



The Civic Society For Milton Keynes

## **PLAN:MK**

# **MILTON KEYNES OPEN SPACE ASSESSMENT**

**A Response to  
the Consultation by  
Milton Keynes Council**

**January 2018**

## INTRODUCTION

Milton Keynes Forum is the Civic Society for Milton Keynes, with membership open to local residents, organisations and businesses. It has contributed to constructive thinking about the development of the Milton Keynes area for almost three decades.

It is evident that the Open Space Assessment has not achieved what it set out to do. Nor has it been concluded in time to provide useable evidence on which to base policies and standards for the future provision of open spaces, or to inform the protection and use of existing open spaces, as it has not been subject to public consultation until its publication at the same time as 'Proposed Submission Plan:MK October 2017'. We set out below our considered comments, reasons and objections to specific aspects of policies, categories, standards and site designations proposed for open spaces, as well as support for some aspects.

This consultation response from Milton Keynes Forum is in addition to the submission we have already made relating to the consultation on the 'Proposed Submission Plan:MK October 2017'.

### 1. THE MILTON KEYNES OPEN SPACE ASSESSMENT

A plan and programme for the Open Space Assessment was set out in a MK Council document dated July 2016, entitled 'Open Space Assessment Note'. In this, at 3.3, Table 1: 'Approach and Scope to Open Space Assessment', it was indicated that Stage D would be about *"Defining policy implications"* and that this would use the findings of the previous three stages (A to C) to *"... inform policy recommendations regarding sites for protection/enhancement or removal in Plan:MK"*. It also proposed in Stage D that: *"The policy recommendations also respond to the application of the open space standards, and provide suggestions on areas of Milton Keynes where there is adequate open space, deficient open space, or a surplus of poor quality open space. This part of the assessment should help identifying important sites in need of quality improvements and set the context for the council to work with local communities on locally important sites"*.

This is not the outcome that has now been provided for public consultation. What has been published is too late; and:

- It has not provided the promised basis for defining policy implications;
- There has been no overarching statement of sites for either protection & enhancement or removal from Plan:MK;
- It has not provided any assessment of where open space is adequate, deficient, or surplus to requirements, or even any basis for such recommendations;
- It has not identified sites in need of quality improvements.

Not only do the final documents from the Open Space Assessment fall short of what was promised, but they have been made available too late, at a stage at which public responses could not influence the final consultation draft of Plan:MK, as both were made available through the Plan:MK website at the same time, around 1<sup>st</sup> November 2017, for a six week consultation period ending on 20<sup>th</sup> December 2017. Although consultees were informed in a letter by e-mail on 1<sup>st</sup> November 2017 that the 'Proposed Submission Plan:MK October 2017' had been published for public consultation, this made no reference to consultation on the

Open Space Assessment, but referred only to consultation on; *"The Proposed Submission Plan:MK October 2017, Proposed Submission Policies Map Schedule, Sustainability Appraisal, Habitats Regulations Assessment, Statement of Consultation together with a Statement of Representations Procedure ..."*

It was some weeks later that an MK Forum member noticed that the webpage containing links to the above documents also provided a link to a separate page for 'Technical Studies and Background Documents' and that under this was a heading 'Landscape', at the end of which was a further link to 'Open Space Assessment'. Clicking on that link led to PDFs for:

- 'Open Space and Recreation Facility Provision categories'
- A sequence of 45 'Draft 2017 Open Space Maps', one for each parish.

Beneath the 45 map PDFs was a heading 'Consultation October 2016', but at the foot of this was another link that had not been made available until late in 2017, probably October or November, entitled 'Open Space: evidence base towards draft qualitative criteria', an undated document which had not previously been made available to the public. In view of this, MK Council staff gave a dispensation that MK Forum could submit its response up to 5<sup>th</sup> January 2018.

What has been provided about open space for public consultation is therefore: in the 'Proposed Submission Plan:MK October 2017'

1. Revised open space policies
  2. A revised list of open space categories at 'Appendix C. Open Space and Recreation Facility Provision'
- ... and, elsewhere,
3. 'Draft 2017 Open Space Maps'
- ... with the invitation in November 2017, *"Following the consultation with stakeholders in autumn 2016, a revised list of open space categories was produced. We are seeking comments on whether the categories and maps are logical and accurate"*:

There is also a further document, though consultation responses were not invited on this:

4. 'Open Space: evidence base towards draft qualitative criteria'.

What we do not have for open spaces is a single document summarising: background documents, previous policy, facts about open spaces, outcomes of the assessment of open spaces, and an explanation of why and how policy and standards are based on these. As a result, the crucial context for the proposed changes to open space designations has not been provided. It is not made evident that there have been previous reports on open space of direct relevance. For example, the Council published its 'Open Space Strategy' in 2007, intended to provide a framework for the provision and management of public open spaces for 20 years to 2027.

The original open space standards for areas developed by Milton Keynes Development Corporation are set out in 'The Milton Keynes Planning Manual' (1992). MK Council's open space policy and standards were set out in The Local Plan (2005) and many Local Plan policies were saved for continuing application when the Core Strategy (2013) was adopted. There have been other documents relating to open space such as: play area policies, and policies for provision of sports grounds and facilities. A whole range of documents are available about sites of significance for biodiversity. There is also the recent report of the Buckinghamshire & Milton Keynes Local Environment Partnership of its 'Green Infrastructure Plan', with relevant

recommendations to local authorities, such as Milton Keynes Council, about open space in relation to health, the economy, biodiversity and landscapes. We can find no references to any of these documents in the work that has been now been presented about open space in order to shape policies and standards for Plan:MK, though that report is referred to in the chapter on 'Environment, Biodiversity and Geodiversity'. This matters because what are now being proposed are changes to how particular sites are designated, but in the absence for any justification or evidence, or a sense that they are building on previous foundations.

For example, MK Council's 'Open Space Strategy 2007' has a section on 'The Open Space Legacy of Milton Keynes' (Section 2.04, page 8) which says:

*"Milton Keynes is well known for its city landscape of parks, woods, lakes, waterways and wildlife sites which have been either retained and conserved or consciously provided and evolved for up to 35 years. It was and remains a feature of open space development in Milton Keynes that they frequently benefit from the utilisation of the 'natural assets' within new spaces whether they are local open spaces or larger District and Linear Parks. ... Collectively, the urban open spaces and the countryside provide a rich and accessible outdoor environment which is 'free' and contributes enormously to health and social well-being, economic activity and recreational opportunities for residents and visitors alike".*

The report goes on to say, at Section 2.05, that:

*"The open space of Milton Keynes is predominantly 'green space' and the common perception is that the City has sufficient, so why do we need a 'strategy'? The apparent abundance of green and pleasant open space, seemingly free from threats and problems can hide underlying issues and lead to complacency among both the community it serves and the agencies responsible for maintaining and managing those open spaces. Complacency can in turn lead to under-valuing the asset rather than recognising the importance of open space and the substantial contribution made by open space to the quality of people's lives ... ."*

## **2. NATIONAL PLANNING POLICY FRAMEWORK REQUIREMENTS**

The National Planning Policy Framework (NPPF) sets out a number of requirements relating to open spaces.

At Section 73 the NPPF says: *"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should be used to determine what open space, sports and recreational space is required.*

At Section 114 the NPPF says: *"Local Planning Authorities should:*

- set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; ... ."*

At Section 117 the NPPF says: *"To minimise impacts on biodiversity and geodiversity, planning policies should:*

- plan for biodiversity at a landscape-scale across local authority boundaries:*
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan:*
- aim to prevent harm to geological conservation interests; ... ."*

It is the view of Milton Keynes Forum that MK Council's Open Space Assessment documents have failed to provide a robust assessment that takes account of all these requirements for open space, biodiversity and geodiversity.

### **3. OPEN SPACE, LANDSCAPE CHARACTER, AND BIODIVERSITY**

Open spaces provide multiple and overlapping benefits. The same site may provide some or most of the functions of flood alleviation, parkland, play areas, sports facilities, habitat for wildlife, and structural landscape of visual importance. In providing these it will also contribute to the physical and mental health and wellbeing of users of these spaces. The overall visual landscape also contributes to place-making, local distinctiveness, and to the image and reputation of Milton Keynes as a place to live and for business and the economy to thrive.

There is no apparent recognition in the documents presented for consultation that these overlapping purposes of open spaces are adequately appreciated. These three distinct aspects of the uses of open space – functional, visual and biodiversity – need to complement each other, even though each space may major on only one or two of these. For example, this may mean that a particular site is designated as a local park but also provides useful habitat for wildlife and makes an attractive contribution to the overall landscape structure of the area.

#### *Landscapes*

The value of many open spaces may be largely visual ones and in a Milton Keynes context most of these contribute to a connected network of landscapes. This relates to the distinctive objectives in developing Milton Keynes as a New Town, which is well described in 'The Milton Keynes Planning Manual' (Milton Keynes Development Corporation 1992, Chapter 3: 'Landscape, Parks and Open Space': page 63) which says:

*"One of the chief characteristics of Milton Keynes is the high quality of its landscape. The Corporation has always placed great emphasis on this aspect of development, in the Master Plan goal of 'an attractive city'.*

*The Parks and open spaces cater for the outdoor activities of residents and visitors ... but they also establish a green image for the city and a setting for its buildings. This setting is re-inforced further by city road landscaping, local open space and, at a smaller scale, by the hard and soft landscaping of streets and redways and the landscape component in built development.*

*Together, these elements create a structural framework for development and provide the 'predominant continuity of green space' envisaged in the Master Plan."*

As a result, the open spaces and landscapes of Milton Keynes are the outcome of more extensive landscape design than ever went into a parkland designed by William Kent or 'Capability' Brown and deserves to be respected for that, even when changes are proposed.

Nowhere in the 'Open Space Assessment' for Plan:MK is there evidence that the visual landscapes of Milton Keynes have been adequately appraised. MK Council commissioned a Landscape Character study of only the rural areas of Milton Keynes, but has commissioned no such studies of the urban landscapes, despite the character and extensiveness of these and that there is as much need to protect these visual landscapes within the 'city'.

In the 'Pevsner' for Buckinghamshire (1994) Elizabeth Williamson refers to Kevin Lynch's book 'Theory of Good City Form', which described what he called 'urban countryside'. Elizabeth Williamson says that this is "*a label that fits MK better than any yet invented*". We could also describe this as 'the countryside within the city', as throughout Milton Keynes there are quietly beautiful landscapes that retain much of their rural character. Hundreds or acres of land within the 'city' on floodplain pastures are managed productively, being grazed by sheep and cattle while also providing public use of these areas. There is no sense within the 'Open Space Assessment' that this is recognised or appreciated.

