carbon energy. ID 5-001-20140306 of the NPPG explains the importance of planning for renewable and low carbon energy. It states:

“Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.”

- 4.36 The **Energy Statement** assessed the opportunities for low and zero carbon technologies within the Proposed Development. Those opportunities include: solar photo-voltaics (“PV”); solar thermal; air and ground source heat pumps; log burners; heat pumps for Class B1 uses; larger solar PV arrays with Class B1 uses; and solar thermal, solar PV, heat pumps and biomass for the school and community building uses. The Proposed Development will be required by regulation to achieve very high energy efficiency and CO2 standards.
- 4.37 Paragraph 99 expects new development to avoid increased vulnerability to the range of impacts arising from climate change. It is recognised that in vulnerable areas, green infrastructure can provide a suitable adaptation measures. The Proposed Development includes a range of green infrastructure measures such as surface water attenuation, landscaping and open space.
- 4.38 Paragraph 100 expects inappropriate development to avoid areas at risk of flooding, and for development to be directed away from areas of high flood risk. Paragraph 103 seeks to ensure that flood risk is not increased elsewhere as a result of development.
- 4.39 A **Flood Risk Assessment** has been prepared for the Proposed Development. ID 7-030-20140306 of the NPPG identifies the objectives of a flood risk assessment. It states:

“The objectives of a site-specific flood risk assessment are to establish:

- *whether a Proposed Development is likely to be affected by current or future flooding from any source;*
- *whether it will increase flood risk elsewhere;*

- *whether the measures proposed to deal with these effects and risks are appropriate;*
- *the evidence for the local planning authority to apply (if necessary) the Sequential Test, and;*
- *whether the development will be safe and pass the Exception Test, if applicable.”*

4.40 ID 7-068-20140306 of the NPPG provides a checklist of matters to be addressed in a flood risk assessment. The **Flood Risk Assessment** deals with these matters. The majority of the site lies within Flood Zone 1 and therefore is at low risk of flooding. The north western corner of the site is within Flood Zone 3 and as such is at high risk of flooding. However the Environment Agency has no records of flooding at the site. All buildings will be located within Flood Zone 1. The Proposed Development will include sustainable drainage systems comprising green roofs, rainwater harvesting and permeable paving, and swales and attenuation basins will be included to attenuate surface water run-off to green field rates.

Conserving and Enhancing the Natural Environment

4.41 Paragraph 109 seeks to enhance the natural and local environment by protecting landscape and biodiversity and by avoiding increases to pollution. A number of technical studies and an ES have been submitted with the application to address these matters.

4.42 Paragraph 112 seeks to retain the best and most versatile agricultural land. ID 8-026-20140306 of the NPPG states: “...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”. These matters are addressed in the **Agricultural Land Chapter** of the ES. The Application Site mostly comprises Grade 3b agricultural land, but there is a small area of Grade 3a land. The site is predominantly in arable use with a small area of pasture. The site is occupied by three farm businesses, one of which only operates on a part time basis. The Proposed Development would involve the loss of less than 20 Ha of the best and most versatile agricultural land, which is assessed as a slight negative impact of moderate adverse significance. The two affected full time farm businesses will remain viable and can operate off-site.

4.43 Paragraph 118 seeks to conserve and enhance biodiversity, and expects development to avoid significant harmful impacts on habitats. ID 8-016-20140306 of the NPPG explains how biodiversity should be taken into account in preparing a planning application. Ecological surveys are required to determine the impact of development on biodiversity. ID 8-018-20140306 of the NPPG identifies the issues that should be considered when seeking to avoid, mitigate or compensate for significant harm to biodiversity. These matters are addressed in the **Ecology Chapter** of the ES. ID 8-019-20140306 of the NPPG notes that green infrastructure can help to mitigate any significant harm to biodiversity. The site contains woodland, hedgerows and mature trees, which will largely be retained within the Proposed Development. Parts of the site are used by badgers, common lizard, grass snake, bats and birds. A wide range of new habitats will be delivered as part of the Proposed Development, including native broadleaved woodland, species-rich grassland and wetland. A Biodiversity Management Plan will also be prepared. The Proposed Development would lead to some limited disruption to wildlife which is unavoidable. However, the scale and diversity

of the green infrastructure proposals included within the Proposed Development will provide comprehensive mitigation, compensation and substantial enhancement to compensate for any initial losses.

- 4.44 Paragraph 120 seeks to prevent unacceptable risks from pollution; in this case both noise and air quality matters have been assessed. Paragraph 123 relates to the adverse impact of noise pollution. Section ID30 of the NPPG deals with noise matters and provides advice on how planning can manage potential noise impacts in new development. ID 30-001-20140306 states that *“Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment”*. The consideration is whether the noise impact would be significant. ID 30-005-20140306 identifies the noise exposure hierarchy, which range from not noticeable where no specific action is required to noticeable and very disruptive where preventative action is required. ID 30-008-20140306 identifies a range of potential solutions to address noise impacts which are engineering, layout, use of conditions/obligations, and mitigation measures. These matters are addressed in the **Noise & Vibration Chapter** of the ES. Noise from the Proposed Development would be generated by construction activities (ground preparation, excavation for foundations, construction of roads and buildings, off-loading of materials and vehicle movements), fixed plant equipment (in employment area, schools and neighbourhood centre), additional road traffic, and a reopened railway line. The existing and future residents are those that would be most affected by noise from the Proposed Development, unless mitigation measures are implemented. A draft **Construction & Environmental Management Plan** has been submitted with the application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from noise. The design and layout of the proposed development and buildings will need to separate dwellings from main noise sources, avoid habitable rooms facing noise sources, and provide adequate noise attenuation measures within building facades and glazing. A buffer will need to be included to provide suitable stand-off distances between the proposed dwellings and the main roads (Standing Way, Whaddon Road and Buckingham Road) and the re-opened East West railway.
- 4.45 Paragraph 124 relates to the impact of development on air quality. Section ID 32 of the NPPG provides guiding principles on how planning can take account of the impact of new development on air quality. ID 32-005-20140306 identifies the factors that could determine whether air quality is relevant to a planning decision. In summary those factors are as follows: significant changes in traffic generation; introducing new sources of air pollution; exposing new residents to existing sources of air pollutants; giving rise to potentially unacceptable impacts (such as dust) during construction; and, significantly affecting biodiversity at designated wildlife sites. ID 32-008-20140306 identifies examples of air quality mitigation measures, which are as follows:
- *the design and layout of development to increase separation distances from sources of air pollution;*
 - *using green infrastructure, in particular trees, to absorb dust and other pollutants;*
 - *means of ventilation;*

- *promoting infrastructure to promote modes of transport with low impact on air quality;*
- *controlling dust and emissions from construction, operation and demolition; and*
- *contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development.”*

4.46 The **Air Quality Chapter** of the ES considers potential air quality impacts associated with the Proposed Development. Air quality impacts from the Proposed Development would arise from dust associated with construction phase, and increased traffic during construction and from the additional uses within the completed development. The potential for increased nitrogen dioxide emissions from locomotives on the proposed re-opened East West railway line were considered. However, the distance between the nearest proposed residential dwellings and the railway line significantly exceeds minimum distances where emissions might be a factor, and therefore this issue was not assessed further. A draft **Construction & Environmental Management Plan** has been submitted with the application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from dust and on air quality. The assessment of air quality concludes that the Proposed Development will lead to an imperceptible or small increase in concentrations of fine particulate matter and nitrogen dioxide, and that overall the impacts on existing and future residents would be negligible.

Conserving and Enhancing the Historic Environment

4.47 Paragraph 126 seeks to protect heritage assets in a manner which is appropriate to their significance. The term ‘significance’ in terms of heritage policy is defined in the Glossary to the NPPF as follows: *“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting”*. ID 18a-003-20140306 of the NPPG explains what is meant by the conservation and enhancement of the historic environment, and states that: *“...Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development”*.

4.48 The Proposed Development will have no direct or indirect impacts on listed buildings. It will have only a minor impact on views from the western edge of Newton Longville Conservation Area and a small number of listed buildings on the western edge of the modern built area of Newton Longville. The historic landscape of the site is essentially that of 19th century parliamentary enclosure which has subsequently suffered from significant hedgerow loss, and the Proposed Development will have a negligible impact upon this landscape type. The geophysical survey and evaluation trenching has identified a four areas of late prehistoric/Roman settlement within the development site. The Proposed Development has been designed so as to enable all four settlement areas to be preserved within open space or school playing fields. An archaeological watching brief will be implemented to record any peripheral remains.

Decision-taking

- 4.49 Paragraph 186 expects local planning authorities to approach decision-taking in a positive way to deliver sustainable development, and in accordance with Paragraph 187, to look for solutions rather than problems. Sections 3 and 4, and the **Sustainability Statement** submitted with the application, demonstrates that the Application Site is a sustainable location for development and the Proposed Development has all the attributes of sustainable development.
- 4.50 Paragraph 188 encourages early pre-application engagement, which is what has happened during the preparation of this planning application and the ES. The pre-application consultation that has been carried out is set out in the **Statement of Community Involvement**. Three briefing sessions for elected members, parish councils and business leaders took place during April and May 2013. Two public exhibitions were held during June 2013. Paragraph 190 notes that benefits can occur when issues are resolved at the pre-application stage. The design of the Proposed Development was informed by three design workshops attended by officers from AVDC and MKC. The matters raised and the outcome of the workshops is described in Paragraphs 4.25 and 4.45 of the **Design & Access Statement**. The final version of the **Development Framework Plan** is the result of those pre-application discussions. The key benefits of the Proposed Development are identified in **Section 7**.
- 4.51 Paragraph 196 confirms that the planning system is plan-led (also confirmed in Paragraphs 14 and 17). As set out above, in this case the development plan is out of date in terms of the development strategy and the housing requirement. AVDC does not have an up to date plan and has failed on two separate occasions to prepare one. This planning application is a positive response to the core planning principles of the NPPF in the absence of an up to date plan. There are no constraints to a higher housing target and SWMK has been identified as a sustainable and suitable location for development.
- 4.52 Paragraph 203 encourages the use of conditions or planning obligations to make development acceptable that would otherwise be unacceptable in planning terms. Paragraph 204 sets out the three tests that must all be met for planning obligations, which are as follows: necessary to make the development acceptable in planning terms; directly related to the development; and, fairly and reasonably related in scale and kind to the development. ID: 23b of the NPPG provides further advice on when obligations should be used. The Heads of Terms for a S106 Agreement are set out in **Section 8**.
- 4.53 Paragraph 206 deals with conditions. It states: *“Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects”*. ID 21a-004-20140306 of the NPPG explains how the six tests for conditions should be applied. The applicant will work with AVDC and MKC as local planning authorities to identify the matters that will need to be the subject of conditions.

