

REPRESENTATIONS RECEIVED ON DRAFT SOUTH CALDECOTTE DEVELOPMENT FRAMEWORK 2018

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
Milton Keynes Council Officers		
1.1	<p>Nick Crank, Senior Archaeologist</p> <p>On the 10th January I sent the following text to be included in the brief:</p> <p>Archaeological excavations in advance of the construction of the A5(T) in 1977-78 revealed a roughly N-S aligned Roman road, perpendicular to Watling Street and associated regular ditched plot boundaries as well as evidence for metalworking/ industrial activity and several groups of early Roman cremations. It is highly likely that this activity continues along the predicted line of the Roman road into the proposed development site.</p> <p>Prior to a planning application being submitted the area should be subject to an archaeological evaluation comprising geophysical survey (100% detailed magnetometry) and subsequent trial trenching to a specification agreed with the Council’s Archaeological Officer. This will enable any necessary mitigation (excavation or avoidance of significant archaeology) to be agreed and secured via a planning condition.</p> <p>The first part has been faithfully reproduced, the second half (bold) not. Can you please revise the development framework to include my full response including the advice in bold?</p>	<p>Noted. An archaeological evaluation of the site has now been undertaken.</p> <p><u>Include bullet points under para 2.8 to read: “A geophysical survey and trial trenching has been undertaken on the site which has indicated that there is an area of buried archaeological remains in the southern part of the site. The surveys have revealed the remains of a Roman street with buildings alongside. The significance of these remains is not known at present. However, given the proximity of the ancient monument it is possible</u></p>

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		<p><u>that they may be of equal significance. The significance of the remains and the impact of development on the heritage asset will be considered through the planning application process.</u></p> <p><u>The above area of significant buried archaeological remains is also partly coincident with an area of well-preserved ridge and furrow earthworks surviving in the area of priority habitat grassland in the south of the site.”</u></p> <p>Amend fig 2.8 to show ‘indicative area of buried archaeological remains’</p> <p>Delete para 3.6.11 and replace with “<u>A geophysical survey and</u></p>

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			<p><u>trial trenching has been undertaken which indicates that there is archaeological interest within the south-western part of the site. The significance of the remains and impact of development on the heritage asset will be considered through the planning application process.</u></p>
2.1	Development Plans	<p>The introductory text should be expanded to detail the site's context (within the Oxford to Cambridge arc) and its relationships to surrounding developments within the area, the SESDA, Caldecotte site C (the former employment site now proposed for housing) the Red Bull site at Tilbrook and the new transport infrastructure expected to be developed within the area in the future e.g. east-west rail and the Oxford to Cambridge Expressway, which bring new opportunities for development but also constraints. A revised figure 2.1 plan would assist in providing this context and illustrate these relationships. You also may want to mention the recently opened link road from the A5 to junction 11a of the M1, which has improved the access of this site to and from the south.</p>	<p>Accepted. Include text referring to Oxford-Cambridge Arc after para 1.1. Amend para 1.1.1 second sentence to read: "The site is strategically located next to the A5 Trunk Road (see figure 1.1) <u>which connects to junction 11a of the M1 via the recently opened link road.</u>"</p>

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		<p>Include new para after 2.3.3 to read: "<u>The site is also located adjacent to the proposed SEMK Strategic Urban Extension which lies to the east. That site will deliver around 3000 homes together with associated social, community and green infrastructure.</u>"</p> <p>Amend third sentence para 2.3.1 to read: "<u>North of the railway is Caldecotte, comprising Caldecotte Business Park and a parcel of land known as Caldecotte Site C, which is allocated for residential development;</u>"</p> <p><u>Include new sentence at end of para 2.3.1 to read: "To the north-east of the site are two residential properties at the junction</u></p>

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			<p><u>of Brickhill Street and Station Road. Beyond these, across the railway line, is the Tilbrook employment area which includes the business premises of Red Bull Racing.</u></p> <p>Amend figure 2.1 to show other developments and allocations (SEMK SUE) in surrounding area.</p>
2.2		<p>Para 1.1.3 refers to '<i>Milton Keynes is in the Oxford-Cambridge Arc. East-west rail proposals and growing up to 500,000 people means this development can capitalise on these opportunities and provide jobs for the projected population growth.</i>' You may want to clarify your sources if this text is retained. I assume you are referring to the National Infrastructure Commission report Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc as the source for suggesting growth of up to 500,000 people [in the city]?</p>	<p>Delete para 1.1.3. and include new section on Oxford to Cambridge Arc.</p>
2.3		<p>Para 1.4.1 The National Planning Policy Framework (NPPF) was published in 2012. Be aware a new version of the NPPF is being consulted on until the 10th May and is expected to come into force this summer.</p>	<p>A revised NPPF was published in July 2018.</p> <p>Amend para 1.5.1 first sentence to read "<u>A revised National Planning Policy Framework was published in July 2018.</u>"</p>

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2.4		Para 1.4.14 A new revised Planning Obligations SPD will come into force on 1 st September and replace the existing suite of Supplementary Planning Documents and Guidance relating to Developer Contributions.	The new Planning Obligations SPD did not come into force in September. The SPD is to be revisited in the light of the emerging Plan:MK.
2.5		The Schedule of Proposed Modifications [to Plan:MK] March 2018 details a minor changes to Policy SD16 (PM48) you may want to mention.	Accepted. Proposed Additional Modifications were published in October 2018. Amend text of policy SD16 to reflect Proposed Additional Modifications.
2.6		Para 2.3.3 ' <i>Immediately to the south-west of the site is the A5 Trunk Road. Beyond the A5, to the west is the Ouzel Valley and Fenny Stratford; to the south is the proposed Eaton Leys housing development.</i> ' Did you want to mention the Scheduled Ancient Monument of the Roman settlement of Magiovinium is also to the southwest of the site I know you mention the site later at para 2.8.	Accepted. Amend para 2.3.3 to read: “to the south is <u>the Roman settlement of Magiovinium and beyond that the proposed Eaton Leys housing development.</u>”
2.7		Para 3.4.1 since impact of the development on the landscape is a critical issue, the Landscape Visual assessment (LVIA) work to assess the impact of the development on the landscape and to identify appropriate mitigation measures needs to be undertaken urgently since this could have significant implications for the contents of the Development Framework. This work could for example suggest height restrictions on buildings across the site.	Noted.
2.8		The brief needs to mention the east–west expressway between Oxford and Cambridge and give as much certainty as we can that the expressway is not a 'show stopper' for the site. Some further details about the corridor for the road should be available later this	Accepted. Include new paragraphs on Oxford to

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	year.	Cambridge Arc and the Expressway in Section 1.
2.9	<p>We need to be more definitive about highway/transport issues in the Development Framework with implications for this site such as:</p> <ul style="list-style-type: none"> • Why is the access to the site shown where it is on Brickhill Street and if another access is required? • At para 3.5.5 we say '<u>It is the Council's intention to upgrade the whole length of Brickhill Street (south of the railway line) to a grid road standard ...</u>what exactly do we mean, single or dual carriageway standard or single carriageway with a grid road reservation to accommodate future traffic growth? • The issue of the bridge over the railway line by Bow Brickhill station? Our transport modelling work and Network Rail say it is not needed but local residents say it is? • Will there be any changes to the existing level crossing by Bow Brickhill station as a result of the additional east-west rail services on the line? 	<p>First point: The Council's Highways Development Management Team has no objection to the siting of the access. An additional access is not required, but the access should be widened to accommodate emergency vehicles. Include new text in para 3.5.4 to read: "<u>The developer will need to give special priority to the passage of emergency vehicles into and out of the site through the widening of the main access road from the point of entry at Brickhill Street to a point to be determined at detailed design stage.</u>"</p> <p>Second point: Include new para after 3.5.5 to read: "<u>Building to grid road standard will require the provision of a redway, and a landscaped grid road reserve within the site.</u>" Amend fig 3.1. to show remainder of Brickhill</p>

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		<p>Street as being upgraded to grid road standard at a future date.</p> <p>Third and fourth points: Whilst a bridge is not currently required, land has been safeguarded to enable its future provision if required. Feasibility work that has been undertaken suggests that a bridge could be constructed on the existing line of Brickhill Street without impacting on the site. There are currently no changes proposed to the level crossing as the result of the additional east-west rail services.</p> <p><u>Include new text in Section 1 to read: "Currently, there is one passenger train per hour each way between Bedford and Bletchley on weekdays and Saturdays, and then the level crossing gates at Bow Brickhill are closed for a total of 14-15 minutes per hour, more if a freight train (not at peak times) also uses the line.</u></p>

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		<p><u>As a result there are notable queues of traffic on Brickhill Street on both sides of the level crossing when the gates are closed, and also along Station Road into Bow Brickhill, particularly during the morning and afternoon/evening rush hours. The number of passenger trains on the railway line is due to double in 2024 when the upgrade is complete.</u></p> <p><u>Stakeholder engagement on the Development Framework has identified traffic delays at the level crossing as an important issue of concern to local people.</u></p> <p><u>A long term solution to these delays is the provision of a bridge over the railway line. Whilst Network Rail currently has no plans to provide such a bridge, it is considered that there is sufficient land</u></p>

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			<u>within the adopted highway to enable a bridge to be provided at some future date. Feasibility work undertaken by the Council suggests that a bridge could be constructed on the existing line of Brickhill Street (see fig 1.3), subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site”</u>
Parish Council			
3.1	Bow Brickhill Parish Council	<p>As part of Bow Brickhill Parish Council’s Consultation Response to the Draft Plan: MK October 2017, as submitted to MKC on 17 December 2017, we expressed our belief that, with specific reference to Policies SD16: SD1, SD11, SD12 and INF1 the Plan is not legally compliant because it was not:</p> <ul style="list-style-type: none"> • Prepared in accordance with the Statement of Community Involvement • Consistent with the regulatory requirements for consultation <p>For clarity, we stated that: Paragraph 1.10 of the Milton Keynes Statement of Community Involvement (adopted March 2014) asserts that: “As part of consultation and engagement through the planning process, the Council will work to the following principles: We will meet and where practicably possible exceed the minimum standard for</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter</p>

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	<p>community involvement as set out in the legislation.” Although “practicably possible” for Milton Keynes Council to consult Bow Brickhill Parish Council on its proposals for the so-called ‘Caldecotte South’ Employment Site and the South East Milton Keynes residential development, it did not do so until the formal consultation in March 2017. This is in contravention of the requirements of the Council’s Statement of Community Involvement (as adopted in March 2014)</p> <p>We wonder why MKC’s consultants have been wasting time and public money producing a Development Brief ahead of Plan: MK being examined by an inspector and the NIC announcing the broad route of the Expressway. It is, at the very least, premature and would suggest the decision to crash on with this development, regardless of its unsuitability is a fait accompli, demonstrating an unacceptable degree of bias on the part of MKC Members.</p> <p>This also begs the bigger question: Why does MKC repeatedly refuse to consult Bow Brickhill Parish Council about what it’s doing in our parish? MKC has consistently failed to acknowledge the problems with either of the rail crossings - at Bow Brickhill or Woburn Sands, ploughing on regardless in pursuit of its own agenda without doing the necessary traffic modelling.</p> <p>Broadly, Bow Brickhill Parish Council strongly opposes any development of this nature on the following grounds:</p> <ul style="list-style-type: none"> • It will seriously affect the character of the surrounding area and in particular the visual impact it will have on the Greensands ridge area. • The volume of traffic such a development will generate is wholly unacceptable to the residents of Bow Brickhill. • MK Council has previously identified an area for this type of development adjacent to the M1 (Junction 14) which is far more appropriate than that being suggested. • The development of the East West corridor road and rail links has yet to be 	<p>for the Development Framework to consider.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”</p>

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	<p>decided but is likely to require substantial parts of this area in order to be completed.</p> <p>Again, for clarity, I would refer you to the text of our Consultation Response to the Draft Plan: MK October 2017 in which we express our opinion that the Plan is unsound as regards Policies SD16: SD1, SD11, SD12 and INF1:</p>	
3.2	<p>To appreciate the enormity of the impact of the Proposed Submission Plan:MK October 2017 on this area, it is essential to have a clear idea of the character, heritage and nature of the village concerned.</p> <p>Bow Brickhill (OS grid reference: SP9034) Approx. 450 houses</p> <p>http://www.bowbrickhill.com/NeighbourhoodPlan/NPFeb2016ConsultationDraft.pdf</p> <p>The (currently stalled) Bow Brickhill Neighbourhood Development Plan Draft of February 2016 tells us:</p> <p>“Bow Brickhill is an ancient settlement nestling into the dominant Greensand Ridge to the south west of the original designated area of Milton Keynes. It is separated from the urban area by the Bedford-to-Bletchley rail-line (planned to become the East West Rail Line) and lies within an Area of Attractive Landscape. The village is physically separate from the urban mass of Milton Keynes. This is an important part of the character of the village and its strong sense of community.”</p> <p>This is clearly shown in the Milton Keynes Local Plan as adopted in 2005 and Core Strategy 2013, in which Bow Brickhill has Selected Village status. Indeed, the Inspector of that Core Strategy, (part 2, section 8.14) stated development of the area between Woburn Sands and Bow Brickhill south of the rail line would cause unacceptable coalescence with the urban area.</p>	Noted.