### *Biodiversity*

Almost any open space has benefits for some wildlife, and all open spaces can be managed to maximise their value for wildlife, as far as is compatible with their functional purposes or visual contribution as landscape. Sites to be designated specifically as wildlife areas should be chosen on the basis of ecological evidence of their importance for biodiversity, though many sites that do not have this evidence will still attract some kinds of wildlife.

In the hierarchy of international, national and locally designated sites of importance for biodiversity, Milton Keynes Borough has:

- None of the international site designations (Ramsar, SPA or SACs)
- Two SSSIs (Sites of Special Scientific Interest), both of which are within the 'city'
- Eight Buckinghamshire & Milton Keynes Local Wildlife Sites within the 'city', one at the edge of Newport Pagnell and a further 12 in the rural area
- 24 Milton Keynes Biological Notification Sites within the 'city', one (Oakhill Wood) straddling the 'city' boundary and 42 in the rural area
- Four Local Geological Sites within the 'city', and two in the rural area.

A review is in progress across much of Buckinghamshire of existing and potential Local Wildlife Sites, to confirm or de-designate existing sites as appropriate, or to add to them, potentially with some to be upgraded from Milton Keynes Biological Notification Sites to Local Wildlife

Sites. These designations are agreed by a panel of ecology specialists led by the Buckinghamshire & Milton Keynes Environmental Records Centre (BMERC), but they have yet to report on their review of sites within Milton Keynes Borough. Until then, the existing designations apply as summarised above.

Milton Keynes has also designated a series of MK Wildlife Corridors which were set out in The Local Plan. These were identified through the 1996 study 'The Wildlife Corridors of Milton Keynes' and include:

- Seven Wetland Corridors (rivers, brooks and canal) but also identified two further corridors along smaller brooks that required further survey
- Three Woodland Corridors (including the North Bucks Way and the old Oakhill Lane Corridor
- Four Railway Corridors
- The Grid-road Parkway Corridors
- The V4 Watling Street Corridor
- The A5 Corridor
- The M1 Corridor

These have not been adequately reflected in the 'Proposed Submission Plan:MK October 2017' or in the mapping of open space.

In this respect, Milton Keynes was well ahead of the advice to the Government by the Lawton Report ('Making Space for Nature' 2010) which was reflected in the Government's biodiversity policy in 2011, 'Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services'. In turn, this is reflected in planning policy in the NPPF, such as the requirement to *"identify wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation"*.

#### *Open space functions*

What the Open Space Assessment focuses on more fully is the functional aspects of open space: places with specific practical functions such as sport, play and allotments, which are reflected in many of the types of open space shown in the maps of open space.

## **4. THE REVISED OPEN SPACE AND RECREATION FACILITY PROVISION CATEGORIES**

MK Council's 'Open Space Strategy 2007' says (Section 2.02, page 7) says:

*"Milton Keynes Development Corporation provided open space and to a large extent determined the type, location and content through a hierarchical 'formula' based on prescribed needs from the local neighbourhood level to the city wide level. That early visionary approach to open space provision through development has been largely retained, subsequently became a Milton Keynes Local Plan standard, which has been reaffirmed on adoption of the Local Plan in December 2005."*

That report goes on to say:

*"The Milton Keynes range of open spaces and the areas they serve within the existing hierarchy are:*

- *Incidental open space : [typically in residential areas and of immediate community or neighbourhood interest]*
- *Play Areas : Neighbourhood and Local*
- *Local Parks : [serving part of or a whole grid square]*
- *District Parks : [serving a number of grid squares]*
- *Linear Parks : [typically centred on the river valleys and flood plains, serving adjacent grid squares and sometimes beyond]*
- *Country Parks : [a much wider catchment and outside the scope of the original MKDC open space hierarchy]*
- *There are exceptions to the 'standard' such as The Willen Lakes area where a considerably wider range of managed indoor and outdoor recreational attractions give the areas a City wide appeal. Campbell Park is also an exception in that it is intended to serve both local needs and be the main 'City Park'."*

So the original concept was of six categories with occasional one-off exceptions. MK Council's 'Open Space Strategy 2007' (Section 2.03, page 8) says:

*"The categorisation of open spaces into one of the above types should give a reasonable indication of the size, facilities and features expected within the space. This assertion is correct in general terms but the variety which may be found within a single open space category is such that an over reliance on a 'standard' could be misleading. Although useful as background information, it is more appropriate to consider each space as individual, particularly in the context of the community it is intended to serve. It is very important to consider the evolving needs of the whole community and how open spaces might contribute towards those needs in the future."*

The February 2017 'Draft Plan:MK for Public Consultation' listed each type of open space and standards in terms of: minimum size, catchment area or standard, characteristics, and principles. These were set out in Appendix L3: 'Open Space and Recreational Facility Provision' which categorised open space with the following 15 types, as:

- Linear Parks
- Destination, Country Parks and District Parks
- Local Parks
- Pocket Parks
- Civic Spaces
- Amenity Open Space
- Green Access Link
- Areas of Wildlife Interest - Natural and semi natural
- Allotments & Community Growing Areas
- Transport Corridors
- Paddocks
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)
- Playing Fields & Outdoor Sports Facilities
- Sports Facilities.

These have been substantially revised in the November 2017 'Proposed Submission Plan:MK October 2017' at Appendix C: 'Open Space and Recreational Facility Provision'. This has 14



types, as it omits separate mention of 'Sports Facilities. However some types are described differently and the term 'Destination and Country Parks has been removed:

#### *Section 1*

- District Parks (not Destination, Country Parks and District Parks)
- Local Parks
- Pocket Parks
- Amenity Open Space
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)
- Playing Fields & Outdoor Sports Facilities (does not include school playing fields because these are not publicly accessible)
- Allotments & Community Growing Areas

#### *Section 2*

- Linear Parks
- Green Access Links
- Areas of Wildlife Interest – Natural and semi natural

#### *Section 3*

- Transport Corridors
- Paddocks
- Civic Spaces.

The set of parish maps presented separately in the November 2017 consultation use a slightly different range of categories from the previous two typologies, and add seven new ones ('Village Green', 'Orchard', 'Churchyard', 'Cemetery', 'Common Land' and 'Proposed Linear Park') but does not reinstate 'Country Parks', so there are 20 in all; and it describes some of them in other ways, as shown below:

- Linear Park
- District Park
- Local Park
- Pocket Park
- Village Green (not in Plan:MK Appendix C)
- Transport Corridor
- Amenity Open Space (over 1000m<sup>2</sup> a clarification which has been added to the Plan:MK Appendix C title)
- Playing Fields & Sports Facilities (not Playing Fields & Outdoor Sports Facilities)
- Site of Wildlife Interest (not Areas of Wildlife Interest – Natural and semi natural)
- Green Access Link
- Civic Square (not Civic Spaces)
- Allotments (not Allotments & Community Growing Areas)
- Orchard (not in Plan:MK Appendix C)
- Paddock
- Churchyard (not in Plan:MK Appendix C)
- Cemetery (not in Plan:MK Appendix C)
- Common Land (not in Plan:MK Appendix C)
- Proposed Linear Park (not in Plan:MK Appendix C)
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)

The consultation on the 'MK Open Space Assessment' to which we are responding is explained in the following way: *"Following the consultation with stakeholders in autumn 2016, a revised list of open space categories was produced. We are seeking comments on whether the categories and maps are logical and accurate"*: In response, it is our view that the proposed revised categories are neither accurate nor as logical as they need to be. They are based on far too many categories. They include some types that are not publicly accessible so do not need to be included. They confuse issues of legal status with open space function – we do not see the necessity of including a category of 'Common Land' as Bury Field is used as either a large local parkland or a large amenity open space. We see little value in including churchyards as these have a specific and permanent purpose which is not as public parkland.

It would make more sense if the types of open space were focused entirely on public open spaces. Paddocks are in private use and usually have no public access. Golf Courses are run as commercial activities, available only to members or fee payers, in much the same way as private sports facilities such as the David Lloyd Centre at Newlands. Allotments usually provide access only to allotment holders. We doubt that it assists open space policy to include any of these in the Open Space policies or plans.

Although the 'Proposed Submission Plan:MK for public consultation, October 2017' refers to biodiversity sites in Chapter 12, Environment, Biodiversity and Geodiversity, these are not adequately reflected in the Open Space Assessment or 'Appendix C, Open Space and Recreation Facility Provision'. That Appendix also uses categories that do not equate to the biodiversity ones in Chapter 12. For example, it introduces a new category, 'Sites of Wildlife Interest' which is applied to a wide range of sites with other biodiversity designations, such as Howe Park Wood 'SSSI', and Tongwell Lake 'Local Wildlife Site', but is also applied to numerous small sites within housing areas that have never before been considered for formal designation for their wildlife; and for which, as far as we know, there is no objective record of their wildlife interest, although like any landscape area they are likely to have some of the more common species of bird, insect and mammal.

Another issue is the one of open spaces that serve many purposes. For example, although Tongwell Lake has biodiversity value for wildfowl and wetland birds, it is also effectively a Local park for the people of Blakelands, and it is used by a water-skiing club. A better designation would be either a District Park or a Local Park that also has a biodiversity designation and value. Also, it would be simpler to accept that some long-established landscape features do not fit readily into these kinds of categorisation and should not be forced into them. For example, it is now proposed to call Howe Park Wood a 'Site of Wildlife Interest' when it is far more than that. It is a 60 acre ancient woodland of national SSSI status, but has a network of paths that make it popular parkland for dog walking and walkers more generally. It even has a play area and an education and visitor centre, but unlike District Parks it does not have any playing fields or sports facilities.

Unfortunately, the Open Space Assessment makes no reference to most of the previously identified MK Wildlife Corridors, but introduces a new typology of 'Green Access Link' which is applied to a few of the previously identified Wildlife Corridors but designates additional ones such as the avenue of London Plane trees and the grassy mounds which form an avenue either side of the main roads through Bradwell Common. Although road corridors such as this are described as a 'Green Access Link', others are described as 'Transport Corridor'. On the other

hand, 'Green Access Link' is applied to some long-established routes used as Redways and horse-riding paths which already have a biodiversity designation as a 'Wildlife Corridor', such as Common Lane through Bradwell, Heelands and Bradwell Common.

In our view, the most recent sets of open space categories have added confusion rather than clarity, which is compounded because the categories used for the most recent set of maps differ from those in the 'Proposed Submission Plan:MK October 2017' Appendix C: 'Open Space and Recreational Facility Provision'.

We suggest that the long list of 20 open space categories now proposed is unnecessarily complicated and confuses rather than clarifies when compared with previous open space categories. It also adds confusion to biodiversity site categories and fails to take account of the fact that some sites have multiple purposes.