Implementation

- 4.54 Paragraph 210 reiterates the provisions of Section 38(6) of the Planning & Compulsory Purchase Act 2004 i.e. that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. As set out elsewhere, the adopted development plan is time expired and is out of date in terms of the development strategy and the housing requirement. As set out in **Section 5**, the housing land supply position represents a material consideration that is relevant to the determination of this application.
- 4.55 Paragraph 215 explains the weight to be given to policies in existing plans, which depends on the degree of consistency with the NPPF. In this case the adopted development plan is time expired and is out of date in terms of the development strategy and the housing requirement, which is inconsistent with the NPPF which requires an up to date assessment of housing need and to boost significantly the supply of housing.
- 4.56 Paragraph 216 sets out the weight to be given to policies in emerging plans. In this case, there are no emerging development plan documents; the draft VAP has been withdrawn because it was not sound and thus inconsistent with the NPPF, and therefore is given no weight. AVDC is in the very early stages of preparing a draft Vale of Aylesbury Local Plan. According to the latest version of the Local Development Scheme (May 2014) consultation on an Issues & Options document is not due to take place until Summer 2015, with consultation on a Proposed Submission document in Summer 2016.

Community Infrastructure Levy (CIL) Regulations (2010)

- 4.57 The CIL Regulations came into force in April 2010. The Regulations have in part the effect of limiting the use of Planning Obligations to circumstances where:
- It is necessary to make the development acceptable in planning terms;
 - It is directly related to the development; and
 - It is fairly related in scale and kind to the Proposed Development (Regulation 122)
- 4.58 Furthermore, Regulation 123 limits the 'pooling' of S106 funding or infrastructure provision. S106 Heads of Terms are set out in Section 6.

The Development Plan

- 4.59 Following the revocation of the South East Regional Strategy and the Buckinghamshire County Structure Plan 1991-2011 in March 2013, the development plan for AVDC comprises the Aylesbury Vale District Local Plan (January 2004). The Milton Keynes Local Plan 2001-2011 (December 2005) and the Milton Keynes Core Strategy (July 2013) are also relevant because part of the Proposed Development (the highway access) are located within Milton Keynes.
- 4.60 The Proposed Development would in effect be an urban extension of Milton Keynes. It has been designed to be a standalone new neighbourhood which follows the place-shaping principles identified in Policy CS6 of the Milton Keynes Core Strategy. This approach was

discussed with both AVDC and MK during design process. How the Proposed Development has evolved is explained in the **Design & Access Statement**.

4.61 We set out below the relevant policies of the development plan documents.

Aylesbury Vale District Local Plan (January 2004)

4.62 The Application Site is not allocated for development and it is not covered by any other site specific designations. The former development strategy – which sought to focus development at Aylesbury – has not been saved. The Application Site would fall within the rural area. However, the strategy for the rural area (not contained in policy), which is part of and set within the context of the overall development strategy, is also out of date. It is the general development control policies and the policies relating to the link road between the A4146 and A421 that have been saved, and which are relevant to the determination of this application. These policies are set out below.

Housing

4.63 Table 2 identifies the housing requirement for the period 2001-2011, with an overall housing target for the District and separate housing targets for both Aylesbury and the Rural Area. The housing target is out of date because, firstly, the figure was derived from the Buckinghamshire County Structure Plan which has subsequently been revoked, and secondly, the plan period expired in 2011.

4.64 Policy GP2 sets out the proportion of affordable housing that will be required, which is that a minimum of 20% and up to 30% affordable housing should be provided for developments of 25 or more dwellings. AVDC's Affordable Housing Interim Position Statement (June 2014) states that the Council intend to negotiate towards the upper end of the range in GP2 i.e. 30%. The Proposed Development is for up to 1,855 mixed tenure dwellings, which provides scope for a range of affordable housing types to be provided on site. Subject to viability up to 30% of the overall housing target would be affordable, which equates to up to 557 affordable dwellings, and would comply with the minimum policy requirement. The proportion of affordable housing to be provided within the overall development would be specified in the S106 Agreement.

4.65 Policy GP3 seeks to ensure that low cost market housing (the smallest size of units) is provided. However, the NPPF definition of affordable housing makes it clear that low cost market housing may not be considered as affordable housing. Therefore, Policy GP3 is out of date and cannot be given weight. This approach is accepted in the Affordable Housing Interim Position Statement (June 2014).

4.66 Policy GP8 seeks to protect the amenity of residents by avoiding unreasonable harm to nearby residents. The potential amenity impacts on residents are assessed in the ES. A draft **Construction & Environmental Management Plan** has been submitted with the application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from noise and dust. The design and layout of the proposed development and buildings will need to separate dwellings from main noise sources, avoid habitable rooms facing noise sources, and provide adequate noise

attenuation measures within building facades and glazing. The detailed design and layout are issues that will be addressed at Reserved Matters stage. A buffer has been included within the Proposed Development to provide a suitable stand-off distances between the proposed dwellings, and the proposed East West railway. Additional buffers will be provided between the dwellings and the main roads. Air quality impacts could potentially arise from dust associated with construction phase, and increased traffic during construction and from the additional uses within the completed development. The assessment of air quality concludes that the Proposed Development will lead to an imperceptible or small increase in concentrations of fine particulate matter and nitrogen dioxide, and that overall the impacts on existing and future residents would be negligible.

Employment

- 4.67 Policy GP16 of the Aylesbury Vale District Local Plan (2004) sought to secure a close correlation between the location of homes, jobs and skills. This policy has not been saved. There are no other specific employment related policies in AVDLP that would have been relevant to the Proposed Development.

Transport

- 4.68 Policy GP24 seeks to ensure that car parking is provided in accordance with the standards contained in the adopted Parking Guidelines SPG (May 2000). The maximum parking guidelines are contained in the table on pg.8 of the SPG, and range from 1 space for a one bedroom flat to 3 spaces for a 4+ bedroom house. We note that the NPPF (at Paragraph 39) has introduced a degree of flexibility to car parking standards, so that factors such as accessibility and availability of public transport for example are taken into account. The proposed residential areas will provide sufficient car parking, with the exact amount to be determined at detailed design stage. As set out below, we note that MKC has a slightly different approach to parking standards and specifically excludes garages from the calculation. These different policy approaches will need to be resolved at detailed design stage.

Conservation of the Built Environment

- 4.69 Policy GP35 identifies the key factors to consider in the design of new development, which in summary are the physical characteristics, existing building styles, the scale and context, natural features, and visual impact. Policy GP38 expects new development to incorporate landscaping and to complement existing features. Policy GP39 expects existing trees and hedgerows to be protected or replaced as part of development proposals. Policy GP40 in particular seeks to retain trees and hedgerows which have amenity, landscape or wildlife value. Policy GP45 relates to secured by design considerations, and expects development to incorporate measures to assist crime prevention and help reduce risks to personal safety. Policy GP59 expects development proposals affecting a site of archaeological importance to protect, enhance and preserve the historic interest and its setting.
- 4.70 The rationale for the design and layout of the Proposed Development is explained in the **Design & Access Statement**. The Proposed Development has been informed by the characteristics of the site and the surrounding area, and is strongly influenced by principles

that have governed the planned expansion of Milton Keynes. The proposed mix of uses are those expected in a standalone new neighbourhood on the edge of Milton Keynes, and comprise residential, employment, education, retail and community uses. The built development is surrounded by substantial areas of green infrastructure and multi-functional open space. The average density is 35 dwellings per hectare (dph), which is a typical for other Milton Keynes expansion areas. Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The building heights are determined by their location within the site and the proposed use. The residential buildings are higher at key entrances or intersections to provide landmark or gateway buildings. The employment, neighbourhood centre, and school buildings are the highest within the Proposed Development. The internal highway network will comprise primary and secondary routes, internal residential roads, footpath, bridleways, cycle paths. The Primary routes will connect each of the proposed residential parcels. The Secondary routes will provide connections through and between residential development parcels. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport.

- 4.71 The landscape features and the existing trees and hedgerows have been incorporated into the Proposed Development, and the impact of the development on these features and landscape mitigation measures is explained in the **Landscape & Visual Chapter** in the ES. The majority of the site is within a low sensitivity landscape character area which generally lacks intrinsic features of landscape merit. The site lies adjacent to a character area of high sensitivity - part of the former hunting chase of Whaddon Chase – however, the green infrastructure and strategic landscaping on the western and southern boundaries of the site will minimise adverse effects on this landscape. The landscaping at the site boundary will reduce the visual impact from neighbouring dwellings and residential areas and from surrounding villages. The Proposed Development would be completely contained within a very robust green infrastructure framework which surrounds and permeates the developed area. The green infrastructure would be multi-functional, encompassing broadleaved native structural woodland, extensive areas of species rich wet meadow, footpaths and bridleways, play areas, and community sports fields.
- 4.72 The Proposed Development avoids areas of known archaeological potential. The four areas of late prehistoric/Roman settlement within the development site are to be preserved within open space and school playing fields. An archaeological watching brief will be implemented to record any peripheral remains.