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	<p>Although the 2011 Census showed a population of 562, that number is closer to 650 now, following the building of the Brickhill Sands housing estate in 2016.</p> <p>The steep, single track Church Road, with its attractive late 19th and early 20th century cottages, gives access to Bow Brickhill Woods by car, foot, horse and bicycle. It has become a popular choice for a number of outdoor pursuits and a large portion of the Woburn Golf Club's internationally-renowned courses are located within the parish boundaries.</p> <p>The National Planning Policy Framework (Paragraph 73) acknowledges the importance of planning for recreation and sport, stating that "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", and that "planning policies should protect and enhance public rights of way and access".</p> <p>On top of the steep hill is the listed 12th Century All Saints Church, close to which is the Danesborough Iron Age Fort - a scheduled monument.</p> <p>The introduction of an additional 3,000 houses in this area would represent a radical change to the character and identity of the area, effectively rendering it an urban extension of Milton Keynes and is, in our view, not proper planning</p> <p>Paragraph 5.29 of the Proposed Submission Plan:MK October 2017 states: "Land south of Milton Keynes, as shown on the Key Diagram and Policies Map, is allocated as a strategic employment site for the development of large footprint B2/B8 units to meet the requirement for this type of commercial floor space in Milton Keynes in the plan period."</p> <p>The suggested Employment area and part of the South East Growth area have already appeared in the Site Allocations Program as U22 and U27 where in conclusion both advised that, "Development would represent a noticeable intrusion into open countryside and present coalescence issues between Bow Brickhill and the urban area of Milton Keynes". Entering Plan: MK at such a late stage with absolutely no notification or</p>	

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	consultation with the Parish on a site recently dismissed by MKC Site Allocation Program (U27) as “a poor prospect for development” demonstrates how desperate and dangerous the Plan has become.	
3.3	<p>The core strategy approved in 2013 had secured employment land up to 2026 with land known as “Berkley Employment Land” at Junction 14 of the M1. It makes little sense that a site so far from J14 with such poor road and rail links would be included in a Plan that lists “Protection of natural and historic environment” as one of its Development principles.</p> <p>Paragraph 5.30 of the Proposed Submission Plan:MK October 2017 and Map 4 establish the size and location of the site as follows: “The site has an area of around 57 hectares and is located south of the Bletchley to Bedford railway line (the route of the East-West Rail line), north west of the A4146 and east of the A5.”</p> <p>Rula Developments are promoting a 63-hectare site within Plan:MK for a new employment development, around 2.5km north east of Newport Pagnell, close to the M1 at Junction 14. This site is not currently within the draft versions of Plan:MK. Bow Brickhill Parish Council have been advised by Rula Developments in September 2017 that they had made representations for its inclusion which was a month prior to the publication of the Proposed Submission Draft and in our view could have been included as an alternative option. This site is more suitably located and larger than the 57 hectare site proposed at ‘Caldecotte South’.</p>	See response to rep. no. 3.1.
3.4	<p>Policy SD16.7 states: “The design and appearance of buildings should be sensitive to the neighbouring uses, with development fronting Brickhill Street being sensitive to views into the site from the wider landscape. Buildings should be designed to provide an attractive entrance to Milton Keynes from the south”.</p> <p>The neighbouring village of Bow Brickhill is residential. The proposed site is at least as close to residential property as the old Reads tin can factory was, many years ago. This very site is now, according to Item 7 on your Delegated Decisions Agenda identified as Caldecotte Site C. Following many complaints about noise and vibration, the old factory</p>	<p>Include new para in Section 3.7 under heading “<u>Noise and Air Quality</u>” to state that “<u>Any application will be required to submit a Noise and Vibration Impact Assessment and an Air Quality Assessment.</u>” Amend para 3.6.3 to read:</p>

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	<p>was closed down and the building was demolished. The brownfield site it once occupied has stood empty, concrete capped and overgrown ever since. This surely set some sort of precedent in terms of site usage in close proximity to residential areas.</p> <p>In the presentations made during the public consultation period 17th March – 9th June 2017, and despite many protestations to the contrary by the owner of 1 Station Road, Bow Brickhill, MKC officers repeatedly insisted that the site is:</p> <p>Away from Residential Property –The photograph at Figure 1 below, taken from a bedroom window of 1 Station Road, Bow Brickhill clearly disproves this claim. The green area on the far side of the mini roundabout is part of the proposed site, which will also directly impact the home and livery stable business at 3 Station Road, Tilbrook Farm, the proposed Tilbrook Pastures development in the village and up to Greenways, Bow Brickhill.</p> <p>Bow Brickhill Parish Council has made numerous requests that a representative of MK Council attend for a site visit to so-called ‘Caldecotte South’ as they have clearly made a number of assumptions based on map data only. 1 Station Road has never been sold, it therefore does not appear on the Land Register, so the Plan has demonstrably been prepared on the basis of fundamentally flawed data.</p> <p>Furthermore, it is also noted that 600 homes have recently been approved by MK Council at Eaton Leys – this site is on the opposite side of the A5 from the proposed employment site. See Proposed Submission Plan: MK October 2017 Map 3 and Policy SD15.</p> <p>The site itself is working high grade arable farm land, a rapidly decreasing resource vital to the food chain and protected as such by the NPPF. It sits at the foot of the Greensand Ridge in an area designated AAL (Area of Attractive Landscape) status. The status awarded over five decades ago relates to the views of and from the Greensand Ridge and is just one of two AAL held in the Borough of MK. Such existing views are obviously in direct conflict with views that an industrial development like Magna Park would</p>	<p>“North Brickhill Street: Small <u>and</u> Medium Enterprise (SME) <u>office and light industrial units.</u>”</p> <p>Amend sentence to para 2.3.1 to read: <u>“To the north-east of the site are two residential properties at the junction of Brickhill Street and Station Road.”</u></p> <p>As stated in para 3.4.1 of the Framework, “A Landscape Visual Impact assessment (LVIA) should be undertaken to assess the impact of the development on the landscape and to identify appropriate mitigation measures.”</p>

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	<p>present.</p> <p>Moreover, in the MK Core Strategy (adopted July 2013) the land now identified as the so-called 'Caldecotte South' Employment Site was allocated as an extension of the Linear Park.</p>	
3.5	<p>In the presentations made during the public consultation period 17th March – 9th June 2017 it was also claimed:</p> <p>It Has Good Access to the Road Network: The site obviously has very restricted access to the road network. Located 7 miles from M1, Junction 14 and isolated from the Berkley Strategic site, Brickhill Street has an unmanned level crossing that brings Brickhill Street to a standstill several times an hour. With projected rail volumes increasing, such a vast employment area would severely overload the surrounding road network. The possibility of access via a slip road from the A5 would negatively impact traffic flow on the A5. Bow Brickhill Parish Council's understanding is that if route option 'B', for the Oxford to Cambridge Expressway is favoured it would have less frequent access/exit points and the site would be unsuitable for a slip road from it. The choice of option 'B' would drastically reduce the amount of land available from 56.8ha. We are unaware of any traffic feasibility study that would support the site's inclusion within Plan:MK.</p> <p>The proposal notes that Brickhill Street would need to be upgraded to grid road standard. This is impossible because of the physical constraints of the unmanned, unelectrified rail line crossing. A proposal for such a large industrial estate several miles from the M1 would rely on traffic entering from the A5 onto Brickhill Street. The fact that the level crossing gates close every time a train passes between Bletchley and Bedford means that traffic is brought to a standstill tailing back on all the approaching roads (the traffic queue reaches from the A5 to Bow Brickhill Station - past the site's only road access - and from the Station to the junction with Bletcham Way. It also tails back right through the entire length of the village of Bow Brickhill, which is a residential area. The East West Rail proposals for this line will include an initial increase of two trains per hour therefore meaning the level crossing barrier will be closed for approximately 20 minutes per hour with future expectation this will rise to 30 minutes per hour when the trains</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p> <p>See response to rep. no. 2.9.</p>

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	increase further.	
3.6	<p>Potential access to East-West Rail Network: Whilst there is limited potential for access via Bow Brickhill Station, stops are limited and the network is unelectrified. Inclusion of the site has seemingly not taken into consideration the current proposal by Red Bull Racing (based on the business park on the north side of the railway line) to expand their campus almost to Bow Brickhill station, or the harmful effects to the future potential of the East West Rail Link.</p> <p>Referring to the point: "...given the amount of development proposed services from this station it may require significant investment and improvement in the long-term," there is currently no feasible alternative to the at-grade level crossing despite many years of study, proposals and meetings. It appears to be an unsolvable problem. Traffic trying to access the site would, at several times a day, be unable to exit or enter for considerable periods while the queues clear, and given the amount of traffic likely to be generated in addition by the site, it may be that they never entirely clear.</p> <p>It will, therefore, be impossible to develop this site while at the same time limiting or reducing road congestion. It is understood that no traffic modelling was done before proposing this site for industrial development given that the unique traffic problems in this area are well known to Milton Keynes Council, and are worsening. A transport assessment should have been carried out before designating the site.</p>	See response to rep. no. 2.9. Feasibility work undertaken suggests that a bridge could be constructed on the existing line of Brickhill Street, subject to more detailed technical work and planning permission.
3.7	<p>No mention has been made of the more well-known negative aspects of the site:</p> <p>The site lies immediately below the Greensand Ridge, a nationally recognised AAL (Area of Attractive Landscape) and one of just two in the borough.</p> <p>The site had recently appeared as U27 in the Site Allocation Program where prior to being removed it concluded: "The site offered a poor prospect for development". A survey carried out throughout MK on behalf of MKC by Gillespies (landscape architects, environmental and master planners) warns of the harmful effects of developing the site including the loss of view from the Greensand Ridge. Whilst the survey has resulted in the removal of other sites in the plan it appears to be ignored by</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development</p>

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	<p>officers in relation to the current proposals.</p> <p>The initial sustainability appraisal, which contains inaccuracies and a great number of misunderstandings about the specific nature and features of the site itself, notes there is potential on the site to provide new areas of accessible green space and opportunities to connect to the existing cycle network which would encourage walking and cycling .</p> <p>This is not so, the site is bounded on two sides by a rail line and a trunk road, and the “opportunities to connect” access via cycle and walking routes are minimal. There is only one footpath access beneath the railway bridge and at times of flooding the route from that point beneath the A5 at the west of the site, connecting to Fenny Stratford, is impassable.</p> <p>The Sustainability Appraisal notes that “emissions are likely to increase.” This statement is grossly understated as currently, other than those from the two or three cars associated with the existing house and an occasional tractor, there are no emissions from the site. The emissions from the proposed site and in the vicinity of the proposed site, from both commercial vehicles and cars, will be considerable.</p> <p>With the constraints of the site being connected to the existing urban area by only one vehicle and one pedestrian route, its designation will inevitably generate greater emissions than an alternative site with fewer restrictions.</p> <p>Furthermore, noise from the site would be caused by both private cars and commercial vehicles, not only during the day but during the night.</p> <p>Paragraphs 7 and 8 fail completely to address the visibility of the site from the Greensand Ridge escarpment.</p> <p>The Greensand Ridge, which is acknowledged as an area of national importance, rises to the east of the site and is a major heritage asset. Development on this site would compromise views to and from the site to the detriment of the setting of the ridge. No</p>	<p>will be established through Plan:MK and is not a matter for the Development Framework to consider.</p> <p>As stated in para 3.4.1 of the Framework, “A Landscape Visual Impact assessment (LVIA) should be undertaken to assess the impact of the development on the landscape and to identify appropriate mitigation measures.”</p>

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	<p>amount of tree screening could mitigate this given the height of the ridge and the industrial site would be a major eyesore. This is emphasised in the Council's Landscape Character Assessment LCA 4b Wavendon Clay Lowland Farmland, which states: "Ensure that open views across the landscape character area to the Brickhill Greensand Ridge are retained."</p> <p>The Landscape Sensitivity Study by Gillespies at 6.14.4, in considering this site in relation to housing development, says: "Residential development could not be accommodated without affecting key characteristics and/or values in the landscape." - "Maintain views along the valley and up to the Greensand Ridge to the east. Any residential development in this area would block views across to the east and affect the setting of the Area of Attractive Landscape."</p> <p>It is clear that the development would affect the key characteristics of the Greensand Ridge. Bearing in mind this assessment was carried out in regard to housing development, the harm caused to the value of the landscape by this proposal for acres of warehousing and offices up to 25 metres high would be so much greater.</p> <p>Although the very same advice resulted in removal of sites from the North of MK, this appears to have either been forgotten by the planning officers or prior to the employment of those who proposed it when it came to Bow Brickhill.</p> <p>Noise would also have a serious and detrimental effect on the rights of enjoyment of the Brickhill Woods, a major leisure destination for the inhabitants of Milton Keynes and further afield. Development on this site could only serve to increase that effect and compromise the peace and tranquillity afforded by the woods.</p> <p>Again, this places Policy SD16 of Plan: MK at odds with NPPF Policy 123, which states: "Planning policies and decisions should aim to:</p> <ul style="list-style-type: none"> • avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development 	

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		<ul style="list-style-type: none"> • mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions • recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established • identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason” <p>Again, therefore, it is our view that Plan: MK Policy SD16 is unsound.</p>	
3.8		In summary, Brickhill Parish Council holds fast to its conviction that there are so many conflicts with what is possible, the site should never have been designated in Plan:MK and should be removed.	Noted.
4.1	Woburn Sands Town Council	Woburn Sands Town Council objects strongly to the inclusion of this site for commercial/warehouse development in Plan:MK without any prior consultation. We, therefore, do not see the need for a Development Framework at this stage and its production makes the acceptance of the site for Commercial/Warehousing look like a “done deal”.	The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.
4.2		In the existing Local Plan this site was designed as an extension to the linear park south of Caldecotte lakes. It is immediately adjacent to the land rising up to the Greensand ridge, an area of attractive landscape and the views from the ridge will be dominated with this very ugly factory development on this site. This is a rural area and this kind of development is entirely unsuitable.	The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p>Amend para 3.6.7 to read: <u>“The design of individual buildings should aim to reduce their perceived bulk and massing. The choice of materials, use of colour and the orientation of buildings can help to reduce the visual impact of buildings. Key long distance views of the roofs of the proposed buildings will e gained from the Brickhills. Careful consideration should be given to the design of roofs.”</u></p>
4.3		<p>The site is also in the corridor which may become part of the Oxford/Cambridge Expressway and no decisions on this area should be made until that route is determined. The future development of EastWest rail will also impact upon the site.</p>	<p>Proposals for east-west rail do not impact on the site. The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and scheduled monument of Magiovinium.</p>
4.4		<p>The local road network will really struggle to cope with the volume of traffic likely to accompany a commercial/warehouse development: the level crossing over the railway immediately north of the site is already the scene of sizeable traffic queues when the gates are down twice and hour: by 2020 the number of trains is set to double, thus</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>aggravating that problem, and making access to Milton Keynes via the V10 an even less viable proposition. The road through Bow Brickhill leading to Woburn Sands is also unsuitable for heavy traffic particularly through The Leys and Hardwick Road. These are unclassified roads now as is the A5130 and absolutely no HGV's over 7.5tonnes can be allowed. That only leaves the road to the A5 roundabout as a viable access point and this roundabout is rapidly becoming a source of significant traffic at times.</p>	<p>transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
4.5	<p>It is untrue that the number 18 bus is hourly: it is an infrequent service and the hope that people will use this service to access the site a false one.</p>	<p>Accepted. Amend figure 2.6 'Public Transport' and para 2.7 to read:</p> <ul style="list-style-type: none"> • There are <u>two existing bus routes (17 & 18)</u> that run along the southern part of Brickhill Street which currently serves Woburn Sands, Bletchley and CMK. <u>The 18 service runs once per day in each direction, with no service on Sundays. The 17 service passes the site three times per day in each direction.</u> • There are <u>frequent bus routes that</u>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p>serve Caldecotte <u>and that run along along the A5 and A146 (F70). The F70 service currently has no bus stops within close proximity to the site.</u></p> <ul style="list-style-type: none"> • There are existing bus stops on Brickhill Street, and on Station Road. <u>New bus stops are proposed on the A4146 at the entrance to the new Eaton Leys development.”</u>
4.6		We sincerely hope this Development Framework will never need to be implemented, but if it is, much more consideration needs to be given to access.	Noted. The Council's Highways Development Management Team has no objection to the siting of the access.
Other Stakeholders			
5.1	Norman Wright	I have viewed this Consultation on the website and cannot find any reference to the	Noted. Include new text on

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>East-West Rail initiative.</p> <p>In my opinion the rail link is the most important development proposed in our area and any plans for Caldecotte South MUST take this into account and be secondary to it.</p>	<p>East-West Rail to read: <u>“The east-west rail project will re-establish a rail link between Cambridge and Oxford to improve connections between East Anglia and central, southern and western England.</u></p> <p><u>The existing Marston Vale Line from Bletchley to Bedford which runs to the north of the site is part of the western section of the East West Rail route. Phase 2 of the Western Section will upgrade and reconstruct existing and mothballed sections of the line that link Bedford with Bicester, and Milton Keynes with Aylesbury. Public consultation was undertaken in September-October 2015, June-August 2017 and January-February 2018.</u></p> <p><u>Following public consultations, a Transport and Works Act Order</u></p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p><u>(TWAO) was submitted to the Secretary of State for Transport on 27 July 2018. The TWAO does not involve any works that will affect the site.</u></p> <p><u>Depending on funding, construction of the line between Bicester and Bletchley will start at the end of 2019 with trains operating from 2023.”</u></p>
5.2		I am also concerned at more works on the A5 roundabout. It was a very short time ago that major works took place here causing travel disruption and delays. I note that due to the Eaton Leys development further works are planned, surely all these works could have been progressed at the same time thus reducing costs and aggravation?	Timing of works is dependent on when planning permission is granted for the various proposed developments.
6.1	Robin & Margaret Marriott	<p>Both my wife and I would be dismayed to see money spent to develop warehousing on this piece of land. Your heading refers to "Employment and Warehousing", however, with automation and robotics on the increase I can't envisage huge numbers of employment opportunities. We cannot see the benefit of having large articulated vehicles being released onto the A5 when there are bottlenecks at Towcester and Hockcliffe, nor how they might reach J13/J14 of the M1.</p> <p>We would like to see the railway improvements being given the go-ahead as east-west rail links are quite dire currently.</p> <p>Thank you for giving us the opportunity to comment.</p>	The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019.
7.1	Mrs Lesley Greenaway	Further to your letter of 5 th March, I have reviewed the development brief and have the following comments	The transport modelling which the Council has

