Matter 2: Berkeley Strategic (273036)

Milton Keynes Core Strategy Public Examination

Matter 2
“Development Strategy, Settlement Hierarchy”

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(2.1))  “In general, does the Core Strategy provide clear, sound guidance about the roles that will be played by various parts of the borough in its future development?”*

2.1 Subject to the concerns expressed under question (Q(2.2)) below relating to the absence of an allocation for an employment focussed SDA east of the M1 and south of Newport Pagnell, the Core Strategy does give clear guidance about the roles played by various parts of the borough.

3.0 *(Q(2.2))  “Is the settlement hierarchy and broad scale and direction of growth as set out in Policy CS1 properly justified?”*

3.1 In proposing a strategy which seeks to focus development within and on the periphery of the urban area of Milton Keynes, the Core Strategy accords with the sustainable development principles of both the South East Plan and the NPPF. Similarly lower levels of development at Newport Pagnell, Olney and Woburn Sands and limited development elsewhere constitutes the basis of a sound spatial strategy which locates most development where there is the best range of jobs, services, facilities and public transport. It is difficult to see what other strategy could be adopted which would also accord with the South East Plan and the NPPF.

3.2 Whilst the third paragraph of Policy CS1 advises that other sites, in addition to the Strategic Reserve Areas (now called Strategic Land Allocations), will be considered through the subsequent Sites Allocations DPD, it is considered that the policy should give greater guidance on the broad direction of future strategic employment land releases necessary to deliver 42,000 additional jobs between 2010 and 2026.

3.3 For the reasons explained in paragraphs 1.2 to 1.4 above, Berkeley considers that, as presently drafted, the Core Strategy is unsound since deficiencies in the current qualitative and quantitative supply of employment land will frustrate the Council’s ambitions for 42,000 jobs and greater economic diversity by 2026. The NLP report *(Appendix 1)* provides compelling evidence of these deficiencies and concludes that
the key missing element in the Milton Keynes portfolio of employment land is a strategic scale employment release with good access to the M1. Since this deficiency exists now, the Core Strategy is unsound in not ensuring 42,000 new jobs can be delivered. The remedy is for the Core Strategy to be made sound by the addition of an employment focussed SDA to the east of the M1 and south of Newport Pagnell. Since the SDA would effectively function as a peripheral extension to the urban area of Milton Keynes, it would accord with the wider spatial strategy of the plan, the South East Plan and the NPPF.

3.4 Berkeley has prepared and submitted an SA of this proposed SDA so it would be possible for the Core Strategy to be modified to incorporate the proposal. It is suggested that policy CS1 is modified to refer to this broad direction of growth and this is shown with a symbol on the Key Diagram. The precise boundaries of the SDA can then be defined in the subsequent Allocations DPD.

3.5 The suggested modified wording of Policy CS1 would be as follows.

- Amend the second paragraph of Policy CS1

“The allocation of the Strategic Reserve Areas south east of the city from the Local Plan (2005) and an employment focussed Strategic Development Area east of the M1 and south of Newport Pagnell will provide sustainable urban extensions adjoining the existing urban boundary”

- Amend the third paragraph of Policy CS1

“In addition to the Strategic Reserve Areas and the Strategic Development Area, other sites will …. ” (rest of paragraph unchanged).
4.0 (Q(2.3)) “Is there a sound policy framework for the rural areas of the borough?”

4.1 No comment.

5.0 (Q(2.4) “In terms of their guidance and specificity, is the balance between the area based policies and Table 5.7 appropriate?”

5.1 It is considered that splitting ‘area of change’ guidance between the Area policies and Table 5.7 does not aid clarity. For example, Policy CS5 does not specify the number of dwellings in the SRAs but Table 5.7 (which is not policy and hence has lower text status) does. It is recommended that Table 5.7 is deleted and the information which needs to be in a policy is contained in the relevant policy and non policy guidance is placed in the supporting text immediately below the policy. This would aid clarity by focussing all guidance on each area of change in a single location in the Core Strategy and providing a more logical separation of ‘upper case’ policy guidance and that which is just supporting text.

5.2 If the Berkeley submission relating to the identification of a broad location for an employment focussed SDA to the east of the M1 is accepted, it will be necessary to add an additional ‘Area of Change’ policy to the Core Strategy to deal with it. Provisionally numbered Policy CS5A, it would state

“Strategic Development Area

An employment focussed Strategic Development Area is proposed to the east of the M1 and south of Newport Pagnell. The broad location is shown with an ‘asterisk’ notation of Figure 5.2 ‘Key Diagram- Urban Area’ and the Proposals Map Amendment. The precise boundaries of the SDA will be defined in a subsequent ‘Allocations’ DPD.”
Development in the SDA will be permitted in accordance with other relevant policies in the LDF and the principles of development are set out below.

In order to ensure that the SDA is brought forward in a strategic and comprehensive manner, planning permission shall only be granted in conjunction with a site-wide Master Plan and/or Development Brief. These shall be prepared by the developer and approved by Milton Keynes Council.

The principles of the SDA are that the development should

1. Provide a sustainable urban extension to Milton Keynes, providing a strategic employment location of up to 400 gross hectares (1,000 gross acres). This will accommodate employment uses in B1, B2 and B8 classes, with ancillary facilities, and help Milton Keynes to attract inward investment and better cater for new and expanding businesses.

2. Create a sustainable, safe and high quality employment focussed urban extension which is well integrated with and accessible from the existing city and is complementary with Central Milton Keynes (CMK). Its structure and layout should draw upon the principles that have shaped the existing city, especially the road system, the linear parks and strategic flood water management.

3. Maintain the character and integrity of existing settlements.

4. Maximise opportunities for sustainable travel patterns, including reducing car use by locating development close to public transport nodes and routes and creating enhanced links to CMK.

5. Link to the surrounding road, redway and grid road network.

6. Create an enhanced skills base through training, apprenticeships and links to educational institutions.

7. Provide businesses with access to a high quality telecommunications and ICT network.

8. Create strategic landscape boundaries to the outer edges of the development area and to soften the impact of the development on the adjacent and surrounding open countryside.
9. Take a strategic and integrated approach to flood management and provide a strategic and sustainable approach to water resource management, including Sustainable Urban Drainage Systems (SUDS) and flood risk mitigation.

10. Deliver the development through an updated tariff and / or framework and / or Section 106 and / or Community Infrastructure Levy agreement to provide for contributions to on-site and off-site strategic and local infrastructure in an effective and timely way. This must include financial contributions to the improvement and extension of infrastructure and facilities in nearby existing settlements.

11. Make provision for local retail, leisure and associated ancillary development of an appropriate scale to serve the SDA.

12. Make a contribution to new or upgraded transport infrastructure.”

5.3 The incorporation of this new policy text and Proposals Map amendment would make the Core Strategy sound in terms of the achievement of 42,000 new jobs in the period 2010 to 2026. The east of the M1 SDA proposal has been supported by an appropriate SA which was submitted by Berkeley in July 2011.