

PLANNING STATEMENT (ADDENDUM) MILTON KEYNES EAST SEPTEMBER 2021



Milton Keynes East Planning Statement Addendum

Hybrid Planning Application

St James Group Limited

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LICHTFIELDS

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1.0 Introduction

- 1.1 This Planning Statement Addendum has been prepared by Lichfields on behalf of St James Group Ltd ('St James') to provide supplementary information and to support minor revisions in respect of the proposals under the hybrid planning application for Milton Keynes East (21/00999/OUTEIS).
- 1.2 The planning application was originally submitted in March 2021 and following further detailed design work and in response to consultee comments, St James is submitting several revised plans which make minor changes to the application proposals (see below). This Planning Statement Addendum describes those changes, considers how they continue to accord with planning policy and also provides further supplementary information on the proposals, including the applicant's response to issues raised through consultation to date. This addendum document should be read alongside the original Planning Statement dated March 2021.

Substitutions and Additional Information

- 1.3 A full schedule of substitutions and additional information is contained within the cover letter and application schedule accompanying. Notwithstanding, in broad terms, this submission addresses the following amendments and additional information:
- 1 Amendments to plans and drawings for the detailed highway and infrastructure element in relation to the following:
 - a Moving the location of the 'Eastern Link Roundabout 3' on the north east edge of the scheme further south along the route of the eastern link by approximately 50m, with associated design and earthwork amendments;
 - b Amending Tongwell Street arrangements including removing the proposed Carleton Gate roundabout and re-introducing the southbound carriageway along Tongwell Street from Tongwell Roundabout. This involves the removal of all vehicle access to Willen at Tongwell Street. The amended design also includes provision for an expanded redway network in the area;
 - c Amendment to the proposed Moulsoe Stream bridge plan such that it accommodates a 4m clear width bridleway below;
 - d Provision of the structural drawing for the proposed underpass beneath Link 101 (a new plan which was not previously provided, but provides the structural detail for this underpass/subway);
 - e Removal of the noise barriers internal to the MKE site along the Eastern Link Road, Link 107 and Link 108;
 - f Consequential updates to the outline integrated drainage strategy and proposed drainage catchments plan, which now form part of drainage strategy superseding earlier versions; and
 - g Substitution of relevant Drainage Sheet plans.
 - 2 Amendments to the parameter plans for the outline element in relation to the following:
 - a Changes to all parameter plans to reflect the impacts of moving the 'Eastern Link Roundabout 3' and the associated realignment of the primary route through MKE that would feed into that roundabout. This has included minor changes to the development parcels and location of green infrastructure (including play areas);

- b A change to the Land Use and Building Heights parameter plans to provide a minimum 44m habitable window offset between existing residences at Pym's Stables and proposed new homes to be located to the rear;
 - c An amendment to the Green infrastructure parameter plan to allow for movement of the existing watercourse (Hermitage Stream) to any route within the proposed eastern employment zone, whilst maintaining the entry point (north) and exit point (south under the M1) of the existing watercourse. This retains the requirement for a 30m wide structural landscape zone around any realigned course;
 - d An amendment to the Access and Movement parameter plan to introduce a zone within the employment area which will be kept clear of buildings;
 - e An extension of the redway network from Tongwell Roundabout to the new M1 bridge along the northside of Tongwell Street (also to be addressed as part of the revised Tongwell Street arrangement);
 - f Addition of a location for a bat roost on the Green Infrastructure parameter plan
- 3 Supporting information in relation the above changes, alongside further information contained within:
- a A Design and Access Statement Addendum;
 - b A Statement of Community Involvement Addendum;
 - c An ES Addendum, incorporating addendums to the transport, noise and air quality assessments in respect of the changes to highway layouts; and
 - d A revised set of s106 Heads of Terms.

1.4 Individually and cumulatively these changes to the proposed scheme are minor in nature and do not materially alter our proposals for Milton Keynes East in any way. The overall scale, nature and essential character of the development proposed remains the same.

2.0 **Amendments to Proposed Plans**

- 2.1 The amendments to the proposed plans described in the above do not fundamentally alter the proposed scheme. Notwithstanding, this section sets out why those amendments are sought and appraises them in terms of planning policy to demonstrate they continue to accord with the development plan. In this context, we do not repeat here the assessment of policy contained within the original planning statement, which should be read alongside this addendum.

Detailed Element

Eastern Link Roundabout

- 2.2 The amendments to the Eastern Link Roundabout 3 would move this roundabout c.50m southwards along the carriageway alignment. This has been considered necessary, in consultation with MKC Highways, in order to achieve an improved access geometry to the adjacent Milton Keynes Council land parcel to the north which is also contained within the MKE allocation (Policy SD12). It therefore accords with the overarching principles set out in Plan:MK for the whole allocation to come forward in a planned manner between the respective landowners.
- 2.3 This amendment does not alter the fundamental nature of the of the Eastern Link Road, which retains its alignment, albeit with the roundabout moved along it. However, this amendment does mean that the primary street that would serve the development from this roundabout is moved to the south of an existing hedgerow which is to be retained within a green corridor, and as such the layout of the outline element has been amended accordingly (see below).