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<ul style="list-style-type: none"> • The increase in traffic along Brickhill St from the north to access this site and the increase in traffic volume will have a detrimental impact on those whose properties back onto Brickhill St. At the moment most (not all) of the heavy traffic is destined for Tilbrook • Is there a possibility that the site will be open 24hrs a day; thereby compounding the issue above? • Has a slip road off the A5 been considered to give primary access to the site? • Is Brickhill St south of the railway line to be upgraded before site works begin – to facilitate the movement of people and materials to the site 	<p>undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p> <p>It is unlikely that a slip road off the A5 would be allowed. The intention is that the stretch of highway from the A5 to the site access would be upgraded before site works begin.</p>
8.1	Neville Benn, Environment Agency	<p>The only addition we would possibly recommend is adding “contamination assessment” to the bullet point in 4.3.4. The site appears to be the vast majority greenfield, so assessment may not need to be that detailed, a walkover in the first instance may be all that is required, but helpful to any future developer to be made aware.</p> <p>We would be unlikely to have many comments on an EIA at this site as there are minimal environmental constraints on matters within our remit.</p>	Accepted. Add “contamination assessment” to bullet points in para 4.3.4.
9.1	Jenny Turner	<p>The infrastructure of the roads around this area are already at popping point most mornings and afternoons, adding huge warehousing will carry a lot of heavy vehicle traffic which this area just can't handle.</p> <p>On top of this why can't we leave some natural land on the outskirts on the Milton Keynes. We are surrounded by some wonderful villages, I'm sure they as well as us on</p>	The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		caldecotte would hate to be living surrounded by metal tins and a bad congested road network!	<p>the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p> <p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
10.1	Lucy Gilbert	I am emailing in regard to the above consultation with residents of Caldecotte. I myself am a resident of and received the letter notifying of the framework publication this week. Having read the 'South Caldecotte Development Framework' document. I feel that generally this is well thought out development framework for use of the land, and the conservation of the areas wildlife/views/other uses has been considered. However, I do have some concerns whilst reading – namely increase of traffic/cars/HGVs in the area.	Noted.
10.2		As noted in the document, the current state of Brickhill Street is that it is a single carriage way rural road. Obviously upgrading this road to conform to 'grid standards' would require the road to be widened, potentially to a dual carriage way. This would increase	The transport modelling which the Council has undertaken indicates that

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>the capacity for cars and HGVs in the area as a necessity to business. However my concerns are the extent to which this increase in road use would be. I imagine that as this area is designated for development of a mix of Class B2 and B8 employment floor space, there is likely to be a substantial requirement for many more HGVs for distribution, as well as personal transport for employees. The area [Caldecotte] currently already hosts a business park (north of the northerly boundary, but south of the Caldecotte residential area) which is a cause of congestion in traffic flow at peak times. Additionally there is also business units on the other side of Brickhill Street which add to the traffic issues. This congestion occurs primarily along Brickhill street in both directions, but also impacts on Caldecotte Lake Drive, Heybridge Crescent and Monellen Grove which feed into the Caldecotte are. This congestions is only worsened when the road is closed at the level crossing for trains to use the railway line and pass through Bow Brickhill station – something I expect would be a more frequent occurrence if there is increased use of this line as a transportation link. As the A5/Brickhill Street junction is proposed to be a ‘strategic arrival gateway to Milton Keynes’ this would insinuate a marked increase in road usage for the area.</p> <p>Further to the congestion on the main road, other roads in Caldecotte are currently used as a ‘rat race’ to avoid the main road traffic - such as Wadesmill Lane. I am a resident of Wadesmill Lane and often find that people drive at high speed around these roads when leaving/heading to the business park – this is particularly dangerous for animals and children, several cats have been killed in the past few months due to this. I worry that a substantial increase in traffic flow could also lead to further incidents on these side roads.</p>	<p>there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
10.3	<p>Additional to my concerns on congestion, I wonder what the situation with parking will be? The document does not mention that there is a requirement for a the developers proposals to include a minimum number of parking spaces or note that this is a requirement to consider at all. When the aforementioned Caldecotte business park was designed, it was not designed to include sufficient parking for employees. This has led to the streets of the business park to be lined with cars - some parked at dangerous angles or on verges wherever there is space. This has also created an unwanted over-spill of</p>	<p>Accepted. Include sentence at para 3.5.10 to read: <u>“Provision should be made for vehicle and cycle parking in accordance with the Council’s Parking Standards.”</u></p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		cars parking in the residential area streets. I wonder if this design flaw occurred due to an expectation that public transport would be more heavily used (similar to insinuations in this framework), when in reality many people drive to work, possibly due to being located on the outskirts of Milton Keynes. I would furthermore hope that this is a consideration for the development of the land so not to impact on local residents.	Paras 3.5.11-3.5.12 of the Framework require developers to prepare travel plans setting out measures that will reduce the number of car journeys. Replace text of para 3.5.11 with: “<u>Development proposals that generate significant amounts of traffic movements will normally be required to provide a Travel Plan.</u>”
11.1	Natural England	Para 1.4.10 - This would be a good place to also talk about biodiversity net gain in line with Para 109 of the NPPF (para 168d of the new draft NPPF) Also the protection of Priority habitats in line with NPPF para 177 (Para 172b in new Draft NPPF)	Partly accepted. Include reference to priority habitats within section 3.4 (see response to rep. no. 11.7). Amend first sentence of para 3.4.6 to read: “<u>A site-wide ecological enhancement scheme will be required that incorporates, wherever possible, net gains for biodiversity into the development (in accordance with para 170 of the NPPF and Plan:MK Policy NE3).</u>”
11.2		Page 11, policy SD16 - This is insufficient to be in line with the NPPF current and draft	Policy SD16 has been

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		versions. There is no requirement for a biodiversity net gain for the site and there is no mention of the Priority Habitat - Lowland meadows located on the site. Using the site as an extension to the linear park system in line with the current Local Plan is a more appropriate use of this land.	considered by the Inspector at Plan:MK examination. His Report, published in February 2019, has accepted the wording as amended by the Proposed Modifications.
11.3		Page 22, para 2.6 - Support statement: "In the central west of the site is an area of Priority Habitat (Lowland Meadow)."	Noted.
11.4		Figure 2.5 - It would be useful to show the location of the waterway on this figure	Accepted. Include watercourse on fig 2.5.
11.5		Page 32 – habitat and vegetation - please include a description of the waterway, its condition, and associated vegetation	Not accepted. Reference to the watercourse is made in the preceding paragraph.
11.6		Figure 2.10 – include the waterway	The watercourse is included on fig 2.10.
11.7		Para 3.4.5 - Please include a description of the Priority habitat - lowland meadow, MG5 grassland.	Accepted. Include new text in para 2.6 to read: "<u>Recent National Vegetation Classification (NVC) grassland surveys have identified that the grassland type has characteristics of MG5, MG6 and OV23c communities. Overall it is considered that the grassland represents a fairly poor quality example of lowland meadow habitat type.</u>" Include new para before

