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For and on behalf of  
**HB (South Caldecotte) Ltd**

**PLANNING STATEMENT**

**Land at South Caldecotte, Milton Keynes**

**Prepared by  
DLP Planning Ltd  
Bedford**

July 2019





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Appendix 1. Policy SD14 of Plan: MK

Appendix 2. Excerpt from Inspector's Report on Plan MK

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## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared to support an outline planning application with all matters apart from access reserved for the development of land at South Caldecotte, Milton Keynes, as allocated in policy SD14 of the adopted Plan: MK 2016-2031.

1.2 The application proposes the development of the site for up to 241,548 m<sup>2</sup> (2,600,000 sq ft) employment use, comprising of up to; 192,159 m<sup>2</sup> (Including mezzanine floors) of warehousing and distribution (Class B8) floorspace with ancillary B1a office space, up to 48,040 m<sup>2</sup> (Including mezzanine floors) of general industrial (Class B2) floorspace with ancillary B1a office space, 999 m<sup>2</sup> of a small standalone office (Class B1) and 350 m<sup>2</sup> small café ( Class A3) to serve the development; car and HGV parking areas, with earthworks, drainage and attenuation features and other associated infrastructure, a new primary access off Brickhill Street, alterations to Brickhill Street and provision of Grid Road reserve to Brickhill Street.

1.3 The Planning Statement should be read in conjunction with the following plans and technical documentation submitted as part of this application:

- Design and Access Statement
- Sustainable Drainage Statement
- Flood Risk Assessment
- Landscape and Visual Impact Assessment
- Arboricultural Impact Assessment
- Ecological Appraisal
- Archaeological Desk Based Assessment
- Geophysical Survey
- Archaeological Written Scheme of Investigation
- Transport Assessment
- Framework Travel Plan
- Noise Assessment
- Air Quality Assessment
- Lighting Assessment
- Phase 1 and Phase 2 Geo-Environmental Assessment

- Sustainable Design Statement
- Statement of Community Involvement

1.4 Before considering the policy context, this statement sets out the site's planning history and details of the proposed development, then reaches its conclusion as to why the development in all regards is one that is sustainable and should be approved without delay.

## 2.0 BACKGROUND, LOCAL AND NATIONAL CONTEXT

- 2.1 Before looking in detail at the development proposals it is important to review the local context and need for additional logistics and employment floorspace in the area.
- 2.2 The need for additional employment floorspace is identified within the recently adopted plan for the area Plan: MK; which sets out a target of 28,000-32,000 jobs over the plan period of 2016-2031.

### **The Applicant**

- 2.3 HB (South Caldecotte) Ltd is the applicant and is a wholly owned subsidiary of Hampton Brook set up to deliver the South Caldecotte development. Hampton Brook are a leading regional property development and Investment company specialising in delivering commercial developments for a wide range of occupiers and Institutional Funds.
- 2.4 Hampton Brook's emphasis is on delivering premium quality buildings that are based on a full understanding of occupier's requirements. They have delivered a number of schemes supporting inward investment and economic growth throughout the region and especially in Milton Keynes.
- 2.5 Hampton Brook has an excellent track record for development and delivery of employment floor space in Milton Keynes and throughout the East Midlands and South East. Examples of recent developments include:
  - Brioche Pasquier Wymbush Milton Keynes
  - Magnetic Park, Desborough
  - Velocity, Knowlhill, Milton Keynes
  - Reiser Kingston Milton Keynes
  - J16 M1 Logistics Park .
  - The Pinnacle, Milton Keynes
  - Trek Cycles HQ Milton Keynes
  - Express Park, Rushden
  - Luton Airport office development

### **The Logistics and Distribution Sector**

- 2.6 The storage and distribution sector is a key sector of the economy, that continues to develop and evolve. Logistics is becoming increasingly popular, with e-commerce playing an increasing role, alongside international trade, capital growth, and manufacturing.
- 2.7 Logistics as a sector is increasingly demanding higher skills employees where there are high degrees of automation require increased literacy, numeracy and ICT skills.

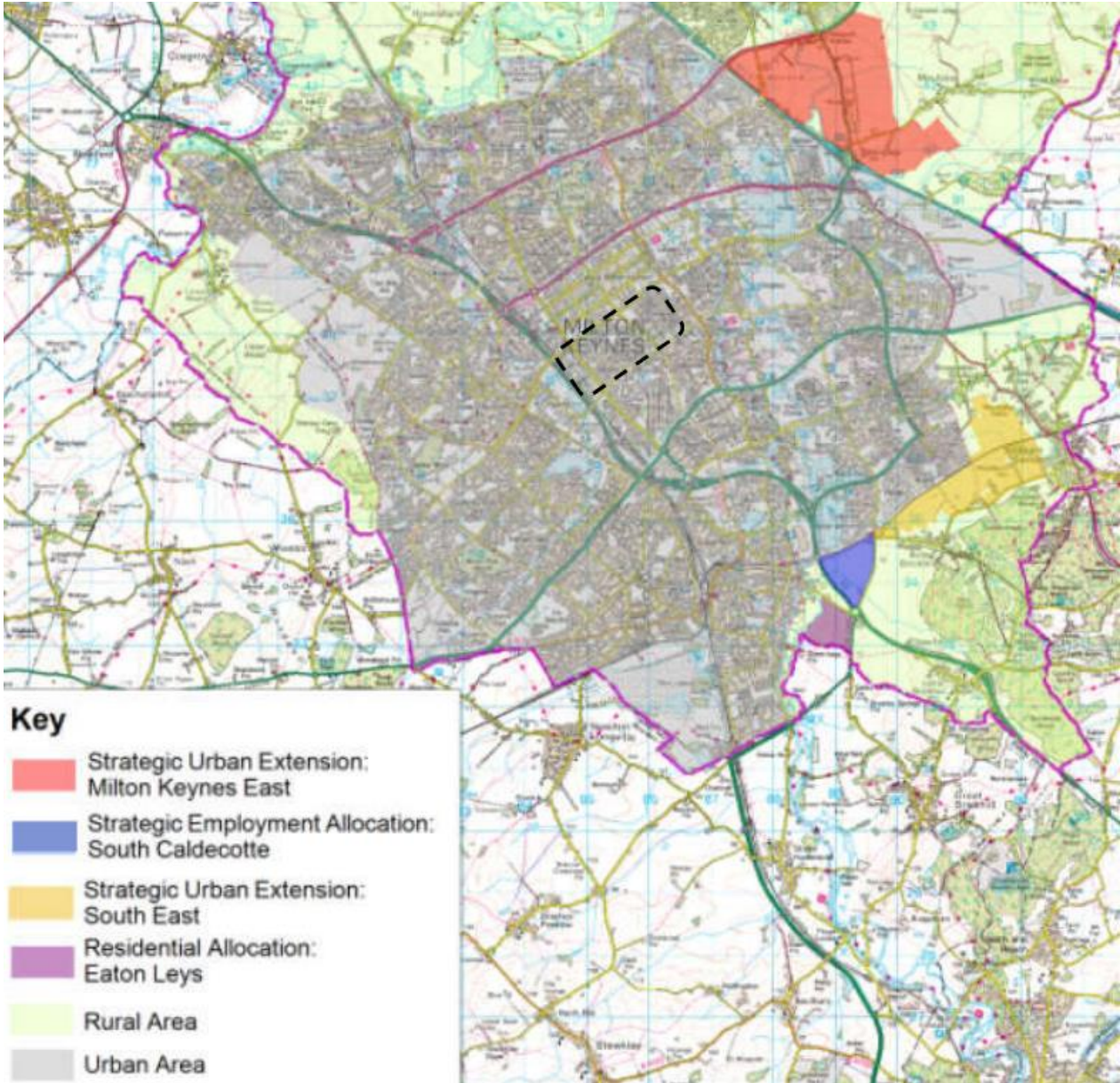
### **Strategic Importance of Milton Keynes for Growth**

- 2.8 Historically the heart of the country's logistics sector has been the 'Golden Triangle' located within the East Midlands, though increasingly other locations are becoming more attractive to business.
- 2.9 Milton Keynes is located within a strategically important location for storage and distribution uses, being the major employment centre within the region.
- 2.10 The location of Milton Keynes is particularly well suited for further growth, being located within the Oxford-Cambridge Arc. The National Infrastructure Commission has published the document 'Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc', which sets out recommendations for the government to drive growth across the wider region.
- 2.11 As part of its evidence base for Plan: MK, Milton Keynes Council commissioned the Milton Keynes Economic Growth and Employment Land Study - November 2015 in order to forecast future requirements for employment land. This was later updated in 2017, and accompanied by a Local Economic Assessment, and the MK Economic Development Strategy 2017-2027. These documents set out a requirement for new jobs and employment growth within Milton Keynes.
- 2.12 In this way, Milton Keynes has been identified locally and regionally as an important location for employment growth.