Recreation and Leisure

- 4.73 Policy GP84 seeks to protect existing public rights of way. Weasel Lane, an existing bridleway and cycle route, and other public rights of way across the site, including the Milton Keynes Boundary Walk, will be retained and incorporated into the Proposed Development.
- 4.74 Policy GP86 relates to the provision of outdoor playing space within development, with a standard of 2.43 hectares outdoor play space per 1000 persons, subject to existing open

space provision in the locality. Policy GP87 expects equipped play areas for children to be provided, and Policy GP91 expects informal amenity open spaces to be provided within development. The Proposed Development includes a total of 55.95 Ha of open space. The Proposed Development includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children's play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and eight Local Equipped Area of Play (LEAP), and allotments.

- 4.75 Policy GP90 seeks to ensure that indoor sports facilities are provided, according to the need arising from the Proposed Development. The Proposed Development includes a sports hall, as part of the mixed-use neighbourhood centre.

Community Facilities and Services

- 4.76 Policy GP94 expects residential development to make provision for community facilities and services. The Proposed Development includes a neighbourhood centre which will make provision for community uses such as health and leisure, and land is provided for a primary school and secondary school within the site.

Special Landscape Areas

- 4.77 Policy RA8 seeks to protect designated landscape areas. The Application Site is not within such a landscape protected area, however, the supporting text in Appendix 5 seeks to also protect other non-designated areas. It states:

"Parts of Aylesbury Vale have been identified as areas of special landscape: an Area of Outstanding Natural Beauty (AONB), Areas of Attractive Landscape and Local Landscape Areas. These designations highlight particularly important features of the countryside. The remaining countryside, although possessing less distinguishable features, has a soft and subtle charm which it is nonetheless important to protect."

- 4.78 The impact of the Proposed Development on the existing landscape and the landscape mitigation measures are explained in the **Landscape & Visual Chapter in the ES**. The majority of the site is within a low sensitivity landscape character area which generally lacks intrinsic features of landscape merit. The green infrastructure and strategic landscaping on the western and southern boundaries of the site will minimise adverse effects on neighbouring sensitive landscapes. The proposed landscaping at the site boundary will reduce the visual impact from neighbouring dwellings and residential areas and from surrounding villages.

A4146 to A421 Link Road

- 4.79 Policy RA34 and RA35 relate to the redevelopment of the Newton Longville Brickworks site, and of particular relevance to the Proposed Development, these policies safeguard a road corridor to the A4146 and protect a future road link to the A421 from development. As set out below, there is a similar policy requirement for a link road in the development plan for Milton Keynes.

- 4.80 The Proposed Development makes provision for a link road between the A4146 Fenny Stratford bypass and the A421 Buckingham Road / H8 Standing Way, and land is reserved within the Application Site for a grid road to accommodate that link. The proposed link road would require land and funding derived from development for it to be delivered.
- 4.81 If the proposed link road is not provided then adopted policies RA34 and RA35 would not be implemented, and the associated benefits of it would not be delivered including the removal of through traffic from the surrounding villages.

Milton Keynes Local Plan 2001-2011 (Adopted December 2005)

- 4.82 The Milton Keynes Local Plan is time expired but the relevant design, transport and housing policies are saved and have informed the design and content of the Proposed Development.

Design

- 4.83 Policy D1 is concerned with the impact of development on the surrounding area, with a need to address issues relating to traffic generation, drainage, visual impact, pollution, and highway access for example. Policy D2A seeks to ensure that new development is of a high standard of design, by taking into account factors such as existing character, street frontage, public realm, and ease of movement in the design and layout of development. Policy D2 relates to the design of buildings, and requires scale, relationship, access, and landscaping to be considered in the design of development. Policy D4 relates to sustainable construction, and identifies a range of measures to reduce the use of resources and materials. Further detail on the implementation of Policy D4 is contained in the Sustainable Construction Guide SPG (April 2007). The **Sustainability Strategy** sets out the commitments to sustainable construction that would be delivered at detailed design stage.
- 4.84 The rationale for the design and layout of the Proposed Development is explained in the **Design & Access Statement**. The Proposed Development has been informed by the characteristics of the site and the surrounding area, and is strongly influenced by principles that have governed the planned expansion of Milton Keynes.

Transport

- 4.85 Policy T1 defines a transport user hierarchy in order to encourage non-car modes of transport. It is expected that development should meet the needs of transport users in following order of priority; pedestrians, cyclists, public transport, and then others. Policy T3 seeks to ensure that pedestrian and cycle infrastructure is provided within development including links to neighbouring areas, safe and convenient routes, and appropriately designed traffic calming schemes. Policy T4 identifies the priorities for improving access and conditions for pedestrians and cyclists. The relevant priorities for this application are as follows: (i) routes from nearby settlements to Milton Keynes City and (iii) the National Cycle Network. Policy T5 relates to public transport provision and infrastructure within development, and seeks to deliver safe and convenient bus routes, bus priority measures, and for bus stops to be located within 400m of new development.
- 4.86 The Application Site is located adjacent to Milton Keynes. Sustrans Route 51 crosses the Application Site. The Proposed Development includes walking, cycling and public transport

infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport. It should be possible for residents to travel within the development by sustainable modes. The **Transport Assessment** recommends a new bus service through the Application Site with the developer partly funding new vehicles to operate the service, and the **Framework Travel Plan** seeks to effectively manage and promote walking and cycling within the Proposed Development and to the surrounding area.

- 4.87 Policy T9 and Table 1 relate to the road hierarchy, and identify the objectives for each type of road. It is expected that roads will be designed according to their intended function. The Proposed Development includes improvements to the existing highway network to provide the primary access points from the A421, and identifies primary and secondary routes at this stage. The local residential roads and access points would be determined at detailed design stage. The proposed road hierarchy is described in the **Design & Access Statement**.
- 4.88 Policy T15 relates to parking provision, and seeks to ensure that maximum parking standards are not exceeded and that parking areas are well-designed. We note that the Parking Standards for Milton Keynes SPG (2005) specifically excludes garages as a parking space. Policy T17 expects development to include traffic calming to enable safe access for pedestrians and cyclists. Parking provision and traffic calming measures are matters that would be addressed at detailed design stage, including the slight differences in parking standards applied by AVDC and MKC.

A4146 to A421 Link Road

- 4.89 Policy KS1 relates to a mixed use development area at Newton Leys. The policy requires that the development at Newton Leys safeguards a route for a link road between the A4146 Fenny Stratford bypass and the A421 Buckingham Road / H8 Standing Way. The logical route of the link road is through the Application Site, and land is reserved within the Proposed Development for a grid road to accommodate that link.

Housing

- 4.90 Policy H4 sets an affordable housing target of 30%, which is identical to the upper limit specified in the Aylesbury Vale District Local Plan. The Proposed Development is for up to 1,855 mixed tenure dwellings, which provides scope for a range of affordable housing types to be provided on site. Up to 30% of the overall housing provision would be affordable, which equates to up to 557 affordable dwellings. The proportion of affordable housing to be provided would comply with the minimum policy requirement in the adopted Aylesbury Vale District Local Plan. The proportion of affordable housing to be provided within the overall development would be specified in the S106 Agreement.
- 4.91 Policy H8 provides guidance on housing density, so that development is built at a density which is appropriate to the location. The relevant average net density standards for the Application Site are 35 dph in other expansion areas (Zone 3) and 30 dph elsewhere in the Borough (Zone 4). The Proposed Development includes a variety of residential densities, as shown on the Residential Density Plan (Drawing No. SWMK03-082-C). The average density for the Proposed Development would be 35 dph, which complies with policy. The density

varies across the site, with lower densities at the more sensitive boundaries and higher densities close to the primary routes and at the neighbourhood centre.

- 4.92 Policy H9 requires residential development to provide a mix of types and sizes of dwellings, including lifetime homes. The Proposed Development is for up to 1,855 mixed tenure dwellings, which provides scope for a range of house types and sizes to be provided. The detailed mix of dwellings will be determined at detailed design stage.

Town Centres and Shopping

- 4.93 Policy LC1 requires new local centres (neighbourhood centres) to be provided as part of the new city expansion areas. The local centres (neighbourhood centres) should be located so that the majority of all new dwellings are within 500 metres walking distance. The Proposed Development includes a neighbourhood centre providing retail and community facilities, which is located in an accessible location for the residents of the Proposed Development.

Milton Keynes Core Strategy (July 2013)

- 4.94 The key policy areas of interest specific to Milton Keynes are infrastructure requirements and design. The highway access points are within Milton Keynes. The Proposed Development would be an extension of Milton Keynes and has also been designed to be a standalone new neighbourhood.
- 4.95 The Core Strategy Inspector's Report includes comments that are particularly relevant to this application. Paragraph 37 states:

"Having considered all the evidence and views on this matter, I agree that the most significant policy deficits and planning challenges that may arise, following SEP revocation, are related to cross-boundary issues and the ability of the borough to respond to demographic and economic change. This now has added importance since the latest household projections do not extend beyond 2021. The borough sits at the centre of the SEMLEP area and is very well placed as a focus for strategic growth. These issues need to be addressed positively and effectively, applying the duty to co-operate, and joint working should be informed by updated assessments of the housing, economic and other needs of the wider area. The Plan has a limited time horizon and there is a large measure of agreement that its adoption would be in the public interest. But an early review is needed for greater clarity about the role that Milton Keynes and its hinterland will play in the longer term. This will complement initiatives to help deliver growth locally and ensure that the potential for significant uplift in housing and other requirements will be planned in the most sustainable way." [Our emphasis]

- 4.96 We note the expectation that Milton Keynes will continue to be a focus for strategic growth, and that additional housing growth will be required in Milton Keynes and the surrounding area.