We do not agree with the view that the category of 'Linear Park' should be confined only to river valleys. It should be applied where parkland is in extended linear form, or where new parkland can be created in this form. In particular, we think this should apply to the western flank of Milton Keynes along the alignment of the North Bucks Way from Bottledump Roundabout northwards through the Western Expansion Area, eventually extended to the River Great Ouse, a route that is of considerable importance for biodiversity and is valued as a walking route. We agree that the Ouzel Valley Linear Park should be extended northwards to the Great Ouse. We consider that other opportunities should be sought as Milton Keynes expands to ensure that residents from all parts of the 'city' are within range of a linear park, whether in the valleys or rivers and brooks or on higher ground.

## **5. THE PROPOSED STANDARDS FOR OPEN SPACE AND RECREATION FACILITY PROVISION**

The standards set out in the October 2017 version: 'Appendix C, Open Space and Recreation Facility Provision' have introduced some confusions:

- 1) District Parks are to have catchments of 1,200 metres, but their Characteristics are to be that they *"Actively attract visitors from a wide catchment, typically further than 10 kilometres ..."* It can't be both. This is a very different definition from the established MK definition of District Parks which has been applied to larger parks serving a local population of around 15,000, so has been applied to sites such as: Tattenhoe District Park, Emerson Valley DP, Great Linford DP, Manor Fields Bletchley etc. and is appropriate for the new park at Fairfield. The muddle began in the February 2017 consultation on Plan:MK which introduced a new category of 'Destination, Country Parks and District Parks' which has now been discarded by calling these just 'District Parks'. The original concept for District Parks in MK applied to larger parks serving a district, much as retail provision has been made on a district as well as local basis. We think this is a more appropriate use of the term.
- 2) We do not agree with the designation of Campbell Park as a District Park as it was designed to be a park for all of the 'city' and contains an events area, an open air auditorium and a cricket pitch constructed to county cricket standards. In the Milton Keynes context it is a one-off.

- 3) Surely, a 'Pocket Park' is just a small local park that would be better described as a 'Local Park'?
- 4) The term 'Amenity Open Space' is a useful one but we see no reason why this should apply only to grasslands. It would be an appropriate description of many of the open spaces that have now been placed in the category of 'Areas of Wildlife Interest'.
- 5) We suggest that the category of 'Green Access Link' is an unnecessary complication. Some of these are 'Wildlife Corridors' but all are visual landscape features and some should be simply categorised as 'Amenity Open Space'.
- 6) We support the view that landscaped Transport Corridors *"Define the urban form of Milton Keynes"* and *"Also provide key habitats."* We suggest that these are of probably of greater importance for biodiversity than has been recognised, and can be valuable linear habitats in line with the Lawton report and Government biodiversity policy on connected and linear habitats.
- 7) We prefer the title 'Civic Spaces' to the more limited one on the open space maps of 'Civic Squares'.

What is not clear is what objective information the proposed revisions to standards are based on.

## 6. THE DRAFT 2017 OPEN SPACE MAPS

We welcome the mapping of open spaces provided in the sequence of 45 'Draft 2017 Open Space Maps', but have reservations about the differences to categorisation that these have introduced, as set out above.

We have a number of concerns about these maps:

- 1) There are many small areas of landscape within housing that have not been shown with any designation, but no evidence has been provided for their exclusion.
- 2) Two categories show swathes of transport corridors as if they were accessible and useable open spaces, including the tarmac and inaccessible grass verges. This applies to the presentation of almost all 'Transport Corridors' and some 'Green Access Links'. Presentation of tarmac and roadway as open space gives a substantially misleading presentation of public open space. We recognise the value of the landscape that flanks the grid-roads visually and for biodiversity, but only some of this is accessible open space. Where it is, particularly alongside the earlier grid-roads, it provides on the housing area side valuable accessible open spaces that look like local parkland and are well-used by local residents. We suggest that these areas should be recognised as a form of Local Park, a kind of parkway linear park.

- 3) Areas shown as Linear Park have been extended to sites that have not previously been considered to be part of the Linear Parks. For example, extensive amenity open spaces with play areas through Woolstone and the large locally-managed Great Linford Park should probably be shown as either Local Park, District Park, or amenity open space.
- 4) We are surprised that the length of the River Great Ouse north of Newport Pagnell has not been shown as 'Future Linear Park' including the existing notable wildlife site of lakes and their surrounds at Gayhurst Quarry and Kickles Pit.
- 5) It is inconsistent that designations such as Playing Fields, Play Areas and Allotments are not indicated in their colour on the areas of Linear Parks but are shown by colour for other areas.
- 6) We think that there should be a distinction to show areas of open space such as Golf Courses, Paddocks, School Playing Fields etc that are an important part of the visual landscape but for which there is not general public access as of right. This could be done, for example, with a toned overlay.
- 7) We find it surprising that some existing public open spaces have been shown as potential development sites in the 'Proposed Submission Plan:MK Policies Map: Schedule of new and deleted designations, October 2017' without any explanation of that in the Open Space Assessment.
- 8) The Calverton map shows a large area of Linear Park which is not currently linear park, so should probably be shown as 'Proposed Linear Park'.
- 9) The mapping is unhelpful in not showing lakes as separate features as they are extensive and are not open space in the conventional sense of places where people can walk.
- 10) The Wavendon map has not indicated the areas of open space to be provided as part of planning consents for developments such as Eagle Farm. These need to be added.

## **7. THE QUANTITY, QUALITY AND ACCESSIBILITY OF OPEN SPACE PROVISION IN THE BOROUGH**

We understand that the Open Space Assessment set out to assess the 'quantity, quality, and accessibility' of open space throughout the borough. We have seen no evidence that presents the size of each site or the overall quantity of each type, though we recognise that categories need to be revised before final presentation of that information.

We have not seen useful data on the quality of open spaces, and we do not see any sign of objective criteria used to test the accessibility for each type of open space.

Although the report, 'Plan:MK Open Space Assessment' makes some interesting subjective judgements about the qualities of particular open spaces used as examples, the language suggests a lack of objective evidence. For example:

- *"Very accessible"*

- *"Publicly accessible"*
- *"Attractive and tranquil"*
- *"Provides sufficient parking"*.

It is not made clear what criteria have been used to assess accessibility. Is this a matter of a particular population number within a defined distance or walking time, or does it imply use of other forms of transport? How is 'sufficient parking' determined? What objective methodology has been used to assess attractiveness or are these simply professional opinion, or the views of local users of the site? However, the photos provide useful information to inform such a discussion.

## **8. CONCLUSION**

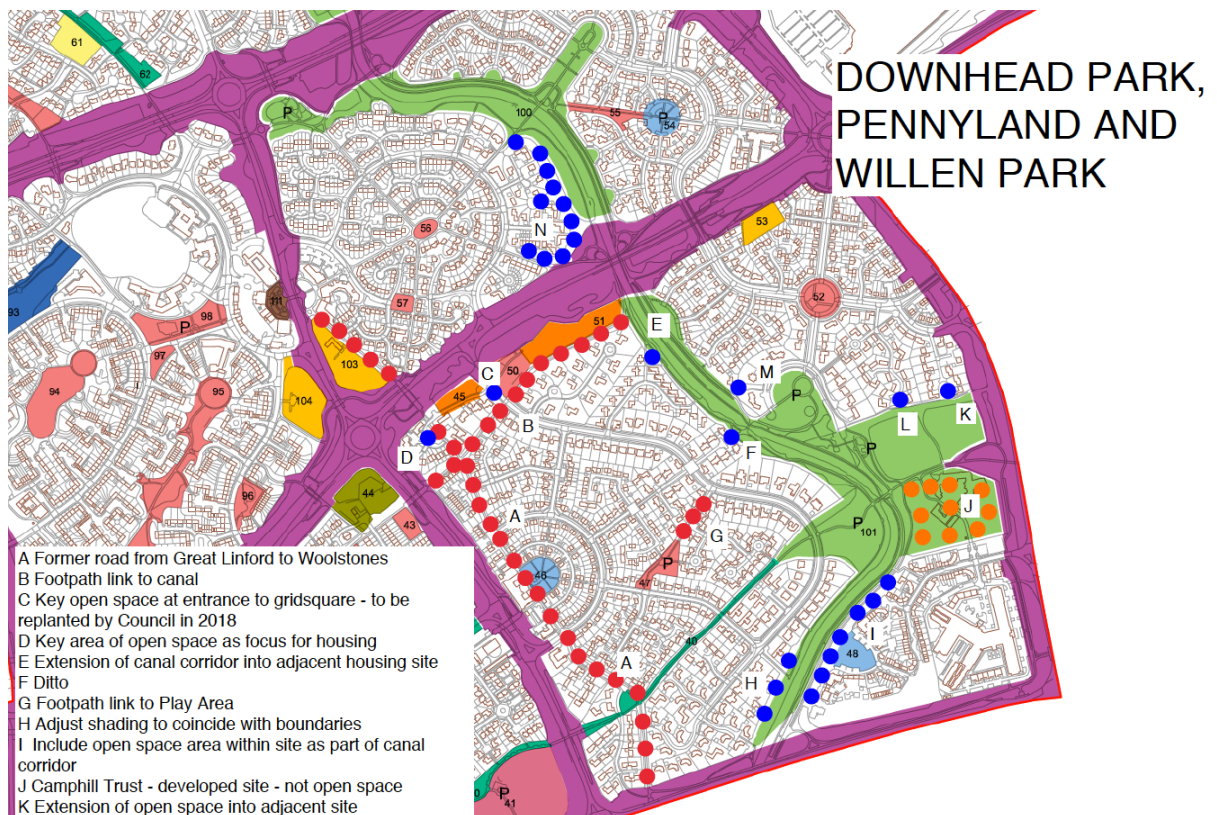
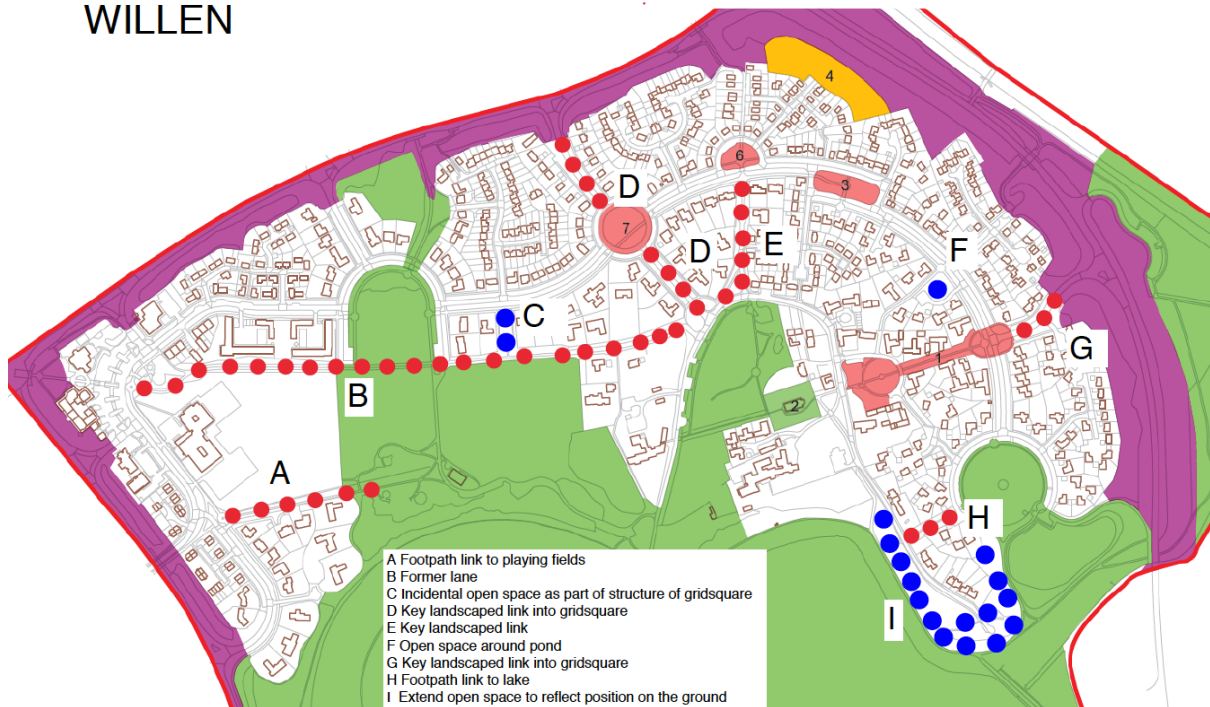
MK Forum welcomes the opportunity to comment on open space policies, standards and proposals. We would have been able to contribute to the formulation of these more effectively if the consultation had been carried out at the right stage. We are disappointed that this important work appears not to have been adequately resourced to have enabled it to be carried out more effectively.