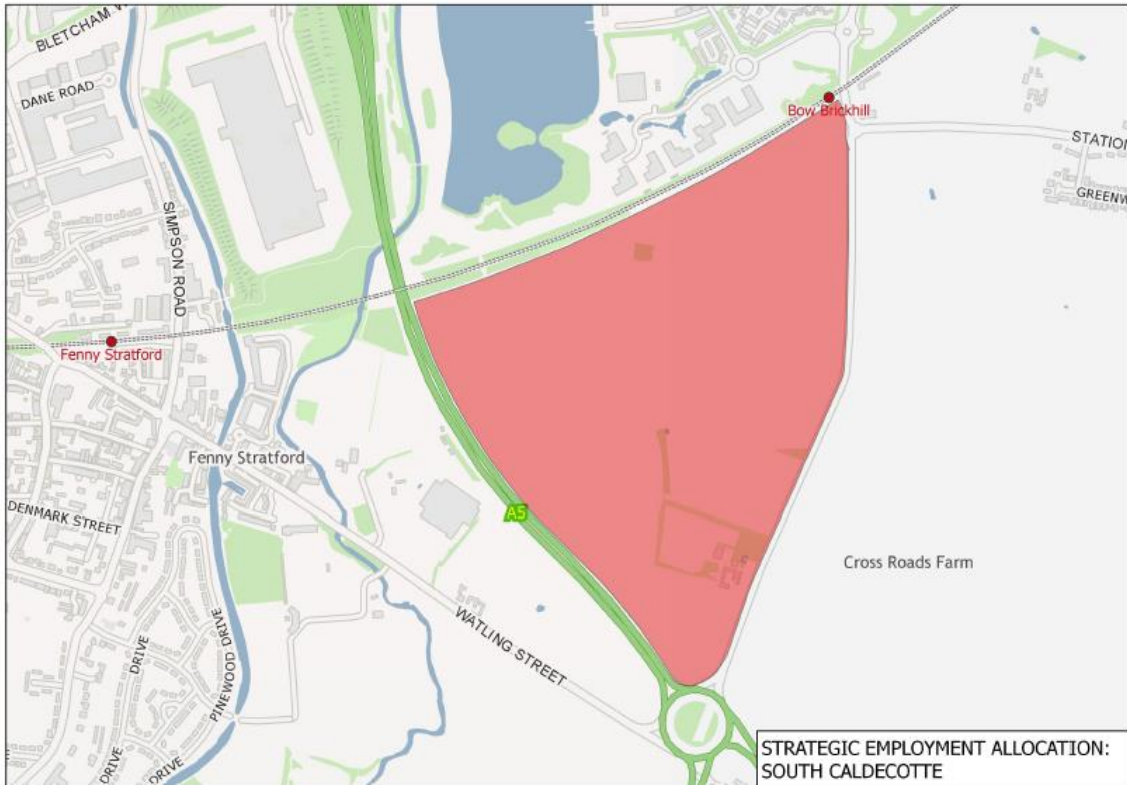
### **3.0 SITE LOCATION AND DESCRIPTION**

- 3.1 The application site is located within the administrative boundary of Milton Keynes, in the parish of Bow Brickhill.
- 3.2 The site is located approximately 6.2km from Central Milton Keynes. It is located adjacent to Bow Brickhill train station to the north of the site. The site is located off V10 Brickhill Street, west of the site is the A5 and this can be easily accessed from the site. The site is also relatively closely sited to junction 11A of the M1 motorway as a result, being approximately a 20 minute drive from the site. This provides access to the wider strategic road network.
- 3.3 To the north east, land is allocated for the South East Milton Keynes strategic urban extension (Policy SD11) for approximately 3000 dwellings. To the east lies farmland which generally slopes upwards towards an area of woodland known as The Brickhills. South of the site lies land at Eaton Leys (Policy SD13) where permission for up to 600 residential units has been granted. To the south east, the land (known as Levante Gate) was subject to a speculative planning application (reference 17/03233/OUT) for up to 500 residential units and a primary school this has recently been refused planning permission.
- 3.4 The site context is shown on the drawing below:



**Figure 1. Site Context – Source: Plan: MK - Infrastructure Delivery Plan (2018)**

## The Application Site



- 3.5 To the west of the A5 lies the River Ouzel. Beyond this is are the urban areas of Bletchley and Fenny Stratford.
- 3.6 In extent, the site covers an area of approximately 57 hectares and forms the whole of the South Caldecotte site allocated within Policy SD14 in Plan:MK.
- 3.7 The site is well enclosed due to it being bounded by V10 Brickhill Street to the east, the A5 to the west and the railway line to the north. The site is generally made up of a mixture of arable farmland and pasture, set within large fields separated by mature hedgerows. The site forms a triangular shape, with the existing farm buildings situated in the southern portion of the site taking access from V10 Brickhill Street. Physically the site is relatively flat, with a slight incline from south to north-west of the site.
- 3.8 The site is currently accessed via Brickhill Street. Brickhill Street connects to the A5 to the south and leads north into Milton Keynes. To the north east of the Site is Bow Brickhill station, which is located on the northern side of the railway line. There is a level crossing on Brickhill Street where it crosses the railway line. The Site is currently not directly served by any bus

stops but routes 17 and 18 from Bletchley pass the Site and there are several routes which connect Caldecotte northwards to Central MK.

- 3.9 The site itself comprises approximately 57 hectares of arable farmland and pasture. The northern half of the site is in arable cultivation, formed of two fields separated by a hedgerow. The southern half of the Site is used for pasture and is made up of smaller fields again separated by hedgerows. The farm complex, comprising of a farm house and several small associated barns and sheds, is located in the south east corner of the Site.
- 3.10 The site is relatively enclosed on its boundaries by a mixture of established native hedgerows and trees.
- 3.11 The site is located within Flood Zone 1 as defined by the Environment Agency Flood Map and therefore demonstrates a low risk of fluvial flooding (i.e. 1 in 1000-year event).
- 3.12 The site is not located within the bounds of either the Green Belt or any Area of Outstanding Natural Beauty (AONB). It is relatively unconstrained in planning terms.
- 3.13 There are no listed buildings within vicinity of the site. The Roman town of Magiovinium and Roman fort (list entry number: 1006943) is located south-west of the site, but this is separated from the site by the A5. This is a scheduled monument.
- 3.14 The northern and western boundaries of the Site, following the A5 and railway line, lie within Wildlife Corridors as defined on the Local Plan Proposals Map. A part of the Site to the west is designated as a priority habitat, a lowland meadow. This is defined in the UK Biodiversity Action Plan as: '*a key habitat, important for flowers, invertebrates and ground-nesting birds. Sensitive to changes in hydrology and nutrient status.*' This area has been surveyed and found to be a poor quality example of its type.



## 4.0 PLANNING HISTORY

4.1 There are only two previous planning applications which have been submitted on site, and these are as follows:

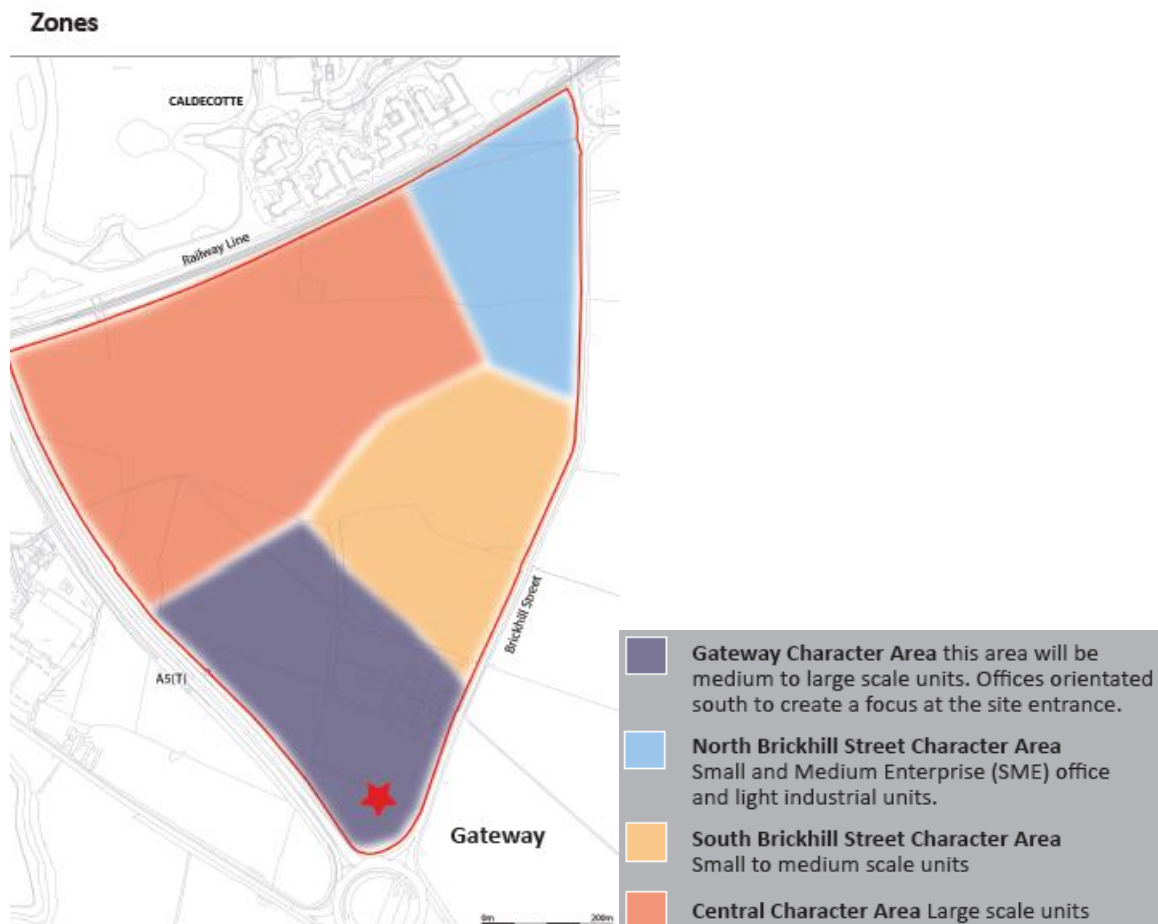
Reference	Description	Address	Decision
00/01954/FUL	Change of use of barn to business use for the storage and sale of animal feed.	Cross Roads Farm Bow Brickhill Road Bow Brickhill Milton Keynes MK17 9JL	Permitted  12/02/2001
05/01722/FUL	Single storey side extension.	Cross Roads Farm Bow Brickhill Road Bow Brickhill Milton Keynes MK17 9JL	Permitted  09/12/2005