Tongwell Street

- 2.4 The original submission included a new roundabout on Tongwell Street providing access to Willen at Carleton Gate and northbound running only along Tongwell Street between the proposed new M1 overbridge and Tongwell Roundabout.
- 2.5 The amended submission involves the removal of the proposed Carleton Gate roundabout and removal of existing vehicular access to Willen at Carleton Gate altogether, albeit with redway and emergency vehicle access retained. This would facilitate, and go alongside, the reintroduction of the southbound link along Tongwell Street, which would run under the new M1 bridge link (using a new bespoke structure) and join up with the southbound lane. The amended road layout for Tongwell Street would remain within the existing grid road transport corridor, with a new noise barrier to be provided along the southern side of Tongwell Street. This revised arrangement for Tongwell Street is detailed on the illustrative 'Tongwell Street Northbound and Southbound Links' plan included within this submission pack.
- 2.6 These changes are being proposed in direct response to ongoing engagement with Willen residents/Broughton Ward Councillors and delivers several advantages. It would retain north and southbound running along Tongwell Street, maintaining the wider grid road structure in this location (and the benefits it provides to route options) whilst removing vehicle access to Carleton Gate would also prevent any potential for 'rat running' through the estate.
- 2.7 A Transport Assessment addendum report (enclosed as part of the ES Addendum) assesses the different traffic flows that would arise from this change and the removal of the Carleton Gate access. It concludes that Tongwell Roundabout will continue to operate within capacity and that the previously identified and proposed mitigation at Pineham Roundabout remains appropriate. These changes have also been assessed from a noise and air quality perspective, with no materially greater impacts than originally assessed envisaged.

- 2.8 Overall, this change is considered to provide a better highway solution for the Tongwell Street corridor and directly responds to the feedback received through consultation on the scheme.

Moulsoe Stream Bridge

- 2.9 The Moulsoe Stream bridge plan has been amended and updated such that it accommodates a 4m clear width bridleway (with 1m margin each side against the stream bank and bridge abutment structure) to be delivered as part of the up-front infrastructure works. This will ensure enhanced east/west connectivity across the eastern link road for pedestrians and horse riders, linking into the wider network of existing public rights of way and the proposed network across MKE.

Noise Barriers

- 2.10 The detailed plans have been updated in respect of noise barriers (fences) on the Grid Road corridors internal to the MKE site, in particular the Moulsoe Stream Bridge structure. The original noise assessment, as contained within the Environmental Statement accompanying the application, confirms that extensive noise barriers across the MKE site are not necessary for noise attenuation purposes (Figure AH1-3). Such noise barriers are not a common feature of Grid Road corridors within Milton Keynes as the corridors themselves, and their broad landscaping, create a sufficient offset to homes and other uses to address any noise impacts; so this change is simply consistent with how the issue is approached across Milton Keynes. Noise barriers along the Tongwell Street Corridor where the road will be dualled are retained within the detailed plan. The potential to introduce noise barriers alongside new residential development (including within the new Grid Road corridors where appropriate) is retained within the outline element and would come forward subject to detailed acoustic testing alongside any detailed layout for proposed new homes (or other uses) if required.

Outline Element

Amendments to Layout

- 2.11 Where the Eastern Link Roundabout 3 has been moved, it has been necessary to amend to the layout of the proposals within the immediate vicinity to reflect the need to tie in the primary road into new roundabout location. This has necessitated amendments to the development parcels in this location. The main consequence of this is that it has been necessary to move the local play area in this location by approximately 50m, from south of the primary road to the north of the primary road. The revised location would continue to meet locational requirements with required offsets from roads, as shown within the Design and Access Statement Addendum. This maintains the overall network and distribution of play areas and the same play catchment coverage as previously, with only small areas beyond the 300m. Where these minor catchment gaps exist they are only marginally beyond the radius distances set out, whilst it is also proposed they can be further addressed at reserve matters stage via some incidental play and/or play-on-the-way type features within nearby green corridors.

Pyms Stables

- 2.12 Following consultation with the residents of Pyms Stables, the applicant has introduced a change to provide a minimum offset between the existing residences at Pyms Stables and any new homes which will be located to the rear of them. This is proposed as a parameter which would see a minimum 44m between habitable room windows in Pyms Stables and the new development. This offset is double the 22m 'rule of thumb' identified as the back-to-back privacy distance between homes within the Milton Keynes New Residential Development Design Guide

SPD (para 4.10.1) and will ensure that the residential amenity of those within Pym's Stables is maintained.