Open space and the visual landscape are at the heart of the character and experience of Milton Keynes and require vigilance to ensure that as the 'city' grows it continues to value these and to develop new areas that are of the same high standards.

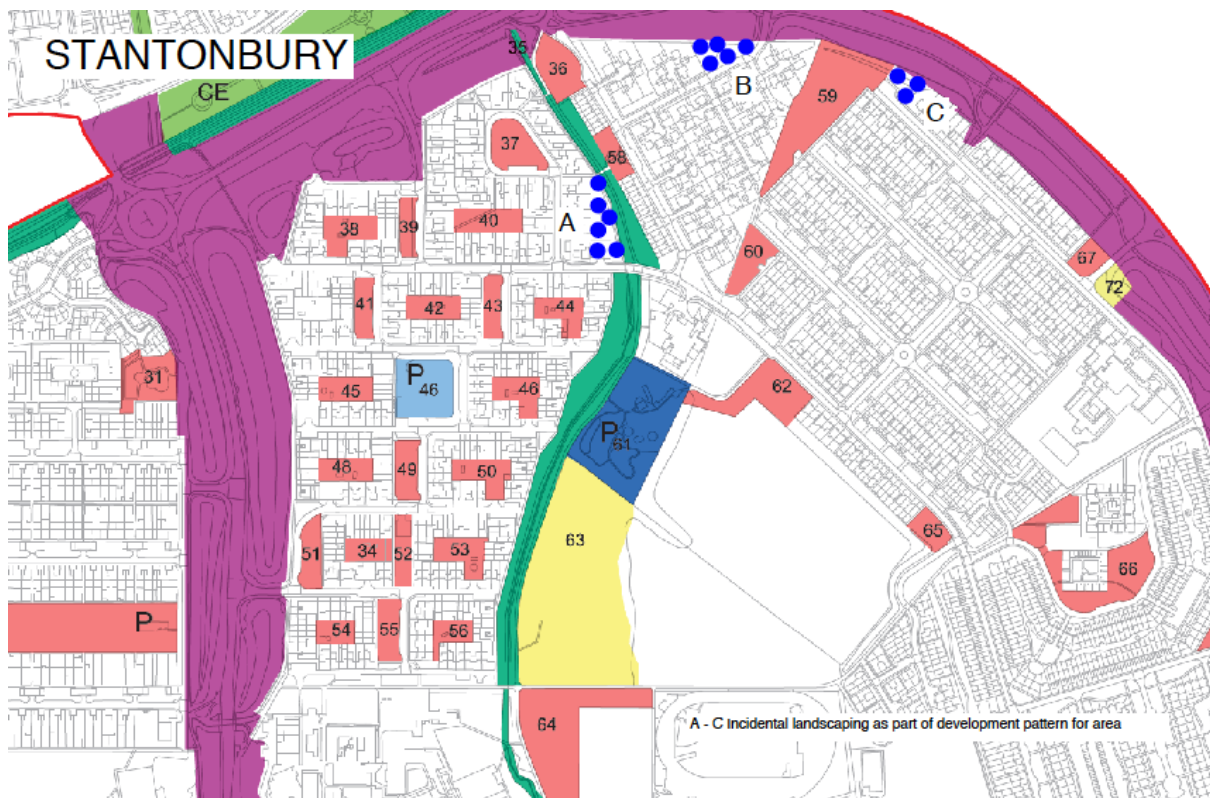
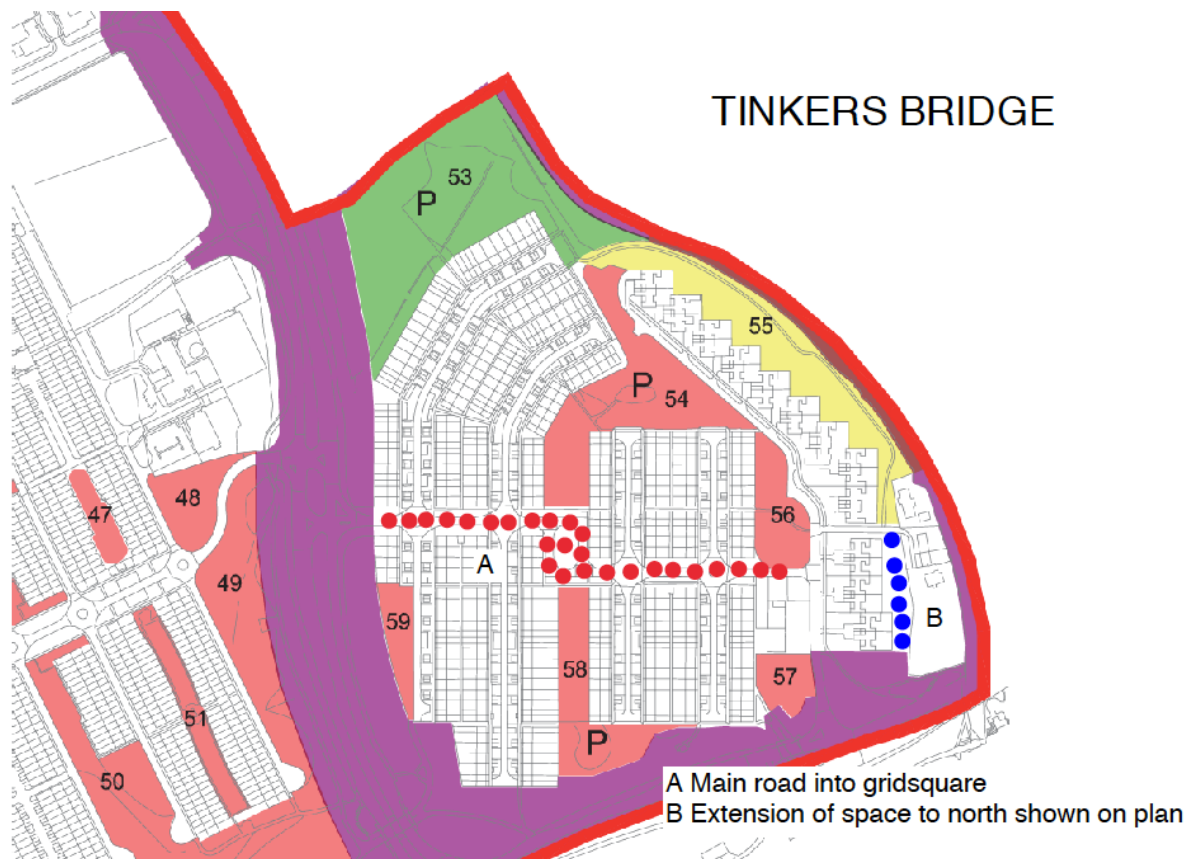
## **APPENDIX**

