Matter 6 : Berkeley Strategic  
(273036)

Milton Keynes Core Strategy Public Examination

Matter 6  
“The Strategic Land Allocation”

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 consider 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(6.1)) “(i) Is the proposed SLA consistent with the sustainable development of the borough and adjoining areas?”
“(ii) Has ‘future proofing’ been appropriately considered?”

2.1 No comment on part (i) of this question.

2.2 With regard to part (ii) of the question, Berkley have no comment if it only relates to the ‘future proofing’ of the SLA. However, Berkley has a wider concern that, as presently drafted, the plan will not achieve its 42,000 jobs target or the Council’s Economic Development Strategy objective of a more diverse economy. This is due to the deficient amount of employment land that is currently available which will limit the degree to which Milton Keynes can respond to changes in market demand in the period to 2026. As such, the plan is not ‘future proofed’.

3.0  (Q(6.2)) “Have the reasonable alternatives to the SLA been properly exhausted at an appropriate stage in the plan-making process?”

3.1 The Berkeley position is not that the Strategic Land Allocations allocated in Policy CS5 should be rejected, but that the process of SLA assessment and identification was too narrow in its scope and hence, flawed. This was because the September 2010 Core Strategy did not seek to look more widely than the Milton Keynes part of the former housing led South Eastern Development Area to meet its development provisions of 28,000 new homes and 42,000 additional jobs.

3.2 The Nathaniel Lichfield & Partners report ‘Employment Land Assessment’ (Appendix 1), commissioned by Berkeley demonstrates the quantitative and qualitative deficiencies of the current Milton Keynes Employment Land portfolio and how this is likely to frustrate the Core Strategy objectives of delivering 42,000 additional jobs between 2010 and 2026 and diversifying the local economy. The decision of the Council to only consider the previous SRA through the SA process meant that other strategic land allocations which could have contributed to the 42,000 new jobs were not considered.
3.3 Berkeley has undertaken its own SA of the proposed employment focussed SDA east of the M1 and south of Newport Pagnell which has been submitted to the Council. Should the Inspector consider that the Berkeley submissions have merit, the existence of this additional SA makes it possible for the proposed SDA to be added as a modification to the plan. The effect of such a modification would be to ensure that the objective of an additional 42,000 jobs can be met within the plan period, thus making the employment proposals of the plan sound.

4.0 (Q(6.3)) “With the post submission changes to provide for the SLA, does the Core Strategy represent the most appropriate strategy when considered against reasonable alternatives?”

4.1 The post submission changes do not do enough to make the Core Strategy sound. It remains the case that the plan has not fully considered the range of reasonable alternatives necessary to identify sufficient strategic land releases to meet the Core Strategy objective of an additional 42,000 jobs between 2010 and 2026. However, this could be remedied by the addition of the proposed Berkeley SDA which has been the subject of its own SA.

5.0 (Q(6.4, 6.5, 6.6, 6.7 and 6.8))

5.1 No comment.