4.97 We identify below the relevant policies in the Core Strategy.

Employment

4.98 Item No.7 in the Spatial Vision: Milton Keynes in 2026 states:

“The Borough’s range of local employment opportunities will have been augmented by business diversification and growth (continuing a growth rate of 1.5 jobs to every 1 new home)....”

4.99 Paragraph 5.28 and 5.29 deal with the jobs to homes ratio. In summary, the purpose of the ratio is to link jobs growth with planned levels of housing and to avoid increases to net commuting. The ratio is not contained in policy, and it is clearly a borough-wide target for monitoring purposes and not intended to apply to individual developments. The Inspector for the MK Core Strategy was also clear that the jobs to homes ratio is intended as a monitoring target (see Paragraph 112 of Inspector’s Report 23rd May 2013).

4.100 Policy CS3 relates to the employment land supply, and seeks to focus employment development in Central Milton Keynes and a series of employment allocations. The policy seeks to direct B1a/B1b uses to Central Milton Keynes. While the Proposed Development includes an employment area for B1a uses, the intention is that this would provide small scale starter units for which there is a need and demand in Milton Keynes. It would be appropriate to include small scale employment uses within the mix of uses provided at a sustainable urban extension, although there is no policy requirement to do so. The employment provided at the Application Site would represent a marginal employment location, and as such it would not divert jobs or businesses from the main industrial and employment areas.

Future Development Areas

4.101 Policy CS6 identifies the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes. These principles have informed the Proposed Development, and this is explained in the **Design & Access Statement** and in the other technical reports submitted with the application. It states:

“When and if development comes forward for an area on the edge of Milton Keynes which is wholly or partly within the administrative boundary of a neighbouring authority this Council will put forward the following principles of development during the joint working on planning, design and implementation:

- 1. The local authorities will work jointly, and with infrastructure and services providers, to achieve a coordinated and well-designed development.*
- 2. A sustainable, safe and high quality urban extension should be created which is well integrated with, and accessible from, the existing city. Its structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, redways and the linear parks and strategic, integrated flood management.*
- 3. A strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation) should be taken.*

4. *The design of development should respect its context as well as the character of the adjoining areas of the city.*
5. *Linear parks should be extended into the development where possible to provide recreational, walking and cycling links within the development area and to the city's extensive green infrastructure and redway network.*
6. *Technical work to be undertaken to fully assess the traffic impacts of the development on the road network within the city and nearby town and district centres and adjoining rural areas, and to identify necessary improvements to public transport and to the road network, including parking.*
7. *A route for the future construction of a strategic link road(s) and/or rail link should be protected where necessary.*
8. *New social and commercial facilities and services should be provided, and existing facilities improved where possible, to meet the day to day needs of new and existing residents.*
9. *The opportunity for new 'Park and Ride' sites for the city should be fully explored and where possible provided and efficiently and effectively linked to the city road system.*
10. *The local authorities and their partner organisations should produce an agreement on appropriate mechanisms to secure developer contributions towards improvement and provision of infrastructure to support the development, including facilities in the city that will be used by residents of the development area."*

4.102 The relevant utility companies and statutory undertakers were contacted during the preparation of the **Services & Utilities Chapter** of the ES. The Application Site does not currently have utility supplies, but water, electricity, gas and telecommunications services exist in the neighbouring areas, so it would be possible for utilities connections to be made to the Proposed Development. The Proposed Development would incorporate drainage infrastructure, foul water pumping stations, statutory undertakers equipment, and surface water attenuation measures.

4.103 The **Flood Risk Assessment** explains that the majority of the Application Site lies within Flood Zone 1 and therefore is at low risk of flooding. All buildings within the Proposed Development will be located within Flood Zone 1. The Proposed Development will include sustainable drainage systems comprising green roofs, rainwater harvesting and permeable paving, and attenuation basins will be included to attenuate surface water run-off to green field rates.

4.104 The rationale for the design and layout of the Proposed Development is explained in the **Design & Access Statement**. The Proposed Development is intended to be an extension to and part of Milton Keynes. The design and layout is strongly influenced by the principles that have governed the planned expansion of Milton Keynes e.g. self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping. The design of the Proposed Development seeks to respond to the characteristics (density, built form, and open space) which define the built form of the residential areas located around or in close proximity to the Application Site i.e. the traditional grid square of Tattenhoe, the neighbourhoods in the southern part of Newton Longville, and the western neighbourhoods of Far Bletchley.

- 4.105 Weasel Lane – an existing restricted byway and cycle route – cuts through the Application Site from Whaddon Road to Buckingham Road. There are other public rights of way across the site, including the Milton Keynes Boundary Walk. Sustrans Route 51 crosses the Application Site. These rights of way and cycle routes will be retained and incorporated into the Proposed Development. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 4.106 The traffic impacts of the Proposed Development have been assessed in the **Transport Assessment**. The Proposed Development includes new highways access points and junctions, and highway improvements to affected junctions and roundabouts close to Central Milton Keynes and on the A421. The Proposed Development makes provision for a link road between the A4146 Fenny Stratford bypass and the A421 Buckingham Road / H8 Standing Way, and land is reserved within the Application Site for a grid road to accommodate that link
- 4.107 The Proposed Development includes a neighbourhood centre providing retail and community facilities, and land for a primary school with early years provision and a secondary school. It includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children’s play areas, and allotments.
- 4.108 **Draft Heads of Terms** are submitted with the application, which sets out the planning obligations that would be provided in conjunction with the Proposed Development.
- 4.109 Overall, the Proposed Development complies with the relevant place-shaping principles for sustainable urban extensions on the edge of Milton Keynes.

A Well-Connected Milton Keynes

- 4.110 Policy CS11 seeks to improve public transport, provide more sustainable transport choices, encourage cycling and walking, and to direct development to locations that can be served by sustainable modes of transport.
- 4.111 The Application Site is located adjacent to Milton Keynes. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport. The Proposed Development would accommodate a mix of uses – residential, community, retail, employment and education – making it possible for residents to travel within the development by sustainable modes. In all respects the Application Site represents a sustainable location for development. The **Transport Assessment** recommends improvements to various junctions and roundabouts that would operate above capacity as a result of the Proposed Development including the Tattenhoe Roundabout and Bottle Dump Roundabout. Traffic calming would be provided in adjacent villages. A Travel Demand Management Strategy would be implemented for the Proposed Development, which is aimed primarily at maximising the opportunities for travel by non-car modes of travel and minimising the impact of traffic generated by the Proposed Development. A **Framework Travel Plan** is submitted with the planning application, which

contains details of the initial targets and measures to achieve a modal shift towards non-car modes of transport. The Framework Travel Plan includes a commitment to prepare a Residential Travel Plan and Workplace Travel Plan to deliver the modal shift targets. The Public Transport Strategy comprising a new bus service through the Application Site, and the delivery of pedestrian and cycle facilities on site with connections to the wider footpath and cycle network, are key elements of the transport mitigation strategy. The developers would fund new vehicles to service the proposed new bus route.

Tackling Climate Change and Building Sustainable Communities

4.112 Policy CS12 seeks to ensure the delivery of successful neighbourhoods e.g. neighbourhoods that are walkable, contain key facilities, demonstrate high standards of design, provide open space, include flooding and water management measures, and protect residents from noise generating uses. Policy CS13 seeks to ensure the delivery of high quality well designed places.

4.113 A **Design & Access Statement** has been submitted with the application to explain how the design has evolved and the rationale behind the design and layout. The Proposed Development has been designed to be a standalone new neighbourhood with its own characteristics. It includes a neighbourhood centre providing retail and community facilities, and land for a primary school with early years provision and a secondary school. It includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children's play areas, and allotments.

Delivering Infrastructure

4.114 Policy CS21 relates to the delivery of infrastructure, and requires new development to provide the necessary on and off-site infrastructure required to support and mitigate the impact of that development. The Proposed Development incorporates drainage and transport infrastructure, including new highway junctions, internal roads, pedestrian footpaths, cycle paths, public transport infrastructure, foul water pumping stations, statutory undertaker's equipment, and surface water attenuation measures.

Other Policy Documents

4.115 We identify below some of the other non-statutory policy documents which are relevant to the Proposed Development. These documents fall into three categories: those that have informed the supporting technical studies e.g. landscape and visual impact; those that have informed the design and layout and content of the Proposed Development e.g. sport and leisure facilities, and planning obligations; and, those that will guide the detailed design stage e.g. building materials, sustainable construction, and refuse and recycling facilities.

Landscape/Green Infrastructure

4.116 A number of green infrastructure strategy documents have been prepared, which are relevant to the Proposed Development. The list of documents is as follows:

- Aylesbury Vale Green Infrastructure Strategy 2011-2016 (AVDC)

- Buckinghamshire Green Infrastructure Strategy April 2009 (Buckinghamshire GI Consortium)
- Whaddon Chase Green Infrastructure Plan March 2010 (Buckinghamshire GI Consortium)
- Milton Keynes Green Infrastructure Plan February 2008 (MKC)

4.117 The findings and conclusions of the green infrastructure strategies, and the opportunities identified to enhance green infrastructure and landscape, have informed the **Landscape & Visual Chapter** of the ES. The Proposed Development includes substantial areas of green infrastructure and multi-functional open space.