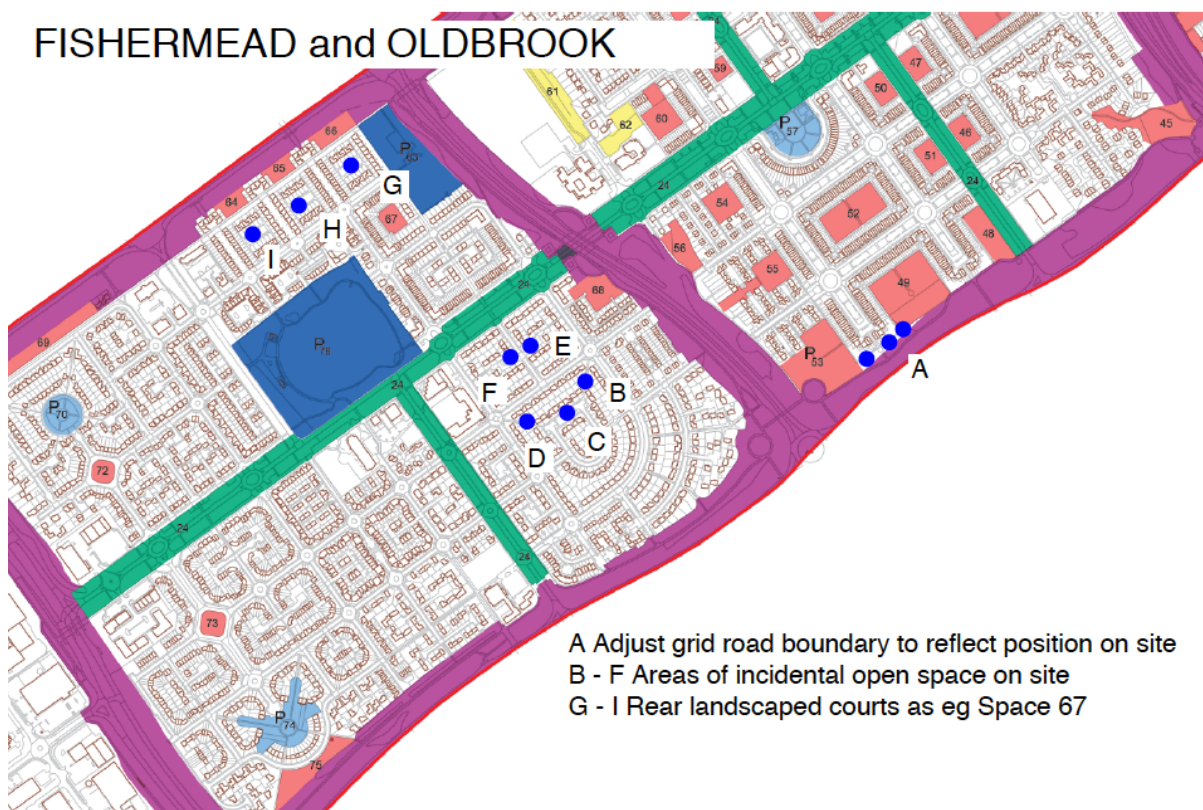
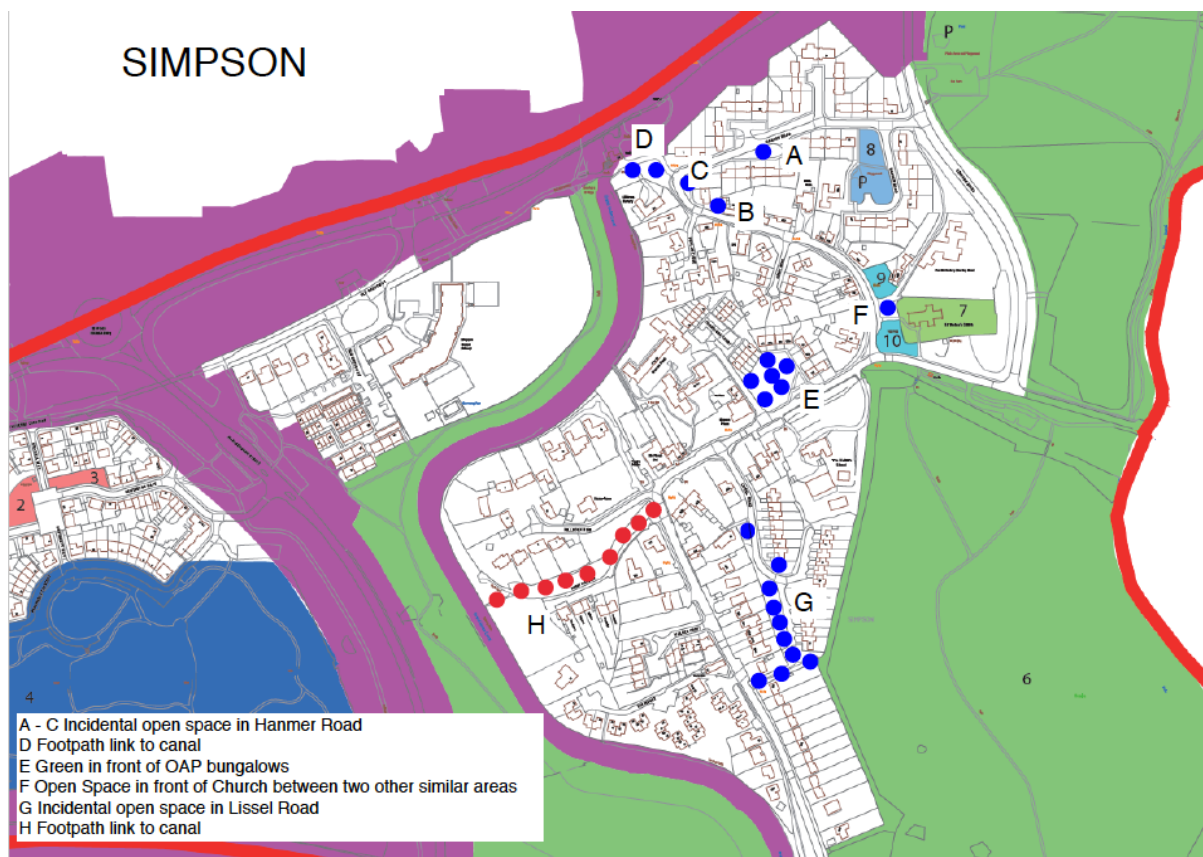
We have included on the following pages comments upon the existing plans for some gridsquares with which some of our members are familiar, and which show spaces that they feel to be important but which have been excluded. It is not intended to be an exhaustive survey of the city but it illustrates some of the concerns that have been referred to above.

## WILLEN



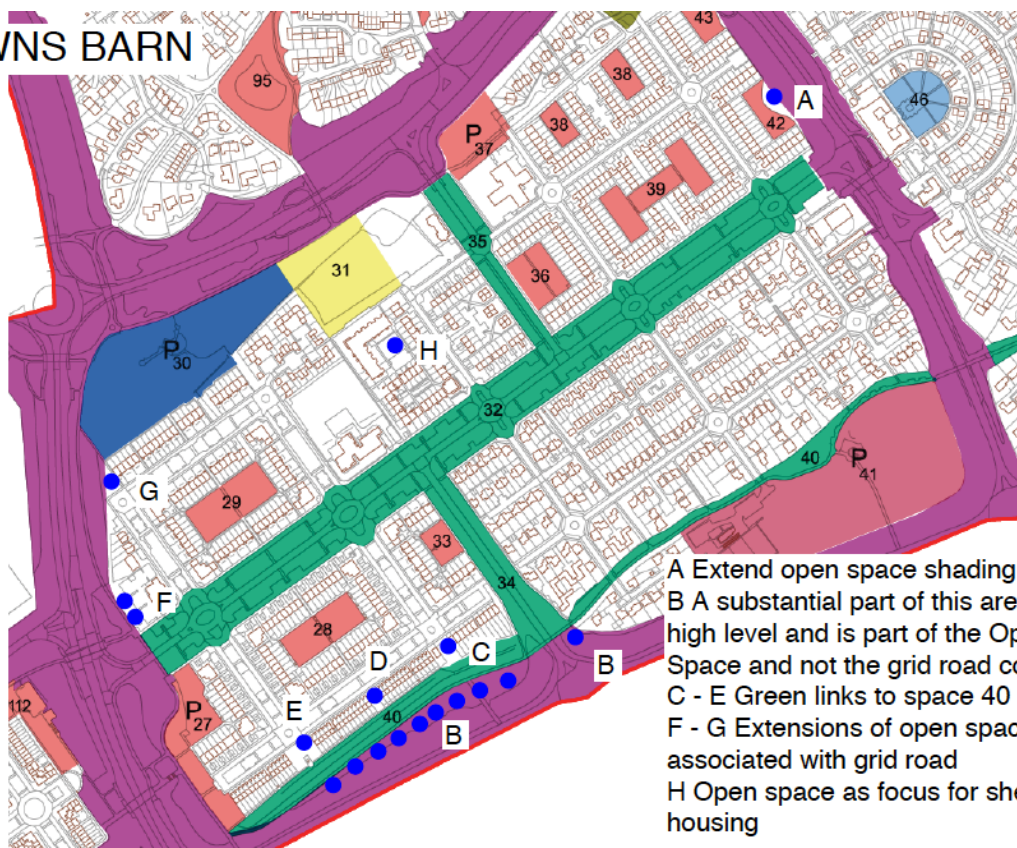




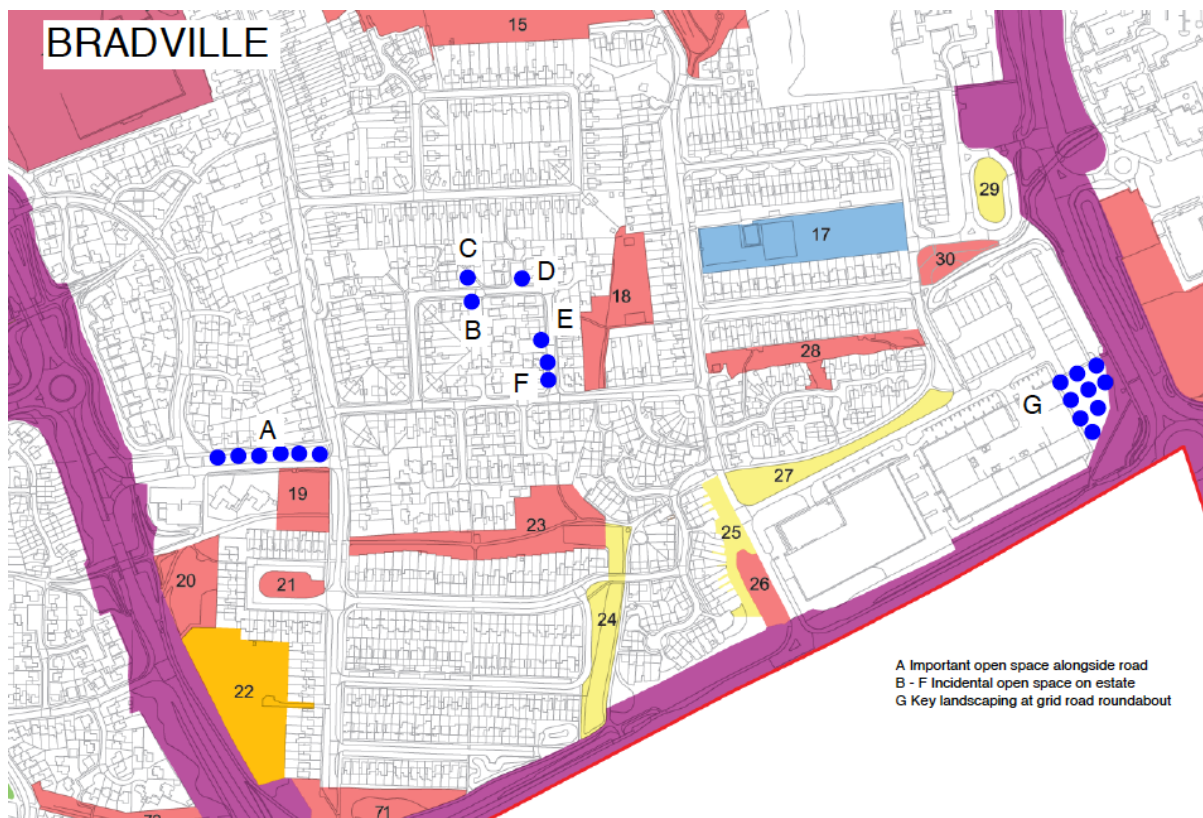


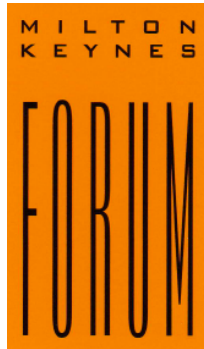


## DOWNS BARN



## BRADVILLE





The Civic Society for Milton Keynes

# **SOUTH CALDECOTTE DEVELOPMENT FRAMEWORK SUPPLEMENTARY PLANNING DOCUMENT**

**A Response to  
Milton Keynes Council's  
Consultation Draft**

**April 2018**

## **INTRODUCTION**

Milton Keynes Forum welcomes the opportunity to comment on the consultation draft of the South Caldecotte Development Framework Supplementary Planning Document.

