Matter 1 : Berkeley Strategic
(273036)

Milton Keynes Core Strategy Public Examination

Matter 1
“Overview”

Submitted by
Sellwood Planning

on behalf of
Berkeley Strategic

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1.0 **Introduction**

1.1 This statement has been prepared by Sellwood Planning on behalf of Berkeley Strategic (Berkeley). It is supported by a report from Nathaniel Lichfield & Partners (NLP) “Employment Land Assessment” which forms **Appendix 1** to all the Berkeley matter statements.

1.2 It is the overall conclusion of Berkeley that the Milton Keynes Core Strategy does not currently provide a sound basis for the planning of the area to 2026. This is because it provides insufficient employment land (both qualitatively and quantitatively) to allow Milton Keynes to realise its economic potential.

1.3 However, Berkeley consider that it would be possible to find the Core Strategy sound if Milton Keynes Council (the Council) committed in the document to immediately prepare a review of this plan to 2030 to meet the objectively assessed development needs of the area. As a consequence, the Core Strategy would effectively have interim status over the next three years but it would allow it to be adopted within twelve months of the publication of the NPPF (para. 214), thus achieving a development plan which can be given ‘full weight’ in planning decisions.

1.4 Berkeley considers that the current deficiencies in the qualitative and quantitative supply of employment land are such that the Core Strategy will not be able to achieve its aspiration for an additional 42,000 jobs between 2010 and 2026 or the objective of the Council’s Economic Development Strategy to diversify the economic base of the area. To remedy this, Berkeley propose that the Core Strategy is amended to provide for a new employment focussed Strategic Development Area (SDA) to the east of the M1 and south of Newport Pagnell.
2.0 (Q(1.1)) “Has the overall spatial strategy emerged from a sound process of assessment including evaluation of alternatives and sustainability appraisal, and public involvement?”

2.1 Berkeley consider that the Sustainability Appraisal (SA) process was inadequate since the January 2011 SA (‘SA of Reasonable Alternative Sites’) is only an SA to examine alternative sites to form a Strategic Reserve Area (now called a Strategic Land Allocation) of 2,500 dwellings. As such, it did not consider wider options such as the potential for an employment focussed SDA to the east of the M1. However, Berkeley instructed WSP to undertake an SA of its proposed SDA site which was submitted in July 2011 (Milton Keynes Core Strategy: Sustainability Appraisal of Reasonable Alternative Sites). This demonstrates how the site accords with the sustainable objectives of the Core Strategy. As a consequence, it would be possible for the SDA to be inserted into the Core Strategy.

3.0 (Q(1.2)) “Taken as a whole, is the Core Strategy consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development. If it is not, how might any inconsistencies be rectified?”

3.1 The ‘Spatial Vision’ of the Core Strategy accords with the principles of the NPPF; however the quantification of this in the Core Strategy objectives (Table 4.1) fails to meet the NPPF employment objective that plans should proactively meet the development needs of business and identify strategic sites (para 21). The Core Strategy seeks to accommodate 42,000 additional jobs between 2010 and 2026. However, the attached NLP report (Appendix 1) demonstrates that both qualitative and quantitative deficiencies in the current employment land supply will mean that this jobs target is likely to be frustrated.

3.2 This could be rectified by the allocation of an employment led SDA to the east of the M1 and south of Newport Pagnell. If the Council also commit to an immediate review of the Core Strategy to meet the objectively assessed development needs of
Milton Keynes to 2030, the Berkeley SDA will also support the resulting increased and more evidence based jobs target as well as allowing for the diversification of the Milton Keynes economy.

4.0 (Q(1.3)) “Does the Core Strategy make reasonable, appropriate provision for meeting the strategic priorities for the area?”

4.1 The Core Strategy does not make an appropriate provision for meeting the strategic priorities for Milton Keynes to 2026. However, the currently identified development pipeline is generally capable of meeting most needs which will arise in the short term (up to 2015) when a review of the Core Strategy could be adopted. For this reason there is a strong case in favour of finding the Core Strategy sound for the purposes of guiding development in the short term, but such a finding of soundness is wholly contingent on the Council committing to an immediate review of the Core Strategy. The only area where the Core Strategy would fail to meet its strategic priorities is in terms of employment land supply. The NLP report shows that, in 2012, Milton Keynes has only one employment site capable of offering plots larger than 10 ha and has deficiencies in being able to meet specific qualitative requirements. This qualitative and quantitative deficiency needs to be remedied now if this Core Strategy is to be found sound.

5.0 (Q(1.4)) “Does it take appropriate account of the sub regional and wider context, including cross boundary impacts?”

