

## ITEM 4(a)(i)

### Call in of Site Allocations Plan: Consultation on Additional Sites, February 2015

#### Councillor Brackenbury

This document outlines my concerns with the delegated decision made on Feb 3<sup>rd</sup>, and the changes I would like to see, for Executive Scrutiny attention. All page references are to the Annex - please refer to the Annex to the report at item 4(a)(iii).

and I also refer to the options and issues consultation document from Autumn 2014 at [http://miltonkeynes-consult.objective.co.uk/portal/dev\\_plans/sap/sap\\_io](http://miltonkeynes-consult.objective.co.uk/portal/dev_plans/sap/sap_io)

This is a vital consultation and I do not want to see it stopped or delayed; but I believe that changes are needed to make sure that the consultation is appropriate and that resource is focussed on realistic sites,

#### **1. Size of Sites**

Any site with potential for less than 10 dwellings is regarded as suitable for windfall development rather than being included in the Site Allocations Plan (as defined in paragraph 5.2 of options and issues consultation, and also discussed in paragraph 3.3 with a footnote confirming assent from the Core Strategy Planning Inspector.)

Indeed in Annex E of the options and issues consultation, we see (emphasis mine):

*“Of the sites under consideration through the Site Allocations process, as listed in Annex F 'Profiles of potential Site Allocations', it is not proposed to take forward the following sites any further as they **clearly fail Stage 1** of the proposed site assessment process.*

- *Belvedere Farm, Fenny Stratford: Site fully in an area of flood risk*
- *Former Gas Works Site, Stony Stratford: **site too small. Sites under 10 dwellings considered as windfall.***”

So we have confirmation that a site being unable to provide at least 10 dwellings is a full reason for exclusion.

However the current consultation paper includes:

- U52 – Downs Barn – capacity 9
- U53 – Emerson Valley – capacity 9
- U78 – Stantonbury – capacity 71 according to the table, capacity 9 according to the detail. Which is it? Hard to imagine these are simply different estimates.
- U84 - Wolverton – capacity 4 (but a note that this could be considered for higher density / height development, thus providing 10 or more dwellings)

To minimise risk to the council, a consistent approach is needed that can be defended. Either we include all sites that don't have the required capacity to provide 10 dwellings, or we should remove them.

**Recommendation 1: Review capacities – if not realistic to provide required dwelling numbers, remove sites from consultation.**

## **2. Duty to Consult on proposed sites**

The cabinet member said in the delegated decision meeting that a consistent approach was needed to proposed sites. However this ignores why sites have been put forward. The three sites in my ward are all council-owned, and the consultation paper is clear that these have not been proposed by any third-party. It is simply the council's choice to market them. The idea that there is any risk attached to not marketing them does not stand up – the same argument could be used on any number of sites on council-owned land.

**Recommendation 2: Clarify that where land is council-owned and no third party request has been received to consider for development, that it is the council's choice where to consult and there is no legal responsibility to do so on any individual site.**

## **3. Use of amenity land in donut estates**

Paragraph 9.11 of the issues and options consultation states that:

*“Equally, there are areas in city estates which are classed as amenity open space - spaces left undeveloped but not specifically identified as open space on the local plan proposals map. Some of this land will have been designed to be an attractive feature in a built up area. Others are left over pieces of land which have limited value for estates. Local Plan Policy L2 envisages that there will be infill opportunities on some pieces of land like this. Again, at this time sites like this haven't been identified in the list of potential sites, but there might be sites you would like to put forward to us for consideration.”*

This states that as Autumn 2014, no such sites had been identified. Yet by February 2015, three sites in Downs Barn and Springfield (and others in Conniburrow and Fishermead) are being formally consulted on for potential housing. The public reaction to these sites shows that the principle of significant building on amenity land in donut estates surrounding CMK has not been accepted. Leaving aside the specific details of individual sites, residents have moved into estates well aware that there is high density housing and small garden sizes, with the understanding that the green space between housing blocks and roads provides a buffer and as a substitute for individual garden areas. It is no surprise that the specific sites have caused such a reaction when the principle of infilling on donut estates is not accepted, and was not a key part of the issues and options consultation. (and this is before we consider whether local facilities would have sufficient road capacity, school places, health availability etc. – of course discussions about planning gain would come much further down the line.)

**Recommendation 3: In recognition of the lack of acceptance of such levels of infill on donut estates, carry out surveys and consult on the principle of building on these estates before bringing specific proposals forward.**

## 4. Specific Sites

There are fundamental issues with the sites in Downs Barn and Springfield as follows.

### a) **U52: Capel Drive, Downs Barn**

- Cannot provide 10 dwellings (capacity 9)
- Ecology: site contains trees and mature planting
- Slope - significant
- Amenity Value – highly valued green space by residents.
- Privacy - Would likely be back garden to back garden.
- Access - If you come in from Capel Drive you break a fundamental design principle of Milton Keynes (and likely have on-street parking in estate access road. The other option is a link road from Farrier Place – but this would mean knocking houses down!
- Significant opposition within estate.

This site is simply not plausible for development, and fails to meet criteria such as access and capacity (as defined in para 10.2 of the issues and options consultation) that should have ruled it out well before now.

**Recommendation 4: Remove site U52 from the consultation document.**

### b) **U74: Springfield Boulevard, Springfield**

- Valued amenity land – including new MKC play area
- Privacy and facing issues – surrounded on 3 sides by development.
- Would surround the pub on 2 sides
- Significant opposition within estate.

I cannot argue this site fails the stated criteria (as per para 10.2) but it is still wholly inappropriate for development.

**Recommendation 5: Remove site U74 from the consultation document.**

### c) **U75: Turnmill Avenue, Springfield**

I simply quote the consultation paper:

*“The site is laid out in an unorthodox shape and location bordered on 3 sides by established dwellings. It is currently open space with some amenity value (although this could be restricted to certain areas within the site). The topography of the site may constrain develop as the landscaping undulates significantly (possibly for drainage purposes). Given the site’s long thin nature, access will need careful consideration, particularly in respect of the numerous properties that overlook the site.”*

The idea that you could fit 68 properties on this site is laughable; you would have to use most of the site creating an access road. It's on a steep slope, highly valued amenity land within the estate, and provides strategic off-road pedestrian access to Woolstone. In addition, existing residents are strongly opposed to this site going forward. This site proposal is not fit even for consultation.

**Recommendation 6: Remove site U75 from Consultation.**

## **5. Consultation Approach**

If you are going out to consultation for proposals with surrounding development, it is not credible to put a single notice up at the site.

**Recommendation 7: Commit to writing individually to all residents facing / backing onto the development sites, as part of the consultation. Ward councillors may offer to help with delivery if this is an issue!**

## **6. Best use of Council Resource**

This is a key strategic consultation for the council; we have to get it right. It serves no-one going out to consultation on sites that are simply not credible; it generates awful press for the council, it wastes council officer resource processing responses (and takes up plenty of time of members of the public, as we've already seen from the attendance at the delegated decision meeting.)

It is far better for everyone to take implausible sites out at this stage and for the consultation to deal with sites with a realistic chance of progressing all the way through the process; the three sites in my ward are not in this category.

Thanks for your time reading this

**Ric Brackenbury 11/02/2015**