4.2 There have not been any other planning applications submitted on site, nor any others of relevance.

## 5.0 PROPOSED DEVELOPMENT

- 5.1 The proposal seeks to bring development forward in accordance with policy SD14 set out in Plan: MK (2019), which allocates the site for employment uses. The policy requires the site to be developed for at least 195,000m<sup>2</sup> of B2 and B8 floorspace with ancillary B1a uses.
- 5.2 The broad principles of the development encompass the following considerations. The split of development will be approximately 80% B8 Class floorspace and maximum 20% B2 Class, with ancillary B1(a) Class offices. In addition to provide support to the development a small standalone B1 Class office and small café (Class A3) are proposed to serve the development. The height of buildings proposed will be limited to no more than 24 metres. As part of the proposal, the existing farm buildings will be demolished. The buildings will be suitably designed in order to ensure that impact on the landscape is minimised, particularly in views from the east towards the village of Bow Brickhill, this has been informed by the Landscape and Visual Impact Assessment which accompanies the planning application.
- 5.3 The development will be accessed from Brickhill Street via a new roundabout to be created as part of the development. Brickhill Street is proposed to be upgraded to a dual carriageway between the A5 and the new roundabout, along a distance of approximately 400 metres. A Grid Road reserve will be provided to the east of Brickhill Street between the A5 roundabout and the railway.
- 5.4 Within the site, the main estate road will be built to adoptable standard and designed to allow public transport to penetrate into the site. The site will be served directly by public transport, with bus routes linking into Bletchley and Milton Keynes. Discussions on provision are ongoing with the service provider at this stage.
- 5.5 The Site will be serviced by Redways, connecting both north towards the railway station and Caldecotte beyond, and south, meeting an existing redway which connects to Watling Street and into Bletchley/Fenny Stratford.
- 5.6 The existing Public Right of Way running through the north of the Site will be maintained and enhanced with localised diversions to facilitate the proposed development. This will include improving the currently unkempt route through to Caldecotte Lake and the connections beyond.

5.7 Within the site, in line with the emerging development brief, it is expected that there will be four development zones. Within each, level development platforms will need to be created to accommodate development. Smaller scale units are expected to be accommodated on higher ground towards the north east corner. Larger footprint units will be accommodated within the other development zones. Buildings located in the east of the Site will have their short ends oriented towards the Brickhills breaking up the extent of development and the impact on long and short-range views of the Site. Although at this stage the detailed design is to be confirmed, landscape impact will be minimised as much as possible for this form of development. The scheme will be designed in a way that is sensitive to the nearby settlement of Bow Brickhill.



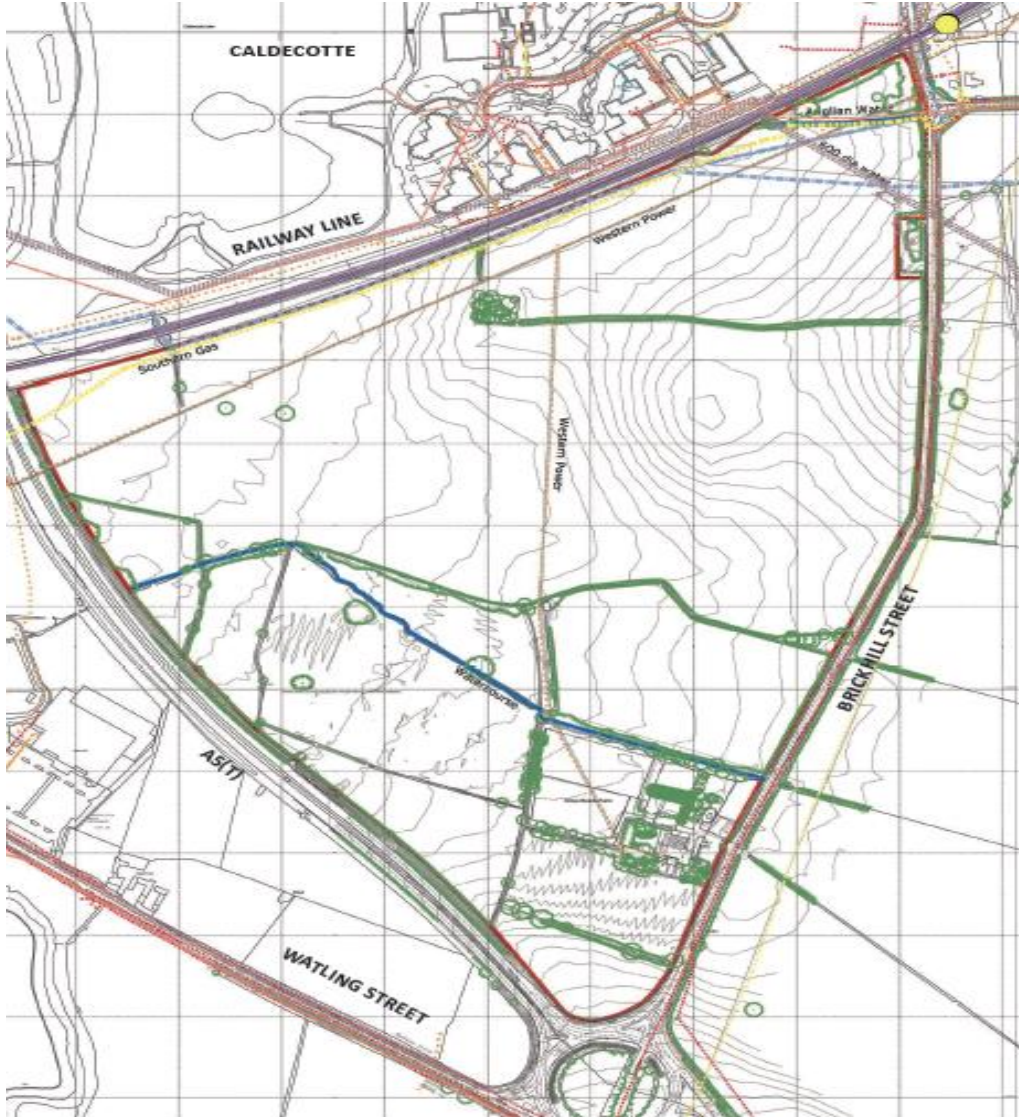
**Figure 2. Development Zones**

5.8 To the western side of the Site, an area of green link will be created. This area will be multi-functional containing new vegetation to soften views of the development, surface water attenuation features as well as leisure routes for use by pedestrians and cyclists. The green

link will also act as a wildlife corridor, as currently designated on the adopted Proposals Map.

- 5.9 Given the large footprint nature of the proposed use it is inevitable that hedgerows and trees within the site will need to be removed. However, the proposed development will see a significant increase in the overall length of hedgerow within the site as a result of new boundary planting and additional landscaping. Whilst the proposals would result in the loss of the poor quality lowland meadow, mitigation measures are proposed to provide new habitat areas as well as improving access to these by creating a green link between the built development and the railway and A5.
- 5.10 All surface water will be dealt with in accordance with the SUDS drainage hierarchy. In addition to drainage swales within the green link, swales will also be created within the development. The SUDS features will be appropriately designed and planted to contribute to the ecological value of the site.
- 5.11 Within the site, the existing ordinary water course will be re-routed to allow development platforms to be created without the need to culvert long lengths of the stream. Where the watercourse lies within the IDB boundary, a 9m easement to both sides of the watercourse, clear of landscaping, will be provided to comply with IDB byelaws. Access to the watercourse will be maintained via the existing access from the A5.
- 5.12 To the western edge of the site, a landscaped buffer will be created within the development area and the Grid Road reserve. This will include taller planting to act as a partial screen to development, softening its impact.





