



## 4. VALP Housing trajectory 2013/14 - 2032/33

- 4.1. In our response to MM76, which offers support for the allocation of the Site for residential units, we refer to and demonstrate the ability of the site to accommodate more units than are currently included in the policy text. In order to ensure the final version of the VALP is sound, the housing allocations must be based on robust trajectories that, as much as possible, accurately assess the level of housing that can be delivered within the plan period to 2036.
- 4.2. Following the Local Plan examination, the Inspectors interim findings dated 29 August 2018 (ED166) found that the housing requirement needed to be increased. The inspector calculated that the Objectively Assessed Need (OAN) for AVDC was **20,600 (+1,200 increase on Submission VALP)** and the combined unmet need from other authorities within the Housing Market Area (HMA) was **8,000 (no change to Submission VALP)**, resulting in a requirement for the VALP of **28,600 (+1,200 increase on Submission VALP)**.
- 4.3. Further correspondence between AVDC and The Inspector resulted in agreement being reached that there is a need for the VALP to provide for a land supply in the region of **30,233 units**, i.e. 5.7% higher than the 28,600, as a 'buffer' to reflect uncertainty or in case some sites do not come forward as predicted.
- 4.4. CN have undertaken a review of the housing trajectories within document ED213 'VALP Housing Land Supply Soundness Document' (July 2019) to assess whether the main modifications, that were originally prepared in early 2019, represent the most up to date picture in terms of housing delivery.
- 4.5. As paragraph 3.2 of document ED213 notes, *'The proposed main modifications to the VALP are still based on the [housing land supply] position at 31 March 2018, as the full information for the position at 31 March 2019 was not available at the time of drafting the modifications'*.
- 4.6. Whilst minor revisions to the supply number have been made, the analysis of the housing trajectories shows two key updates that will have an impact on the number of units that the proposed allocations will deliver within the plan period. In order for the VALP to be found sound, as set out in paragraph 35 of the NPPF, policies must be 'Justified' (based on proportionate evidence) and 'Effective' (deliverable over the plan period).
- 4.7. Firstly, site NVL001, or 'Salden Chase', is shown in Appendix B of ED213 as delivering 1,855 units in the plan period, commencing with the first 50 units in 2020/21, with a further 1,805 units across the next eight years until completion in 2029/30.
- 4.8. Since the main mods publication, Salden Chase has moved further away from implementation, as an application for one of the primary access routes into the site off the A421 has recently been refused by Milton Keynes Council (application reference 15/00619/FUL refused on 7 November 2019). The AVDC outline application (15/00314/OAP) has also not yet been approved as, despite a resolution to grant permission on 24 April 2019, the s106 has not yet been signed.



4.9. As such, we believe an accurate trajectory should allow for at least an additional year for the applicant to either reapply for the necessary access from Milton Keynes and/or appeal, and then a minimum of a further year to 18 months for the preparation, submission and approval of the first reserved matters and associated discharge of conditions applications once the s106 is agreed, thereby delivering the first units in 2024/25 rather than 2021/22 as suggest in main modifications. A tapering off of units towards the end of site delivery has also been assumed, as it is typical to have less outlets operational at the end years of a site. The impact of this is demonstrated in the comparison table below:

**Table 2: NLV001 Salden Chase delivery trajectory**

Site: NLV001 Salden Chase													
Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	TOTAL
Main mods completions	50	100	200	250	250	250	250	250	255				1855
Savills analysis				50	100	200	250	250	250	250	250	200	1800

4.10. The net result of this delay to the ability of the site to start delivering houses is **55 units** falling out of the VALP plan period, a reduction from the envisaged 1,855 to 1,800. A useful reference point is document ED151 – a site delivery statement prepared by AVDC and the SWMK Consortium (developing group of the Salden Chase site) and dated August 2018. This predicted the Section 106 agreement would be signed in early 2018, six months after the original resolution to grant in June 2017, the first reserved matters would follow in July 2018, a start on site in July 2019 and first completions in July 2020.

4.11. ED151 therefore considered a period of two and half years from the signing of the Section 106 agreement to first completions on site – using this as a reference (notwithstanding this assumes the associated accesses into the site have planning permission) the main mods trajectory already requires revision as, with no Section 106 currently signed, Summer 2022 would be the earliest completions if it were signed in early 2020. As noted in paragraphs 4.8 & 4.9, the refusal of planning permission for access improvements required to deliver the site adds further delay to the process whilst this issue is resolved, which we believe results in a number of units falling out of the plan period.