The Council will be aware, from our submission about Plan:MK (which is contained in the Appendix to this response) that we object to this site for employment development, unless it were to be rail related.

That said, and with the possibility that our objections will not be supported, we are concerned about certain aspects of the Brief, which we have set out below.

## **SUMMARY OF MAIN COMMENTS**

The South Caldecotte site is of considerable importance because of its visibility from a wide area and will be a significant visual feature at a main entry point to the 'city'. It will either demonstrate the distinctive character of Milton Keynes or become a disappointing 'anywhere' kind of development. It is particularly important because it is one the few sites within the 'city' that can readily be viewed from above.

The South Caldecotte Development Framework SPD provides the opportunity to ensure that this site is developed to a genuinely imaginative standard of design and layout that makes it a distinctive and memorable introduction to Milton Keynes for those travelling from west, south, or east and those viewing it from nearby heights.

Our main concerns relate to:

1. Use of the site for warehousing and other industrial and commercial uses.
2. The relationship between the site and the proposed upgrading of the adjacent section of Brickhill Street to grid-road standards.
3. The need to provide for a bridge to replace the existing level crossing over the Bletchley to Bedford railway line and what land take this may require in relation to the South Caldecotte site.
4. The proposed location of a junction between Brickhill Street and the proposed spine road into the site.

5. The need to protect a small woodland of oak trees within the site.
6. The apparent confusion between provision of SUDS and the provision of public open space and a new footpath.
7. Whether the proposed public open space along the noisiest side of the site is in the most appropriate location for such a use and how best to achieve genuine and useable linear parkland connecting Caldecotte Lake southwards and towards Eaton Leys.
8. Views into the site from surrounding areas.
9. How to achieve the necessary quality of design of the proposed industrial and commercial buildings.
10. The lack of provision for enhanced use of Bow Brickhill station on the Bletchley to Bedford railway line and the likely need for enlarged station facilities.
11. The lack of provision for the potential use of Bow Brickhill station area as the hub of a park-and-ride system for rail and bus.
12. Potential need for additional land-take for future enhancement of the road junction between the A5, A4146, Brickhill Street and Watling Street.
13. The lack of clarity about what account should be taken of the area of Lowland Meadow Priority Habitat within the proposed 'Gateway Character Area' part of the site.
14. The need to forewarn developers of the likely need for access to the site for employees arriving by cycle and on foot from housing areas such as Bletchley, Fenny Stratford and Water Eaton, for which provision will be needed beyond the boundaries of the site.

## **SPECIFIC COMMENTS**

### **SECTION 1: INTRODUCTION**

#### **Policy SD16**

Part of the text has been corrupted so that the number for item 5 of the principles is missing and the text reads *"... as part of a Sustainable Drainage System across the Brickhill railway station ..."* etc. This makes no sense. Some text is missing.

### **SECTION 2: THE SITE AND ITS CONTEXT**

#### **2.3.1**

There is an inconsistency here and elsewhere in the document. At this point and elsewhere the railway is called "the Marston Vale railway line"; elsewhere it is described as "the Bedford to Bletchley railway". It would assist clarity if a single title were used, to avoid confusion. We suggest using 'Bedford to Bletchley Railway' because 'The Marston Vale Railway' is more of a marketing description. Mentions of 'East-West Rail' are appropriate when they refer to plans to enhance this route and service.

#### **2.3.4**

It is not at all clear what the following text means *"Edge conditions are important to evaluate, as they form the interface with the existing context. Depending on their nature, they can inform a certain development or open space response."* This needs to be stated with more clarity.

#### **Figure 2.2 Edge Conditions**

Brickhill Street should also be shown as a future noise generator as it is a City Road and elsewhere in the text there is explanation that this section is to be upgraded to grid-road standards. Already it generates noise: in future it can be expected to be noisier and this needs to be taken into account when designing the South Caldecotte development.

#### **2.3 Surrounding Area and Edge Conditions**

*"Immediately to the north is the Marston Vale Line."*

We suggest, to avoid confusion and for consistency, that this should be described as Bedford to Bletchley Railway.

## **2.4 Topography, Views and Drainage**

Mention should be added of the deep and substantial ditch that runs along the northern edge of the site and along some of its western edge. Does this continue westward under the A5?

*"Wider views into the site are seen from the Brickhills, with Milton Keynes and Bletchley in the background."* We suggest that the views from the A5 heading northwards towards the site will be of particular importance and this should be mentioned.

## **2.5 Landscape Character**

### **2.5.4**

*"... encourage appropriate management of all drainage ditches to improve wildlife value, by improving water quality and establishing grass verges."*

There is an inherent conflict between the way in which many drainage ditches are managed for flood prevention and their wildlife value, and as part of public open space. MK Forum has drawn attention to this in its comments on Plan:MK. Recent Internal Drainage Board comprehensive dredging of ditch sides and removal of vegetation at Brooklands Meadow linear parkland illustrates this, as it has rapidly reduced an attractive feature with useful wildlife habitats to a bare and un-vegetated ditch with piles of bare clay soil on either side.

We therefore propose additional wording such as: *'The design of the landscape, drainage and flood prevention measures should be planned to avoid the need for harsh dredging and excessive clearance of vegetation. It should enable attractive areas of landscape to be managed for public access and for watercourses to be designed and managed as naturalistic streams of ongoing benefit to a wide range of wildlife.'*

## **2.6 Habitat and Vegetation**

*"There are two small groups of trees within the site."* This is not correct as there is a third and more substantial woodland immediately north of Crossroads Farm buildings, which should be referred to.

## **2.8 Heritage**

As the line of a Roman road has been predicted as crossing the site, it would be helpful to mark the indicative line of this on Figure 2.8. Should this be considered as a design feature?



## 2.9 Utilities

There is a line of concrete marker posts along the northern edge of the site indicating the alignment of a gas pipe, which has not been mentioned. This route should be added to Figure 2.9.

## 2.10 Opportunities and Constraints

### Edge Conditions

*"The A5 and Marston Vale Railway are noise generators."*

We suggest that this should be described as Bedford to Bletchley Railway. Brickhill Street will become more noisy as its use increases and it is upgraded to grid-road standards. This should also be mentioned.

### Topography, Views and Drainage

*"Wider views into the site are seen from the Brickhills."*

Mention should also be made of views from the A5 as it heads down the hill from the south towards the site.

## Figure 2.10 Opportunities and Constraints

The existing woodland immediately north of Crossroads Farm buildings should be shown on Figure 2.10.

## SECTION 3: DEVELOPMENT FRAMEWORK

### 3.2 The Vision

We welcome the statement that *"Transport facilities will promote the most sustainable forms of movement such as walking and cycling ..."* but this has not been carried through to the concluding sentence which says *"Connections will be made to the rest of Milton Keynes' grid road and transport network"*. This makes no mention of the most effective way of doing this which would be through the Redway network. We suggest that the final sentence should say *'Connections will be made to the rest of Milton Keynes' transport networks including Redways, footpaths and the grid road network'*.

We also suggest that this should be not only about connecting to existing Redways but extension of them through the site and beyond to facilitate movement from areas west, south and east of the site.

### 3.4 Landscape and Open Space Strategy

The text has an error which reads *"... as part of a Sustainable Drainage System across the Brickhill railway station ..."*. Some words appear to be missing.

## **Landscape**

### **3.4.1**

We suggest a change of wording to read: 'A Landscape and Visual Impact Assessment (LVIA) should be undertaken to influence the impact of the development on the landscape ...' rather than only "*... to assess the impact ...*".

We consider it to be a serious omission not to include measures to protect, retain and enhance the clump of around 20 mature oak trees towards the north of the site as a feature of the site (These could well live for at least a hundred more years) and to retain some trees, hedgerows and vegetation alongside watercourses. We also consider that the site should be designed in ways that retain some, if not all, of the woodland immediately north of Crossroads Farm buildings.

## **Areas of Wildlife Interest**

### **3.4.6**

The consultation draft offers no recommendations of how the area of Lowland Meadow Priority Habitat should be addressed in the design of the site. It could, of course, be retained as open space and wildlife habitat, managed for hay and light aftermath grazing. If it formed a core open area around which some of the buildings were placed, these could provide some shielding from the noise of the A5 and provide an attractive area for those working within the site; as well as linking to the corridor of SUDS and any paths along the west side of the site. This should be discussed with The Parks Trust to assess the feasibility of managing this area in that way.

Given the nature of the proposed development and the limitations on scope for ecological improvement, it will be necessary to find ways of using buildings themselves to make provision for ecological enhancement. One way of doing this would be to design buildings that make provision for nesting Swifts beneath roofs and on walls. Swifts are a declining species – present elsewhere in Milton Keynes and known to feed over Caldecotte Lake – that relies on buildings for nesting sites. These can be provided by installing Swift 'nest bricks' or nest-boxes on buildings (specifically designed for Swifts) and the provision of playback equipment to play Swift calls to attract use of these nest sites.

## **Green Link**

### **3.4.7**

This development area should be seen as an attractive place to work. Open space should be seen as a positive attribute to those who work on the site, as a place to

stroll and sit whilst taking a break. It should also provide for those who are more energetic and who may, for example, choose to go for a run during their rest periods. The open space should therefore be seen as an integral part of both the site and the Milton Keynes park network; it should not, therefore, be placed in strips along the site boundaries. As a general principle the site edge boundaries should be treated the same as landscaped grid road boundaries and not as linear parkland. Although the western edge of the site is an appropriate area for surface water attenuation, and may provide some of the ecological resource that is needed, it has limitations as an area for recreation and public open space as it is an area subjected to high and ongoing noise. The idea that this could serve as a *"noise ... buffer"* perpetuates a common myth: neither grassland nor trees offer substantial sound attenuation.

Although a path through the western edge could provide a practical means of movement by cycle or on foot it would not create a pleasurable area of linear parkland for leisure use, other than as a landscaped area to pass through that provides connections between Caldecotte Lake and the wider countryside.