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p>3.4.5. to read: “<u>Within the site, to the west of Cross Roads Farm, is an area of lowland meadow which has been identified by English Nature as a Priority Habitat. NPPF (para 174) states that “plans should promote the conservation, restoration and enhancement of priority habitats.” Policy NE2 of Plan:MK seeks, wherever possible, to promote their preservation, restoration, expansion and/or re-creation in line with the mitigation hierarchy. Applications should seek to preserve and restore this habitat. If evidence indicates this is not possible, this will be dealt with at planning application stage.</u>”</p>
11.8		<p>Para 3.4.7, Green Link - We would like to see a width similar to that of the linear park to the north of the site. The functionality of an ecological corridor is only as good as its thinnest part. A width significantly thinner than the existing corridor to the north would not provide the same functions as the rest of the corridor thereby causing a bottle neck effect. Keeping the corridor a similar width would also allow the Priority habitat to be</p>	<p>Not accepted. The site is allocated for employment development. Plan:MK policy SD16 does not allow for the provision of a green</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		contained within the corridor. A minimum width is recommended.	link of similar width to the existing linear park to the north of the site.
11.9		Para 3.4.9 - supported	Noted.
11.10		Figure 3.1, spine street - This road appears to impact the Priority Habitat. Please revise the location of the internal road. The current location also restricts the width of the wildlife corridor in the south of the site.	Not accepted. The road only impacts on a corner of the Priority Habitat.
11.11		Para 3.5.6 - Tree planting will need to be carefully assessed near the Priority habitat grassland as inappropriate tree selection could result in trees colonising the grassland habitat. Suggest changing the wording to "Suitable landscaping should be provided on verges on both sides of the street".	Not accepted. Selection of tree species can be determined at detailed planning stage.
11.12		Para 3.6.2, gateway character area - There is an opportunity here to include the area of Priority habitat as a central green lined by offices looking out on to the field. Adding paths and small seating areas for workers around the edge of the field. The 'Gateway' area should be expanded to include all of the Priority habitat area and an area around the field to accommodate offices.	Not accepted. A less prescriptive approach is considered to be more appropriate.
11.13		Para 3.6.5, central character area - Please exclude the priority habitat area from this character area	Not accepted. The approach to the priority habitat area is covered in new para in section 3.4. (see response to rep. no. 11.7).
11.14		Para 3.6.8, second sentence – amend to read “Consequently, offices should be located on elevations that front the key public areas of the development, in particular the Spine Street and areas of green infrastructure.”	Not accepted. It is most important for offices to front the street.
11.15		Para 3.7.3 – reword first sentence of para to read “.., the integration of green infrastructure, water and SuDS options are considered early in the site evaluation and planning process, ...”	Accepted. Amend first sentence of para 3.7.3 to read: “When making planning applications it is essential that, to get the best results, the integration of <u>green</u>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<u>infrastructure</u> , water and SuDS options are considered early in the site evaluation and planning process, not just at the detailed design stage.”
11.16		Para 3.7.3 – amend second sentence to read: “Full consideration of SuDS at the pre-application and outline stage is important to ensuring surface water management is fully integrated into the development, leading to an effective drainage design, providing multiple <u>environmental and ecological</u> benefits and with costs considered from the outset.”	Accepted. Amend second sentence of para 3.7.3 to read: “Full consideration of SuDS at the pre-application and outline stage is important to ensuring surface water management is fully integrated into the development, leading to an effective drainage design, providing multiple <u>environmental and ecological</u> benefits and with costs considered from the outset.”
11.17		Para 3.8.1. - You have missed the opportunities and constraints layer. Please include this layer in the indicative development framework plan.	Not accepted. The opportunities and constraints plan should be read separately from the development framework plan.
11.18		Figure 3.4 - Please redesign this figure to show indicative green infrastructure which includes the Priority Habitat (a hashed area overlain along the A5 and rail line corridors and priority habitat area). At present this layout will result in impacts to the Priority Habitat. It makes no allowance for the conservation of the priority habitat and is therefore	Accepted. Revise fig 3.4 to show green infrastructure.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		not in line with the NPPF.	
11.19		Para 4.2.3 – amend second sentence to replace ‘may’ with ‘should’.	Accepted. Amend para 4.2.3 second sentence to read: “This <u>should</u> include transfer of the open space to the Parks Trust, <u>as the Council’s preference, or into a management company.</u>”
11.20		Support sentence “In anticipation of this arrangement, it is helpful for all landscape to be designed in consultation with the Parks Trust.”	Noted.
12.1	Mark Johnson	<p>As a resident of Caldecotte, I am contacting you to register my objection to this proposed development.</p> <p>It is another development that is proposed, even though Plan MK still has not been approved. It is therefore premature.</p> <p>It will also result in the loss of yet more desperately needed good quality agricultural land and will create environmental problems as it is so close to housing. Traffic problems are already significant in this area, these will be increased by the developments at Eaton Leys. This further proposed development will cause major problems and present significant road safety issues.</p> <p>It may also create problems for the East West Rail project.</p> <p>In short, this proposed development is totally inappropriate and I urge that it be rejected.</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”
13.1	Paul Simpson	<p>I wish to raise my objections to the above proposal. This proposed development, along with several others to the south of Milton Keynes, are entirely inappropriate as the local infrastructure and environment (especially highways and travel) are unsuitable for further development and will place intolerable burdens on the local communities. One of the great attractions on Milton Keynes is the quality of life it offers – this is now at significant risk from over development.</p> <p>Employment is important but has to be in the appropriate location and not to the detriment of the local communities. The designated employment areas close to the M1 J14 have already been identified as appropriate and suitable, this site is not.</p> <p>Over development to the South of Milton Keynes is putting severe pressure on highways and considerably increasing the risk of serious road safety issues in the area. If all the proposed developments go ahead there will be tens of thousands of extra car journeys on roads already at capacity. Whilst developers may claim to mitigate some of the impact of their proposals overall we will suffer ‘death by 1000 cuts’ as the cumulative effect is grossly underestimated.</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
13.2		<p>I understand the proposed route for the Oxford-MK-Cambridge expressway is yet to be finalised and any further development proposals should be delayed until the outcome of the route considerations are known. The risk that the developments will be isolated or even worse, compensation will have to be paid is at best ill advised.</p>	<p>Include new para in section 1 to read: <u>“The likelihood of the expressway passing through the site is considered low as this would affect the consented</u></p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p><u>Eaton Leys residential scheme and the scheduled ancient monument of Magiovinium.</u></p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”</p>
13.3		<p>All development should be considered in the context of Plan;MK which has yet to be considered by the planning inspector following public consultation. Do not allow premature applications to undermine or circumvent the democratic process.</p> <p>I trust you will give my objections adequate consideration.</p>	The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.
14.1	Damian Low	<p>The proposal for the Development of Caldecotte South for Employment and Warehousing is rejected in its entirety for the following reasons:</p> <p>There are scores of empty or derelict warehouses already in existence within the entire Milton Keynes boundary, without the need to develop any new areas for the very same purpose. The writer will draw up a list of 50-100 such locations and submit by the 27/04/18 deadline.</p>	The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.
14.2		The development will be located on an area of Ancient Monument interest. There is a Roman road running north-south through the site, and therefore should be considered heritage listed. The writer will be contacting the Museum of London Archaeology to ensure all areas of interest are thoroughly examined before any project commencement. As you are aware, the Ancient Monument of Magiovinium is only across the road from the site. Archaeological excavations in advance of the construction of the A5(T) in 1977-78 revealed a roughly N-S aligned Roman road, perpendicular to Watling Street and associated regular ditched plot boundaries as well as evidence for metalworking/industrial activity and several groups of early Roman cremations. It is highly likely that this activity continues along the predicted line of the Roman road into the proposed development site. The site has sat undisturbed for over 2000 years and now MKDC is considering development for commercial purposes. A full-time watching brief by MOLA archaeological inspections would have to be stipulated as a minimum in any planning consent. The developer would have to be made fully aware that such a watching brief by MOLA carries a risk of delaying the construction project by 12-24 months as occurred with the Guildhall Redevelopment for the Corporation of London in 1995. It is my considered opinion as a Chartered Civil Engineer that the ancient Roman site of Magiovinium is actually 2-3 times larger on plan than currently recorded, with the majority of research work yet to be undertaken within the site of the planned development. Quite clearly it would be a mistake to assume an entire settlement would only exist on one side of Watling Street i.e. to the south.	Accepted. See response to rep. no. 1.1.
14.3		There will significant loss of wildlife habitat and watercourses through the development. These local ecosystems are of more value to the local community than any commercial interest.	Development will be required to retain existing habitat where possible and failing this to provide replacement habitats.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
14.4		This is prime green belt land which needs to be maintained on the very perimeter of the Milton Keynes landscape. This is the first view of visitors heading north on the major A5 artery. Loss of green belt land in this specific location would be highly detrimental to the image of MK as a green city. There are numerous other brown sites within the MK boundary which need to be regenerated, restored and upgraded prior to selection of this site.	<p>Site is not green belt land.</p> <p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
15.1	Ann Sidgwick	I wish to comment on the proposal for the Development of Caldecotte South for Employment and Warehousing as I believe that this is somewhat premature given the fact that the Plan:MK to which this relates, has still some way to go before the overall plan is approved together with any final amendments.	<p>Development Framework will not be adopted until Plan:MK is adopted.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			circumstances.”
15.2		I would also comment that the uses proposed are inappropriate, present severe additional highways and road safety issues and create considerable environmental issues so close to housing which is already suffering poor air quality due to traffic volumes.	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
15.3		This could also compromise the East West Rail plans for the Oxford-MK-Cambridge Expressway which has yet to be agreed.	<p>Proposals for east-west rail do not impact on the site. The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and scheduled monument of Magiovinium.</p>
15.4		Further that employment development of employment land close to Junction 14 of the M1 makes more sense than these sites.	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p>confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p> <p>Land at J14 has also been allocated for employment development.</p>
16.1	Daniel Cooper	<p>I write regarding the above to confirm that as a local resident (living in Bow Brickhill) I consider that the above is an inappropriate use of the site and would present severe additional highways and road safety issues. Currently the traffic volume alongside this land is such that leads to very long tailbacks in both directions, to add in further warehousing etc would only exacerbate the problem.</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
16.2		<p>There are better areas already identified for warehousing close to Junction 14 of the M1 which already has the necessary infrastructure to meet the demands that this would bring, surely it makes more sense for this land to be used.</p> <p>I would therefore oppose the use of this land for this purpose.</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019.</p> <p>The Local Plan Inspector has</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			<p>confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider. Land at J14 has also been allocated for employment development.</p>
17.1	Chris Baker	It seems that these plans are premature given the East West Rail and Oxford to Cambridge Expressway issues have not, as yet, been settled.	<p>Proposals for east-west rail do not impact on the site. The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and the scheduled ancient monument of Magiovinium.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			unlikely to justify a refusal of planning permission other than in limited circumstances.”
17.2		<p>There is considerable concern about further industrial development in this area which has already been badly affected. The lack of parking for the people working in Copperhouse Court and Caldecotte Lake Business Park has led to significant impact on residents and damage to property.</p> <p>To add further employment without the provision of a remedy to current problems would exacerbate the issue.</p>	The proposed development will be required to meet Council parking standards, so it shouldn't exacerbate the existing situation.
18.1	Richard Alder	I am against the use as warehouse/logistics/commercial use as I find that to be inappropriate, present severe additional highways and road safety issues, create considerable environmental issues being so close to housing.	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
19.1	Maureen Martin	<p>I just wish to express my opinion on the MK proposal for development of the South Caldecotte site for commercial use.</p> <p>My strong feeling is that it would be preferable to await the outcome of the East-west railway plans and there are plenty of other sites which could be utilised for commercial/warehousing space if it is needed.</p>	<p>East-west rail plans have been published and this development would not conflict with those plans.</p> <p>It is not reasonable to delay</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		A railway link for south Milton Keynes to Oxford and Cambridge is a real priority for me and development of this site may compromise future plans.	development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”
20.1	Jo Littlefair	<p>I am a resident of Little Brickhill and my family and I own a property on Watling Street. We enjoy the strong sense of community of our village which we feel is a friendly, helpful, caring and semi-rural environment within which to raise our children. That said, we also enjoy the thriving city of Milton Keynes and understand it needs to grow in line with government requirements, our concern is that this is done in the most suitable way possible.</p> <p>We are deeply concerned about the impacts to the local character of the area of three sites that are currently being considered by the council.</p> <p>The first is Levante Gate which we have already commented on. The addition of 500 houses is going to have significant effects on the local environment, significantly increasing traffic and the rat run effect that Watling Street currently suffers from already at peak traffic times. The services for an additional 500 properties are not in place and will significantly affect the current offering. This area is outside of those identified by the MK plan for development and are being proposed prior to any firm decision on the A4146 which may become an even more significant artery. How can housing be considered next to what may become such a noisy and busy motorway? It seems nonsensical when there are other sites that would be better developed.</p> <p>The second and third plots that are proposed for development are those of the South</p>	<p>Planning permission for the Levante Gate development was refused in September 2018.</p> <p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider. Warehousing is also being</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Caldecotte and the 1.9 ha of land at the junction of Brickhill Street and Caldecotte Lake for commercial use. These uses in these locations feels entirely inappropriate. Warehousing does not appear in these locations currently and surely this would be better allocated to land closest to junction 14 of the M1, thus consolidating and easing the traffic of HGV's and not further clogging the road networks throughout the city? It increases the risk of road safety issues and also creates environmental pollution close to housing, which is a significant concern also for Levante Gate, as noted above.	proposed at junction 14 of the M1.
20.2		The East West rail plans have yet to be determined and development of these sites would compromise the development of this important connecting route between Oxford, Cambridge and our city.	East-west rail plans have been published and this development would not conflict with those plans.
20.3		Generally we are concerned that Milton Keynes should retain an air of pride about its planning and ensure that in the future, society doesn't look back on decisions made now and feel they were arbitrary rather than founded on rational thought processes.	Noted.
21.1	Phil Bowsher, Parks Trust	Paragraph 3.4.1 The terminology to the provision of 'landscaped belts' in the bullet points is too simplistic. The structure of landscaping and the positioning of green links and corridors that can provide connected habitat for wildlife should be required to be more sensitively considered and designed rather than simply creating belts along the edges of the site.	Amend para 3.4.1 to refer to landscape buffers rather than belts. Landscape buffers are required along the edge of the site to mitigate the visual impact of the development.
21.2		Paragraph 3.4.2 The text here where it refers to the likely removal of existing trees and hedges within the site are too dismissive of the landscape and ecological value of these features. For example, the tree group in the middle-north section of the site is a group of mature native-species trees (they appear to be oak), which have value as an ecological resource. This is a large site and the layout should be able to accommodate these features to retain them as part of an ecological network within the site. For example, the group of trees could be linked with the railway embankment to provide a linked ecological resource for wildlife.	Accepted. Amend para 3.4.2 to read: "The large footprint nature of the development will result in large development parcels and will require a certain amount of cut and fill. <u>However, where possible existing trees and hedgerows should be</u>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
		<p><u>retained in line with Plan:MK. Where the loss of hedgerows or trees is unavoidable and can be justified, compensatory planting should be provided elsewhere within the site in line with the mitigation hierarchy.</u></p>
21.3	<p>Paragraph 3.4.7 We are supportive of the principle of establishing a green link within the development. However, establishing this near the edge of the busy and noise-generating A5, as is proposed in this paragraph, may not be the most satisfactory location for this link to serve “as a recreational and ecological resource”. The experience of recreational users of this link would be affected if the route was placed close to the edge of the A5. Furthermore, we feel the wording of this section would be improved by more closely followed the wording of policy SD16 of the Submission Version of Plan:MK by including reference to the linkage with Caldecotte Lake to the north.</p> <p>We note that this paragraph includes a bullet point about provision being made for ecological enhancement. It would be better if this section was strengthened by referring to the area of Lowland Meadow Priority Habitat, which is identified in preceding sections of the document, setting out the requirement that this area be incorporated within the green link and that appropriate management be applied to conserve that area of habitat.</p>	<p>Accepted. <u>Include new para before 3.4.5 to read: “Within the site, to the west of Cross Roads Farm, is an area of lowland meadow which has been identified by English Nature as a Priority Habitat. NPPF (para 174) states that “plans should promote the conservation, restoration and enhancement of priority habitats.” Policy NE2 of Plan:MK seeks, wherever possible, to promote their preservation, restoration, expansion and/or re-creation in line with the mitigation hierarchy. Applications should seek to preserve and restore</u></p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
		<p><u>this habitat. If evidence indicates this is not possible, this will be dealt with at planning applications stage.</u></p> <p><u>Include new sentence in para 3.4.7 to read: “The green open space link should connect Caldecotte Lake in the north to areas of existing and proposed open space to the south.”</u></p>
21.4	<p>Paragraph 3.4.8 We are supportive of a path link to Caldecotte Lake via the railway underpass. However, this proposal should be strengthened by prescribing that this link will require some off-site upgrade of paths to ensure the links with the existing pathway network to the north of the railway line are well made and are fit for purpose as part of this development. These connections are absent on Figure 3.1 Movement Framework.</p> <p>A further strategic green access need is the upgrade of the pathway along the east side of the River Ouzel to the south of the railway line which then links through to Watling Street nearby to the Dobbies Garden Centre. This route is partially shown by a black dotted line (Public Right of Way) on Figure 2.10</p> <p>It is also foreseeable that the paths around Caldecotte Lake line that would link this site via the railway underpass to the redway alongside Monellan Grove to the east of the Lake and to the redway along the south side of Bletcham Way to the west side of the lake will be of strategic importance to this site as it becomes developed, providing pedestrian/cycle routes to the site development from the urban area to the north.</p>	<p>Para 3.5.2 of the Draft Development Framework refers to the requirement for applicants to submit a Transport Assessment (TA). The TA will identify what off-site improvements will be required to pedestrian/cycle routes.</p> <p>Amend fig. 2.7 to show existing permissive paths to north of railway line. Include new text in para 3.5.8 to read: “Pedestrian/cycle links will be provided from the</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		However, this is not recognised in the document, which is a shortcoming. The upgrading of these off-site paths should be considered as a requirement to support this development, such upgraded to be funded by the development.	development into the wider redway network. <u>The redway network within the site should be designed to enable future connections to be made to the SEMK Strategic Urban Extension. There is an existing public footpath that provides access to the site via an underpass from Caldecotte. Improvements should be made to this footpath, including off-site improvements to connect it to permissive paths around Caldecotte Lake.</u>
21.5		Paragraph 3.4.9 We are supportive of the proposal to transfer the completed green link to the Parks Trust, together with the necessary endowment to cover future maintenance costs. This should be via a 999-year lease with the freehold being passed to Milton Keynes Council, subject to the lease. This would replicate the structure for the management of the linear park network in Milton Keynes, including the parkland around Caldecotte Lake to the north of this site. We would not be supportive of the green link being passed to a private management company, which we feel would be an inferior arrangement that would not ensure future management of the green link for the benefit of the public. The Trust's charitable objects require it to manage parkland and green spaces only for that purpose and to provide the added value of recreational and educational services in relation to the green space. The level of endowment sum passed to the Trust to cover future maintenance costs would open to scrutiny to ensure it represented fair value.	Noted. See response to rep.no. 11.19.
21.6		Paragraph 3.5.1	Noted.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Refer to our comments about the path links to the north within our response to Paragraph 3.4.9 above.	
21.7		<p>Paragraph 3.5.5</p> <p>If Brickhill Street south of the railway line is to be upgraded to 'grid road standard', this must include provision for the structural landscape corridor along the grid road. It should be specified in the Development Framework that the road corridor will be established under the same tenure and management arrangements as the grid roads within the older established area of the Milton Keynes. For these, the full width of the road corridor is held freehold by Milton Keynes Council and leased to the Parks Trust under Transportation Corridor leases. These leases provide the Council as landlord with retained rights to use any land within the corridor for highway purposes whilst enabling and requiring the Parks Trust to manage the wider 'non-highway' structural landscape along the corridor. The future management costs of the grid road structural landscape by the Parks Trust would be provided ideally through provision of an endowment, as per the mechanism that was used when the original landscaped grid road network in Milton Keynes was established.</p>	<p>Include new para after 3.5.5 to read: "<u>Building to grid road standard will require the provision of a redway, and a landscaped grid road reserve within the site.</u>"</p>
22.1	Sue Willis, Mary Preen and Beverley Thompson	<p>The existing traffic problems in the vicinity of Bow Brickhill Station and often stretching right through this village, will only be exacerbated by developing the industrial site.</p> <p>We already have the addition of the traffic from Tilbrook Pastures, which will not be able to get in or out onto Station Road during rush hours. Residents of Caldecotte C will not be able to leave the site in either direction, for a significant time in the morning too, just as is the case for Bow Brickhill residents now. When the gates close, no traffic is able to move on Station Road at the mini-roundabout – other than those vehicles who risk driving on the wrong side of the road. It all comes to a standstill right through the village.</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
2.2		Network Rail wants to close crossings because they are dangerous. It may well be that Bow Brickhill level crossing is closed and a bridge replaces it, or that it is closed altogether. No-one knows at the moment.	See response to rep. no. 2.9.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined>)
22.3		The views of South Caldecotte from the Greensand Ridge are extremely attractive, marred only by the horrible Tesco warehouse. What you are proposing at South Caldecotte will be a blot on the landscape when seen from Bow Brickhill hill. No amount of design will mask the fact that the development masks views to and from the Greensand Ridge.	The developer will be required to undertake a Landscape Visual Impact Assessment (LVIA) to assess the impact of the development and to identify appropriate mitigation measures.
22.4		The proposed Expressway runs right through our parish and potentially both these sites but the final route will not be decided for another seven years.	The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and scheduled monument of Magiovinium.
22.5		<p>The Plan MK Inspector when they see the evidence and how cut off South Caldecotte is from the rest of Milton Keynes may well realise that the site's allocation is a big mistake.</p> <p>Whatever happens, the chances are that designs for both these sites will have to be changed, so we suggest that you wait until the future is much more clear before wasting time on documents which may become completely out-of-date.</p>	<p>If Plan:MK confirms the allocation, development can then proceed.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that "arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances."</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
23.1	Woburn Sands and District Society	<p>The Woburn Sands and District Society is a conservation and amenity society covering Woburn Sands and the neighbouring villages including Aspley Guise, Aspley Heath, Wavendon and Bow Brickhill. The Society was founded in 1965 and is a registered charity.</p> <p>The proposal to develop South Caldecotte for employment was not included in the early public discussions on <i>Plan:MK</i> that occurred in 2014-2016. It first appeared in the draft <i>Plan:MK</i> that was circulated for consultation in March 2017, but that document did not include any data to support that particular site or to reject others. The proposal was also in the proposed submission version of <i>Plan:MK</i> that was circulated in October 2017, but Milton Keynes Council stated that that document would not be modified in any way and would be sent to the Planning Inspectorate as it was, along with any comments on it.</p> <p>This means that the consultation draft of the <i>South Caldecotte Development Framework</i> is the first available document that begins to suggest the basis of why the site was proposed for development for employment by Milton Keynes Council. Under these circumstances it is very disappointing that the individuals and groups who had commented on the Caldecotte proposal in the draft and/or submission versions of <i>Plan:MK</i> were not alerted to the existence of this <i>Development Framework</i> by the Council and comments invited from them. Fortunately the Society was alerted by a vigilant local resident, but doubtless many individuals and groups who commented on the versions of <i>Plan:MK</i> are blissfully unaware of the existence of the <i>Development Framework</i>.</p>	Noted.
23.2		<p>The <i>Development Framework</i> appears to have been written in regrettable ignorance or denial of developments that are planned close to Caldecotte and in the surrounding area; as a result, there are serious omissions and inaccuracies in the <i>Framework</i>. These seriously undermine the proposal to develop the South Caldecotte site.</p> <p>Cambridge - Milton Keynes - Oxford Expressway The proposed Cambridge - Milton Keynes - Oxford Expressway is not mentioned in the <i>Development Framework</i>.</p>	<p>Accepted in part. Include paragraphs in section 1 on the Oxford to Cambridge Arc and text and plan relating to the Expressway.</p> <p>The likelihood of the expressway passing through</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>The three current potential corridors for the Expressway all run through or close to the South Caldecotte site. Since the Expressway will be built to motorway standards, it will consume a significant area of land and will have a profound effect on the volume and flow of the traffic in the immediate and surrounding area wherever it is built. It is therefore surely a waste of everybody's time to try and produce any development framework for the Caldecotte site until the route of the Expressway is decided. The National Infrastructure Commission stated on March 23rd 2018 that it would announce its preferred corridor for the Expressway this summer, and that its preferred route within that corridor would be announced in 2020. A commitment to construct could be given by 2025. Therefore any discussion of any development of the Caldecotte site is premature, and will be so for several years.</p>	<p>the site is considered low as this would affect the consented Eaton Leys residential scheme and scheduled monument of Magiovinium.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that "arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances."</p>
23.3		<p>East West Rail East West Rail is not mentioned in the <i>Development Framework</i>. The development of the railway line between Oxford (Bicester) and Bletchley is currently scheduled for completion in 2023 and the upgrade of the line between Bletchley and Bedford by 2024. Public consultation on the plans has occurred, and there is likely to be a Public Inquiry on them in 2019. Construction work should start in late 2019 or early 2020.</p> <p>Currently there is one passenger train per hour each way between Bedford and Bletchley on weekdays and Saturdays, and then the level crossing gates at Bow Brickhill are closed for a total of 8 to 9 minutes per hour, more if a freight train also uses the line. As a result, there are long queues of traffic on Brickhill Street on both sides of the level crossing when the gates are closed, and also along Station Road into Bow Brickhill,</p>	<p>Accepted in part. Include new text on east-west rail in Section 1 (see response to rep. no. 2.9).</p> <p>East-west rail plans have now been published and this development would not conflict with those plans.</p> <p>It is not reasonable to delay development of a site which is allocated in the</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>particularly during the morning and afternoon/evening rush hours. The number of passenger trains on the railway line is due to double in 2024 when the upgrade is complete. So then the gates will be closed for nearly twenty minutes per hour, and for longer if there is/are freight train(s). Obviously this will severely exacerbate the traffic problems on the adjacent roads.</p> <p>It is not possible to model the effect of the increased closure of the level crossing gates accurately and hence to produce a robust Transport Assessment for the South Caldecotte site, as required under Policy SD16 of the submission version of <i>Plan:MK</i>, until (i) the schedule of the trains that will be running in 2024 is known – hence the pattern (i.e. the frequency and duration) of the closure of the gates – and also (ii) the volume and pattern of the road traffic that there will be in the area then, which will depend on developments both within Milton Keynes (e.g. the route of the Expressway; and the housing developments at Eaton Leys, Newton Leys and possibly Levante Gate) and in the surrounding area (e.g. Aylesbury Vale).</p> <p>It has been suggested that a bridge should be built over the railway line at the Bow Brickhill crossing to reduce the traffic problems there. However, at a meeting on 16th March 2018, a spokesman for Network Rail stated that the current plans for the upgrading of the railway line do not include any such bridge. Quite possibly the issue will be raised at the Public Inquiry concerning the plans for East West Rail that is expected to be held in 2019.</p> <p>Therefore again any discussion of any development of the Caldecotte site is premature, and will be for some time.</p>	<p>Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”</p>
23.4		<p>The Site Allocation Plan Milton Keynes Council has already considered much of the South Caldecotte site for housing under its Site Allocation Plan (as site U22, Land West of Brickhill Street). At stage 2 of the site assessment (Emerging Preferred Options Consultation, October 2015) it was judged:</p> <ul style="list-style-type: none"> • Amber in terms of Access – noting that access achievable although 	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of</p>