Hermitage Stream

- 2.13 The parameter regarding the proposed rerouting of the hermitage stream through the eastern employment parcel has been amended to provide greater flexibility. The principle remains the same; that the route of the watercourse will be moved to accommodate the development and re-provided in a 30m width landscape corridor. The change to the proposal is just to introduce additional flexibility for how that gets routed, with previously a deviation of up to 150m on a central line provided for and now a deviation anywhere through the employment parcel allowed for.

Safeguarding Zone for M1 Footbridge

- 2.14 A parameter is introduced on the access and movement plan to restrict the siting of any employment building within a certain zone (e.g. the footprint of a warehouse could not sit within this zone) such that a new pedestrian footbridge over the M1 subsequently brought forward has the space and flexibility to 'land' along that edge. Whilst the footbridge is not specifically proposed as part of this application (it would need to come forward via a separate application process), this parameter means that any future proposals for a bridge in this location would not be prevented or stymied by the layout and arrangement of employment units that could come forward via later reserved matters applications. The 'landing' of the footbridge would only require a c.10m corridor into MKE and as such once a potential location is fixed and agreed, the remainder of the safeguarding would no longer be required.

Extension to Redway Network

- 2.15 An extension to the redway network is proposed as an addition to the access and movement parameter plan. This will extend the network from Tongwell Roundabout along Tongwell Street to the new M1 overbridge, providing a missing section of redway and ensuring a comprehensive redway network right across the eastern flank of Milton Keynes.

Potential Additional Underpasses

- 2.16 As part of the outline element, two locations for potential additional underpasses are identified within the eastern link road adjacent to the employment parcel. These will give the applicant additional flexibility to bring forward routes under the link road (at precise locations points to be determined at a later date but being between the respective roundabouts) and would be subject to reserved matters applications.

Bat Roost

- 2.17 A location for a bat roost building has been specified on the Green Infrastructure parameter plan. This is located in the main green corridor (river ouzel linear park), east of the river but west of the employment parcel. It is in an area beyond the flood plain (flood zone 3), is far enough away from the motorway and with flexibility on precise location such that it can be sensitively placed to avoid impacts from external lighting that might be associated with nearby employment development. The bat roost is identified within the ecological assessment as in-built mitigation, and specifically will be used as replacement bat habitat following the necessary demolition of farm structures associated with Hermitage Farm.

3.0 Further Information and Clarifications

- 3.1 In addition to the changes made to the proposed scheme as detailed above, there has been several consultation responses made on the application and areas where further information can be provided. Appendix 1 to this report provides a schedule which provides the applicant response to the main themes that have been raised via consultation. In addition to this the applicant has been in discussions with several statutory consultees, including in respect of lifting holding objections; response to those statutory consultee comments will be prepared and shared with MKC as points are agreed. However, we address several specific points as follows.

Highway Stopping Up

- 3.2 In addition to the highways stopping-up identified within the original Planning Statement, it will be necessary to formally stop-up the existing Tongwell Street underpass near Carteret Close. The revised arrangements around Tongwell Street (detailed above) do not retain an underpass in this location with a new underpass to be provided further east near the existing alignment of Carleton Gate (which will be closed). As such the existing underpass is proposed to be demolished and it will be necessary to formally extinguish parts of the highway rights of the footpath in this location. For clarity access/connectivity from the Carteret Close redway would still be retained and linked to a new redway to run along the south side of Tongwell Street.

Proposed Uses

- 3.3 As part of responses made on the application proposals, comments have been made on how uses identified as part of Plan:MK Policy SD12 are to be accommodated within the allocation scheme. In this respect it is important to recognise that this application only covers St James' element of the overall MKE allocation and is in outline form, meaning it provides a flexible overarching masterplan which can accommodate many different uses at later detailed design stages. However, in respect of specific uses:

- **Place of worship** – Policy SD12 contains no requirement for a place of worship, although the MK Development Framework SPD sets out that places of worship will “*be an appropriate use within the local centre*” and alternatively, subject to certain criteria, places of worship can be developed on employment sites. The parameters for St James' application includes 400 sqm for community halls and/or community services within Use Classes F1 or F2 to be provided in the community hub. This provides the flexibility to include a place of worship in line with the SPD's principle, whilst flexibility also remains via the employment elements of the proposals.
- **Hotel** – Policy SD12 indicates MKE should provide associated infrastructure including a hotel within the allocation area. No elaboration is provided within the SPD on what this entails. The St James' proposals do not include a proposed hotel on the basis that there is already a well established and large hotel at the centre of the MKE allocation which already addresses the requirement in Policy SD12. The Holiday Inn on London Road provides a wide range of functions and has been sensitively integrated into the MKE scheme which will sit around it.
- **Household Waste Facility** – Policy SD12 contains no requirement for a household waste recycling centre, although the MK Development Framework SPD sets out that land should be retained within the employment area (of which the St James' proposal is only part) or adjacent the Park and Ride site (identified within SPD for the MKC owned parcel to the north, beyond St James' application area). A household waste facility would fall within use class B2 (general industrial) or B8 (warehousing and storage) depending on the scope and

nature of the facility. Therefore, the employment elements of the overall MKE allocation (MKC, Newlands, Bloor and St James) provide the flexibility for accommodating such a use. However, it is equally likely that a household waste facility would be provided within the MKC owned parcel adjacent to the park and ride location as indicated by SPD. The precise location would be subject to detailed design proposals and the agreed distribution of civic uses across the different parts of the site.