We suggest instead that the footpath link under the railway line - which should be treated as either a Leisure Path or a Redway - should run directly through the site. There should also be a potential provision for a link, via an underpass, to the land east of Brickhill Street to link up with the Redway running south from Tilbrook. Consideration should also be given to additional provision of a horse-riding path from Caldecotte Lake southwards through the site, subject to discussion of this with horse-riding interests and The Parks Trust. This would contribute to extension of the existing network of horse-riding paths and bridle-paths throughout Milton Keynes and enable eventual connection with routes in the Brickhills and across Eaton Leys, through Waterhall Park and past the Lakes Estate towards Newton Leys.

If wet and dry ponds for drainage are created here, any provision for public access should be additional to, distinct from, though possibly alongside these, even if the flood management areas are designed in ways that make them attractive visual features. *"Multi-functional landscaped areas"* are something of a planning myth, although flood-prevention, ecology and recreation can sometimes be provided for successfully alongside each other.

A *"landscape belt"* suggests just a line of trees. Preferable would be tree-planting in informal groups of differing widths and with a range of native species to create far more interesting and varied landscape.

### **3.4.9**

We welcome the proposed text about transfer of the open space to The Parks Trust with a necessary endowment, but suggest that the sentence should conclude with “... *to cover necessary endowment to cover future maintenance and management costs*”. Looking after and ensuring good use of open space requires much more than just maintenance, it requires visits by rangers, communication with users, and oversight to identify necessary improvements, to ensure good use of the site.

## **3.5 Movement Framework**

### **3.5.2**

We have a general concern about the connectivity between this site and the rest of Milton Keynes, particularly because many potential employees will live nearby in Bletchley, Fenny Stratford and Water Eaton. The Brief should therefore include a requirement for appropriate Redway and footpath links to these surrounding areas. We welcome the proposed emphasis on improving accessibility, particularly for walking, cycling and public transport. We also welcome the proposals to extend the Redways into and through the site and to connect them to the A5 roundabout and beyond, particularly to enable cycling and walking access from new housing at Eaton Leys. We are concerned that the weak link in the chain is surface level pedestrian and cycle crossing at the A5 roundabout, which is a far from satisfactory way of crossing this busy road. We consider that the planning of the proposed upgrade of the A5 roundabout should include consideration of providing underpasses for pedestrians and cyclists.

More is needed to achieve this objective, because large areas of housing within range of the site are in Fenny Stratford, Water Eaton and Bletchley, but there is no direct westward Redway connection. We suggest that the proposed Transport Assessment should consider all possibilities to rectify this. One possibility would be for the footpath between the south end of Caldecotte Lake and the Canal near Fenny Lock to be substantially upgraded to provide a surfaced Redway, with associated enhancement of the surrounding landscape, but there may be other alternatives.

### **3.5.4 and 3.5.5**

We welcome the Council’s intention to upgrade the whole length of Brickhill Street south of the railway line to grid road standard (does this mean single or dual carriageway?) and for the developer to carry this out from the A5 junction as far north as a new junction with the proposed spine road into the development site. This raises three issues:

- 1) No mention is made of the necessity of constructing a bridge over the railway to replace the level crossing.
- 2) The radius of the corner on Brickhill Street half way between the railway and the A5 is unsuitable for a road of grid-road standard.
- 3) We suggest that the proposed location for the spine-road junction is in the wrong place.

From the aspect of safety, Network Rail's policy has been to replace level-crossings by grade-separated crossings. Even in present circumstances the existing level crossing sometimes causes considerable road traffic delays (a recent incident of an eight minute delay and a 200m vehicle back-up for example) which is entirely inappropriate on a main route such as Brickhill Street. The proposed development will introduce yet more traffic. The planned development of East-West Rail will increase train movements, which is the main purpose of that major investment. All of this necessitates a bridge to carry the grid-road and Redway and horse-riding path over the railway. Even if this is not constructed before the development of South Caldecotte, the alignment and land-take for the bridge and approach slopes need to be allowed for. It seems likely that some land from the South Caldecotte site (and Caldecotte Site C) will be required for this, so consideration for this is required now. This is made more complex because the eastbound and westbound railway platforms are offset either side of the level crossing. As mentioned at 3.4.7 above, there will also be a question of the need for a Redway underpass to enable cyclists and pedestrians to cross Brickhill Street safely to reach the development site from the Bow Brickhill direction, and for access to the footpath running east of Brickhill Street towards Bow Brickhill church and Aspley Heath.

It would seem far more appropriate for the new junction for the spine road through the South Caldecotte site to be placed approximately half way between the railway and the A5, which would place it at the existing corner on this length of Brickhill Street. This would make simpler the task of designing the enhancement of Brickhill Street to grid-road standards, but would require a revised layout of the indicative route for the spine-road.

There is a further issue. We anticipate that Bow Brickhill rail station would be of increased importance when East-West Rail services are in operation. We suggest that there should be thorough consultation with East-West Rail and Network Rail about this, to ensure that provision is made for any increased land required to upgrade the station. A related point is that some car-parking could well be needed by the station. In fact, this area could provide an important location for a

park-and-ride scheme for both bus and rail, which would require a significant additional area of land. Unless this is considered now, development will prevent this ever being achieved.

### **3.6 Design**

The design of the site to an appropriate standard is of considerable importance because of its prominence.

#### **3.6.6**

In general terms we welcome the proposal that *“Development should have a contemporary character reflecting Milton Keynes’ reputation as a forward-thinking modern city”* though we think the issue is primarily of good quality design rather than off-the-peg solutions.

#### **3.6.10**

We agree that an LVIA should be used to inform decisions about building heights. We also suggest that careful consideration should be given to the view of roofscapes as some important views of this development will be from the Brickhills and the A5 approaching from the south. This may suggest some creative solutions to the use of form, colour and materials for roofs and copings. There may even be scope for public art designs related to the buildings. There should also be thorough consideration of how best to provide trees and other structure landscape throughout the site to enhance how the whole area looks from areas beyond.

### **3.7 Sustainability**

#### **Surface Water Drainage and Flooding**

It seems likely that the site will require a substantial pond as well as permeable paving, filter strips and possibly swales. It may benefit from a series of ponds stepping down the gradient. We consider that many ponds provided as SUDS schemes are too tightly defined and have excessively steep sides which makes them less attractive and more of a safety hazard. We suggest that a pond or ponds for this site should have shallow edges which will also make them more suitable for a range of wetland as well as water birds, and for marginal vegetation. The advice of The Parks Trust and ecologists should be sought to determine the most appropriate form and edge gradients,

There may be opportunities on office buildings for living roofs, either ‘intensive’ or ‘extensive’, either of which could be made beneficial for wildlife, while also improving the thermal properties and energy efficiency of a building. We recognise that many warehouse and factory buildings have relatively lightweight

roofs, unsuitable to take the weight of a living roof, although these may be able to incorporate rain harvesting systems, which would contribute towards higher BREEAM standards.

## **SECTION 4: DELIVERY**

### **4.2 Management and Maintenance**

#### **4.2.4**

We welcome the text proposing that open space in the site should be offered to The Parks Trust on a 999-year lease with a commuted sum to cover its long-term maintenance, management and overall costs. This is consistent with MK Forum's proposals to this effect in our response to Plan:MK and the Open Space Strategy. Clarity will be needed on which body will hold the leasehold for that land, whether the Council, The Parks Trust or another owner, and on what terms. It is highly appropriate that The Parks Trust should be consulted as plans are being made for this open space.

## APPENDIX

Extract of MK Forum comments on the Submission Version of Plan:MK relating to Caldecotte:

*Policy SD16: We have no objection to the development of this site at the appropriate time but consider that it is illogical to consider it until the precise alignment of the Oxford-MK-Cambridge Expressway is known. We note that the policy is inconsistent with that of the "mirror site" to the east of Brickhill Street (SD13) which states "planning permission.....will not be permitted until 2019/20, once the detailed alignment of the Cambridge-Milton Keynes-Oxford Expressway is known" – there is no similar wording in SD16.*

*Even then, we would argue that the site's development should be more focussed upon the railway line rather than the Expressway. It has convenient access to Bow Brickhill railway station (which would imply residential use) but should also be explored for rail-based freight. Use for "standard" warehousing should be the least favoured option and, in any event, if more B2/B8 land is required during the plan period, Milton Keynes East (ie the land east of M1 J14) is better placed as it has more convenient motorway access.*

*In any event, we remain to be convinced that there is a need for more large scale warehousing within the Plan period and we feel that it is a poor return for the city in terms of job density given the amount of land required for such use when considered at a city scale and the other pressures upon Milton Keynes.*

*Fundamentally however, we do not necessarily believe that there is proven demand for warehousing space within MK that requires the allocation of this site for such a use:*

- a. Policy ER1 is incorrect in that it includes Caldecotte South as "vacant land" – this is curious given that it has yet to receive planning consent and should be deleted. The amount of vacant Employment Land is therefore 134.5ha.*
- b. Table 4.4 (p24) indicates a forecast demand for Employment Land for 2016-2031 of 132ha (of which Industrial/Warehousing comprises 116ha).*
- c. On the face of it there is therefore sufficient employment land within Milton Keynes with the appropriate planning consents for the Plan period.*
- d. However, the June 2017 update of the "Milton Keynes Economic Growth and Employment Land Study" indicates a wide range in perceived demand according to whether one uses the EEFM figure of 87ha or the Experian one of 132ha. Significantly, neither predicts a shortage of land but it is pertinent to point out that each figure has an allowance for churn and windfall (35%/62% and 22%/39% respectively).*
- e. The argument is therefore, not about the quantity of land available but the quality and, in particular, sites for large warehouses, along the lines of Magna Park.*



- f. We accept that Magna Park has been successful but the reality is that half of the space let to date (c270,000 sq m) has been to one occupier (John Lewis/Waitrose). What is the reality of this happening again?*
- g. Critically the amount of jobs created over the Plan period from warehousing varies from c956 (EEFM - "distribution and logistics") to 4,500 (Experian - "land transport, storage and post").*
- h. The logistics industry is changing and the amount of automation increasing and there is therefore a logic that looks more towards the EEFM figures rather than those from Experian.*
- i. There are also competing sites outside Milton Keynes eg by M1 (Junction 13) and M1 (Junction 15) Northampton (para4.47).*

*When one takes all of the above together the reality is that the need for this site for warehousing is unproven and, even if the site is developed, the amount of jobs generated could be low. It seems a poor return for the city for such a big piece of land in such a strategic location.*

*While we feel that the site may be too small, we accept, that it might be feasible to develop it for rail based freight distribution and we would support this given the overall paucity of such sites in the local area and the environmental benefits that would result from such a use.*



**The Civic Society For Milton Keynes**

# **MILTON KEYNES GREEN INFRASTRUCTURE STRATEGY**

**A Response to  
Milton Keynes Council's  
Consultation**

**February 2018**

## **INTRODUCTION**

Milton Keynes Forum is the Civic Society for Milton Keynes, with membership open to local residents, organisations and businesses. It has contributed to constructive thinking about the development of the Milton Keynes area for almost three decades and most recently to consultations on Plan: MK, MK Mobility Strategy/TP4, and the MK Open Space Assessment.