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	<p>development is likely to have a strategic impact on the level crossing at its north western tip and also on the village of Bow Brickhill;</p> <ul style="list-style-type: none"> • Red in terms of the site being a logical extension to a settlement – noting that development would represent a noticeable intrusion into open countryside and present coalescence issues between Bow Brickhill and the urban area of Milton Keynes; • Amber in terms of Landscape Character – noting that the landscape character of the area is rural urban fringe. However, there is a large Area of Attractive Landscape (the Greensand Ridge) close to the site that would potentially be impacted by development. <p>So the site was ruled out for housing. The logic of this decision appears not to have been questioned by the Planning Inspectorate when the Inspector examined the Site Allocation Plan in summer 2017. A consultation on the main modifications to the Plan finished earlier this month and hopefully the Plan will be approved this summer.</p> <p>The three critical assessments above are also valid for the South Caldecotte being considered for employment use. The site has not been formally considered or assessed for employment but Milton Keynes Council did commission a report, the <i>Employment Land Review and Economic Growth Study, Phase 2 Delivery Strategy Final Report</i> by Bilfinger/ GVA which appeared in November 2015 (and was updated in June 2017). South Caldecotte did not appear on the list of existing, proposed or potential sites. Moreover it does not fit with the report's conclusions and recommendation, particularly in respect of employment sites with large footprints, including logistics. The demand is for access to the M1 corridor, not the A5; and the logistics in particular are noted to be 'footloose' i.e. they go wherever they can find a suitable location on the motorway networks.</p>	<p>the site in his Report, published in February 2019.</p> <p>.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
23.5	<p>In summary, there are many uncertainties concerning developments in the south eastern corner of Milton Keynes over the next five to ten years, and particularly so around the South Caldecotte site. It is therefore premature to begin to try and produce any realistic</p>	<p>Noted. The site is allocated in Plan:MK and under policy SD16 there is a requirement to prepare a development</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		development framework for that site. The Society trusts that Milton Keynes Council will find these comments helpful.	framework.
24.1	Tony Brett	<p>1. I believe that this development is totally inappropriate for this area of open countryside currently used for farming. This development which is outside the original new city boundary, i.e. the railway line would effectively join the other proposed development the other side of the A5 roundabout and create on big urban area which would also adjoin Fenny Stratford And Bletchley, ruining the rural feel of the area and using land that is used to grow crops and feed us all.</p> <p>2. This development would almost join up with Bow Brickhill village which already has plans approved for additional housing at that end of the village and would spoil the rural feel of the village and the views from the Bow Brickhill Woods.</p> <p>3. This development takes no account of the East West Rail plans or the Oxford to Cambridge Expressway. The level crossing at Bow Brickhill already causes traffic disruption and long queues at peak times and this would be considerably worse if this development went ahead with many more HGVs using it. There is already consideration of a bridge to alleviate this when the railway line is upgraded, but this development would deprive the space to build one.</p> <p>4. There would be a significant increase in traffic through Bow Brickhill, particularly at peak times, adding to the already high volume of traffic and increasing pollution.</p> <p>5. The roads around the area are not suitable for heavy HGVs and present road safety issues.</p> <p>6. It would be much better to site development like this close to the M1 motorway at Junction 14 or the A421/M1 Junction 13 to avoid large vehicles using local roads.</p> <p>In all we believe this to be a badly thought out plan, and one that is not really needed as just over the border in Bedfordshire there are approved plans for exactly this type of development which are close to major roads.</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
25.1	Network Rail	<p>Bow Brickhill Railway Station Consideration should be given in Transport Assessments to the potential for increased footfall at Bow Brickhill Railway Station as a result of proposals of increased footfall from</p>	Noted.

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	users of the employment site. Location of the proposals, accessibility and density of the developments, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall (and the need for car parking) at Bow Brickhill Railway Station, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.	
25.2	<p>Underpass The development brief refers to an existing public footpath link which leads to an existing underpass beneath the railway. Improvements to the underpass and lineside fencing to prevent trespass should be fully funded by the developer(s).</p>	Noted.
25.3	<p>Asset Protection Measures:</p> <ul style="list-style-type: none"> • The site is relatively flat. The proposed developments must not allow any surface water to flow towards the existing operational railway. • No soakaways are to be located within 30m of the Network Rail boundary. Surface water and foul water within 30m of the railway boundary to be removed from site via closed sealed pipe systems. All surface water to be directed away from the direction of the railway. • An exclusion zone in the order of 3m must be left between the Network Rail boundary fence and any structure (including fencing) to enable both parties to maintain their assets. • The “Strengthening Landscaping Belt” proposed by the development along the Network Rail boundary must be reviewed and agreed by Network Rail. • Excavation, earthworks, piling works, scaffolding, crane and plant working to be agreed with Network Rail. • Prior to the submission of any planning applications for development schemes, outside parties should contact Network Rail Asset Protection to discuss layout and construction works. The works on site and as a permanent arrangement must not impact the safe operation and integrity of the railway. • Risk Assessment and Method Statements to be agreed with Network Rail. • Costs – Network Rail Asset Protection work on a cost recoverable basis and subject to the Client (CDM 2015) entering into a Basic Asset Protection Agreement (BAPA) with Network Rail. A cost estimate and BAPA will be drafted once we have a better 	Noted. These are detailed comments which should be considered at detailed planning application stage.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		understanding of the level of involvement required. Email: AssetProtectionLNWSouth@networkrail.co.uk	
26.1	Christine French	<p>My main concern is that the road infrastructure will not cope. Traffic build up along the piece of road in rush hour is already significant. The level crossing and the roundabout close to it at the bottom of Station Road are bottle necks and no mention is made in the document about overcoming this. At one time a bridge across the railway line was mooted but I understand that the piece of land earmarked for this is now earmarked for building..... A bridge is the only solution to traffic congestion.</p> <p>It seems logical that lorries going north will cross the level crossing to travel through MK and access junction 14. Those travelling south may well use the A5 and use junction 11a though in busy times they will encounter Hockcliffe, a major bottleneck in rush hour.</p> <p>You make a great deal of the bus routes, cycle routes, train etc. but the reality is probably that most employees will travel by car. Some of those coming by car may well be coming through Bow Brickhill thus adding to the traffic through the village adding road safety issues for residents.</p> <p>Even if the Bow Brickhill Road is upgraded to grid standard it is my belief that the road nor the A5 roundabout will cope. The A5 roundabout is already extremely busy in rush hour. It is also dangerous as many drivers do not understand which lane they should be in. The result is that many vehicles have near misses. This will only increase.</p> <p>Please explain how you expect the roads to cope with the amount of traffic and how you will avoid gridlock when the level crossing is down. Also how the residents will manage to exit Station Road in the rush hour when the traffic already queues through the village.</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p> <p>See response to rep. no. 2.9. Feasibility work undertaken suggests that a bridge could be constructed on the existing line of Brickhill Street, subject to more detailed technical work and planning permission.</p>
26.2		<p>This plan is premature given that Plan MK has still some way to go before it is approved overall. I understand that this development relates to the Plan. It should also be deferred until the east west rail and road plans are complete.</p>	<p>The SPD will not be adopted until Plan:MK is adopted.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
			of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”
26.3		It is wholly inappropriate for placing in Caldecotte South and would be more appropriate close to junction 14 with easy access to the Motorway.	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
26.4		I would add finally that there are considerable environmental issues so close to homes and the lovely areas around Bow Brickhill	Noted.
27.1	Sue Malleson	<p>The Development Framework for this site conflicts with many policies contained in Plan:MK particularly SD1(2), SD1(13), SD1(15). The site’s designation for development fails to accord with National Planning Policy Framework (NPPF) main principles; the proposal, in traffic generation terms and movement connectivity, is already unsustainable.</p> <p>The document fails to take into consideration that a proportion of this site (and Caldecotte C) may be required for the Oxford-Cambridge Expressway, and/or for</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report,</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>Brickhill Street to be carried on a bridge over the railway as part of the East/West rail upgrade.</p> <p>The latest information (27 March 2018) from the National Infrastructure Commission shows the site within all three of the Expressway corridors under consideration. The corridor route decision, due in July/August this year, will have no effect on the uncertainty surrounding this site.</p> <p>The final commitment to construct the Expressway on a specific agreed route is not scheduled until 2025. So in considering a Development Framework for this site now, the words “jumping the gun” come to mind.</p> <p>The Multi-Modal Model – impacts of Plan:MK – November 2017, which has informed the site allocation, bears no relation to the current reality of congestion on the local road network. See Appendix A – Witness to traffic congestion.</p> <p>The NPPF acknowledges that the cumulative effect of traffic is a valid reason for refusing planning permission. It would be bizarre if Milton Keynes Council, having nominated this site for development, were to have to refuse planning permissions due to the cumulative effect of traffic.</p> <p>This Development Framework is therefore inappropriate and premature however we are where we are. I am therefore offering comments upon the contents of the document.</p>	<p>published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
27.2		<p>Para 1.3: I dispute that the Development Framework accords with the NPPF for reasons of movement constraints which will be explained later.</p> <p>The Core Strategy Local Plan designated the site as Linear Park (detailed in the document at 1.4.5 – so the Development Framework cannot claim it “<i>accords with . the Core Strategy</i>”.</p>	<p>Accepted. Amend para 1.3.1 third sentence to read: “The Development Framework accords with the National Planning Policy Framework and <u>Plan:MK.</u>”</p>
27.3		<p>Para 1.3.3 - The growth of Milton Keynes to 500,000 people is not fact and it is not even an existing plan. It is mentioned in The National Infrastructure Commission’s (NIC) paper published on 17 November 2017 entitled “<i>Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc</i>” thus: “if East West Rail and the Expressway were to be developed along the same broad</p>	<p>Delete para 1.1.3. and include new section on Oxford to Cambridge Arc.</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>corridor then, analysis of land constraints suggest that key opportunities for growth over the next 30 years could include: the re-establishment of Milton Keynes as a development location of national significance, through the intensification and expansion of the town to a population of at least 500,000, in line with local aspirations. This presents an immediate opportunity for growth”</p> <p>Note the words “<i>could include</i>”. It is not a fact; Milton Keynes Council has not consulted upon it or agreed it; therefore it is not policy and it is not “<i>in line with local aspirations</i>”. (Note: An error of this enormity in the NIC report is not unusual; all three facts about the Marston Vale railway line in the same report are wrong!)</p> <p>The figure of 500,000 therefore has no place in the Development Framework.</p>	
27.4	SD16 page 9 and again at 3.4 page 36. Paragraphs 4 and 5 have been merged so this makes no sense.	Accepted. Amend text of SD16 on page 9 and at para 3.4 on page 36.
27.5	<p>Page 16, para 2.3.4 - This statement is misleading and inaccurate as can be seen from the view from the A5 below. The visibility of the buildings on the site will be significant. The speed or otherwise of those travelling the road is irrelevant - not all will be drivers. Buildings on the site will be obvious, clearly visible and will obstruct views across the landscape from the A5 to the areas beyond.</p> <p>The paragraph should also state: “The A5 Trunk Road provides a movement barrier” as does the previous paragraph on about the railway line. The two are very similar in that they both present impenetrable barriers disconnecting the site with the rest of Milton Keynes.</p>	Accepted. Para 2.3.4 third bullet point: “The A5 Trunk Road, which forms the western boundary of the site, <u>represents a movement barrier</u>. There is existing planting along this edge of the site, <u>but there will still be visibility of the site from the public realm</u>.”
27.6	Page 24 - The words: “except on Sundays” should be added to this paragraph; there are currently no normally scheduled trains on a Sunday.	Accepted. Amend first bullet point in para 2.7 to read: “The area is served by <u>Bow Brickhill Railway Station, except on</u>