- **Self-Build Homes** – Policy HN5 requires provision of plots for self-build homes totalling 1ha on growth allocations (circa 30 plots across MKE). As set out a paragraph 6.45(6) of the original planning statement, the parameters for 4,000 up to 4,600 new homes are flexible. Self-build homes fall within Use Class C3 and as such the application secures the parameters which could deliver them via future design codes and appropriately designed reserved matters applications. If necessary, provision can be secured via condition.

Housing Mix

- 3.4 Following further discussion with Milton Keynes Council’s housing department a revised position on the ‘base’ affordable housing mix has been provisionally agreed. This would see slightly fewer 2-beds and slightly more 3-bed and 4-beds within the affordable mix used as the basis for the affordable mix to be secured via the Section 106 agreement. The overall provision of affordable housing, and the tenure splits between different types of affordable housing, remain unchanged, but the change to the size-mix of the affordable homes will provide significant benefit to MKC and help to address affordable needs for family homes. The revised affordable mix is set out in Table 3.1 but this change has no further impacts upon the scheme as originally presented.

Table 3.1 ‘Base’ Affordable Housing Mix

Home Type		Affordable Rent		Social Rent		Shared Ownership		Total	
Flats	1 bed	88	11%	0	0%	38	16%	126	10%
	1 bed extra care	0	0%	128	64%	0	0%	128	10%
	2 bed	80	10%	0	0%	58	24%	138	11%
	2 bed extra care	0	0%	32	16%	0	0%	32	3%
	3 bed	0	0%	0	0%	0	0%	0	0%
Houses	2 bed	289	36%	0	0%	100	42%	389	31%
	3 bed	322	40%	0	0%	44	18%	366	29%
	4 bed	22	3%	40	20%	0	0%	62	5%
	5 bed	0	0%	0	0%	0	0%	0	0%
Total		800		200		240		1,240	

Source: St James and MKC

- 3.5 A revised ‘Affordable Housing Statement’ is included as part of this submission for completeness, but the remainder of the submitted housing statement appended to the original planning statement remains relevant.

Connectivity

- 3.6 The connectivity of the proposals with existing areas of Milton Keynes has been raised in several responses to the planning application. To assist in how it is proposed to connect the proposed development with the existing urban areas for pedestrians and cyclists we have prepared three plans which are included within the Design and Access Statement Addendum:

- 1 An Illustrative Crossings Plan – this shows how the wider Milton Keynes East development will connect to Newport Pagnell northwards across the A422/A509 and to Milton Keynes southwards across the M1. Some of these are secured/provided as routes beyond the scope of this planning application (e.g. as part of the Bloor Homes’ land proposals).
- 2 A Site Connectivity Plan – this shows the key walking and cycling routes through our proposed scheme and the key crossings/connectivity into the areas beyond our site. These can be secured as part of the development (e.g. via way of parameters, with these routes shown, and/or conditions).
- 3 An Illustrative Wider Connectivity Plan – this shows the wider routes beyond the site boundary that are outside of St James control, but which MKE would connect into and/or where enhancements and improvements could be secured subject to third party land rights (e.g. as may be secured as off-site enhancements within a s106 agreement).

3.7 These three plans collectively demonstrate how our proposed scheme would fit into the wider networks of routes and connections, providing walking and cycling routes to key destinations beyond the site (and for those coming from elsewhere into the development for example for school or work).

Conditions and Section 106

3.8 Through consultation with statutory consultees various conditions have been suggested or requested to address various matters. We have not reviewed each of these in any detail, but confirm that in general the applicant is pleased to use conditions where appropriate and where they meet the six tests set out in guidance (necessary, relevant to planning, relevant to the development, enforceable, precise and reasonable). The applicant will also use the Section 106 agreement (set out to also implement the Milton Keynes Tariff for the MKE growth area) to address further issues, including the need for off-site mitigation and any land/financial considerations. The applicant would be pleased to review any draft conditions, including pre-commencement conditions, in line with the guidance contained within the Planning Practice Guidance.