Transport

4.118 Buckinghamshire CC has produced a guide to assist those preparing travel plans. The Sustainable Travel Plans: Guidelines for Developers (updated 2012) document identifies thresholds for when a travel plan would be required, and provides a recommended structure for a travel plan. A travel plan is required for residential developments of 80 dwellings or more, and for all education facilities. A **Framework Travel Plan** has been submitted with the application, which sets out a range of measures to positively influence travel patterns, discourage private car travel, and encourage the use of sustainable modes of transport, and contains details of the initial targets and measures to achieve a modal shift towards non-car modes of transport. The **Framework Travel Plan** includes a commitment to prepare a Residential Travel Plan and Workplace Travel Plan to deliver the modal shift targets.

4.119 In addition, MKC have an adopted Walking Strategy (February 2003) and Cycling Strategy (April 2013), which set out a series of objectives and actions to encourage more journeys by walking and cycling.

4.120 The Application Site is located adjacent to Milton Keynes, which is a main centre in the region providing significant employment opportunities and containing a broad range of services and facilities. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.

Design

4.121 The Design Guide: Building Materials (AVDC January 1995) document provides details on the preferred materials for walls and roofs of new buildings. The document is now quite dated, but it does provide guidance on the materials that are appropriate and contribute to the character of the surrounding area. As set out in the **Design & Access Statement**, the Proposed Development would contain buildings which respond to the existing context, local use of building materials, and the local vernacular in terms of detailing. These are matters that will be addressed at detailed design stage.

4.122 The Safety Through Design SPG (AVDC September 2001) sets out approaches for the planning and design of the external environment that can help reduce the likelihood of criminal and anti-social behaviour and allow people to feel safer. The **Design & Access Statement** has considered safety issues in the design and layout of the Proposed

Development, including overlooking of public areas and spaces. A more detailed consideration of crime and safety issues for individual buildings and residential areas will take place at detailed design stage.

- 4.123 The Sustainable Construction Guide SPG (MKC April 2007) provides further detail on the implementation of Policy D4 of the MK Local Plan 2005, and identifies a range of measures to reduce the use of resources and materials. The **Sustainability Strategy** sets out the commitments to sustainable construction that would be delivered at detailed design stage.
- 4.124 AVDC has produced a Refuse and Recycling: Advice Note for Developers (September 2012) identifies current arrangements for refuse and recycling collections and sets out what needs to be provided within development to facilitate those collections. The Proposed Development will include both internal and external waste and recycling storage facilities, which will be designed at detailed design stage.

Sport & Leisure

- 4.125 AVDC has an adopted Sport and Leisure Facilities SPG (August 2004), which sets out the requirements for such facilities in new development. A Companion Document: Ready Reckoner (August 2005) has also been adopted to identify which facilities a development needs to provide on-site, and sets out a basis to calculate the contribution for off-site community and leisure facilities. The Proposed Development includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children's play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and eight Local Equipped Area of Play (LEAP), and allotments.

Education

- 4.126 Buckinghamshire CC has adopted Guidance on Planning Obligations for Education Provision (June 2010), which sets out the approach for collecting planning obligations to meet the costs of additional education infrastructure requirements generated by new housing developments. The education contributions that would be required by the Proposed Development are set out in the **Draft Heads of Terms**.

Emerging Policy Documents

- 4.127 As set out above, AVDC and MKC are in the process of preparing new development plan documents which in due course will replace policies in their Local Plans. The respective policy documents are the Vale of Aylesbury Local Plan (VALP) and Plan:MK. We set out below the main issues raised in the emerging policy documents published so far.

Vale of Aylesbury Local Plan

- 4.128 In April 2014 AVDC undertook a consultation on the proposed content and scope of VALP. The consultation document identified a list of potential topic areas, as follows: spatial strategy; housing and jobs requirements; site allocations; community facilities; development management policies; and, infrastructure delivery. At the same time as the consultation on

VALP took place, AVDC also issued a 'call for sites' where landowners and developers were asked to submit details of sites for consideration through the site allocations process.

- 4.129 Representations were submitted to this consultation document on behalf of the SWMK Consortium. In summary, we requested that all reasonable alternatives must be considered at the options generation stage for the Spatial Strategy, including alternative strategic growth locations. We concluded that land adjacent to settlements located outside but adjacent to AVDC represents a reasonable alternative e.g. SWMK, and as such must also be considered at the options generation stage to comply with the SEA Directive and SEA Regulations 2011. We also requested in our representations that the conclusions of the Inspector appointed to examine Draft VAP should be used to inform the emerging VALP and in particular those on strategic growth, levels of housing and employment growth, and the growth of Milton Keynes.
- 4.130 The initial findings of housing and economic evidence work undertaken for VALP were discussed at a Stakeholder Forum meeting in October 2014. A VALP Options Consultation is due to take place in late 2015, with consultations on a Draft Submission VALP document in Summer 2016. On the basis of this proposed timetable, it will be more than 18 months or so before the form and content of any replacement policies are known. Therefore, it is clear that VALP is currently at an early stage in the process, and it will be some time before any weight can be given to replacement policy documents. The examination into VALP is due to occur during early 2017 and if found sound it would be adopted in Summer 2017.

Plan:MK

- 4.131 MKC published a series of topic papers on Plan:MK for consultation in September 2014. This represents the first stage of the process in preparing replacement planning policies. The main Topic Papers that are relevant to the Proposed Development are the Development Strategy, Duty to Cooperate (DtC), Growth in Housing, Employment & Economic Development, and Transport and Travel. The Topic Papers on Town Centres and Retail; and Physical and Social Infrastructure, also have some relevance, in that the Proposed Development would include a local convenience store and land for a secondary school and the consultation includes questions on both these matters.
- 4.132 In summary, the Topic Papers identify a preliminary housing target, but seeks comments on how that target has been derived, the robustness of the evidence to support it and whether it is set at the correct level or not. The preliminary housing target raises the following issues: whether it is necessary for the development strategy to make provision for development outside and adjacent to MK; whether there should be joint evidence gathering with neighbouring authorities on housing issues; and, whether the DtC will be engaged to deliver the strategic priorities, including the housing and jobs needed in the area and the provision of infrastructure. The Development Strategy Topic Paper asks whether development is required on the edge of Milton Keynes and how such development outside and adjacent to MK could be managed. MKC acknowledge what is required by the DtC. A signed Memorandum of Understanding (MoU) exists for all the neighbouring authorities to work together to meet Luton's housing needs. A Shared Framework Document was submitted to the VAP Examination, in which AVDC and the other Buckinghamshire Authorities (not MK)

agreed to co-operate, align plan-making timetables; and undertake joint working or sharing of technical evidence. An MoU does not exist with neighbouring authorities for Plan:MK, but MKC acknowledge that engagement will need to take place. The DtC Topic Paper acknowledges the likely pressure for the urban area of Milton Keynes to grow and the need to consider all reasonable options for accommodating this growth, which could include sites across the authority boundary.

- 4.133 A Plan:MK Preferred Options consultation is due to take place in Summer 2015, with consultations on a Submission Draft Plan:MK document planned for Early 2016. The examination for Plan:MK is expected to occur during Summer 2016, with adoption of the document taking place in late 2016/early 2017. The timetable for Plan:MK is broadly similar to that for VALP, although the process it is expected to be completed slightly earlier. While the relevant issues that will need to be tackled in Plan:MK have been identified, it is clear that the document is still at an early stage in the process and no weight can be given to replacement policy documents or the associated technical evidence.

Newton Longville Village Plan (2012)

- 4.134 In November 2012 the Newton Longville Village Plan was published. The document was prepared by a Steering Group comprising local residents. In summary, the document includes a review of services and facilities within the village, presents the findings of residents' surveys and opinions on matters affecting the village, and identifies a series of actions for the future. The Village Plan is a non-statutory document.
- 4.135 The Village Plan includes comments on the previous larger Salden Chase application, the future expansion of Milton Keynes towards Newton Longville, and traffic related issues in the village. These comments are out of date and not relevant to this current Planning Application, which is for a substantially smaller development. Therefore, we give the document no weight.
- 4.136 The Parish Council is in the early stages of preparing a Neighbourhood Plan, which would be subject to formal consultation and voting procedures before proceeding to a public examination.

Conclusions

- 4.137 The development plan for Aylesbury Vale – the Aylesbury Vale District Local Plan (January 2004) – is both out of date and time expired, and does not comply with the NPPF. Therefore, AVDC does not have an up to date plan. The development plan is out of date in terms of the development strategy and the housing requirement. It is important to appreciate how the presumption is expressed in the NPPF i.e. to grant planning permission unless the negative effects of doing so significantly and demonstrably outweigh the benefits of doing so. The technical studies and the ES submitted with the application demonstrate that after mitigation measures have been implemented there are no unacceptable adverse impacts arising from the Proposed Development. In these circumstances, the proper application of the presumption in favour of sustainable development means that the Proposed Development should be granted planning permission.