4.12. The second site where our analysis has shown a reduction in units within the VALP plan period concerns site ‘HAL003’ or RAF Halton. This site was first included in the VALP in September 2017 following an announcement from the MoD that RAF Halton would be closed by 2022. The DIO indicated to the Inspector in a letter dated 26 June 2018 that the base would close in 2022 and 100 homes a year from 2024/25 would be delivered to the end of the plan period.

4.13. As MM016 indicates, there has been a significant delay to the proposed closure which is now noted in that modification as being in 2026. There is a slight inconsistency within the main modifications, as MM088, which is the allocation policy for RAF Halton, states that the site will not be fully released until 2025. This latter date concurs with the latest Defence Estate Optimisation Programme Update from the Ministry of Defence, published in February 2019, which notes a phased drawdown and closure of RAF Halton ending in 2025.



4.14. Policy HAL003 also notes that ‘*Development at RAF Halton will come forward towards the latter end of the Plan period, and only once a masterplan SPD for the allocation has been prepared and adopted by the Council.*’ This three year delay to the closure of this site, plus the associated timescales for, firstly, a masterplan SPD to be prepared and adopted, and then any planning application to be prepared, approved and implemented post adoption has a significant impact on the delivery of homes from the site within the plan period. This is shown in the table below:

**Table 3: HAL003 RAF Halton delivery trajectory**

Site: HAL003 RAF Halton													
Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	TOTAL
Main mods completions				25	100	125	125	125	125	125	125	125	1000
Savills analysis							25	100	125	125	125	125	625

- 4.15. Using the DIO’s indication to the Inspector that it would be at least two years after base closure before homes would be delivered on the site, the first completions are therefore unlikely until 2027/28 following closure in 2025. This has the impact of **375 units** falling out of the VALP plan period.
- 4.16. Taken in conjunction with the units lost due to the delays at Salden Chase noted in paragraph 4.10, it is considered that **430 units** should be re-allocated within the main modifications to ensure that the VALP represents a justified and effective local plan in line with the NPPF
- 4.17. As Section 2 of these comments has demonstrated, Shenley Park is capable of accommodating around 1,800 units based on a developable area of 55ha and an average site density of between 30 and 35 dwellings per hectare. MM076 allocates Shenley Park for ‘*at least 1,150 homes*’ and we would propose a modification to read ‘*at least 1,580 homes*’ to pick up the units falling out of the plan period from Salden Chase and RAF Halton.
- 4.18. In relation to delivery, the Site is controlled wholly by CN, who intend to bring forward an outline planning application (including a detailed first phase) within the next six to eight months. The Site has been previously identified in the VALP process as suitable, available and achievable for development, meeting the criterion of effectiveness set out in the National Planning Policy Framework.
- 4.19. The Site is available immediately and is able to deliver housing development in accordance with the aims of the Local Plan. CN consider that the Site could be delivered as a comprehensive scheme, delivering at least 1,580 homes, commencing from the early years of the VALP and delivering consistently through much of the plan period.
- 4.20. The latest delivery information from CN has been used to inform and update assumptions on build out rates and these are set out in the table below, which originally formed part of the Site Delivery Statement submitted to AVDC officers in March 2019. Given that there are no known constraints to development on the Site, the build out rates set out in the table below are considered realistic.



**Table 4: WHA001 Shenley Park delivery trajectory**

Site: WHA001 Shenley Park													
Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	TOTAL
Main mods completions				50	100	150	150	200	150	150	100	100	1150
Savills analysis	50	100	200	250	250	250	160	160	160				1580

4.21. It is expected that four to five outlets would be operational on the Site at its peak delivery period. CN will take the lead and be responsible for early phases of delivery, but additional housebuilders will be introduced to assist with range of housing available to the market and speed of delivery. Further timetabling detail is set out in the table below.

**Table 5: Shenley Park timetable**

Stage	Shenley Road Site
Outline application (inc. detailed first phase) to be submitted	July 2020
Planning Consent (including S106 signed)	July 2021
First discharge of conditions applications	July to Sept 2021
Start on site	Winter 2021
First Completions	Spring 2022

4.22. This section has demonstrated that **430 units** are likely to fall out of the plan period due to issues on sites that have become apparent since the main modifications were being drafted in early 2019. Shenley Park is capable of accommodating these units to ensure the VALP remains justified and effective and meets the tests of soundness as set out within the NPPF.