**Figure 3.** Constraints Plan showing locations of hedgerows and watercourse to be diverted.

## 6.0 PLANNING POLICY CONTEXT

6.1 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 (The Act) requires that the determination of a planning application is undertaken in accordance with the development plan, unless material considerations indicate otherwise.

6.2 For the purposes of this planning application the adopted development plan comprises the following:

- Site Allocations DPD (July 2018)
- Plan: MK (Adopted March 2019)

6.3 Material considerations include the following:

- National Planning Policy Framework (the Framework)
- National Planning Practice Guidance (NPPG)
- Supplementary Planning Documents/Guidance (SPDs/SPGs)
- Revised South Caldecotte Development Framework (Currently at Consultation Stage)

### **The National Planning Policy Framework (2019)**

6.4 National planning policy is a material consideration in the context of Section 38(6) of the Planning Act and as such forms part of the statutory test.

6.5 In July 2018, the Government published the revised National Planning Policy Framework (the Framework) which sets out its requirements for the planning system in seeking to ensure sustainable development. The Framework, whilst not prescriptive, is however material to the consideration of all planning proposals and seeks positively to encourage new development. At its heart it provides a 'presumption in favour of sustainable development'.

6.6 The proposal is considered to constitute a sustainable form of development for which the benefits would be significant and would not be demonstrably outweighed by any adverse impacts. This is recognised in the allocation of the site within the emerging development plan.

6.7 **Paragraph 8** sets out the three strands to the delivery of sustainable development through the planning system delivering an economic, social and environmental objective. It states:

- a) ***“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right***

*places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

- b) **a social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) **an environmental objective** – *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

6.8 **Paragraph 11** sets out the basis for the presumption in favour of sustainable development and states:

*“Plans for decisions should apply a presumption in favour of sustainable development.*

*For **plan-making** this means that:*

- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

*For **decision-taking** this means:*

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

### **Building a strong, competitive economy**

- 6.9 **Paragraph 80** states that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

### **Promoting sustainable transport**

- 6.10 **Paragraph 102** encourages transport issues to be considered from the earliest stage possible. This is in order for any potential impacts to be addressed and opportunities for the promotion of public transport, walking and cycling can be pursued in the early stages of the development proposal.
- 6.11 **Paragraph 105** provides some commentary on parking standards for non-residential development, in that they should take the accessibility of the development and type, mix and use into consideration.
- 6.12 **Paragraph 108** states that it should be ensured that:
- a) *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
  - b) *safe and suitable access to the site can be achieved for all users; and*
  - c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
- 6.13 **Paragraph 109** explains that development should only be refused on highways grounds if there is an unacceptable effect on highway safety or the road impacts would be classed as severe.
- 6.14 **Paragraph 110** states that applications for development should:
- a) *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus*

*or other public transport services, and appropriate facilities that encourage public transport use;*

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

6.15 A Transport Assessment has been prepared and submitted as part of this application.

#### **Achieving well-designed places**

6.16 **Paragraph 124** states that good design is a key aspect of sustainable development.

6.17 **Paragraph 127** requires that planning decisions should aim to ensure that developments:

- a) “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

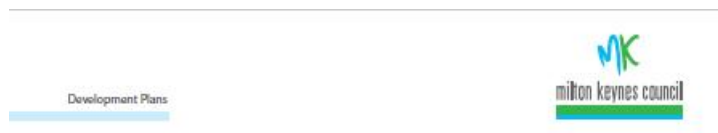
#### **Decision-making**

6.18 **Paragraph 38** sets out the Framework’s expectations for how councils should approach decision making. This paragraph states that decision making should be approached in a positive way to foster sustainable development; that councils should look for solutions rather than problems; and that decision makers should approve applications for sustainable

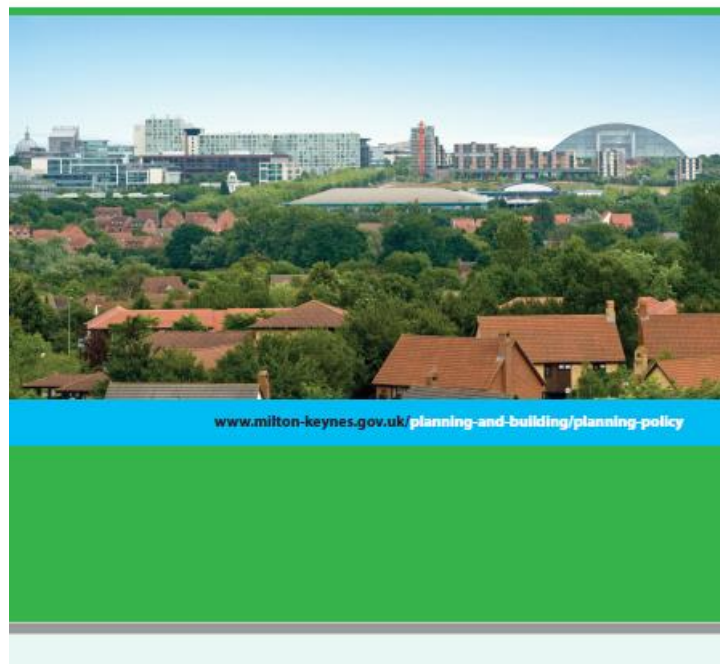


development where possible.

**The Development Plan**  
**Plan:MK**



Plan:MK 2016 - 2031



- 6.19 Plan:MK underwent examination and a main modifications consultation which ran from 31<sup>st</sup> October 2018 to 12<sup>th</sup> December 2018. Land at Bow Brickhill, South Caldecotte is allocated for the development of B2/B8 units under policy SD14.
- 6.20 The inspector declared that the plan is sound and capable of being adopted within their letter dated 13/02/19. It was adopted by Full Council on 20/03/19. It can be given full weight as a result.

- 6.21 **Strategic Objective 5** emphasises the need to allocate employment land and “*pursue a vigorous economic development strategy so that the business sector and local economy are supported, existing firms can expand, new firms are attracted, the level of working skills among the local population is enhanced and the area’s resident population can find employment locally.*”
- 6.22 In line with national policy, the overarching strategy of the emerging Plan:MK is the presumption in favour of sustainable development, and this is outlined in **Policy MK1**.
- 6.23 **Policy DS3** provides commentary on the employment development strategy for Milton Keynes and conveys the importance of capitalise on the Borough’s location halfway between London and Birmingham; and also its position with the Oxford to Cambridge Growth Corridor. It is explained that the allocation of new employment land at appropriate locations will help support the economic needs of the Borough.
- 6.24 **Policy SD9** sets out general principles for strategic urban extensions, including those on unallocated strategic developments. This seeks to ensure that a consistent approach is taken for all strategic proposals.
- 6.25 **Policy SD14** allocates the proposal site for employment use. It states the following:

*“Land south of Milton Keynes in South Caldecotte, as shown on the Key Diagram and Policies Map, is allocated for the development of a mix of Class B2 and B8 employment floorspace within the plan period.*

*The development will be brought forward in line with all relevant policies in Plan:MK, particularly Policy SD1, SD9, SD10 and INF1.*

*The development must accord with the following principles:*

- 1. A minimum of 195,000m<sup>2</sup> of Class B2/B8 and ancillary B1 employment floorspace.*
- 2. Access to be taken from Brickhill Street, which will be upgraded to grid road standard.*
- 3. The development will be subject to a Transport Assessment, which will investigate the development’s impact on the local highway network, including the A5/Watling Street roundabout. The development will contribute to any necessary improvements, as agreed by the relevant highway authorities and Highways England. The Transport Assessment will also set out the basis for effective public connections to and from the site to be implemented prior to completion of the development.*
- 4. A green open space link will be created on the site, linked into Caldecotte Lake*

*to the north and providing future opportunity to link the park to the south/east. The open space link should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds as part of a Sustainable Urban Drainage system across the site.*

5. *Direct footpath connections to Bow Brickhill railway station and the existing Public Right of Way running along the site's northern boundary will be effectively integrated into the development.*
6. *Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets.*
7. *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.*
8. *Existing vegetation to site boundaries should be maintained and enhanced to screen the development from wider views where a LVIA deems this necessary. New planting should be of native species to mitigate the loss of hedgerows necessary to facilitate development.*
9. *A desktop Archaeological Assessment should be undertaken to understand the likely presence of archaeological remains within the site. The recommendations of the Assessment will be implemented prior to each phase of development commencing. It may be necessary to undertake a field investigation to understand the archaeological potential and significance of this site and to inform the layout of development."*

6.26 **Policy ER1** states that planning permission will be granted for B1/B2/B8 at Caldecotte South for 56.8 hectares.

6.27 **Policy CT2** states that development proposals will be permitted if transport impacts are mitigated through necessary improvements to the highway network. The development proposes improvements to the A5 Kelly's Roundabout and will dual the road along Brickhill Street from the proposed roundabout at the entrance of the site down to the roundabout.

6.28 **Policy CT2** also supports the enhancement of public rights of way. The proposal includes a redway through the site and provides a leisure route. This is in line with **Policy CT3** which supports developments who enable and encourage people to walk and cycle to their employment. A full Transport Statement has been produced and accompanies this planning application.