## **THE BRIEF FOR THE MK GREEN INFRASTRUCTURE STRATEGY 2018**

The Council's brief for the MK Green Infrastructure Strategy is not clear. This draft lacks clarity of purpose and largely provides dilute summaries of other documents without adding value or demonstrating specific interactions between them. As it has numerous editing shortcomings we assume that it is an early draft, so look forward to seeing a more finished draft on which we hope we would find more of substance. However, the Introduction explains that it: will:

- Replace the 'Milton Keynes Green Infrastructure Strategy 2008';
- "Build on the foundations laid buy (*sic*) the Buckinghamshire & Milton Keynes Local Nature Partnership's vision and principles for Green Infrastructure" (NB it is actually called an Environment Partnership rather than a Nature Partnership);
- "... set out the Borough's approach to green infrastructure delivery through the local development, Plan: MK to 2031, and beyond."

We do not think it achieves these objectives. Unfortunately, the 'Milton Keynes Green Infrastructure Strategy 2008' does not appear to be accessible online anymore, so we have been unable to compare that with this 2018 version.

## **INTER-RELATING ASPECTS OF GREEN INFRASTRUCTURE**

We suggest that what is needed is a single document that examines the synergies and tensions between the many different purposes to which 'green infrastructure' is put, and which provides solid data on each aspect in relation to existing development and the planning of new development. It should be a document that addresses:

- landscape visual character;
- parklands and open spaces for public access and recreational uses;
- footpaths and bridleways;
- biodiversity and types of habitat in specific relation to landscape-scale connectivity;
- how and where 'green and blue' infrastructure is used for flood management and how this can be further developed strategically;
- river corridors;
- other aspects of 'natural capital'; and
- how all of this interacts with agriculture, horticulture and managed woodlands.

## **LANDSCAPE CHARACTER, URBAN AND RURAL**

There are significant gaps that existing documents do not fill and which a GI Strategy for MK needs to fill. For example, the Council commissioned a Landscape Character Assessment, which was published in 2016 (and a separate one relating to wind turbines and solar PV) which covers only the part of the borough outside the MK urban area, despite Natural England advice making clear that protection of landscapes within urban areas is also of importance. So a landscape character assessment is needed of the very extensive landscapes within and along the edges of the MK urban area. This needs to address, not only the protection of the visual qualities of the urban countryside and landscapes, but also protection of these landscapes from inappropriate visual encroachment on their edges, relating to the form, height and scale of developments next to the landscapes. For example this could have enabled better assessment of the new MK Council Waste Treatment site with its tall chimney prominently

intruding on the landscapes of the Great Ouse Valley and far beyond, as well as nearby Listed Buildings.

## **WATER AND FLOOD PREVENTION**

The Council has also commissioned studies of water and flooding in connection with preparation of Plan:MK:

- 'Milton Keynes Council Surface Water Management Plan' April 2016
- 'Milton Keynes Water Cycle Study' November 2017.

The MK Surface Water Management Plan is a substantial document with location-specific proposals to address future flood risk. This relates directly to GI and to changes to aspects of open space and landscape, so needs to be integrated with the new Milton Keynes Green Infrastructure Strategy.

## **BIODIVERSITY AT A LANDSCAPE SCALE**

It appears that, for biodiversity, this GI Strategy relies entirely on the Buckinghamshire Biodiversity Partnership's document 'Biodiversity & Planning in Buckinghamshire' published in 2014, and the Buckinghamshire Local Nature Partnership's Vision and Principles for Green Infrastructure, published in 2017. We would expect there also to be reference to existing Biodiversity Action Plans:

- 'Forward to 2020: Buckinghamshire and Milton Keynes Biodiversity Action Plan' (Buckinghamshire & MK Natural Environmental Partnership, undated)  
[<http://www.bucksmknep.co.uk/wp-content/uploads/2014/11/Bucks-BAP-Forward-to-2020.pdf>]
- The Parks Trust's Biodiversity Action Plan 2017-2022  
[<http://www.theparkstrust.com/downloads/final-biodiversity-action-plan-2017.pdf>]
- And any comparable BAP from Milton Keynes Council.

## **SPECIFIC COMMENTS**

### **1. Section 2: Green Space Planning in Milton Keynes - A Brief History**

There are many aspects of this text that are unclear or inaccurate (eg the tree nursery was in Milton Keynes Village, not Newlands). We would be pleased to meet with the consultant to explain these to them.

### **2. Section 3: The Current GI Network**

#### **a. Parks - Linear Parks**

*"The feel of the corridors change across the city, more formal in urban areas and more agricultural on the periphery ...".* The character of the linear parks do vary, but significant agricultural areas are well within the urban area, not *"on the periphery"* for example much of the Ouzel Valley which is extensively used for grazing cattle and sheep.

#### **b. Country Parks / District Parks.**

The same confusion occurs in this report as in MK Council's recent 'Open Space Assessment'. The one Country Park within Milton Keynes Borough is Emberton Park. Milton Keynes Development Corporation developed nine District Parks within the 'city' all of which were transferred to Milton Keynes Council. These include parkland at: Great Linford, Tattenhoe, Emerson Valley, Kent's Hill, etc. These are not designed to *"attract visitors from a wide catchment, typically further than 10 kilometres"*. Each was intended to serve one of the many districts within the 'city', which comprised several adjacent grid-squares of housing.

#### **c. Grassland.**

There are also more than 50 paddocks within the 'city' mostly connected to a network

of Bridleways and horse-riding paths throughout the 'city'. These paths enable events like The Pony Club's national programme of Ride Out events to take place from Campbell Park, with up to 100 horses on a single day using the rides throughout the 'city' and out into the surrounding countryside.

d. Waterways / water bodies.

Two issues are confused together. Linford Lakes (*not Lindford*) were formed by mineral extraction but is not an active part of the storm water management system. Willen Lake is used for active flood control, but so also is Caldecotte Lake. Other balancing lakes provide flood control, such as: Furzton Lake, Lodge Lake and Tongwell Lake. More lakes were also constructed within the city such as: Walton Lake and Mount Farm Lake. There also a large number of ponds, many of which were constructed by the Development Corporation; others as SuDS for more recent developments.

e. Figure 3 lacks a key.

f. Designations.

There are no National Nature Reserves in Milton Keynes.

We are not aware of specific "*historic parkland*" at Emberton Park, but there are historic parklands at places such as: Gayhurst Manor and Tyringham Hall.

g. The map of Biodiversity Opportunity Areas (BOA) lacks a title and a key. It needs to be made clear that all of the MK urban area is a BOA as well as the river corridors.

3. **Section 4: Making the case for GI**

Paragraph commencing with "*Population growth ...*": It is wide of the mark to say in relation to Milton Keynes that "*Land-use changes due to development did not consider the 'impact on the extent and ability of green infrastructure to provide ecosystem services such as space for recreation, the mitigation of flooding events and air quality regulation'.*". The linear parks were planned to provide these and other GI services (though that terminology was not used then).

4. **Section 7: Neighbouring Strategies**

These examples of green infrastructure studies at a landscape scale from all the neighbouring local authorities show some of the kinds of GI strategic thinking that should be in the MK GI Strategy, but isn't.

In the Aylesbury Vale section: Tattenhoe not "*Tatternhoe*".

5. **Section 8: Key Issues for Green Infrastructure in Milton Keynes**

a. 8.3. *Enhancing biodiversity: Meeting the need*

"*Establish strategic management and renewal of the urban green infrastructure, particularly along the grid roads, with the strategic objective of improving biodiversity by prioritising native species and active thinning and understory management*". This seems to be based on misunderstandings. Much of the grid-road corridor landscape is of native species. Strategic management of these have been progressing for decades and a major programme of active thinning and understory management has been in progress for many years.

b. 8.7. *Long term management of assets.*

"... *there needs to be a long term strategy for actively managing the borough's green infrastructure.*". The Parks Trust has and implements long-term strategies and plans for management of its landscapes. For example, there are management plans for all three of its Ancient Woodlands which extend for many decades ahead. There are also detailed, site specific plans for management of all the landscapes that The Parks Trust owns. It is not clear what else this sentence is proposing.

*Long term management of assets: Meeting the need*

We welcome the statements about developers working with the Council and The Parks Trust to identify green infrastructure needs and design "*as well as enabling the long*

*term management of the green spaces to be taken over by The Parks Trust as part of developer contributions”.*

c. **8.8. Economic sustainability: Meeting the need**

Mountain biking would be popular in Milton Keynes, but it doubtful whether this would be compatible with the SSSI status of Howe Park Wood, for instance, and the other three Ancient woodlands within the ‘city’ are similarly sensitive because of their importance for both biodiversity and quiet recreation, as are others in the rural areas such as Little Linford Wood. Fortunately, some paths in the Brickhill woodlands and Bedford Estates woodlands provide some biking opportunities, with the advantage of more hilly topography.

*“Promoting local produce”.* The crop of Cricket-bat Willows from the linear parks are used to produce cricket bats; and small roundwood from woodlands and plantations is sold as firewood; and cider apples in the Woughton orchards are used for cider production. The cattle and sheep grazing within the city are managed for agricultural purposes. In general multi-purpose use of linear parklands make them more suitable for these uses than for arable crop production. However the many allotments throughout the ‘city’ are used for food production.

6. **Section 9: Strategic Green Infrastructure Priorities.**

a. **9.2. Connect missing links**

*“West - Green Infrastructure along the western flank of the city is currently fragmented. There is potential to improve the links ...”.*

This would be an important strategy, though it should also be about protecting and enhancing the western flank of the urban area from south to north along the alignment of the former drovers road which the North Bucks Way follows. This also applies to paragraph 9.4. Preparing for longer term growth.

b. **9.4. Preparing for longer term growth**

4 and 5 are noted as TBC, indicating that some words are missing

6. ‘Great River Ouse’ is more usually described as the River Great Ouse.

8. Yardley Chase. Because much of this land has no rights of way and a sizeable part of it remains under military ownership it is well-protected and of significant importance for biodiversity, including areas of SSSI, and has historic pasture woodland with many veteran and Ancient Trees.

7. **Section 10: Next Steps**

Missing wording - paragraph noted as “TBC”