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		<u>Sundays, on the current Bedford to Bletchley line which is also the route for East-west rail.</u>
27.7	Page 24 - Bus route (18) does not operate on a Sunday, neither do the Caldecotte services. Bus Routes F70 and 150 are irrelevant as there are no stops on the A5 Trunk Road or anywhere in the vicinity.	Accepted. See response to rep. no. 34.4
27.8	Page 26 - This paragraph is somewhat misleading. While the public right of way does pass briefly through the area known as Caldecotte it turns immediately left and leads to Belvedere at Fenny Stratford. It is possible to gain access to the Caldecotte area using the public right of way under the railway and then the permissive path to the south of Caldecotte Lake. This path is over land maintained by the Parks Trust which they provide for use by pedestrians and cyclists. The route is, however, not a public right of way.	Accepted. Amend fourth bullet point para 2.7 'Existing Road Hierarchy, Pedestrian and Cycle Routes' to read: "A public footpath runs along the northern edge of the site <u>and passes under the railway line via an underpass. It provides pedestrian and cycle access to Caldecotte, via a permissive path and to Fenny Stratford, via a public right of way. There are other permissive paths that link the site to the redway along Bletcham Way.</u>"
27.9	Page 32 - This sentence is inadequate; views over the site from Bow Brickhill's footpaths and bridleways will be dominated by the buildings on the site. These are views accessed from an Area of Attractive Landscape, designated and now promoted as Greensand Country, which is highly valued by residents and visitors for its magnificent views over the surrounding countryside. Insofar as the Development Framework might try to	Accepted. Amend first bullet point of Topography, Views and Drainage section of para 2.10 to read: "The main <u>local</u> views

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		mitigate the effect of these impaired views, unless it is honest in its representation of the facts, it cannot do that.	into the site are from Brickhill Street, the A5 roundabout and the northern section of the A5. There are direct views into the site from Station Road. <u>There are also views into and from within the site from local public rights of way.</u>
27.10		Page 32 - This statement is inaccurate. There are a number of significant and attractive mature trees on the site.	Accepted. Amend first bullet point para 2.10 'Habitat and Vegetation' and para 2.6 first bullet point to read: "The main existing site features are <u>hedges, a small copse and individual mature trees.</u>"
27.11		Page 32 Public Transport - As detailed previously, public transport does not function on Sundays.	See response above.
27.12		Page 32 Public Transport - As stated previously, the connection to the Caldecotte urban area is via a <u>permissive path</u> which is not a public right of way.	See response above.
27.13		Para 3.4.2. - This paragraph contradicts the management guidelines for the landscape character area as described in the Milton Keynes Council commissioned Landscape Character Assessment (June 2016) by Gillespies – referred to on page 20 of the consultation document - : "Promote hedgerow restoration and improvements throughout the area to provide visual and ecological links between existing and proposed woodland." The guidelines also state: "Ensure that open views across the landscape character area to the Brickhill Greensand Ridge are retained." The very fact of designation for development of the site is in conflict with the recommendation.	Noted.
27.14		Existing trees in good condition should be retained in order to mitigate the overall	Accepted. See response to

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	intrusion on the landscape character area. Mature trees on the boundary should not be sacrificed when there is absolutely no need to do so.	rep. no. 31.19.
27.15	<p>Para 3.4.5 - The diagram below shows that contrary to the drawing, there is no longer and cannot be, a wildlife corridor alongside the A5 Trunk Road. Saved policy NE1 of the Local Plan has been superseded by the fact that Network Rail has fenced the railway thereby severing the wildlife corridor. The gap between uprights in the fencing is just 85mm. The only unimpeded corridor within the shaded area claimed, is on either side of the A5 trunk road where it passes under the railway bridge.</p> <p>How these two very narrow and unsatisfactory corridors can be enhanced in any way as claimed in the document, it is difficult to imagine. The wildlife corridor claim is misleading. It would however be possible to provide an unimpeded, but narrow, wildlife corridor through the 3 metre-wide passageway under the railway bridge on the north-west corner of the site.</p>	Not accepted. Wildlife Corridors are protected by Plan:MK policy NE1. Wildlife corridors do not only serve large mammals. There is scope to enhance the wildlife corridors.
27.16	<p>Para 3.5 - Brickhill Street is the only route of access into the site which is effectively land-locked on two sides, by the railway with its crossing and the A5 Trunk Road. So the only possible “necessary improvements as agreed by the relevant highway authorities and Highways England” are those that can be carried out on Brickhill Street. Point 5.8.4 of the Caldecotte C Development Brief (concurrently out for consultation) states : “Network Rail is concerned that development proposals for this area may impact upon the type and volume of user at the level crossing as well as increase the usage at the crossing. In the light of this, the Transport Assessment should include specific consideration of the impacts of pedestrian and vehicular traffic upon Bow Brickhill Level Crossing.” The Development Framework background for South Caldecotte Employment area omits that point. Surely Network Rail is more concerned about the much greater effect of traffic generated by South Caldecotte (even if lorry traffic is routed towards the A5). Caldecotte C Brief claims that the Multi-Modal Model - Impacts of Plan:MK – November 2017 – indicates a bridge is not necessary but that conclusion is based upon flawed traffic projections. Network Rail, which is attempting to remove level crossings from its network, may require an alternative method at Bow Brickhill because level crossings are inherently dangerous. Additionally queues may not clear before a second train approaches. This is described in Appendix A compiled from witness</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>accounts of traffic backing up during rush hours as far as the OU roundabout, the A5 and to the far side of Bow Brickhill village. The Milton Keynes Multi-Modal Model does not reflect the current situation therefore its extrapolations cannot be correct. The model fails to acknowledge the existing traffic queues in Station Road, Bow Brickhill and the extent of queuing on Brickhill Street. It is worth noting that in 2007 Milton Keynes Council Highways Department agreed that rush hour traffic here was so severe it necessitated the installation of a pedestrian crossing on this C-designated road – that was ten years ago. I cannot find any mention of Tilbrook Pastures in the model. This site has planning permission and will add to the Station Road traffic. Nor is there any indication that the model takes account of the variable times of level crossing gate closures – 4 minute, 4.5 minutes and up to 8 minutes. In the Multi-Modal Model we read: “ Scenario 2a is now considered to be the ‘preferred’ Plan:MK scenario.” This indicative network, modelled and presumably found acceptable, proposes making Station Road in Bow Brickhill and The Leys/Theydon Avenue in Woburn Sands integral parts of the MK grid road network. It is difficult to image a less acceptable solution. The Model itself states that it is not designed for use on a scheme-specific assessment which leads me to conclude that before a Development Brief is undertaken a Transport Assessment should be carried out. This would be based on more up-to-date and locally-based information and would address those points which the industry standard model cannot do.</p>	
27.17		<p>Para 3.5.2 - A Transport Assessment undertaken now may conclude that the impact of development on this site - plus Tilbrook Pastures and Caledecotte C - would be unacceptable in the light of the regular obstruction in traffic flow on Brickhill Street and Station Road Bow Brickhill. There is the danger that, in denying the existence of these issues and relying purely on computer-generated scenarios based on out-of-date data and typical occurrences elsewhere, the site will not be deliverable. This returns to the point made earlier that the site is so unsuitable that it should not have been designated at all.</p>	Noted.
27.18		<p>Para 3.5.4 - The position of the junction as drawn is problematic, being so near to the A5 Trunk Road roundabout and therefore being within the length of Brickhill Street that vehicles are most likely to queue for the junction. Whether the junction is a roundabout or signalised, at times of maximum traffic (rush hours) and when (due to closure of level</p>	Not accepted. The Council’s Highways Development Management Team has no objection to the siting of the

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	crossing gates) convoys of traffic are formed, it will be difficult for any traffic to enter or exit the site.	access.
27.19	<p>Para 3.5.5 - As can be seen from the evidence above, it is essential that the entire length of Brickhill Street south of the railway line is upgraded not "to serve the growth in the wider area to the south east of Milton Keynes" but specifically to serve this site alone. However that will not solve the wider problems of the inability of the level crossing and surrounding road network to cope with the current and future traffic levels and increased train frequency. There is a naivety in the Development Brief that all traffic will come from the direction of the A5 Trunk Road. That might be possible to enforce for HGVs but employees will inevitably choose their own routes. Given the disconnection of the site from the rest of Milton Keynes, the only possible point of entry and exit from the site is Brickhill Street. Those pedestrians or cyclists from the Fenny Stratford direction must cross on foot the A5 Trunk Road at a signal-controlled pedestrian crossing, traversing six lanes; those from Brickhill Street must cross the railway line alongside the Brickhill Street traffic. But Network Rail is intent upon closing level crossings and one option would be to close the crossing at Brickhill Street. Were this to occur the only access would be from the A5 Trunk Road or via Bow Brickhill village and there would be no redway connection for cyclists or pedestrians. No amount of upgrading Brickhill Street south of the railway line will change the fact that the crossing is narrow. It permits three columns of traffic (two going north, one south) with pedestrian paths on either side of the carriageway. It is a pinch point which causes significant traffic congestion and the build up of traffic convoys.</p> <p>During the day there are two trains per hour currently passing through Bow Brickhill level crossing.</p> <p>The gates close for 4.5 minutes when the train is coming from Fenny Stratford, where the relevant signal is located. When a train is approaching from Woburn Sands, the relevant signal is at the horse crossing and the gates are therefore closed for 4 minutes. On two occasions during the day two trains cross at Bow Brickhill necessitating the gates to be close for between 7 and 8 minutes. These closures are due to double in 2022, when the Bedford to Oxford service commences with one train per hour in each direction in addition to the current services. In other words the crossing will be closed twice as</p>	<p>The Framework states in para 3.5.5 that "it is the Council's intention to upgrade the whole length of Brickhill Street to grid road standard".</p> <p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p> <p>See response to rep. no. 2.9 with regard to East West rail.</p>

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	<p>much as it currently is. There are no passenger trains on Sundays; the service only runs Monday-Saturday. There is occasional freight and other traffic on the line as it provides a strategic rail link between main rail lines. More frequent service and therefore more frequent gate closures are forecast. The NIC report November 2017 – “Partnering For Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc” at Page 35 in the section entitled ‘Designing transport to unlock major housing growth’ describes the following: Such an approach could mean that the Marston Vale benefits from better trains, faster journeys and access to more locations further afield. In addition, the arc as a whole enjoys better capacity – equating to the potential for greater frequency – on East West Rail services.</p> <p>So the future train frequency is likely to increase substantially and with it the congestion.</p>	
27.20	<p>Para 3.5.5. - Even if the Expressway proposals do not drive a major highway through the site, there are only three possible outcomes for future access and all are problematic even if there is a Lorry Routing Plan. 1. The railway crossing remains as it is; Brickhill Street is upgraded south of the railway line. 2. A bridge is built over the railway at Brickhill Street and the crossing closed. 3. The rail crossing and Brickhill Street is closed at Bow Brickhill Station. Option 1 promises such severe congestion that there will be periods when no traffic will be able to access the site. Having only one road access into the site also raises the question of how emergency vehicles could enter were the one access point to be impassable. Surely there should be at least two access points for 56.8 hectares of industrial site? Option 2 raises the question of how the Development Framework would be affected by the land requirement for a bridge and whether a separate pedestrian/cycle bridge would be provided. Would pedestrians and cyclists be further disconnected from the existing urban area? Option 3 would cause almost complete disconnection of the site from the existing urban area of Milton Keynes making it impossible for the rail connection to serve employees on the site or for the development to fulfil any of the aspirations in the Vision given at the start of the Development Framework.</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>
27.21	<p>Para 3.5.8 - There is no redway link to the south of the site other than a short length around the A5 roundabout, which goes nowhere. Once cyclists have reached the south of the site they will have to cross the six lanes of the A5 Trunk Road at the signalised</p>	<p>Not accepted. There will be redways provided as part of the SEMK SUE and this site</p>

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		crossing and then use roads. This paragraph should say “A pedestrian/cycle link will be provided □..”, as there is only one over the rail crossing.	should link into those as well.
27.22		It is difficult to see how the proposals here meet this Vision, stated earlier in the document. Where in the Development Framework are the transport facilities which will “promote the most sustainable forms of movement, such as walking and cycling?” No additional provision, other than that which currently exists, is described. Cycle and pedestrian access is poor; public transport possibilities are not good. Access from the A5 Trunk Road direction edge necessitates crossing six lanes of the A5 Trunk Road at a signal-controlled crossing. The only sensible means of access for the majority will be by car; a fact which is inconsistent with the Vision.	The Framework includes provision for redways and footpaths which connect to the wider network, albeit with some gaps. Para 3.5.7 states that an enhanced bus service will be required to enter the site.
27.23		Para 3.6. - It is impossible, given the site is to be developed for employment, that the design and appearance should be “sensitive to views into the site from the wider landscape” or should avoid an “unacceptable impact on the wider landscape□..” Views from wider landscapes will inevitably be of the large areas of roof.	Noted. The wording of policy SD16 has been accepted by the Local Plan Inspector and will be included in Plan:MK.
27.24		Page 41 - I suggest that no “large scale units” should be accommodated on the site, whatever their orientation, for the reason given above.	Not accepted. The site is allocated for a mix of employment development.
27.25		Page 43 para 3.6.7 - Given the elevation of the wider views and the fact that people viewing will be seeing predominantly roofs, the Development Framework needs to be much more specific to “reduce the perceived bulk and massing” and include the phrase “from elevated views,” as all the buildings will be highly visible from the Greensand Country.	Accepted. Include new para after 3.6.7 to read: <u>“Key long distance views of the roofs of the proposed buildings will be gained from the Brickhills. Careful consideration should be given to the design of roofs.”</u>
27.26		Para 3.6.10 - A Landscape and Visual Impact Assessment (LVIA) should have been carried out in advance of this site allocation. If an LVIA now assesses the visual impact to be so severe and in conflict with Landscape Character Assessment in impairment of views to and from the Greensand Ridge, it could invalidate this entire Development Framework	Noted.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
27.27		<p>There is no other way of gaining vehicular access to the site other than from Brickhill Street and that is inconsistent with Milton Keynes' development principles. One access serving nearly 57 hectares is inadequate particularly when that access will be impeded by its proximity to the A5 junction. When you add the invalidity of the claimed wildlife corridor and the need to allow land allocation for the possible future provision of a bridge over the railway line, the whole Development Framework needs to be reconsidered. Whether it will ever be possible to meet the NPPF sustainability requirements for a site which is so evidently unsustainable, is questionable; in any case any development brief is likely to be superseded by NIC plans. The obvious strategy would be to wait until Plan MK has received the inspector's consideration and the decision on the precise route for the Expressway is taken in 2025, before wasting any more time on this exercise.</p>	<p>The site is allocated in Plan:MK.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that "arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances."</p>
28.1	Robert Jones	<p>I cannot help but feel extremely let down by MKC with its proposed inclusion of Caldecotte South for employment and warehousing within Plan:MK. Countless residents and indeed professional bodies have repeatedly pointed out the issues that should have alerted MKC to the unsuitability of the site. Although, this advice seems to have been simply brushed under the carpet to avoid complication. Whilst I appreciate the severe pressure placed on local planning authorities by Government, the task of identifying a suitable site could not have been carried out with more disastrous results. The consistent revolving door of Planning Officers within MKC throughout Plan:MK cannot have helped.</p> <p>If I can outline below,</p> <p>Councillors were given a brief presentation of the sites potential by Senior Planning Officer John Cheston. This made a positive reference to the survey carried out by Gillespie's but did not mention Gillespie's advice was against development, listing the harm to both wildlife and the far reaching views from the highest topographical point in MK, a designated AAL (area of attractive landscape, one of just two in the borough) located on the Greensand Ridge immediately adjacent to the site. The site had also</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>