- 4.138 Paragraph 47 of the NPPF seeks to *“boost significantly the supply of housing”* and to achieve this by using *“their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,...”*. The full objectively assessed needs have not yet been determined. In the absence of a tested housing target the SWMK Consortium has identified an alternative housing figure that takes into account unmet needs from neighbouring areas, market signals, affordable housing need, and economic growth prospects. The figure is more closely aligned with what would be required to determine objectively assessed housing needs. As set out in **Section 5**, if the higher alternative housing figure is used then a five year housing land supply does not exist; the housing land supply lies between 3.7 years and 4.3 years. Therefore, we conclude that, in accordance with Paragraph 49, the adopted housing policy and interim housing requirement are out of date, and in these circumstances planning permission should be granted for sustainable development.
- 4.139 The Application Site is not allocated for development and it is not covered by any other site specific designations.
- 4.140 The Proposed Development provides scope for a range of affordable housing types to be provided on site. Subject to viability up to 30% of the overall housing target would be affordable, which equates to up to 557 affordable dwellings. The Proposed Development would comply with the minimum affordable housing requirement in Policy GP2 of the Aylesbury Vale District Local Plan.
- 4.141 The design and layout of the Proposed Development have been informed by the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes as contained in Policy CS6 of the Milton Keynes Core Strategy.
- 4.142 Policy CS11 of the Milton Keynes Core Strategy seeks to improve public transport, provide more sustainable transport choices, encourage cycling and walking, and to direct development to locations that can be served by sustainable modes of transport. The Application Site is located adjacent to Milton Keynes. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing residents with the opportunity to travel by non-car modes of transport. The Proposed Development would accommodate a mix of uses – residential, community, retail, employment and education making it possible for residents to travel within the development by sustainable modes. In all respects the Application Site represents a sustainable location for development.
- 4.143 This planning application is a positive response to the core planning principles and housing policies of the NPPF, in the absence of an up to date plan. The Proposed Development complies with the adopted affordable housing and transport policies. The design and layout of the Proposed Development complies with adopted design policies, and has taken into account site environmental and other site constraints and the relevant adopted policies dealing with these matters.

5. HOUSING LAND SUPPLY

- 5.1 We set out below the other material considerations that we consider are relevant to the determination of this application. In this case, the fact that AVDC has not identified its objectively assessed housing need and that it does not have a five year supply of deliverable housing sites are material considerations. As an interim measure AVDC proposes to use the 2011-based CLG Household Projections (see Five Year Housing Land Supply Position Statement June 2014). However, AVDC does accept that the CLG Projections do not represent objectively assessed housing need (see Paragraph 1.45 of June 2014 Position Statement). The SWMK Consortium has determined an objectively assessed housing needs figure, taking into account unmet needs from neighbouring areas, market signals, affordable housing and economic growth prospects. The **Housing Land Requirement Report** is contained in **Appendix 7**. For the purposes of determining whether AVDC can demonstrate a five year housing land supply, we use this figure because it more closely reflects objectively assessed housing need (without taking into account higher levels of unmet need from London, or needs arising from neighbouring areas including Milton Keynes through a proper discharge of the Duty to Co-operate).
- 5.2 The strategic planning background to the Application Site and the outcome of the VAP Examination – as described in **Section 2** - are also highly relevant.
- 5.3 These material considerations mean that the application should be granted planning permission, particularly since the site is a suitable location for development, the proposal represents sustainable development and there are no significant adverse impacts that demonstrably outweigh the inherent benefits brought by the development.
- 5.4 The starting point is to determine what the objectively assessed housing need should be.

Objectively Assessed Housing Needs

- 5.5 As set out above in the 'Aylesbury Vale District Local Plan (January 2004)' section in Section 4, the housing target contained in the Local Plan is out of date because, firstly, the figure was derived from the Buckinghamshire County Structure Plan which has subsequently been revoked, and secondly, the plan period expired in 2011. Furthermore, the housing split between Aylesbury and the Rural Area was superseded by a revised distribution strategy in the MKSM SRS and SEP. The MKSM SRS and SEP have also been revoked.
- 5.6 To set the housing requirement in context, Policy MKAV3 of the revoked SEP contained a housing requirement of 21,500 dwellings for the period 2006 to 2026 (16,800 dwellings at the Aylesbury Growth Area and 4,700 dwellings in the remainder of Aylesbury District). The average annual housing requirement would be 1,075 dwellings per year (840 per year in the Aylesbury Growth Area and 235 in the remainder of Aylesbury District). Policy MKAV1 made separate provision for 5,390 dwellings as an urban extension to the south-west of Milton Keynes.
- 5.7 In the now withdrawn draft VAP, the Council initially consulted on a range of housing options from 12,000 to 21,000 additional houses between 2011 and 2031. At the VAP Examination the Council confirmed that it considered each of the options to be a credible

assessment of housing needs and reflected reasonable alternatives, and that there are no fundamental environmental or infrastructure constraints to higher levels of growth within the overall range identified (see Paragraph 33 of the Inspectors letter dated 7th January 2014 – provided in **Appendix 12**). The potential housing options were assessed in the initial stages of the Sustainability Appraisal for draft VAP. Furthermore, the Inspector noted that all of the economic led projections required significantly more houses to be provided, ranging from approximately 16,600 to 21,500 during the period 2011 and 2031, and that this requirement would be still higher if existing patterns of out-commuting were to remain (see Paragraph 36 of the Inspectors letter).

5.8 In the absence of an adopted up to date housing target, AVDC propose to use an interim housing target informed by the 2011-based CLG Household Projections, which is explained in AVDC's Five Year Housing Land Supply Position Statement (June 2014). The Position Statement 2014 concludes that the total housing requirement is 10,176 dwellings between 2011 and 2021, which equates to 1,018 dwellings per year. The five year housing requirement would be 5,088 dwellings. It is acknowledged in the June 2014 Position Paper that the CLG Household Projections does not represent a full objective assessment of housing need, and identifies how future decisions on housing issues will be made at the plan-making and planning application stages.

5.9 Paragraph 1.15 of the June 2014 Position Statement states:

"...It is acknowledged that the household projections do not represent a full objective assessment of need, and in developing a new Local Plan the Council will be engaging with adjoining authorities and consider unmet needs arising in these areas and elsewhere within the relevant housing market area to fully assess requirements for the District".

5.10 Paragraph 1.45 goes on to state:

"In recognition that this is not an requirement to reflect a full objective assessed need in considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF (as required by paragraph 14). It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, without delay, unless material considerations indicate otherwise".

5.11 Therefore, the objectively assessed housing need for AVDC has not been determined yet, and acknowledging the current position, planning applications for residential development will be determined in accordance with the presumption in favour of sustainable development.

5.12 The SWMK Consortium, has commissioned a report to determine an objectively assessed housing needs figure. The **Housing Land Requirement Report** uses the recently published 2012 Sub National Population Projections (SNPP). The well-recognised Chelmer Model has been used to model both the demographic led housing requirement as well as the employment led requirement.

5.13 The key findings of the Report are as follows:

- The objectively assessed need for housing in for the Milton Keynes Housing Market Area, taking into account the requirement to integrate employment and housing strategies (NPPF Paragraph 158), is likely to be some 140,834 dwellings (7,042 dwellings a year).
- The objectively assessed need for housing in Aylesbury Vale is likely to be at least 24,633 dwellings (1,232 dwellings a year). This is significantly higher than the 840 dwellings a year required in the former South East Plan Policy MKAV3.
- The objectively assessed need for housing for Milton Keynes is likely to be 47,188 dwellings (2,359 dwellings a year).
- These projections do not take account of higher levels of unmet need from London, or whether Milton Keynes can actually deliver the rate of 2,359 dwellings a year without engaging the duty to cooperate. As such the level of 1,232 dwellings a year should be regarded as a minimum for Aylesbury Vale.

5.14 Therefore, we conclude that the housing requirement represents a figure which is closer to the objectively assessed housing need. The housing requirement figure is used to determine whether a five year housing land supply can be demonstrated.

Housing Land Supply

5.15 AVDC published a Housing Land Supply Calculation Statement in June 2014 in order to determine whether a five year housing land supply can be demonstrated using the interim housing figure informed by the 2011-based CLG Household Projections. In summary, AVDC conclude that 5.2 years supply exists in the period 2013 to 2018, whereas 4.7 years supply exists during 2014 to 2019. The list of deliverable sites that contribute towards the housing land supply are contained in Appendix 1 of the Land Supply Statement. At this stage we have not critically assessed the list of housing sites in terms of the timing or rates of delivery. However, we do have comments on whether there is an existing housing shortfall and how that shortfall should be addressed ('Liverpool' or 'Sedgefield' method), and whether it would be appropriate to include a housing buffer to address past under delivery (a 5% or 20% buffer). Our housing land supply calculation is based on the housing requirement figure of 1,232 dwellings per annum, or 6,160 dwellings.

Meeting the Housing Shortfall

5.16 Table 2 (Past Housing Delivery Rates) in the June 2014 Position Statement provides housing completion data for the years 2011/12, 2012/13 and 2013/14, which are 1,103 dwellings, 934 dwellings and 990 dwellings respectively – a total of 3,027 dwellings. AVDC has confirmed that housing completions for 2013/14. The housing requirement for those three years – based on a requirement of 1,232 dwellings per year – would be 3,696. Therefore, we conclude that a shortfall of 669 dwellings exists.

5.17 Guidance on dealing with the issue of backlog or shortfall is provided in the Planning Advisory Service (PAS) document 'Ten Key Principles for owning your Housing Number – Finding your Objectively Assessed Needs' published in July 2013 (**Appendix 15**). **Section 8** of this document deals with a housing shortfall, which is defined as the 'under provision that

has accrued against previous development plan targets'. The document goes on to explain the two methods of addressing the backlog; the 'Liverpool approach' (the residual approach) which seeks to meet this backlog over the whole plan period and the 'Sedgefield approach' which is to meet the backlog within the first 5 years of the plan. It notes the basis of the 'Liverpool' and 'Sedgefield' methods and then states on Page 20 that:

"There is no guidance or advice which sets out the preferred approach. However, the 'Sedgefield approach' is more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and remedy the unsatisfactory consequences of persistent under delivery. Inspector's decisions in relation to S78 appeals confirm their preference for this approach."