5.1 Milton Keynes is a town of much more than sub-regional importance in terms of its employment role. The NLP report assesses the potential of the town and concludes that it is capable of generating in excess of 42,000 jobs (2010 to 2026). However, the achievement of this figure is likely to be frustrated by the current qualitative and quantitative deficiencies in the supply of employment sites. It is suggested that this is remedied by
- an immediate short term solution of finding the Core Strategy sound subject to the additional allocation of a strategic, employment focussed SDA site to the east of the M1 and south of Newport Pagnell; and / or
- an early review of the Core Strategy to fully reflect the greater than sub-regional employment role and potential of Milton Keynes, including cross boundary relationships.

6.0 (Q(1.5)) “Does the Core Strategy provide clearly articulated and justified guidance about the way in which cross boundary issues and joint working will be addressed?”

6.1 Berkeley control the entire area required to deliver the proposed new employment focussed SDA and the site is wholly within the administrative area of Milton Keynes Council. This would ensure the delivery of the SDA as it would not be subject to cross boundary working and would solely be in the hands of Milton Keynes Council.

7.0 (Q(1.6)) “On the basis that the South East Plan (RS) remains part of the development plan, is the Core Strategy in general conformity with it? If it is not, what are the specific elements of the strategy that lead to non conformity? How might this be rectified?”

7.1 The South East Plan (SEP) provides for the delivery of 41,360 additional dwellings (2006 – 2026), an average of 2,068pa. The submitted Core Strategy (2010 – 2026) proposes 1,750 dwellings per year which undershoots this by 318 dwellings per year (15.4%). Similarly, SEP Policy MKAV2 sets out the spatial framework for the Milton Keynes growth area and proposes 44,350 jobs (2,217pa). In contrast, the submitted Core Strategy proposes 42,000 jobs in the 16 years 2010 to 2026 (2,625 pa). On the basis that the land supply exists to support the delivery of 42,000 jobs, the Core Strategy exceeds the jobs requirement by 18.4%.
7.2 The central questions which arise from this are

- is a shortfall of 15.4% in the housing provision compared to the SEP a sufficient reason to find the Core Strategy unsound? Berkeley consider that whilst a 15% shortfall is high and, hence, on the margin of conformity, the Core Strategy need not be found unsound if the Council commits to an immediate development plan review which fully meets the objectively assessed development needs of the area.

- the aim to deliver more jobs than required by the SEP is welcomed and accords with the NPPF objective to support sustainable economic growth (para. 19). However, the NLP report commissioned by Berkeley (Appendix 1) demonstrates that the current employment land supply in Milton Keynes has qualitative and quantitative deficiencies which could prejudice the achievement of 42,000 additional jobs by 2026. This can be remedied by the allocation of an employment focussed SDA on the Berkeley land to the east of the M1 and south of Newport Pagnell and a commitment to an immediate review of the plan to 2030.

8.0 (Q(1.7)) “If the RS is abolished as currently proposed, are there any specific policy deficits that would ensue and how would these be addressed in the Core Strategy?”

8.1 If the RS is abolished, it would be necessary for the Council to assemble a new evidence base to determine appropriate levels of housing and employment growth to 2030. In the view of Berkeley, the most pressing short term policy deficit relates to the ability of the employment land supply to deliver the current ‘interim’ 42,000 jobs target, rather than the adequacy of the targets themselves.

8.2 The most appropriate way forward to address this policy deficit (which exists whether or not the RS has been abolished) is for the Core Strategy to identify an employment focussed SDA to the east of the M1.
9.0  (Q(1.8)) “Overall, does the Core Strategy satisfy the test of ‘positive preparation’ (para. 182 of the Framework)? If not, how might any deficiencies be resolved?”

9.1  The Core Strategy was prepared prior to the publication of the NPPF and in the context of the Regional Strategy led system of development plans. However, notwithstanding this, there was nothing in the previous planning guidance to encourage local authorities not to ‘positively prepare’ their development plans, so the Council’s Core Strategy should already have a positive approach.

9.2  Given the lengthy time period for the preparation of development plan documents and the recent publication of the NPPF, it would be unreasonable to expect the Core Strategy to fully comply with this new guidance. The question also needs to be posed whether the sustainable planning of Milton Keynes would be best served by finding the Core Strategy unsound. It is the view of Berkeley that whilst the Core Strategy is clearly imperfect, it is better to find it sound (with modifications) as a means of putting in place local policies that deliver a ‘short term fix’ pending the immediate review of the plan to 2030. Such a Review would obviously need to fully comply with the NPPF.

9.3  The conclusions of Berkeley are that a housing provision of 28,000 dwellings (2010 to 2026) and 42,000 new jobs is a reasonable short term basis on which to plan Milton Keynes, if associated with an immediate Review. The principal concerns are that qualitative and quantitative deficiencies of the employment land supply will frustrate the achievement of 42,000 jobs and prevent the diversification of the economic base in accordance with the Council’s Economic Development Strategy. In view of this, the supply should be augmented by a modification to the Core Strategy to identify the Berkeley site to the east of the M1 and south of Newport Pagnell as an employment focussed Strategic Development Area. This modification can be made by the Inspector since Berkeley has prepared and submitted the appropriate SA document.