3.9 Notwithstanding the above, we address the following areas where conditions and/or things to be secured via the s106 agreement have been considered as follows:

- 1 Comments from MKC’s Landscape Officer have raised the winter views submitted as part of the application. The applicant can confirm that the VVMs (Visually Verified Montages) contained within the application all use winter views undertaken in December 2020. The applicant strongly considers that the full set of photographs and analysis provided give sufficient information to identify where the landscape and visual impacts will occur and as such the Council can be content that these are adequately addressed by the application. Notwithstanding, it is noted that further baseline winter views will be helpful in developing the detailed design, future design codes and landscaping for subsequent reserve matters submissions, and as such the applicant considers any necessity for these could be addressed via condition to link-in with the design code process.
- 2 The applicant is proposing to secure highway improvements within the vicinity of Moulsoe via legal agreement within the s106/s278 agreements for the scheme. These will include footpath access to Moulsoe from the proposed development along the Newport Road highway corridor, and traffic calming measures to Moulsoe’s entry/exit points on Newport Road, such as village gateway features. This is reflected in an updated s106 Heads of Terms.
- 3 Comments on potentially veteran trees has included comments from MKC’s Arboricultural (Tree) Officer, indicating that in respect of some of the ‘A’ and ‘B’ category trees that these could be transplanted and indicating that impacts in respect of trees could be addressed by

way of condition. St James consider this could include identification of specific trees for relocation as necessary, noting that any harm to such potentially veteran trees would still meet the exception in NPPF footnote 58.

- 4 Connectivity beyond and outside of the redline has been an issue raised by several consultees. Whilst some of these are beyond the overall control of the applicant and their (or MKC's) land, several areas where improved connectivity can either be provided for or addressed via off-site works have been identified for inclusion with the s106 Heads of Terms. These include a redway/cycle link along the London Road in Newport Pagnell, a leisure route/cycle link from Tongwell Roundabout to J14/A509 via a route north of the Cotton Valley Wastewater Treatment Works (subject to agreement of rights over third party land) and safeguarding for the potential of an M1 foot/cycle bridge, as reflected in the revised parameter plans.

4.0 Conclusions

- 4.1 The amendments to the scheme sought as part of these revisions to the MKE application are minor and do not affect the overall nature of the application. The key impacts of the scheme remain as previously assessed and the applicant has sought to use feedback from consultation to improve the scheme as submitted in several ways. Furthermore, it is considered the overall planning application material provides a clear response to many of the comments put forward on the planning application, whilst St James will also endeavour to continue to provide clarification to statutory consultees and MKC where necessary in advance of determination.
- 4.2 In that context, it is considered that the conclusions of the original planning statement remain relevant (paras 8.1-8.5); the proposals continue to be in accordance with the development plan as a whole, and planning permission for this hybrid planning application should be granted accordingly.

Appendix 1 Applicant Response to Consultee Comments

Applicant Response to Consultee Comments

Theme	Consultee Comments/Queries	Applicant Response
Biodiversity and Trees	The loss of veteran trees within the site and the levels of new tree planting.	<p>Across the site there are trees with potential veteran features. While the majority of these will be retained the development will affect some of these. As set out in the Planning Statement (paragraphs 6.92-6.97) this is unavoidable in respect of the detailed infrastructure aspect of the application and namely the required geometry of the roads; however, some may have potential for extraction and re-planting (albeit others might be managed in other ways due to wider factors such as Ash die-back). The Planning Statement sets out the justification for the potential loss of such trees (either directly, or if re-located and lost via deterioration at a later date) if they are confirmed to be of veteran status; concluding the reasons are 'wholly exceptional' as required by NPPF footnote 58 (n.b. the proposed infrastructure works, nationally funded by Government under the Housing Infrastructure Fund (HIF), fundamentally <u>do</u> fall within the criteria expressed within national policy for infrastructure projects). The applicant would also be willing to translocate specifically identified trees and this could be secured by MKC via condition. Notwithstanding as part of the development, St James are committed to the planting of more than 250,000 trees. As shown in the DAS, many of the streets will be tree lined and this will be translated into future design codes.</p>
	Loss of existing biodiversity, invasive species, and the calculation of net biodiversity gain.	<p>Overall, the development will result in a net biodiversity gain of at least 10%; with current assessments showing a 14.5% net gain. This will be through the creation of the green lattice, the River Ouzel Park, and other ecological enhancements. The Biodiversity Impact Assessment calculator used was Defra's '2019 Biodiversity Metric 2.0- Calculator' and further calculations can be made as the development detail comes forward.</p> <p>In respect of the development there will be the loss of some habitats as these will become built development; but as aforementioned there will be an overall net gain. Notwithstanding, the ES identifies the potential effects on wildlife of nature conservation interest, strategies are provided detailing how habitats and populations will be maintained and, where possible, enhanced. During construction, a Construction and Environmental Management Plan (CEMP) alongside other ecological strategies will set out requisite mitigation to ensure existing and retained habitats are protected. This will include mitigation in respect of protected species such as Great Crested Newts. This will involve the protection of individual newts during construction works and maintenance of both terrestrial and aquatic habitat within the site to ensure maintenance of the favourable conservation status of this species in the long-term.</p> <p>Finally, the actual and potential presence of invasive non-native species will be addressed through both the Construction Environmental Management Plan, which would set out measures to avoid the introduction and spread of invasive non-native species during the construction phase, and Landscape and Ecological Management Plan which would detail measures to</p>