6.29 **Policy CT4** supports the protection and enhancement of existing Redways.



6.30 **Policy CT5** discusses public transport and states that:

- i. *“Road layouts must include direct, convenient and safe public transport routes and be free of obstructive parking;*
- ii. *Public Transport priority measures must be implemented, where appropriate;*
- iii. *Where appropriate and necessary, all houses and most other developments must be no more than 400m from a bus stop;*
- iv. *Bus stops must have good pedestrian access, be open to public supervision and be sheltered where appropriate; and*
- v. *Specific consideration must be given to the provision of public transport services in planning new development.”*

6.31 One bus stop is proposed within the site on the entrance road which spurs off the proposed roundabout on Brickhill Street.

6.32 **Policy CT10** outlines the parking provision required, and that developments should meet the Council's full parking standards. It also iterates that electric vehicle charging points should be provided.

6.33 **Policy INF1** states that all new development must provide necessary on and off-site infrastructure to support and mitigate the impact of development. Any developer contributions will be sorted via a s106 agreement for this proposal.

6.34 **Policy FR1** requires all new development to incorporate a surface water drainage system.

6.35 **Policy NE2** relates to the protection of priority habitats and states that: “when there is a reasonable likelihood of the presence of statutorily protected species or their habitats, or where the site contains priority species or habitats identified in the Buckinghamshire and Milton Keynes Biodiversity Action Plan, development will not be permitted until it has been demonstrated that the proposed development will not result in a negative impact upon those species and habitats.”

6.36 **Policy NE3** states the need for development proposals to maintain and protect biodiversity and geological resources. It is also necessary for a mitigation hierarchy to be demonstrated along with enhancements where compensation is required.

6.37 **Policy HE1** relates to heritage and explains that proposals are expected to sustain and enhance heritage assets. This includes listed buildings, conservations areas, scheduled

ancient monuments and non-designated archaeological sites, registered parks and gardens, assets and assets on the MK New-Town Heritage Register.

6.38 **Policy NE4** explains that development proposals need to provide new, or enhance and contribute to existing green infrastructure.

6.39 **Policy D1** requires high quality design and states that development will be permitted if they meet the following principles:

1. *“The development proposals as a whole respond appropriately to the site and surrounding context.*
2. *Continuity of street frontage and locating fronts of buildings to face the street or public space.*
3. *Appropriate framing of space to define public and private areas, with front gardens designed to be clearly private through appropriate boundary treatments and use of hard surfaces that also maintain an active frontage and passive surveillance of the street.*
4. *The layout should maximise the surveillance of the public realm, prevention of crime and minimise the perception of crime.*
5. *Soft and hard landscaping that continues the verdant and green character of Milton Keynes, enhances the quality of the public realm, is robust to the demands placed upon the public realm, is appropriate to their context and can be maintained and managed without significant cost. In particular, street trees and planting are incorporated to soften the streetscape and ensure the public realm is not dominated by hard surfaces and boundaries and by parked cars.*
6. *Landscape and boundary treatments integrate with and/or enhance those of the surrounding area.*
7. *Ease of movement by creating places that are permeable and well connected with a safe, attractive and convenient hierarchical network of routes that balances the provision for walking, cycling and public transport with that for private motor vehicles.*
8. *Legibility by providing recognisable streets, districts, nodes, edges and landmarks to help people to find their way around.*
9. *A variety of layouts, street types, building sizes and forms, landscapes, uses and housing tenues across the development.”*

6.40 **Policy D2** states that development proposals need to meet the following criteria to be permitted:

1. *“The layout, massing/scale, boundary treatments and landscaping of a development and appearance of buildings exhibit a positive character or sense of place for a development.*

2. *The character of the development is locally inspired where appropriate (for example in or adjacent to conservation areas with a strong positive character).*
3. *Where there is no positive built form character on the site or surrounding area, new development is designed to create its own distinctive character or sense of place using existing site features, the layout of the development and the appearance of buildings.*
4. *The design allows for visual interest through the careful use of detailing, where this is appropriate to the character of the area.”*

6.41 **Policy D3** states that the design and appearance of buildings is important as this contributes to the character of the area, particularly for larger developments. Matters of design will be left to a reserved matters application at a later date. However these policies have been taken into account and considered when designing the proposed indicative masterplan.

6.42 **Policy D4** sets out the requirements for amenity and street scene. Again, whilst the layout will be dealt with at reserved matters stage, this has still been taken into account to form the indicative masterplan submitted as part of the outline application.

6.43 **Policy CC1** requires the provision of public art; this has been accounted for in the indicative masterplan.

6.44 **Policy SC1** requires that development proposals need to demonstrate that they have been constructed sustainably or achieve a BREEAM Outstanding rating.

## South Caldecotte Development Framework

Urban Design & Landscape Architecture



### South Caldecotte Development Framework Supplementary Planning Document

REVISED CONSULTATION DRAFT



February 2019

- 6.45 As the Council has set out in policy SD10 of Plan:MK, major site allocations are to be accompanied by a Development Framework providing guidance on how the site might be development. The Framework does not seek to set new policy.
- 6.46 The South Caldecotte Development Framework was initially published in February 2018 and subject to consultation. Since this time, a further draft has been published in March 2019 and consultation lasted until July 2019.

### Supplementary Planning Documents

- 6.47 Following the adoption of Plan :MK, it is understood that Milton Keynes Council are in the process of adopting a new Supplementary Planning Document on Planning Obligations. This

is recently underwent consultation.

### **MK Futures 2050 Commission 'Vision' Report**

- 6.48 The vision for the growth of Milton Keynes up to 2050 was published by the MK Futures 2050 Commission in 2017. The findings of the commission, set up specifically to assess the long-term potential of Milton Keynes, were endorsed by MKC and will be used as a basis for discussion with neighbouring authorities, the residents of Milton Keynes and the Government as the debate on how the city will meet development pressures over the next 30 – 35 years continues.
- 6.49 The report suggests continued growth of Milton Keynes, both in employment and housing terms over the next 30 years. The application site can help contribute to the employment aspirations set out in the report and in existing and emerging policy.

## 7.0 PLANNING ASSESSMENT

### **Principle of Development and Need**

- 7.1 The site itself is allocated for employment development within Plan:MK, and as such the principle of this type of development proposed on site has already been set out within the plan and should be considered acceptable.
- 7.2 The Inspector's report published on 12<sup>th</sup> February 2019 at paragraphs 120 - 126 states that South Caldecotte is to be the principal employment land allocation and will meet the identified need for warehousing and distribution in Milton Keynes. The Inspector explains that the site is relatively unconstrained and any environmental impacts could be mitigated. The Inspector states that the site would create a new gateway development to the south of the city without being harmful to the urban character, and that the site would be sufficiently separated from the main settlement of Bow Brickhill and that the impact on nearby properties could be minimised through landscaping. The Inspector then concludes that the allocation of this site for employment is soundly based and it would be effective in meeting forecast economic growth.
- 7.3 The contribution that the site will make to employment creation is set out in more detail in paragraph 7.87 of this statement.
- 7.4 In this way the site has been allocated within Plan:MK for the delivery of at least 195,000m<sup>2</sup> employment floorspace. This is a key material consideration that must be given great weight in any decision making exercise.

### **Background**

#### ***Drainage***

- 7.5 As part of this outline application, a full Flood Risk Assessment and Sustainable Drainage Statement has been carried out by BWB.
- 7.6 The Flood Risk Assessment demonstrates that the proposed development would not harmfully increase flood risk, subject to the recommended flood mitigation strategies being implemented.
- 7.7 The site is shown to be located entirely within Flood Zone 1. Site-specific hydraulic modelling has shown that two ordinary watercourses that are present on site require mitigation

measures to be implemented and this will be undertaken as part of the proposals. Interactions of the watercourses with the downstream River Ouzel, surface water runoff from the upstream hillside, and underlying groundwater will also be addressed.

- 7.8 It is proposed to intercept and divert the ordinary watercourses around the development. The strategy will also include features to intercept and divert the overland flood flows entering the site. The site will be reprofiled to raise the development above the floodplain, thereby mitigating the flood risk from fluvial, surface water, and groundwater sources. Floodplain lost to the development will be compensated for within the watercourse corridors on the site.
- 7.9 Due to the ordinary watercourses flowing on the hillside above them, it will not be possible to offer a freeboard above adjacent flood levels to 'Units 5/6/7 and 'Unit 1'. Instead it is recommended that resilience is offered to these plots by raising bank levels of the adjacent channels 300mm above the 1 in 100-year+35% flood level, or to a level above the 1 in 100-year+65 flood level, whichever is greatest.
- 7.10 Additionally, ground levels surrounding the proposed buildings should be profiled to encourage pluvial runoff and overland flows away from the built development and towards the nearest drainage point.
- 7.11 Surface water runoff from the development will be controlled appropriately and discharged to the local watercourse at the equivalent greenfield QBAR rate. Attenuated storage will be provided within the elevated development, outside of the floodplain.
- 7.12 In compliance with the requirements of the National Planning Policy Framework, and subject to the mitigation measures proposed, the development will not increase flood risk to the wider catchment area as a result of suitable management of surface water runoff discharging from the site.
- 7.13 The Sustainable Drainage Statement sets out the principles of drainage design for a development and summarises the reasoning behind the chosen design.
- 7.14 Two options have been considered with above ground and below ground options being utilised. In both cases a restricted discharge of 2 l/s /ha has been proposed, as defined by the Bedford Group Internal Drainage Board. SuDS features where possible have been proposed, this includes attenuation basins, cellular storage and swales.