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	<p>previously been considered for housing under U27 of the Site Allocation Programme using a scoring process against sites throughout MK. A previous Senior Planning Officer at MKC Sam Dix concluded the site offered a poor prospect for development and the site had been dropped from the programme. Employment and warehousing are arguably far more damaging and unsuitable for this location.</p> <p>Reference is made to the unexpected need for additional employment land to that reserved within the Core Strategy next to the M1,J14 (Berkley Strategic employment land assessment). It is suggested South Caldecotte has the potential to offer the amount of land required as a logical extension to this. The site is however some 10 miles away with only minor roads providing extremely poor road links. The presentation suggests the site benefits from its close proximity to the A5 but does not address how traffic will reach the site from the M1 or the A5, or indeed if the present infrastructure could possibly even handle the volumes of traffic at all.</p> <p>The proposed inclusion makes no allowance for the plans to upgrade the rail link that currently leaves the site isolated by unmanned level crossings at both Bow Brickhill and Woburn Sands. No decision has been made public for the route of the proposed East West Expressway whereby development could severely limit or prevent one of the given options.</p> <p>To conclude the proposal appears to amount to an ill thought out knee jerk reaction to a need for further employment land. Planning Officers have simply matched a site that happens to have been made available by a developer regardless of its suitability or accessibility for that purpose. This can be seen in the very late inclusion of the site and it's incorrect description by Planning Officers as South Caldecotte, when in fact it is completely isolated from the Parish of Caldecotte by a railway line and sits within the neighbouring Parish of Bow Brickhill. The people of Milton Keynes can only hope that MKC or the Planning Inspector recognise these and many other points raised and remove it from Plan:MK before it's too late.</p>	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
29.1	Tony O'Rourke	<p>I would like to strongly object to the plan for a South Caldecotte Employment area on the grounds that it is totally inappropriate on a number of levels.</p> <p>Firstly, the proposed location for this development is wholly inappropriate. The previous location which was considered would have been far more practical, having easy access to the M1. As I understand it, the majority of this site will be given over to many enormous distribution warehouses and so a steady stream of juggernauts will be essential for moving goods in and out. A location by the M1 would be perfect for this.</p>	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>The principle of development will be established through Plan:MK and is not a matter for the Development Framework to consider.</p>
29.2		<p>In complete contrast, the roads around Bow Brickhill and the rest of the site are generally of a rural nature and not able to deal well with heavy vehicles. In fact, the A5130 in the neighbouring parish of Wavendon has recently been declassified, with a 7.5 tonne except for loading weight restriction, in order to reduce the amount of heavy vehicle traffic passing through the area.</p> <p>Then there's the problem of the railway line and level crossing on Brickhill Street, by Bow Brickhill railway station. At present, there are two services per hour Monday to Saturday with extra services during peak periods and also the occasional goods train coming through. In each instance the barriers come down across Brickhill Street about four minutes before the train arrives. In that time, long tailbacks form, stretching back maybe half a mile or more on either side of the crossing.</p> <p>When the new Oxford – Cambridge line is fully operational there will initially be two more services per hour. This means that the barriers could be down and the road blocked for</p>	<p>The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE.</p> <p>Any application will require the submission of a Transport Assessment.</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>24 minutes in each hour. Not ideal for a main road into a distribution hub.</p> <p>Apparently, both Network Rail and Milton Keynes Council have stated that there are no funds available and no plans either now or in the future, to build a bridge over the railway, which means that the South Caldecotte site will be extremely difficult to reach from this direction.</p> <p>Traffic on Brickhill Street, Station Road and other roads around the proposed development is already heavily congested. The addition of hundreds more heavy goods vehicles on these unsuitable roads at any given moment will make driving virtually impossible.</p> <p>Pollution caused by the existing traffic and the extra traffic created by the development, is also likely to have a detrimental effect on the health of people who live in the area.</p>	
29.3	<p>It has been stated that the proposed location for the South Caldecotte Employment Site is well away from residential property. This is simply untrue. Our house is directly opposite the site, just a few feet from its boundary across the road from us. Our neighbours are also right up against it.</p> <p>You can clearly see how close the site will be to us from the photo on the next page, taken from one of our bedroom windows. The hedge across the road from us marks the boundary of the employment site. You can also see just how congested the traffic is on a normal day and that's before the addition of hundreds of extra juggernauts which this site would create.</p> <p>In addition, a new development of 600 houses called Eton Leys is on the cards at the other end of Brickhill Street, by the McDonald's roundabout. When built, these homes</p>	Noted. Any application will be required to submit a Noise and Vibration Impact Assessment and an Air Quality Assessment.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		would also be right on the edge of the employment site so just how the people behind this can say it will not be near any residential property is beyond me.	
29.4		It would also surely be foolhardy to confirm South Caldecotte as the location for the employment site before the route of the Expressway has been decided.	<p>The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and scheduled monument of Magiovinium.</p> <p>It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”</p>
29.5		<p>In conclusion, when you compare the two sites that have been considered for this development, it seems insane that the site near the M1 has been rejected in favour such an obviously unsuitable location as South Caldecotte.</p> <p>I would be grateful if you would officially record my objection to this development and my desire for the whole project to be thrown out.</p>	Noted. The site at Junction 14 has been allocated for employment development.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
30.1	Neil Osborn (DLP), on behalf of Hampton Brook	<p>These representations are submitted on behalf of Hampton Brook Ltd who intend to bring forward the development of land known as South Caldecotte in accordance with the principles emerging in the Draft Plan:MK as submitted to the Secretary of State for his approval.</p> <p>We welcome the Council's timely publication of a draft brief for the site (and for Area C, adjoining to the north of the railway. Notwithstanding this, and having regard to comments already in the public domain from other parties arising from the Council's public consultation process, we have some minor comments on matters of detail within the Draft SPD that we ask the Council to have regard to in issuing a final version for adoption.</p>	Noted.
30.2		<p>1.4.11 This paragraph should be updated to reflect submission of Plan:MK for examination and consequently a further step change in weight that it can be accorded in decisions making. Additional reference is needed to make clear to the reader that on adoption of Plan:MK superseded policies of the Milton Keynes Local Plan and of the Core Strategy will cease to be given weight in any future decision making. We suggest amendment as follows:</p> <p>The Proposed Submission <u>Plan:MK has been subject to consultation and was been submitted to the Secretary of State for examination in March 2018 prior to adoption. consultation document was published in October 2017.</u> It is anticipated that an examination will take place in summer 2018. <u>When adopted policies of the Milton Keynes Local Plan and Core Strategy will cease to be given weight in decision making.</u></p>	<p>Accepted. Delete paras 1.5.4–1.5.10. Amend para 1.5.11 to read: “The <u>Examination in Public of Plan:MK took place in summer 2018 and the Inspector’s Report was received in February 2019.</u> It is anticipated that <u>Plan:MK will be adopted in March 2019. When it is adopted, policies in the Milton Keynes Local Plan and Core Strategy will cease to be given weight in decision-making. Plan:MK will then constitute the Development Plan guiding future applications on this site.”</u></p>
30.3		2.3.1.	Accepted. Amend para

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>We suggest that this paragraph be extended in two respects: to refer to the presence of Bow Brickhill station and to the future development of Caldecotte Area C as it is also subject to a parallel SPD. We suggest the following:</p> <p>The built-up area of Milton Keynes lies to the north of South Caldecotte. Immediately to the north is the Marston Vale railway line, and Bow Brickhill station. <u>North of the railway is Caldecotte, comprising Caldecotte Business Park and a parcel of land known as Caldecotte Area C which may be brought forward for a variety of uses including residential, offices (Use Class B1) or retail. Beyond that is then Caldecotte Lake and residential estates further to the north. To the north-west of the site on the western side of the A5 lies the significant and visually dominant Tesco Distribution warehouse.</u></p>	<p>2.3.1 second sentence to read: “Immediately to the north is the <u>Bedford to Bletchley railway line and Bow Brickhill Station.</u> <u>North of the railway is Caldecotte, comprising Caldecotte Business Park and a parcel of land known as Caldecotte Site C which is allocated for residential development; Caldecotte Lake and residential estates further to the north.”</u></p>
30.4	<p>Fig 2.1 The Figure should be amended to show the full extent of Eaton Leys including the park to the north and of any other development currently proposed or allocated in Plan:MK in the vicinity in order to provide the reader with a complete understanding of the context of the surrounding area.</p>	<p>Accepted. Amend fig 2.1 to include wider context.</p>
30.5	<p>2.8 Heritage</p> <p>Bullet 2 should not speculate on the likelihood that potential for Roman remains extend in to the site. The last sentence should be rephrased to state</p> <p>It is highly likely <u>There is potential</u> that this activity <u>could</u> continue along the predicted line of the Roman road into the proposed development site.</p> <p>2.10 References to Heritage should consequentially also be amended to reflect the requested change at 2.8.</p>	<p>Not accepted. Geophysical surveys subsequently undertaken have confirmed that there are remains within the site.</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
30.6		<p>3.5.7 For clarity we consider that the provision of the internal roundabout (as presently shown in our draft masterplan) will provide appropriate opportunity for buses to return down the Spine Street to the site entrance. There would be no need in such circumstances for a dedicated bus turning area in addition.</p>	Noted.
30.7		<p>4.3.4 The site is of a scale that will require screening under the Environmental Impact Assessment Regulations. The outcome of screening cannot however be prejudged (albeit that we share the Council's expectation that an EIA will be required). The paragraph should be rephrased</p> <p>4.3.4 <u>In the event that an Environmental Impact Assessment is required developers should contact the local planning authority at an early stage in order to scope the Assessment and with regard to any other the supporting information that should be submitted with their application. The requirements will include some or all of the following:</u></p>	<p>The developer of the site has obtained a Screening Opinion from the Council. Replace para 4.3.3 with the following sentence: <u>"The local planning authority has provided a Screening Opinion, which confirms that an Environmental Impact Assessment (EIA) is not required for this site."</u></p>
31.1	Milton Keynes Forum	<p><u>INTRODUCTION</u></p> <p>Milton Keynes Forum welcomes the opportunity to comment on the consultation draft of the South Caldecotte Development Framework Supplementary Planning Document.</p> <p>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.</p> <p>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.</p>	Noted.
31.1		<p><u>SUMMARY OF MAIN COMMENTS</u></p> <p>The South Caldecotte site is of considerable importance because of its visibility from a</p>	Noted.

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>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.</p> <p>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.</p>	
31.2	<p>Our main concerns relate to:</p> <ol style="list-style-type: none"> 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 	Noted. Site is allocated for employment use in Plan:MK. See rep. nos. 31.3-31.28 for responses to these concerns.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>and useable linear parkland connecting Caldecotte Lake southwards and towards Eaton Leys.</p> <p>8. Views into the site from surrounding areas.</p> <p>9. How to achieve the necessary quality of design of the proposed industrial and commercial buildings.</p> <p>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.</p> <p>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.</p> <p>12. Potential need for additional land-take for future enhancement of the road junction between the A5, A4146, Brickhill Street and Watling Street.</p> <p>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.</p> <p>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.</p>	
31.3		<p><u>SPECIFIC COMMENTS</u></p> <p>SECTION 1: INTRODUCTION</p> <p>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</p>	Accepted. Amend policy SD16 to correct error and to update with Proposed Additional Modifications.

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<i>Brickhill railway station ...</i> etc. This makes no sense. Some text is missing.	
31.4	<p>SECTION 2: THE SITE AND ITS CONTEXT</p> <p>2.3.1</p> <p>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.</p>	Accepted. Amend second sentence para 2.3.1 to read: “Immediately to the north is the <u>Bedford to Bletchley railway line and Bow Brickhill Railway Station.</u>”
31.5	<p>2.3.4</p> <p>It is not at all clear what the following text means “<i>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.</i>” This needs to be stated with more clarity.</p>	Not accepted. The statement is clear enough.
31.6	<p>Figure 2.2 Edge Conditions</p> <p>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.</p>	Accepted. Include additional sentence to final bullet point in para 2.3.4 to read: “<u>Brickhill Street is likely to become noisier as its use increases, due to the development of this site, the SEMK urban extension and wider MK growth.</u>”
31.7	<p>2.3 Surrounding Area and Edge Conditions</p> <p><i>“Immediately to the north is the Marston Vale Line.”</i></p> <p>We suggest, to avoid confusion and for consistency, that this should be described as Bedford to Bletchley Railway.</p>	Accepted. See response to rep. no. 31.4.
31.8	<p>2.4 Topography, Views and Drainage</p> <p>Mention should be added of the deep and substantial ditch that runs along the northern</p>	The ditch is not shown on any plans as a watercourse.