Theme	Consultee Comments/Queries	Applicant Response
		monitor and control invasive species already present at the site in the long-term. Similarly, the landscape design for the proposed development will avoid use of invasive species, or those likely to become invasive in the future.
Built Heritage	Harm to designated and non-designated heritage assets.	The applicant acknowledges the development will result in 'less than substantial harm' to heritage assets and that is what is concluded within the relevant assessments. What are currently rural listed buildings would become experienced in an urbanised area of development. However, there may also be some heritage benefit to the Moulsoe Buildings Farmhouse, delivered by the downgrading of the road. Overall, as summarised in the Planning Statement (para 6.72, 6.180) the broad range of public benefits of the overall scheme sufficiently outweigh the degree of heritage harm.
Climate Change & Sustainability	Climate change and sustainability measures to be incorporated into the development.	<p>This development will be built out over a significant period and there will inevitably be changes to building standards and sustainability requirements during this time. However, new homes within the development are to be zero carbon from the outset meeting the incoming 'Future Homes Standard' will mean that new homes must be built to be zero-carbon from 2025; the point at which homes are expected to be delivered. In addition, there are a range of other energy and sustainability measures that will be explored throughout the build-period and as part of reserve matters applications.</p> <p>Queries have also been raised regarding heat networks. These do not necessarily in themselves provide any greater carbon performance than could be achieved with individual dwelling technologies for new homes. Specifically with regard to combined heat & power (CHP), the decarbonisation of the electricity grid now means that gas CHP increases carbon emissions rather than reducing them. This is recognised by the Government in recent consultations (e.g. Future Homes Standard, including Part L; SAP10.1; SAP10.2);</p> <p>Hodkinson has also prepared an Outline Energy Statement, a Sustainability Statement, and an Overheating Mitigation Strategy for the outline scheme (all submitted as part of the planning submission not the ES). These are supported by the 'Climate Change & Resilience' chapter in the ES (Chapter N). The statements and the ES Chapter illustrate how the proposed development can be designed to comply with national and local policies related to sustainability, energy use and efficiency, water use and carbon dioxide (CO₂) emissions.</p>
Community Hub / Local Centres	Level of retail provision and other uses within these centres (including places of worship).	<p>The level of retail provision within the Community Hub and Local Centres has been determined through a retail assessment. An appropriately worded condition will ensure there are no temporary impacts on nearby centres by the delivery of retail development proposed at MKE outpacing the commensurate growth of homes on the site.</p> <p>The uses proposed in the Community Hub will support a range of future retail and other occupiers. This includes Use Class F1 floorspace that could support a place of worship. There may be some office use within the Community Hub should there be demand for it and a need for it to support good placemaking principles (e.g. providing co-working type space at the</p>

Theme	Consultee Comments/Queries	Applicant Response
		neighbourhood level), and this will depend on market conditions and economic trends as the scheme is built out. The Community Hub will also be delivered alongside the first main residential phases to foster the community and help meet the needs of early residents.
Construction Impacts	Mitigating against the impacts of construction throughout the phased development.	St James will be required to complete a thorough Construction Environment Management Plan (CEMP) prior to commencement, which will include the measures being implemented in order to prevent construction traffic being routed through surrounding settlements, tyre cleaning, and other measures. Chapter Q of the ES also details a summary of various mitigation and monitoring measures that will be implemented during the construction phase to limit impacts.
Delivery	Ensuring a coherent development will be brought forward by multiple landowners/developers; avoiding a piecemeal approach to applications.	Separate applications will be submitted by other landowners at MKE for their developments; St James does not have the ability to compel or dictate to other landowners when they bring forward their own planning applications, but has an imperative (given the need for an infrastructure-led approach) to bring forward this application first. The adopted site-specific SPD – the ‘comprehensive development framework’ as required by Plan:MK Policy SD10 – already provides the framework to ensure applications come forward in a holistic, coordinated and comprehensive manner. In addition to this, a collaboration agreement is being brought forward between the landowners and MKC will have a role to play in binding interests via the proposed Milton Keynes Tariff for the MKE allocation area. The landowners are committed to continue to work collaboratively to bring about a coherent and sustainable development.
Flooding and Water Environment	Flooding within the site and downstream in Newport Pagnell.	The application submission is supported by a comprehensive Flood Risk Assessment and Drainage Strategy, as appended to Chapter L of the ES. Overall, the FRA demonstrates that the development proposals can be accommodated without increasing flood risk within the locality in accordance with objectives set by Central Government and the Environment Agency. A response to queries by the Environment Agency has already been prepared by the applicant and submitted to MKC (26 May 2021) and the ES Addendum included as part of this submission includes a revision and technical summary to the drainage strategy.
Housing Mix and Self-Build	Ensuring an appropriate mix of homes and self-build provision.	MKE will provide a range of housing types and sizes. The exact requirements will be flexible (more so for the market element) to be able to respond to changing demand over the 25+ year build period which extends well beyond the horizon of Plan:MK and MKC’s existing housing needs evidence. An appropriate framework for the housing mix can be secured by an appropriately worded condition. In respect of self-build, these units fall within Use Class C3 and can fall within the parameters sought. There is no specific location shown for where self-build plots will be accommodated in the wider MKE development (and within St James’s landholdings) and this will be a matter for future reserved matters submissions.
Infrastructure & Proposed Uses	Upfront delivery of infrastructure to support early phases.	St James is committed to providing upfront infrastructure to support the early phases of development. This includes the initial delivery of highways infrastructure and the early delivery of the health hub and a primary school. These items are to be funded

