Briefing Note

milton keynes council

North Crawley Site Assessment Work

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Purpose of this Briefing Note

The purpose of this briefing note is to firstly, review the North Crawley Neighbourhood Plan Site Options and Assessment – Draft Report (December 2020) and secondly to provide comments on the report's methodology and approach rather than commenting on the detailed assessments of each site. The draft report has been produced for North Crawley Parish Council by consultants Aecom to assist the Parish Council in the preparation of the North Crawley Neighbourhood Plan.

Introduction

Aecom comment at para 2.7 in their report that:

"No sites are allocated for development in North Crawley Parish and Plan:MK does not set a housing requirement for the parish. It is therefore not imperative that the Neighbourhood Plan allocates land for housing or other uses. However, North Crawley Parish Council has identified a need for entry level affordable housing for younger people within the parish and intends to identify suitable sites which may be able to deliver 30-35 dwellings (equivalent to an increase of 10% of the village size) to meet local needs."

Methodology and Approach

Approach

The approach to the site assessment is based on the following documents:

1. Relevant sections of the Government Housing and Economic Land Availability Assessment (March 2015)
2. Neighbourhood Planning (updated February 2018) and
3. Locality's Neighbourhood Planning Site Assessment Toolkit.

The approach to assessing whether a site is appropriate for allocation in a Neighbourhood Plan is based on whether it is suitable, available and achievable. In terms of methodology a four-part approach to site identification has been used:

Task 1: Identify Sites to be included in the Assessment: A total of 13 housing sites ranging in size from 0.24 to 11.6 hectares have been evaluated. These sites have been identified through a Call for Sites conducted by North Crawley Parish Council in May 2017 and through a landowner's submission in 2020.

Task 2: Gathering Information for Site Assessments: Aecom are using a site appraisal pro-forma to assess potential sites for allocation in the Neighbourhood Plan based on the Government's National Planning Practice Guidance and the Locality Site Assessment Toolkit. Use of the pro-forma is to enable a consistent evaluation of each site against an objective set of criteria. The pro-forma covers:

1. General information about each site location and use, context and planning history.
2. Context: – Type of site (greenfield, brownfield etc.); and
3. Suitability: – Site characteristics, Environmental considerations; Heritage considerations; Community facilities and services; and possible site constraints such as flood risk, agricultural land, tree preservation orders etc.
4. Availability of site

Task 3: Site Assessment: The forms for each site have ben prepared using desk top studies , site visits and other sources such as Milton Keynes Council data and Google maps

Task 4: Consolidation of Results: A 'traffic light' rating of sites has been used to assess if a site is should be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the site is suitable, available and achievable

Conclusions of the Aecom Report

This report concludes that of the thirteen sites considered, five sites (NC2, NC3, NC4, NC6 and NC9) are potentially suitable for allocation for housing development, subject to the identified constraints being resolved or mitigated. The remaining sites (NC1, NC5, NC7, NC8, NC10, NC11, NC12 and NC13) are considered unsuitable for allocation in the Neighbourhood Plan at the current time.

One of the suitable sites, NC2, has the potential to accommodate 10 or more dwellings and would be required to include a proportion of affordable housing for Discounted Market Housing (e.g. First Homes), affordable housing for rent, or other affordable housing types (see NPPF Annex 2). The proportion of affordable housing is expected to above 10%, unless the proposed development meets the exemptions set out in NPPF Paragraph 64. However, on housing proposals for 11 dwellings or more Milton Keynes Council seeks provision of 31% affordable housing (Plan:MK policy HN2),

Aecom comment in the conclusions to their report the Government is currently considering changes to the current planning system. As part of this they are considering increasing the site size threshold for which developers need to make contributions towards affordable housing from sites of 10 dwellings or more, to sites of 40 or 50 dwellings or more. None of the sites that are suitable or potentially suitable for residential or mixed-use allocation have the potential to accommodate 40 or more dwellings.

Next Steps
Aecom recommended that the next step would be for the Steering Group to use this shortlist of sites (all sites rated amber) to narrow the list down to the required housing number based on further investigation into individual sites if necessary, and consultation with the community and Milton Keynes Council

MKC Comments
Aecom have produced a professional report assessing and evaluating the 13 sites considered and concluded what sites in their view are the most suitable, available and achievable to deliver on the Parish Council's objective of entry level affordable housing for younger people within the parish. Their approach is like how the Council would conduct such an exercise. Their methodology has evaluated sites in an objective way to see what constraints to development exist and if they can be overcome.

To make this report's findings more transparent, site appraisal details of the sites considered suitable and unsuitable should be put into two separate tables of suitable and unsuitable sites, to enable a closer comparison between the sites to be made. The Parish Council might also want to ask Aecom to rank sites from 1 to 13 with 1 being the most suitable site with fewest constraints to development.

If after careful consideration of the report, the Parish Council is minded to prefer sites for development not considered suitable by Aecom then they need to justify and provide reasons for their preferred choice and why they consider that site is more suitable than alternative sites.

Appendix

Other Points
Policies quoted by Aecom in their report are DS1,DS2,DS5,HN1,HN2, HN10, CT2,CT3,INF1,FR1, NE1-NE5, NE7,HE1. I would add HN4 (Amenity, Accessibility and Access) CT5 (Public Transport) to this list. Site specific and design policies can be considered later.

Paragraph 4.12 in the report will need amending as the Council will not be submitting a revised plan for examination by December 2022. New text shown in bold and underlined, text for deletion crossed through. More detail will be provided in the Council's forthcoming Local Development Scheme (LDS).

"*Plan:MK 2016-2031 (adopted in March 2019) sets out the vision and development framework for meeting the Borough's needs until 2031. It is expected that the Plan will be reviewed with a draft plan submitted for examination* ***in the mid-2020s*** *no later than December 2022, to reflect the long-term aspirations set out in the Council's Strategy for 2050 and in the Cambridge-Milton Keynes Oxford Corridor Joint Vision Statement.*