7.15 The preferred options for Foul flows are for them to be directed in a southerly direction to the existing sewer located on Watling Street, with a pumping station located within the site to enable this. Further discussion with Anglian Water at the appropriate juncture will be undertaken to deliver this as part of a S104 agreement for the development.

7.16 It is envisaged that the final drainage strategy will be determined at reserved matters stage.

### **Landscape and Visual Impact**

7.17 A full Landscape and Visual Impact Assessment has been prepared by Aspect Landscape Planning.

7.18 This appraises the site context in landscape terms. It then assesses the effects of the proposed development in line with GLVIA3 (Guidelines for Landscape and Visual Impact Assessment 3 Edition). This is the standard recognised methodology within the landscape planning industry.

7.19 In allocating the site, Policy SD14 sets out that *'Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets. 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. Existing vegetation to site boundaries should be maintained and enhanced to screen the development from wider views where a LVIA deems this necessary. New planting should be of native species to mitigate the loss of hedgerows necessary to facilitate development.'*

7.20 The LVIA seeks to analyse the baseline site conditions. The site is bounded by roads to the western, eastern and southern boundaries. There are a mixture of native hedgerows and trees which separate the site from these road corridors and the railway line to the north. To the north is the Built up area of Milton Keynes. Public Rights of Way run across the north of the site.

7.21 The LVIA identifies that the site is within two National Character Areas (As set out by Natural England), namely Bedfordshire and Cambridgeshire Claylands and Bedfordshire Greensand Ridge. The report also assesses the site against the Milton Keynes Landscape Character Assessment. (2016).



- 7.22 The report follows the methodology of assessing the site's Landscape Susceptibility, Landscape Value, Landscape Sensitivity and carries out a Visual Baseline Assessment. The latter acknowledges that the visibility of the site is highly localised as a result of boundary vegetation. Middle and longer distance views are restricted and contained, with some glimpsed views of the site possible on higher ground to the east.
- 7.23 In terms of the effect of the proposals upon the receiving landscape character, it is concluded that whilst the loss of agricultural land in landscape terms represents a degree of harm, the site, in its current form does not contribute particularly positively to the localised or wider landscape or townscape setting. The character assessment identifies that the application site is heavily influenced by the proximity of urbanising features such as the adjacent road corridors including the A5 road corridor and forms a clearly defined boundary to the site. The application site is relatively enclosed by the adjoining established vegetation which will largely be retained as part of the proposals. Additional planting is to be implemented along the site boundaries and internally. This will ensure an enhanced and robust visual edge to the proposals and will contribute to the local green infrastructure. It is therefore concluded that the proposals will not give rise to significant effects in terms of landscape character and the site has the capacity to accommodate the proposals without significant visual harm arising.
- 7.24 In terms of the effect of the proposals upon the receiving visual environment, views of the application site are well contained through a combination of the low lying flat topography, established vegetation cover and intervening built form associated with the immediate setting. As such, views of the proposals will be highly localised. Where they are available, the proposals will integrate successfully into the surrounding landscape when considering the existing built form, urbanising components and adjacent road corridors. While the proposals will represent a degree of change within localised views, they will not harm the context of these views and it is considered that the proposals can be accommodated.
- 7.25 Within the context of views from the wider rural landscape to the south, the development would be well contained and, where glimpsed views through vegetation are available, the proportion of the development visible would be seen in the context of the existing built-up area of Milton Keynes. Overall, it is considered that the proposed development can be integrated without significant harm to the receiving visual environment.

- 7.26 Aspect Landscape have provided a Landscape Strategy which sets out our general approach to landscape in order to ensure that the development can be landscaped appropriately. A detailed scheme will be developed as part of the reserved matters application should approval be granted.
- 7.27 Whilst the external appearance of the development is a reserved matter, the approach set out within the Design and Access Statement prepared by Stephen George and Partners sets out how the development would achieve a high standard of design.

### ***Ecology***

- 7.28 An Ecological Appraisal has been undertaken by Aspect Ecology. The site was surveyed between October 2017, based on standard extended Phase 1 methodology. In addition, a general appraisal of faunal species was undertaken to record the potential presence of any protected, rare or notable species. Specific surveys were also conducted in respect of Bats, Badger, Water Vole, Otter, Reptiles, Great Crested Newt and birds during 2017 and 2018. Detailed botanical surveys of the woodland and pastoral fields were carried out in 2018.
- 7.29 A Milton Keynes Wildlife Corridor is partially located within the west of the site. Under the proposals, the on-site habitats will be enhanced through the provision of a green link along the western boundary, therefore retaining the function of the designation. A Milton Keynes Wildlife Corridor is also located adjacent to the north of the site along the railway and will be retained within the proposed green link. Other designations in the local area are well separated from the site.
- 7.30 The site comprises a mix of pastoral and arable agricultural land bound by hedgerows, scrub and tree lines, and a parcel of land containing a residential dwelling, associated buildings, two ponds, small orchard and plantation woodland. The majority of the habitats on-site do not constitute important ecological features. The poor quality lowland meadow, hedgerows, mature Black Poplar trees, woodland and stream do form important ecological features. As such, losses of these habitats will be mitigated for through new habitat creation and the stream will be re-routed with enhanced habitat created. New and retained habitats will be subject to appropriate long-term management.
- 7.31 In terms of protected species, low numbers of Brown Long-eared Bats, Common Pipistrelle and Soprano Pipistrelle are roosting within a number of the on-site buildings. These and other

bat species also utilise the site for foraging and commuting. Badgers utilise the site for foraging, although no setts have been recorded on-site. Common Lizard and a single juvenile Slow-worm have been recorded on-site, as well as a range of bird species and Water Vole within the stream. Outline mitigation strategies have therefore been presented for these species within this report.

- 7.32 The proposals present the opportunity to secure a number of biodiversity benefits, including new landscape planting, and faunal specific enhancements such as the provision of hibernacula for reptiles.
- 7.33 The proposals have sought to minimise impacts on biodiversity and the proposals provide opportunities for ecological enhancements.

### ***Archaeology***

- 7.34 An Archaeological desk-based Heritage Assessment and Archaeological Geo-Physical Survey has been carried out by MOLA.
- 7.35 The areas to the north, south and south-west of the site have been subject to many archaeological excavations which have shown that the site lies between areas of dense Iron Age and Roman settlements. At Caldecotte to the north of the site, Iron Age enclosures and Roman settlement remains have been found. The Roman road of Watling Street and the small Roman defended town of Magiovinium lie close to the south-west boundary of the site and further Iron Age and Roman remains have been found to the south at Galley Lane. There are no designated heritage assets within the site but there are two references in the Historic Environment Record that lie within the boundary.
- 7.36 The Archaeological Geophysical Survey undertook a magnetometer survey of circa 62ha of land to the south of Caldecotte, Milton Keynes. The survey area lay close to the scheduled remains of the Roman town of Magiovinium. A Roman street was detected leading north from the town, with suburban settlement or industrial remains lying to either side, and a separate area of Roman suburbs was detected in the southernmost part of the survey area. Few archaeological remains were detected elsewhere, apart from a large isolated enclosure of possible Iron Age or Roman date and medieval to early post-medieval ridge and furrow.
- 7.37 A Written Scheme of Investigation has been prepared by CgMs Heritage. This sets out an investigate strategy and method statement, as well as details of how any archaeological finds

will be reported.

7.38 The reports provided with the planning application illustrate that heritage assets in the form of buried archaeology remains can be mitigated through the planning process.

### **Transport**

7.39 BWB Consulting Ltd have carried out a full Transport Assessment in relation to the scheme.

7.40 In terms of improvements to the sustainable infrastructure, a new Redway will be provided connecting the existing Redways at the A5 junction and on Brickhill Street to the north of the site. A route across the level crossing will also be provided to connect the existing Redways to the site Redway.

7.41 The proposed public transport strategy provides additional bus stops and routes through the site. Commercial services 11/12, which currently route to/from South Caldecotte Lake Drive will be extended to serve the proposed development.

7.42 Discussions are currently ongoing with the public transport team and relevant local operators to agree the details.

7.43 BWB has engaged in pre-application scoping discussions with Milton Keynes Council and their appointed transport consultants, Stirling Maynard Transport (SMT) and Highways England and their consultants, AECOM , to agree the key parameters of the Transport Assessment. This included the below study area junctions, the proposed site access roundabout and queue assessment of Bow Brickhill level crossing.