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		<p>by the HIF monies successfully secured by a joint bid to Government between Berkeley and MKC. This principle of infrastructure before expansion will continue throughout the delivery of the MKE development.</p> <p>The level of school provision across the site has been tested using the latest school pupil data of surrounding schools and MKC pupil yields. The secondary school land will be made available to MKC to deliver the secondary school when it is needed (it is currently anticipated this will be in the 2nd main phase of development at which point there will be sufficient students to support it). Before this time, it is anticipated that the secondary school needs generated will be met within nearby schools for a temporary period. Using the child yields from the Milton Keynes Borough Council 2017 survey, the initial 1st main phase of development is estimated to generate demand for only 62 secondary school places once complete (n.b. more primary school children are forecast to be generated, supporting the primary school in the early phase).</p>
	Hotel Uses within the Site.	Policy SD12(C3) sets out that MKE urban extension should include appropriate infrastructure including a hotel. A hotel – the Holiday Inn along London Road – is already within the urban extension site and is bounded by the St James Red Line area but not within the application site itself.
	Household Waste Facility within MKE.	The adopted SPD does not set a specific location for the household waste facility. Such a facility would be a B-Class use and therefore could be accommodated as part of the St James application or another landowner's application. The SPD notes that it should be located within an employment area or adjacent to the park and ride site (which is outside St James's application site in the Council's land ownership).
Landscape and Open Space	Landscape buffer around Pym's Stables.	The landscape buffer around the Pym's Stables area has been redesigned in response to local residents' concerns. This has been reflected in the parameter plans which have also been adapted to ensure no new houses will be closer than 44m from the Pym's Stables houses (habitable room to habitable room).
	Whether existing power cables will be relocated underground.	As part of power cable (and other utilities line) diversions, it is anticipated that existing lines would be relocated underground where required to accommodate development (n.b. none of these are high voltage powerlines/pylons). This would be finalised through detailed design at reserve matters stage.
	Types of sport pitch provision.	The proposals are currently in outline and the masterplan showing a cricket pitch is only illustrative. The playing pitch area is provided such that it could accommodate a range of different sports provision with the optimum layout/orientation of pitches. The specific type of sports pitches can be determined through reserved matters to accommodate sports requirements at the relevant point of time, alongside an appropriate sports pavilion.
Minerals	Sterilisation of potential minerals.	The site is within a minerals safeguarding area. As set out in the Planning Statement (para 6.143), it is not proposed at this stage to substantively work the mineral deposits as part of this planning application or extract deposits as part of a commercial operation. The justification for this is fully set out in the Planning Statement (para 6.142-6.144) but in summary is due to the conditions attached to the HIF funding secured, and the necessity and timescales for delivering infrastructure and then the