5.18 However, the recently published NPPG states in the final paragraph of ID: 3-035-20140306 states that:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible."

5.19 Therefore, we conclude that the existing identified shortfall of 669 dwellings should be met during the five year period i.e. 'Sedgefield'.

5% or 20% Buffer

5.20 The second bullet point of Paragraph 47 of the NPPF states that local planning authorities should:

"identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;..."

5.21 In calculating the five year housing land supply, it is important to establish whether a 5% or a 20% buffer should be applied i.e. has there been persistent under delivery. The Council has applied a 5% buffer in its calculation of housing land supply.

5.22 We acknowledge that at a recent appeal in Aylesbury Vale District, the Inspector concluded that a 5% buffer should be applied (Appeal Ref: APP/J0405/A/13/2198840 - Land to the rear of Brook Farm, Leighton Road, Stoke Hammond). It is not clear from the appeal decision how rigorously the buffer was assessed at the hearing. It appears that the Inspector concluded that because a number of planning permissions had been granted for residential development there had not been a record of persistent under delivery in Aylesbury Vale (see Paragraph 27 of the appeal decision). This approach is incorrect. The purpose of the buffer – as set out in Paragraph 47 of the NPPF – is clearly related to the delivery of housing and not just about the number planning permissions that exist. The outcome of the appeal did not turn on this issue, because whichever buffer was applied AVDC could not demonstrate the

required five year housing land supply. The appeal was allowed, and planning permission was granted for 40 dwellings at the site. As set out below, there is evidence to demonstrate that there has been persistent under delivery in Aylesbury Vale, and it would be appropriate to apply a 20% buffer.

5.23 Table 5.1 shows housing completions data compared with the housing requirements in former development plan documents and population projections.

Table 5.1 Housing Completions Data

Year	Completions	AVLP 2004		SEP 2009		AVDC 2011-based CLG Projections		DLP 2012 Sub National Population Projections	
		Requirement	Balance	Requirement	Balance	Requirement	Balance	Requirement	Balance
2001/02	516	801	-285						
2002/03	499	801	-302						
2003/04	934	801	+133						
2004/05	667	801	-134						
2005/06	643	801	-158						
2006/07	616	801	-185	1,075	-459				
2007/08	822	801	+21	1,075	-253				
2008/09	744	801	-57	1,075	-331				
2009/10	795	801	-6	1,075	-280				
2010/11	755	801	-46	1,075	-320				
2011/12	1103			1,075	+28	1,018	+85	1,232	-129
2012/13	934			1,075	-141	1,018	-84	1,232	-298
2013/14	990					1,018	-28	1,232	-242

5.24 Table 5.1 shows the following:

- in 8 of the last 10 years of the AVLP 2004 the housing requirement was not met;
- in 6 of the 7 years of the SEP 2009 the housing requirement was not met; and
- in 2 of the last 3 years the interim AVDC housing target was not met.

5.25 The completions data demonstrates that there has been a record of persistent under delivery in Aylesbury Vale.

5.26 The issue of what represents persistent under delivery has been considered at appeals and in High Court judgements e.g. appeal at Burbage in Leicestershire (APP/K2420/A/13/2202261), and the 'Cotswolds' Judgement in the High Court ([2013] EWHC 3719 (Admin)). The decision maker in each of these cases concluded that under delivery in 50% or more of the years in the periods considered represents persistent under delivery.

5.27 Therefore, we conclude that there has been persistent under delivery in AVDC and that a 20% buffer should be applied.

Five Year Housing Land Requirement

5.28 Our conclusions on the five year housing land supply position using the housing requirement figure for the period 2014/15 to 2018/19 are set out below. It is important to note that at this stage we have not critically assessed the Council's assumptions about the deliverability

of individual sites that contribute to their assessment of the housing land supply. Our assessment of the five year housing land supply position is as follows:

Housing Requirement	6,160 dwellings
Housing Shortfall	669 dwellings
Total Housing Requirement (using 'Sedgefield')	6,829 dwellings
Housing Requirement (+5% buffer)	7,170 dwellings
Housing Requirement (+20% buffer)	8,195 dwellings
AVDC -Deliverable Housing Land Supply	6,022 dwellings
5 Year Housing Land Supply (with 5% buffer)	4.2 years (6,022/7,170 x 5)
5 Year Housing Land Supply (with 20% buffer)	3.7 years (6,022/8,195 x 5)

5.29 Therefore, we conclude that, using the housing requirement established on behalf of the Consortium, the 'Sedgefield' approach to meet the housing shortfall and a 20% buffer to account for persistent under delivery, AVDC can only demonstrate a 3.7 year housing land supply. As set out above, the housing figure of 1,232 dwellings a year should be regarded as a minimum, until the unmet needs from neighbouring areas has been determined and the DtC has been properly discharged. In these circumstances, planning applications for residential development should be considered in the context of the presumption in favour of sustainable development.

5.30 As set out in **Section 7**, the site could deliver approximately 600 dwellings in the five year period.

6. KEY BENEFITS

- 6.1 The detailed assessment of the Proposed Development included within this Planning Statement demonstrates that that this application accords with national guidance and relevant development plan documents. In addition, the Proposed Development would deliver a number of key benefits which are material considerations in the determination of this application.
- 6.2 The Proposed Development will, if approved, deliver the three strands of sustainable development - social, environmental and economic - identified in Paragraph 7 of the NPPF. It would provide the following benefits:

Social Benefits

- Boost the supply of land for housing, and provide high quality market and affordable housing on the edge of Milton Keynes;
- Deliver up to 557 affordable dwellings, which equates to 30% of the total housing provision;
- Generate additional funding from the New Homes Bonus;
- Generate additional Council Tax and Business Rates which would directly enhance the future finances of the local authority.
- Provide a wide range of community and recreation facilities, including a local park and district park, formal sports pitches, tennis courts, games area, a skateboard park, children's play areas, and allotments;
- Provide a neighbourhood centre with retail and community facilities; and
- Provide land for a new primary school and secondary school.

Environmental Benefits

- Provide substantial areas of Green Infrastructure which include new habitats of native broadleaved woodland, species-rich grassland and wetland to enhance wildlife;
- Provide additional strategic landscaping, woodland planting, green infrastructure and open space to enhance the surrounding landscape;
- Promote sustainable forms of transport by including walking, cycling and public transport infrastructure and facilities, which connect to the existing networks in the surrounding area;
- Deliver a Framework Travel Plan to manage and promote walking and cycling within the site and surrounding area, including initial targets and measures to achieve a modal shift towards non-car modes of transport;
- Deliver a Public Transport Strategy comprising a new bus service through the Application Site, and a commitment by the developer to fund new vehicles to service the proposed new bus route;
- Reduce in-commuting by car which would have positive benefits for air quality;
- Contribute towards traffic calming in adjacent villages such as Whaddon, Newton Longville and Nash to discourage rat-running and high-speed traffic;

- Reserve land for a possible extension of the grid road so in the long term a connection can be made from the A421 to the A4146, which would remove through traffic (including HGVs) from local villages.

Economic Benefits

- Provide employment opportunities, including local construction jobs;
- Provide housing for employees;
- Reduce commuting distances;

6.3 We consider that the delivery of these items via the Proposed Development would provide a substantial benefit to the local community and to Milton Keynes as a whole, and in our opinion provide additional justification for the scheme.

7. DELIVERABILITY

7.1 Paragraph 47 of the NPPF seeks to “boost significantly the supply of housing”, and to achieve this local planning authorities are required to identify a supply of deliverable sites to provide a five year housing land supply and a supply of developable sites for years 6 to 15.

7.2 As explained elsewhere in this Statement the Application Site is a suitable location for development, and the Proposed Development is sustainable. In this Section we explain why the initial phase of the Proposed Development is deliverable in the short term and the development as a whole is developable within the longer term, by firstly identifying who would deliver the Proposed Development and when, and secondly whether the development is viable.

7.3 The expected timetable for the Proposed Development is as follows:

- Planning Application submitted – 2014/15
- Outline planning permission granted (one year from submission) – 2015/16
- Reserved Matters approval (one year from outline permission) – 2016/17
- Start Date – 2016/17
- Infrastructure delivery (two years from outline permission) - 2017/18
- Housing delivery (seven years from reserved matters) – 2017/18 to 2023/24
- Completion – 2023/24.

7.4 The estimated annual completion rates are as follows:

Table 7.1 Estimated Annual Completions

	Year 1 (2017/18)	Year 2 (2018/19)	Year 3 (2019/20)	Year 4 (2020/21)	Year 5 (2021/22)	Year 6 (2022/23)	Year 7 (2023/24)
Estimated Annual Completions	80	210	310	360	360	360	175

7.5 The site could deliver approximately 600 dwellings in the five year period.

7.6 The SWMK Consortium comprises both developers and housebuilders, all of whom are experienced at delivering large scale mixed use developments of the type proposed in this planning application. The Application Site is either owned by members of the Consortium or is controlled under option.

7.7 In conclusion, the initial phases of the Proposed Development are deliverable, and could contribute to the five year housing land supply. The Proposed Development is developable between years 2017/18 and 2023/24. The site is controlled by developers and housebuilders, and the Proposed Development is viable.

8. S106 HEADS OF TERMS

8.1 The applicants are willing to enter into a Section 106 legal agreement with the Councils and any other relevant parties in order to address the matter of planning obligations related to the proposals. **Draft Heads of Terms** are submitted with the application.

8.2 In summary, the heads of terms relate to the following matters:

- Affordable Housing
- Health Facilities
- Green Infrastructure
- Community Buildings
- Employment Land and Neighbourhood Centre
- Education
- Highways and Transport

8.3 The applicants are willing to enter into negotiations with the Councils and look forward to prompt communication from the Council's solicitors in this regard.