1. A5/A4146/Watling Street/V10 Brickhill Street (Kelly's Kitchen Roundabout)
2. V10 Brickhill Street/Station Road mini-roundabout
3. V10 Brickhill Street/Caldecotte Lake Drive (Tilbrook Roundabout)
4. A4146 Bletcham Way/V10 Brickhill Street (Walton Park Roundabout)

7.44 Junction turning count surveys were undertaken at the above junctions in October 2017 and growth factors were applied to represent 2018 as the baseline planning application year. Queue length surveys were also undertaken on Kelly's Kitchen Roundabout, Bow Brickhill level crossing and Walton Park Roundabout. In addition, automatic traffic count survey was undertaken on the V10 Brickhill Street along the site frontage for the proposed roundabout design.

- 7.45 Subsequently the study area junctions were modelled to determine the existing 2018 capacity, five years following planning application 2023 and end of local plan (Plan:MK) 2031. Relevant traffic growth factors were applied to the morning and evening peak hours of the local highway network, which were identified 08:00-09:00 and 17:00-18:00 respectively.
- 7.46 At the time of writing the report, the following committed developments that would impact the agreed study area junctions were identified:
- Land at Eaton Leys – 600 units
  - Levante Gate: Land south of the A5 – 500 units
  - Red Bull: Land east of V10 Brickhill Street
- 7.47 It should be highlighted that the land south of A5 development has been refused on 13<sup>th</sup> September 2018. However as the refusal was not on highway grounds, BWB has accounted for the traffic associated with this development. This would ensure robust assessment and worst case modelling of the study area junctions.
- 7.48 In terms of traffic generation, the proposed development is anticipated to generate a total of 556 two-way vehicular trips and 86 HGV trips during the morning peak hour. During the evening peak hour, the development would generate 422 two-way vehicular trips and 84 HGV trips. This is based on TRICS trip rates provided by AECOM on behalf of HE and SMT on behalf of MKC for the B2 and B8 separately, which were assessed based on 20% of the overall development being of B2 land use and 80% B8 land use.
- 7.49 It was calculated that 66% of the vehicular trips would route via Kelly's Kitchen Roundabout, whereas the remaining 34% would travel north along the V10 Brickhill Street. This is based on the 2011 Census 'Origin-Destination' data for the local MSOA E02003482: Milton Keynes 024, which looks at other employment destinations in the area that would have similar origin-destination patterns to the proposed development.
- 7.50 As for the proposed development's HGV traffic distribution, these have been calculated using Department for Transport's traffic counter points within Milton Keynes in proximity of the site. Adjustments were made to take into consideration the HGV proportions that would use Station Road, Watling Street and through Walton Park Roundabout to the north. It was established that 60% of the development's HGV traffic would route to/from the south via Kelly's Kitchen Roundabout and 40% to/from the north via Walton Park Roundabout. These

proportions have been suggested by SMT following review of the previously issued Transport Assessment and have been used as a worst case assessment for the local highway network.

- 7.51 Kelly's Kitchen Roundabout has been modelled using a PTV VISSIM model. The model is for a mitigation scheme proposed for the roundabout part of Eaton Leys committed development, southwest of the A5.
- 7.52 The VISSIM modelling has demonstrated that with the development trips in place, journey time increases across the junction would rarely exceed 1 minute, with the largest increase being 85 seconds in 2031. Given the scale of the junction and the existing journey times recorded in the baseline scenarios, such increases are not considered to be severe and no further mitigation is proposed.
- 7.53 A mitigation scheme has been identified for Tilbrook Roundabout, part of land east of V10 Brickhill Street (Red Bull Racing) committed development. Therefore the roundabout has been modelled with and without the mitigation scheme, which includes widening of the eastern arm, increasing the flare length and entry width of the northern arm (V10 Brickhill Street) and associated road markings.
- 7.54 It was concluded that the proposed development would have minimal impact on the operation of Tilbrook Roundabout, precisely the northern and southern approaches. The impact on the northern approach would be further reduced as a result of the mitigation scheme, whereas the impact on the southern approach would not be significant as a result of the proposed development.
- 7.55 A mitigation scheme has been prepared for Walton Park Roundabout, as it is operating over-capacity in the current 2018 baseline during the peak hours and is forecast to do so in the 2023 future baseline.
- 7.56 The mitigation scheme includes:
- Increasing the flare length of V10 Brickhill Street northern approach from 11.6m to 20m.
  - Increasing the flare length of A4146 Bletcham Way eastern approach from 19.7m to 25m.
  - Increasing the entry width of A4146 Bletcham Way eastern approach from 9.35m to 10m.

- Increasing the flare length of V10 Brickhill Street southern approach from 14.3m to 25m.

7.57 The roundabout was subsequently modelled with and without the above mitigation, and it was identified that such scheme would improve to the operation of the roundabout during the morning and evening peak hours. The mitigation particularly benefits the more critical V10 Brickhill Street approaches, and the eastern approach of the A4146 Bletcham Way. The scheme would be implemented subject to agreement with MKC Highways and an independent Road Safety Audit.

7.58 The application is also accompanied by a Framework Travel Plan, which sets out objectives, targets and measurements to reduce single occupancy car trips, as well as methods for implementing and monitoring this.

7.59 The Transport Assessment illustrates that the proposals would not have a severe impact in transport terms.

### **Noise**

7.60 A Noise Impact Assessment has been conducted by BWB Consulting Ltd.

7.61 A baseline noise survey was undertaken at the site in September 2018. The survey, and subsequent assessment work, have been undertaken in accordance with current standards and guidance.

7.62 Noise limits for fixed plant and equipment to meet have been set based on the results of the baseline noise survey.

7.63 Noise level predictions have been undertaken to establish noise levels at the nearest noise sensitive receptors. Assessing these predictions in accordance with BS4142:2014, it has been identified that noise generated by HGV movements and delivery activity is below the level at which it would have a low impact at all existing sensitive receptors.

7.64 Development generated road traffic noise on the local road network has also been assessed using available traffic data and has identified impacts of no greater than minor/low.

7.65 It is therefore considered that, at this stage, no noise mitigation is warranted as the development would be acceptable in noise terms.



### ***Air Quality***

- 7.66 An Air Quality Assessment has been carried out by BWB Consulting Ltd.
- 7.67 A qualitative construction phase dust assessment was undertaken in accordance with Institute of Air Quality Management guidance and measures were recommended for inclusion in a Dust Management Plan to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions was considered to be 'not significant' in accordance with IAQM guidance.
- 7.68 A detailed road traffic emissions assessment was undertaken to consider the impact of development-generated road traffic on local air quality at identified existing receptor locations. Road traffic emissions were modelled using the dispersion model ADMS-Roads and concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) were predicted at identified sensitive receptor locations. The modelling assessment was undertaken in accordance with Defra Local Air Quality Management Technical Guidance. The development was not predicted to result in any new exceedances of the relevant air quality objectives and the impact of the development on local air quality was predicted to be 'negligible' in accordance with IAQM and EPUK guidance.
- 7.69 The development is therefore acceptable in air quality terms.

### ***Lighting***

- 7.70 BWB Consulting Ltd have undertaken a Lighting Assessment.
- 7.71 The proposed development lighting is expected to have a negligible level of change with respect to local residential properties and a generally minor to moderate adverse effect on areas containing sensitive wildlife/habitat.
- 7.72 The indicative lighting design presented indicates the proposed lighting installation can achieve the required minimum lighting levels and distribution to meet the applicable standards but also within the parameters of the local authority's guidance benchmarks.
- 7.73 The indicative lighting design presented indicates the proposed lighting installation can achieve the required minimum lighting levels and distribution to meet the applicable standards but also within the parameters of the local authority's guidance documents.



- 7.74 The indicative lighting design presented indicates the proposed lighting installation can contain the vast majority of lighting overspill within the site boundary and as such cause minimal light trespass to the adjoining land.
- 7.75 The impact of the proposed site lighting is considered to be generally negligible with respect to residential properties and minor to moderate adverse in direct relation to wildlife/habitat locations on site, resulting in a negligible effect at local, regional and national levels. The most noticeable effect due to the proposed site lighting expected to remain is sky glow.
- 7.76 Lighting calculations demonstrate the indicative lighting design presented will cause no light intrusion through the vertical windows of the existing dwellings which bound the proposed site.
- 7.77 In this way the proposed lighting scheme would have an acceptable impact.

### **Ground Conditions**

- 7.78 A Phase 1 and 2 Geo-Environmental Assessment has been completed by BWB Consulting Ltd.
- 7.79 The ground investigation scope of works was completed between 15<sup>th</sup> and 24<sup>th</sup> October and 28<sup>th</sup> November 2018 and comprised the following:
- Non-intrusive survey of excavation locations for underground utilities;
  - 44 machine excavated trial pits;
  - 13 cable percussive boreholes;
  - Installation of gas and groundwater monitoring wells;
  - Laboratory chemical analysis of soils;
  - Geotechnical testing of soil; and
  - Four post investigation gas and groundwater monitoring visits.
- 7.80 Ground conditions recorded on site typically comprised Topsoil/Made Ground across the site, overlying superficial River Terrace Deposits in the west part of the site, Head Deposits in south-eastern part and directly overlying bedrock of the Oxford Clay Formation across the remainder. The Oxford Clay Formation was recorded across the site, with the West Walton Formation not encountered during the investigation.