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		housing to follow. In that context 1) it is considered neither practicable nor feasible to extract any sand or gravel deposits before implementation and 2) in any case mineral extraction has already been ongoing on other parts of the MKE allocation site such that it has already contributed to minerals working in the Borough. Therefore, it is considered the scheme falls into at least one of the exclusion criteria detailed within Policy 18.
Transport, Redways and Active Travel	Grid road system should be retained into the site and potentially dualled.	The highway layout for MKE extends the principles of Milton Keynes' 'relaxed' grid system of roads into the site. Both the western and eastern link road will be provided as fully landscaped Grid Road corridors with roundabouts at all junctions, and are intended to operate as Grid Roads. The Cranfield Link as part of the south-east of the site is also safeguarded as a grid road corridor (allowing for future extension of the grid), whilst the new route north from Tongwell Street over the M1 will also link into Willen Road (through the adjoining Bloor Homes land). This highway layout will allow the roads to function in the same way as the existing grid system, with alternative routes to destinations, whilst also providing an alternative crossing of the M1 to junction 14 in order to reduce 'local' through-traffic from needing to use the junction (particularly at peak times). Each of these key roads will be constructed to Milton Keynes Council's required specifications for different grid road typologies. In addition, the Grid Road corridors provide safeguarded land to dual the roads should that be necessary.
	General concerns and queries regarding the traffic impact (including congestion, potential for rat running, and impact of freight).	<p>The application submission includes a Transport Assessment (ES Volume 2, Appendix D1), Travel Plan (ES Volume 2, Appendix D2 and D3), and Construction Logistics Plan (ES Volume 2, Appendix D5) – supported by a strategy. The overall conclusion is that the scale of traffic generated by the proposal is appropriate for the function and standard of the roads serving the area. This includes the impact of freight movements to and from the site.</p> <p>In addition, following ongoing post submission consultation St James is exploring a range of additional traffic calming measures (both within and beyond the application site) that will be agreed via updated 'Heads of Terms' (albeit some of these measures are reliant on third party land agreements).</p>
	The location of the bridge over the M1.	The necessity of this alignment was considered early in the design, with this location providing the optimal balance between deliverability, engineering considerations and providing a genuine alternative route to crossing J14 for a much local traffic as possible. The HIF funding is predicated on the submitted design for a bridge over the M1 at this location whilst the adopted Development Framework SPD also identified the bridge at this location.
	Grade separated crossings across the A509.	The adopted SPD development framework shows two crossings of the A509 to Newport Pagnell and an additional one west across the A422 (on what is Bloor land outside of St James' land holdings). The Movement and Access Parameter Plan shows the fixed location of one crossing to Interchange Park and two potential locations for crossing are shown by the roundabout where the road meets the A422, with St James' preferred approach to provide an underpass alongside the river corridor (albeit this is predicated on overcoming third party land agreements). The DAS Addendum provided alongside this submission provides wider plan showing how the scheme will connect into locations beyond the site.

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	Redway design, location, and linkages to nearby areas.	The proposals include a comprehensive network of Redways and other pedestrian/cycle paths throughout the site. The masterplan has been designed in a way to promote pedestrian and cycle routes including extensions of the redway network that is a fundamental part of Milton Keynes. St James is also currently exploring opportunities to expand the network beyond the red line boundary that could be secured via legal agreement (including to tie into the redway network under the A509 near MK Coachway, connecting Willen, MKE and Broughton); however, these are subject to third party land negotiations. A proposed redway along the London Road verge in Newport Pagnell would enhance northwards connectivity, whilst safeguarding is proposed to allow for a future further pedestrian crossing of the M1 between MKE and Broughton. These additional redway connections would enhance the redway connectivity across this part of Milton Keynes and is proposed to be secured via the s106 with additions to the Heads of Terms in this respect. The illustrative connections plans provided alongside this submission shows how the scheme will connect into locations beyond the site.
	Mass Rapid Transport System safeguarding.	The scheme appropriately safeguards land for a future Mass Rapid Transport System; should one be funded and delivered in the future. The scheme is ultimately not reliant – in transport terms – for this scheme to come forward. However, the scheme is well placed to build upon the vision for such a system and its implementation would benefit the scheme.
	Rat-running through Willen	There have been various comments relating to concerns that the proposed design would lead to rat running through Willen. This revised submission includes proposals that amend the Tongwell Street alignment and arrangements including the removal of the proposed Carleton Gate roundabout and removing vehicle access to Willen at this location altogether. This further allows the retention of a southbound route on Tongwell Street. These changes are proposed as a direct response to the ongoing public consultation that is occurring and follows specific consultation with residents of Willen. The changes will remove any potential for rat running through Willen whilst also benefitting the Grid road system (and its resilience) by retaining the two-way running along the full length of Tongwell Street.
	Safeguarding potential for J14 improvements	The MKE scheme does not include any specific junction improvement works to J14 (e.g. to slips etc.) and neither is there any requirement within Plan:MK to safeguard any land for them in the future. However, St James is alive to the fact that a scheme for junction improvements may come forward in the future, albeit likely dependent on Government's future aspirations for maintaining/improving the motorway network vs. investing in other forms of transport investment. As such the MKE scheme has the flexibility to accommodate improvements. The current proposals retain sufficient space within the Grid Road corridors (at the A509) to allow for such a scheme at J14. Furthermore, via reserve matters St James can ensure that any development within the employment parcels adjacent to J14 does not place buildings hard up against this boundary, with uses such as service yards or car parking located in such areas; this would mean if a J14 improvement scheme were to come forward it would not require the demolition of any buildings, and could be accommodated by simply re-providing parking elsewhere within the employment area.