9. SUMMARY AND CONCLUSIONS

- 9.1 The Proposed Development is a mixed-use sustainable urban extension to the south west of Milton Keynes, comprising up to 1855 dwellings, an employment area, a neighbourhood centre, land for a primary school and for a secondary school, green infrastructure, and associated drainage, highway and transport infrastructure. The planning application is submitted in outline with all matters reserved except for access. The Illustrative Masterplan, Parameters Plan and Design & Access Statement submitted with the application clearly define the future parameters of the Proposed Development, and demonstrate that a high quality scheme could be delivered at detailed design stage.
- 9.2 The Proposed Development is intended to be a part of Milton Keynes. It would include some of the characteristic features of the City, such as self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping, and it would connect to the existing grid road network. The Proposed Development has also been designed to be a standalone new neighbourhood with its own characteristics.
- 9.3 The average density is 35 dwellings per hectare (dph), which is typical of other Milton Keynes expansion areas. Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The building heights are determined by their location within the site and the proposed use. The residential buildings are higher at key entrances or intersections to provide landmark or gateway buildings.
- 9.4 The Proposed Development includes open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-Use Games Area (MUGA), a skateboard park, children's play areas, and allotments. These facilities are located where they are easily accessible to residents within the Proposed Development and also from neighbouring areas.
- 9.5 The existing rights of way and cycle routes through the Application Site will be retained and incorporated into the Proposed Development. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 9.6 The Proposed Development includes land for employment uses to accommodate small scale starter business units. The proposed neighbourhood centre would include a small convenience store, intended to meet the day to day needs of local residents.
- 9.7 The **Sustainability Strategy** demonstrates that the Application Site is a sustainable location for development and the Proposed Development has all the attributes of sustainable development, by including landscape and biodiversity features, providing a mix of uses, additional housing, and being accessible by walking, cycling and public transport. In addition, there are opportunities for low and zero carbon technologies to be included within the Proposed Development.
- 9.8 The Proposed Development reserves sufficient land to accommodate a dual carriageway grid road, providing a link between the A421/Snelshall Street (V1) under the proposed East West

railway line and connecting to the A4146 Stoke Hammond By-pass. The land has been reserved within the Application Site, but the link road would in due course be designed and delivered by third parties and not the SWMK Consortium.

- 9.9 Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Paragraph 210 of the NPPF requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The successful operation of the planning system requires local planning authorities to maintain an up to date development plan. The adopted Aylesbury Vale District Local Plan has an end date of 2011, and therefore is time expired. The document did not take into account growth strategy for Aylesbury Vale identified in the South East Plan and the Milton Keynes South Midlands Sub-Regional Strategy, and it did not allocate sites to meet development needs beyond 2011. We conclude that the development strategy and the housing requirements in the adopted Local Plan are out of date. AVDC has attempted unsuccessfully to replace the Local Plan twice in recent years; the draft Vale of Aylesbury Plan was considered to be not sound by an Inspector and was withdrawn. The Proposed Development represents a positive response to the core planning principles and housing supply requirements of the NPPF in the absence of an up to date plan.
- 9.10 The growth of Milton Keynes and development in the SWMK Area has been the subject of numerous technical studies over the last twenty two years. All of the historic technical studies (including those undertaken for AVDC) concluded that the SWMK Area - land at the south western edge of the urban area of Milton Keynes, between the A421 and the disused former Oxford to Bletchley rail line - represents a suitable location for development. The former SWMK SDA Area successfully passed through the sustainability appraisal process of the South East Plan, and was specifically identified as a suitable location for development on the edge of Milton Keynes.
- 9.11 Paragraph 47 of the NPPF seeks to “*boost significantly the supply of housing*” and to achieve this by using “*their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,...*”. The full objectively assessed needs have not yet been determined. In the absence of a tested housing target DLP, on behalf of the SWMK Consortium, has identified an alternative housing figure that takes into account unmet needs from neighbouring areas, market signals, affordable housing need, and economic growth prospects. The DLP figure is more closely aligned with what would be required to determine objectively assessed housing needs. A five year housing land supply does not exist; it lies between 3.7 years and 4.3 years. Therefore, we conclude that, in accordance with Paragraph 49 of the NPPF, the adopted housing policy and interim housing requirement are out of date, and in these circumstances planning permission should be granted for sustainable development.
- 9.12 The Application Site mostly comprises Grade 3b agricultural land, but there is a small area of Grade 3a land. The impact of the Proposed Development on agricultural land and farm businesses are considered in the **Agricultural Land Chapter** of the ES. The Proposed Development would involve the loss of 20 Ha of the best and most versatile agricultural land. The two affected full time farm businesses will remain viable and can operate off-site.

- 9.13 The impact of the Proposed Development on the historic environment and archaeology is assessed in the **Archaeology & Cultural Heritage Chapter** of the ES. The geophysical survey and evaluation trenching has identified four areas of late prehistoric/Roman settlement within the development site. The Proposed Development has been designed so as to enable all four settlement areas to be preserved within open space or school playing fields. An archaeological watching brief will be implemented to record any peripheral remains.
- 9.14 The Application Site contains woodland, hedgerows and mature trees, which will largely be retained within the Proposed Development. Parts of the site are used by badgers, common lizard, grass snake, bats and birds. The impact of the Proposed Development on protected species and habitats is explained in the **Ecology Chapter** in the ES. A wide range of new habitats will be delivered as part of the Proposed Development, including native broadleaved woodland, species-rich grassland and wetland. A Biodiversity Management Plan will also be prepared. The Proposed Development would lead to some limited disruption to wildlife which is unavoidable. However, the scale and diversity of the green infrastructure proposals included within the Proposed Development will provide comprehensive mitigation, compensation and substantial enhancement to compensate for any initial losses.
- 9.15 The landscape features and the existing trees and hedgerows have been incorporated into the Proposed Development, and the impact of the development on these features and landscape mitigation measures is explained in the **Landscape & Visual Chapter** in the ES. The majority of the site is within a low sensitivity landscape character area which generally lacks intrinsic features of landscape merit. The site lies adjacent to a character area of high sensitivity - part of the former hunting chase of Whaddon Chase – however, the green infrastructure and strategic landscaping on the western and southern boundaries of the site will minimise adverse effects on this landscape. The landscaping at the site boundary will reduce the visual impact from neighbouring dwellings and residential areas and from surrounding villages. The Proposed Development would be completely contained within a very robust green infrastructure framework which surrounds and permeates the developed area.
- 9.16 A draft **Construction & Environmental Management Plan** has been submitted with the application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from noise and air quality. The design and layout of the Proposed Development includes buffers to separate dwellings from potential noise sources including main roads and the railway line.
- 9.17 A **Transport Assessment** has been submitted with the application to assess the traffic and transport related impacts of the Proposed Development. The Transport Assessment recommends improvements to various junctions and roundabouts that would operate above capacity as a result of the Proposed Development including the Tattenhoe Roundabout and Bottle Dump Roundabout. Traffic calming would be provided in adjacent villages. A Travel Demand Management Strategy would be implemented for the Proposed Development, which is aimed primarily at maximising the opportunities for travel by non-car modes of travel and minimising the impact of traffic generated by the Proposed Development. A **Framework Travel Plan** is submitted with the planning application, which contains details of the initial targets and measures to achieve a modal shift towards non-car modes of

transport. The Framework Travel Plan includes a commitment to prepare a Residential Travel Plan and Workplace Travel Plan to deliver the modal shift targets. The Public Transport Strategy comprising a new bus service through the Application Site, and the delivery of pedestrian and cycle facilities on site with connections to the wider footpath and cycle network, are key elements of the transport mitigation strategy. The developers would fund new vehicles to service the proposed new bus route.

- 9.18 The **Flood Risk Assessment** demonstrates that the majority of the site lies within Flood Zone 1 and therefore is at low risk of flooding. All buildings will be located within Flood Zone 1. The Proposed Development will include sustainable drainage systems comprising green roofs, rainwater harvesting and permeable paving, and attenuation basins will be included to attenuate surface water run-off to green field rates.
- 9.19 In conclusion, the technical studies submitted with the application propose mitigation measures to deal with any adverse impacts, and overall demonstrate that there are no constraints to development. The design and layout of the Proposed Development is well-designed and has taken into account the characteristics of the surrounding area. It has been informed by the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes as contained in Policy CS6 of the Milton Keynes Core Strategy.
- 9.20 In addition, the Proposed Development would provide substantial social, environmental and economic benefits to the local community and to Milton Keynes as a whole, which provide additional justification for the scheme. For example, it would provide the following: high quality market and affordable housing on the edge of Milton Keynes; up to 557 affordable dwellings; a wide range of new community and recreation facilities; land for a new primary school and secondary school; substantial areas of green infrastructure and strategic landscaping; walking, cycling and public transport infrastructure and facilities; traffic calming in adjacent villages such as Whaddon, Newton Longville and Nash; reserve land for a link road between the A421 and A4146 which would remove through traffic (including HGVs) from local villages; and provide employment opportunities, including local construction jobs.
- 9.21 The Application Site is controlled by developers and housebuilders, and the Proposed Development is viable. The Proposed Development is deliverable and developable between years 2017/18 and 2023/24, and could deliver approximately 600 dwellings in the five year period ending in 2019/20.
- 9.22 The applicants are willing to enter into a Section 106 legal agreement with the Council and any other relevant parties in order to address the matter of planning obligations related to the proposals. **Draft Heads of Terms** are submitted with the application.
- 9.23 In summary, the Proposed Development represents sustainable development, and in the absence of an up to date development plan and no prospect of an adopted replacement plan for at least two years, it should be granted planning permission.