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	edge of the site and along some of its western edge. Does this continue westward under the A5?	
31.9	<p>2.5 Landscape Character</p> <p>2.5.4 <i>"... encourage appropriate management of all drainage ditches to improve wildlife value, by improving water quality and establishing grass verges."</i></p> <p>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.</p> <p>We therefore propose additional wording such as: <i>'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.'</i></p>	Not accepted. The guidelines referred to in para 2.5.4 are taken from the Milton Keynes Landscape Character Assessment.
31.10	<p>2.6 Habitat and Vegetation <i>"There are two small groups of trees within the site."</i> This is not correct as there is a third and more substantial woodland immediately north of Crossroads Farm buildings, which should be referred to.</p>	Accepted. Amend second bullet para 2.6 to read: "There are <u>three</u> small groups of trees within the site." Amend figure 2.5.
31.11	<p>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?</p>	See response to rep. no. 1.1
31.12	2.9 Utilities	Accepted. Amend fig 2.9 to

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>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.</p>	<p>show gas pipeline along northern edge of site. Include new bullet point in para 2.9 to read: “<u>There is a medium pressure gas pipeline that runs along the northern edge of the site.</u>”</p>
31.13	<p>2.10 Opportunities and Constraints</p> <p>Edge Conditions <i>“The A5 and Marston Vale Railway are noise generators.”</i> 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.</p>	<p>Accepted. Amend first bullet point para 2.3.4. to read: “<u>The Bedford to Bletchley railway line forms the northern boundary of the site.</u>” Add sentence to final bullet point to read: “<u>Brickhill Street is likely to become noisier, due to the development of this site and the SEMK urban extension.</u>” Amend second bullet point para 2.10 Edge Conditions to read: “<u>The A5 and Bedford to Bletchley railway line are noise generators. Brickhill Street will become noisier as its use increases.</u>”</p>
31.14	<p>Topography, Views and Drainage (2.4 & 2.10) <i>“Wider views into the site are seen from the Brickhills.”</i></p>	<p>Not accepted. There are limited views from the A5 to</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Mention should also be made of views from the A5 as it heads down the hill from the south towards the site.	the south of the site.
31.15	Figure 2.10 Opportunities and Constraints The existing woodland immediately north of Crossroads Farm buildings should be shown on Figure 2.10.	Accepted. Amend fig 2.10 to include additional woodland.
31.16	<p>SECTION 3: DEVELOPMENT FRAMEWORK</p> <p>3.2 The Vision We welcome the statement that <i>“Transport facilities will promote the most sustainable forms of movement such as walking and cycling”</i> but this has not been carried through to the concluding sentence which says <i>“Connections will be made to the rest of Milton Keynes’ grid road and transport network”</i>. 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 <i>‘Connections will be made to the rest of Milton Keynes’ transport networks including Redways, footpaths and the grid road network’</i>.</p> <p>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.</p>	<p>Accepted. Amend final sentence of Vision (para 3.2) to read: “Connections will be made to the rest of Milton Keynes’ transport networks <u>including redways, footpaths and the grid road network.</u>”</p> <p>Amend para 3.5.8 first sentence to read: “Pedestrian/cycle links will be provided from the development into the wider redway network. <u>The redway network within the site should be designed to enable future connections to be made to the SEMK Strategic Urban Extension.</u>”</p>
31.17	3.4 Landscape and Open Space Strategy	It is proposed to remove text of Plan:MK policies and

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		The text has an error which reads "... <i>as part of a Sustainable Drainage System across the Brickhill railway station ...</i> ". Some words appear to be missing.	instead signpost relevant policies. Developers should go to the source document (Plan:MK) to access the relevant policies.
31.18		Landscape 3.4.1 We suggest a change of wording to read: 'A Landscape and Visual Impact Assessment (LVIA) should be undertaken to <u>influence</u> the impact of the development on the landscape ...' rather than only "... <i>to assess the impact ...</i> ".	Not accepted. The current wording accurately describes the purpose of an LVIA.
31.19		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.	Accepted. Amend para 3.4.2 to read: "The large footprint nature of the development will result in large development parcels and will require a certain amount of cut and fill. <u>However, wherever possible existing trees and hedgerows should be retained in line with Plan:MK. Where the loss of hedgerows or trees is unavoidable and can be justified, compensatory planting should be provided elsewhere within the site in line with the mitigation hierarchy.</u>"

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
31.20	<p>Areas of Wildlife Interest</p> <p>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.</p> <p>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.</p>	<p>Accepted. Include new para before 3.4.5. to read: <u>“Within the site, to the west of Cross Roads Farm, is an area of lowland meadow which has been identified by English Nature as a Priority Habitat. NPPF (para 174) states that “plans should promote the conservation, restoration and enhancement of priority habitats.” Policy NE2 of Plan:MK seeks, wherever possible, to promote their preservation, restoration, expansion and/or re-creation in line with the mitigation hierarchy. Applications should seek to preserve and restore this habitat. If evidence indicates this is not possible, this will be dealt with at planning application stage.”</u></p> <p>Specific measures for ecological enhancement will be agreed at planning application stage.</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
31.21	<p>Green Link</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Accepted in part. Include new plan entitled “open space and landscape strategy”</p> <p><u>Amend para 3.4.7 to read: “The green open space link should connect Caldecotte Lake in the north to areas of existing and proposed open space to the south. A multi-functional landscaped area of open space will be provided, serving as a recreational and ecological resource, a potential educational resource relating to the site’s heritage assets, a location for surface water attenuation, and as a visual buffer from the A5. This strip may vary in width, but should be designed to ensure that: public access, including a pedestrian leisure route, is provided; a landscaped buffer, including tree planting, is provided along the A5; provision is made for ecological enhancement;</u></p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>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. <i>“Multi-functional landscaped areas”</i> are something of a planning myth, although flood-prevention, ecology and recreation can sometimes be provided for successfully alongside each other.</p> <p>A <i>“landscape belt”</i> 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.</p>	<p>and provision is made for sustainable drainage, including wet and dry ponds.”</p>
31.22		<p>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 “... <i>to cover necessary endowment to cover future maintenance and management costs</i>”. 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</p>	<p>Accepted. Amend para 3.4.9 to read: “The completed green link open space should be transferred to the Parks Trust or into a management company on completion, together with the necessary endowment to cover future maintenance <u>and management costs.</u>”</p>
31.23		<p>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</p>	<p>Para 3.5.8 requires that the development provides pedestrian/cycle links into the wider redway network.</p> <p>Para 3.5.2 of the Draft Development Framework</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		<p>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.</p> <p>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.</p>	<p>refers to the requirement for applicants to submit a Transport Assessment (TA). The TA will identify what off-site improvements will be required to pedestrian/cycle routes.</p>
31.24		<p>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:</p> <ol style="list-style-type: none"> 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. <p>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</p>	<p>1. With regard to bridge crossing, see response to rep. no. 2.9.</p> <p>2. Any improvements required to Brickhill Street as a result of development of the site will be determined through the Transport Assessment.</p> <p>3. The Council's Highways Development Management Team has no objection to the siting of the access.</p> <p>The site is allocated for</p>

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	<p>sometimes causes considerable road traffic delays (a recent incident of an 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.</p> <p>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.</p> <p>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.</p>	<p>employment development in Plan:MK. Development of the site should accord with policy SD16 of Plan:MK.</p>

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
31.25		<p>3.6 Design The design of the site to an appropriate standard is of considerable importance because of its prominence.</p> <p>3.6.6 In general terms we welcome the proposal that <i>“Development should have a contemporary character reflecting Milton Keynes’ reputation as a forward-thinking modern city”</i> though we think the issue is primarily of good quality design rather than off-the-peg solutions.</p>	Noted.
31.26		<p>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.</p>	Accepted. Amend para 3.6.7 to read: “The design of individual buildings should aim to reduce their perceived bulk and massing. The choice of materials and use of colour, and the orientation of buildings can help to reduce the visual impact of buildings. <u>Key long distance views of the roofs of the proposed buildings will be gained from the Brickhills. Careful consideration should be given to the design of roofs.”</u>
31.27		<p>3.7 Sustainability</p> <p>Surface Water Drainage and Flooding It seems likely that the site will require a substantial pond as well as permeable paving,</p>	Accepted. Amend second sentence of para 3.7.2 to read: “Measures that could be

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	<p>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,</p> <p>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.</p>	<p>incorporated include green/brown roofs, rainwater harvesting systems, <u>ponds</u>, permeable pavements, and filter strips and swales."</p> <p>Include new sentence at end of para 3.7.2 to read: "<u>Given the scale of the development, it is likely that a series of ponds will be required to manage surface water drainage. Ponds should be designed to be multi-functional, providing a visual and ecological benefit, as well as a drainage role.</u>"</p>
31.28	<p>SECTION 4: DELIVERY</p> <p>4.2 Management and Maintenance</p> <p>4.2.4</p> <p>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</p>	Noted.

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		<u>Parks Trust should be consulted as plans are being made for this open space.</u>	
32.1	Mrs Veronica Wright	<p>As a resident of Caldecotte I feel the possible proposal to develop the land on the South Caldecotte site for commercial use as totally inappropriate.</p> <p>The increase in heavy traffic, especially in rush hours, would be detrimental to the area which already becomes heavily congested due to the level crossing. Once in operation the site would present sever additional highways and road safety issues as the vehicles would be passing through already busy villages en-route to the M1 or pushing more traffic onto the smaller A5. Warehouse/logistics premises close to housing would also cause increase in air pollution and noise.</p>	<p>The site is allocated for employment development in Plan:MK.</p> <p>Traffic modelling has indicated that the highway network could cope with the increased traffic generated by the development.</p> <p>Any application will require the submission of a Transport Assessment. Para 3.5.5 of the Development Framework requires developers to prepare and adhere to a Lorry Routeing Plan.</p>
32.2		The much more sensible option is the land near junction 14	<p>The site is allocated for employment development in Plan:MK which is due to be adopted in March 2019. The Local Plan Inspector has confirmed the allocation of the site in his Report, published in February 2019.</p> <p>Site at M1 Junction 14 has been allocated for employment development.</p>

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32.3		No developments should be agreed that would compromise the proposals to develop the area for the Varsity line. A possible bridge instead of the level crossing is much more sensible not only would it ease congestion but also give local residents access to the improved rail links to Oxford, Cambridge and Bedford. We'll have the inconvenience of building and upgrades to the line but with long term benefits.	See response to rep. no. 2.9
33.1	Nick Wagstaff	In recent times there have been so many consultation proposals on the development of Milton Keynes and transport linkages that residents of this area are a mite confused about policy directions and the efficacy of strategic thinking. The latest paper seems to set out Caldecotte South proposals with limited acknowledgement of national transport strategy, which is putting into the immediate local area both the East-West Rail upgrade and the Oxford-Milton Keynes-Cambridge Expressway. The precise location of both these major transport initiatives is unknown at present. It seems prudent to me to wait until these highway and rail plans are firmed-up before launching into development of Caldecotte South, <i>even if</i> it were to be concluded that extra warehousing in Caldecotte South is an apt, sensible and sustainable development given the many associated highway and road safety issues it presents to the local population.	<p>The site is allocated for employment development in Plan:MK. It is not reasonable to delay development of a site which is allocated in the Development Plan. Para 49 of NPPF states that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances.”</p> <p>New paras have been included in section 1 of the Framework on East West Rail and the Oxford to Cambridge Expressway.</p> <p>The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys</p>

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			residential scheme and scheduled monument of Magiovinium.
33.2		I have to express disappointment that MK future plans see Milton Keynes as one of the premier warehousing centres in the country. I do not believe that ambitions for the city to be the warehousing capital of England are well founded or desirable. Milton Keynes should set itself higher targets than that by emphasising that it is a welcoming base for development of modern technologies. It should be presenting itself as a natural home for SME businesses and research organisations, with potential to access and build-on the research bases existing in Oxford, Cambridge, London and Birmingham.	Plan:MK aims to provide a range of employment sites.
33.3		If Caldecotte South went ahead in the terms outlined there would be considerable safety issues and traffic congestions as vehicles seek to access the A5 and cross the city to link with the M1. Both the A5 and M1 are already operating at near capacity at present. The environmental damage to the area would be profound. The nearby Greensand Ridge is MK's most attractive natural feature and a popular area for leisure activities. A massive development at the foot of the Greensand Ridge would be an environmental catastrophe and fails future generations by cutting off any possible future development of a green linear path (a natural habitat area and 'redway' extension) from north of the city to the Greensand Ridge itself.	The site is allocated for employment development in Plan:MK. The transport modelling which the Council has undertaken indicates that there would not be a severe transport impact due to this development or in combination with the SEMK SUE. Any application will require the submission of a Transport Assessment.
33.4		I commented extensively on the Plan MK Strategic Development Directions paper last year, and would simply add that several of the points I made then are relevant to the current policy consultation.	Noted.

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
34.1	Alan Francis on behalf of Milton Keynes Green Party	<p>Level Crossing</p> <p>This DF should include space on the west side of Brickhill St for ramps and a bridge over the railway line.</p> <p>There will be an increase in both road and rail traffic at the level crossing and it will cease to function effectively.</p> <p>Road traffic will increase because of this proposed development and those at Eaton Leys, Levante and SEMK.</p> <p>Rail traffic will increase because of EWRL. There is currently 1 train per hour (tph) in each direction. This will increase to 2tph each way when the western section of EWRL opens in 2022 and 4tph or more each way when the central section of EWRL opens some years later. Barrier down time will be about 30 mins in each hour. The barriers will often remain down for a second train because of the proximity of the single track section of the EWRL over the A5 and through Fenny Stratford station. Thus barriers will be closed for as much as 7-8 mins.</p> <p>The traffic queues will tail back to the A5 roundabout and cause congestion on the A5. Highways England will object to that and may impose an Article 15? direction preventing the development taking place until the traffic issues are resolved.</p> <p>These long closures and associated queues would also disrupt bus services and be very inconvenient for pedestrians and cyclists. Pedestrians and cyclists would be tempted to go round the barriers and cross the tracks.</p> <p>Consequently the level crossing at Bow Brickhill station will need to be replaced by a bridge over the railway line at some point in the future.</p> <p>MKC made a mistake two decades ago when it gave planning permission for housing at Turnpike Close on the north side of Woburn Sands level crossing. This development has made it almost impossible to replace Woburn Sands level crossing with a bridge over the railway line. This mistake should not be repeated at Bow Brickhill.</p> <p>It is therefore essential that space is reserved for a bridge. The DF should be changed to include space on the west side of Brickhill St for ramps and a bridge over the railway line.</p> <p>The DF states that Brickhill St from the level crossing to the A5 will be upgraded to grid road status. So V10 would be a grid road with a level crossing in the middle of it. That is not compatible with the definition of a grid road in the Mobility Strategy.</p>	See response to rep. no. 2.9

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34.2		<p>Housing</p> <p>Some of the north eastern part of the proposed employment area, the North Brickhill Street Character area, should be considered for housing. This site is adjacent to Bow Brickhill rail station and so has the opportunity for good sustainable transport links. The vacant employment site in Caldecotte, north of the railway line and adjacent to the station, should also be considered for housing.</p>	Not accepted. Site is allocated for employment in Plan:MK.
34.3		<p>Rail</p> <p>There should be some Rail connected warehouses in MK. Caldecotte South should be considered as a possible site.</p>	Noted. This is a matter for the developer to consider.
34.4		<p>2.7 Access and Movement</p> <p>Fig 2.6 claims that bus route 18 is hourly. This is incorrect. It is just once per day in each direction. Elsewhere 18 is hourly but Brickhill St is just an extension of the core route once per day in each direction.</p> <p>Bus route 17 is omitted. This passes the site 3 times per day in each direction.</p> <p>It is true, as claimed in 2.10, that there are bus routes that run along the A5 but they do not serve Caldecotte and could not do so. Highways England would not allow bus stops on their 70mph dual carriageway road and there is no grade separated crossing for pedestrians.</p> <p>There are, as claimed in 2.10, existing bus stops on Brickhill Street just north of the level crossing. However they are not served by any buses so are irrelevant with regard to accessing the site by bus.</p> <p>To sum up, there are bus stops not served by buses and bus services without bus stops. Neither provide bus access to the site.</p>	<p>Accepted. Amend figure 2.6 'Public Transport' and para 2.7 to read:</p> <ul style="list-style-type: none"> • <u>There are two existing bus routes (17 & 18) that run along the southern part of Brickhill Street which currently serves Woburn Sands, Bletchley and CMK. The 18 service runs once per day in each direction, with no service on Sundays. The 17 service passes the site three times per day in each direction.</u> • <u>There are frequent</u>

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		<p>bus routes that serve Caldecotte (although not on Sundays) <u>and that run along along the A5 and A146 (F70).</u> <u>The F70 service currently has no bus stops within close proximity to the site.</u></p> <ul style="list-style-type: none"> • There are existing bus stops on Brickhill Street, and on Station Road. <u>New bus stops are proposed on the A4146 at the entrance to the new Eaton Leys development.”</u>
34.5	<p>3.5 Movement Framework The DF should require the developers to provide a bus service between the site and both CMK and Bletchley with a frequency of half hourly or better. There should be a short, about 100m in length, bus-only road linking the north end of the spine road to Brickhill St so that bus services can operate through the site without having to double back.</p>	<p>Paragraph 3.5.7 requires that “an enhanced bus service will be required to enter the site”. Figure 3.1 has been amended to show proposed bus stops within</p>

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			the site. <u>The Council's</u> Highways Development Management Team is satisfied with the access arrangements.