- 7.81 The investigation has not identified the presence of any significant contamination which would require remedial or mitigation measures regarding human health risk or controlled waters.
- 7.82 Based on ground gas monitoring results no ground gas protection measures are required for the site.
- 7.83 Should contamination be found during the development that had not previously been identified during the site investigation, work should cease in the immediate area and the environmental consultant notified.
- 7.84 Shallow strip/pad foundations are considered the most viable solution for Blocks 1-6 Units 4 and 6 (if loads are light-moderate), this solution may also be viable for Unit 5, but other options may be more suitable.
- 7.85 Piles, ground improvement or suitable engineered fill are all considered potential foundation options for Units 1-3 and Unit 5.
- 7.86 For Units 4 and 6 and Blocks 1-6, a ground bearing floor slab is suitable assuming loadings will not be more than 30kN/m<sup>2</sup>.
- 7.87 It is assumed that a load of 50kPa would be required for Units 1-3 and 5. For these units a fully suspended slab or shall foundations placed on vibro improved ground or Controlled Modulus Columns (CMCs) will be required unless fill material is placed to an end-product earthworks specification that would facilitate a ground bearing solution.
- 7.88 Once specific design loads are known for the development, further plot specific assessment should be undertaken to ensure the most suitable foundation design is adopted.
- 7.89 It is recommended that, once the earthworks strategy has been finalised and a better understanding of development plans are known, an earthworks specification be undertaken to assess the most economical foundation solution for each plot.

### **Sustainable Design**

- 7.90 The planning application is accompanied by an Energy Statement which has been developed by Yonder Consulting Ltd. This demonstrates how the proposals will be energy efficient and robust to climate change.

- 7.91 The energy statement models the performance of the development in energy terms. The report models that an overall improvement over the target emissions rate of 49% is achievable with the sustainability strategies outlined, including a 35% improvement via demand reductions from fabric and servicing efficiencies and a further 21% reduction from onsite renewable energy production can be achieved.
- 7.92 It is proposed that an efficient VRF heat pump heating and cooling system is provided for office spaces.
- 7.93 Roof mounted photovoltaic panels will be utilised within the development in order to provide renewable energy.
- 7.94 The proposals will incorporate design features to ensure that they are robust to climate change. Warehouse areas are to be insulated beyond part L Building Regulations minimum requirements. Where cooling is needed, curtain walling will be used to increase U values.
- 7.95 Materials and labour will be locally sourced in order to reduce the impact of construction. During construction soil and hardscaping will be retained for use on site where this is possible. Recycling storage will be accommodated within the development for each individual unit.
- 7.96 The report outlines how the development will make a contribution towards carbon offset, subject to development viability.
- 7.97 The proposals would be fully compliant with Plan:MK policies SC1 (Sustainable Construction), SC2 (Community Energy Networks) and SC3 (Low Carbon and Renewable Generation), as well as the principles within SPD Sustainable Construction Guide, April 2007. The development would represent a sustainable form of development.

#### **Loss of Agricultural Land**

- 7.98 The site comprises six fields, which have been intensively farmed for arable crops. Agricultural classifications include Grade 3a (approximately 13.5 hectares or 24%) to the south west of the site; Grade 3b (approximately 40.5 hectares or 71.8%) to the northeast of the site; and a small portion of Grade 4 (approximately 2.4 hectares or 4.2%), near the farm.
- 7.99 Whilst Grade 3a land technically falls within the definition of Best and Most Versatile

Agricultural Land, this represents good quality agricultural land at the lowest end of the scale.

7.100 The loss of agricultural land is a consideration that needs to be taken into account but needs to be considered alongside the economic benefits that the scheme will provide.

### **Utilities**

7.101 The utilities on or outside of the application site are as follows:

- Gas (Southern Gas)
  - Within application site boundary – to the northern boundary, there is an existing buried gas pipe running parallel within the railway, with a 3m easement on either side.
  - Outside of the application site boundary – beyond the western boundary there is an existing buried high pressure gas main, with a 3m easement on either side.
- Electric (Western Power HV)
  - Within application site boundary – to the northern boundary, there is an existing overhead HV cable 11KV, running parallel with the railway line, with a 3m easement on either side. Approximately a third of the distance along this branches directly south to supply Cross Roads Farm.
  - Outside of the application site boundary – there is also an existing HV cable to the north of the railway line.
- Water
  - Within application site boundary – to the north eastern part of the site, a 600mm diameter water main crosses the site diagonally, with a 3m easement on either side.
  - Outside of the application site boundary – to the north of the railway, a 600mm diameter water main runs parallel to the railway line, with a 3m easement on either side.
- Communications
  - None recorded.
- Other utilities outside of the application site boundary
  - Virgin media – a buried service follows the eastern edge of the full length of Brickhill Street.
  - BT Openreach – a buried cable follows the western edge of Brickhill Street.

### **Planning Obligations**

7.102 Hampton Brook have engaged in discussions with officer regarding possible heads of terms for a legal agreement under section 106 of the Town and Country Planning Act 1990 to accompany the scheme. These discussions are ongoing at the time of submitting this

planning application in order to finalise a suite of planning obligations.

- 7.103 Any individual heads of terms forming part of the legal agreement will need to be compliant with the tests in paragraph 122 of the Community Infrastructure Regulations.
- 7.104 In addition, full consideration must be given to the viability of the development to provide any planning obligations sought.
- 7.105 It is anticipated that a legal agreement will be drawn up with officers at Milton Keynes Council to provide planning obligations as part of the planning application process.

### **Economic Benefits**

- 7.106 Hampton Brook has a track record of delivering strategically important employment sites in the area. Recent projects in Milton Keynes include the award winning 250,000 sq. Ft Pinnacle office scheme in Central MK. The delivery of Trek Cycles European HQ at Tilbrook (82,700 sq. ft), the completed French Bakery for Brioche Pasquier at Wymbush (240,000 sq ft) which has attracted a considerable number of new jobs and significant inward investment to the area. Relocation and expansion for Reiser UK at Kingston and more recently the relocation and expansion for Broadbandbuyer to bespoke premises at Knowlhill.
- 7.107 Plan:MK seeks to provide 28,000-32,000 jobs over the plan period (until 2031). (Para 3.1, Plan:MK)
- 7.108 South Caldecotte is the principle allocated employment site within Plan:MK. Warehousing in particular is identified as an area where significant floorspace is needed.

**Table 4.5 Forecast Employment Floorspace and Land Requirements for the Borough of Milton Keynes 2016-2031**

Category of Floorspace	Amount of Floorspace in m <sup>2</sup>	Amount of Land in hectares (ha)
Office	250,760	17
Industrial	46,860	12
Warehousing	415,850	104
<b>Total</b>	<b>713,470</b>	<b>132 hectares</b>

**Figure 4. Table illustrating employment floorspace needs within Plan MK (Source Plan:MK)**

- 7.109 The proposed development would provide at least 195,000 square metres of employment land, primarily within warehousing and industrial categories.
- 7.110 Based on this figures and job densities within Plan:MK, the proposals would have the potential to provide a minimum of 2,050 jobs.
- 7.111 As a result, the delivery of the site would result in the creation of a considerable number of jobs in both manufacturing and warehousing. It should be noted that warehousing is generally footloose, and that these businesses would seek to locate elsewhere if they do not locate in Milton Keynes. (And as a consequence, the benefits would be lost).
- 7.112 The development of the site for employment uses as allocated within Plan:MK would accord with policies ER1 (Employment Sites in MK) and DS3 (Employment Development Strategy), helping to fulfil the objectives on the plan.
- 7.113 The proposals would fully accord with paragraph 8 of the NPPF, which sets out that sustainable development should *'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'*.
- 7.114 Additional benefits also arise from the development of South Caldecotte; assist modal shift for employees by being located close to Bletchley and Fenny Stratford, ease of access to J11A M1, M40, A5, benefits of providing jobs and inward investment to Milton Keynes and the also provide the following benefits. Whilst these are perhaps not at the same scale of benefit these nonetheless are material planning considerations that need to be given weight:
- Direct and indirect construction jobs on a temporary basis.
  - Generation of business rates.
  - Potential Section 106 contributions from the scheme.
- 7.115 In summary, the economic benefits of the scheme in providing new jobs and inwards investment to the Milton Keynes area are considerable, and as a result great weight must be given to them in the balance of any planning decision.

### Community Involvement

7.116 A public consultation event was held on Thursday 14th March from 16:30 to 20:00 at the All Saints Church Hall in Bow Brickhill. A number of residents and businesses within the local area were notified of this event. Details of the wider community engagement strategy can be found in the separately submitted Statement of Community Involvement.

### Sustainability Analysis

7.117 Paragraph 8 of the NPPF sets out the overarching objectives for achieving sustainable development. It is acknowledged that there are economic, social and environmental dimensions to sustainable development.

7.118 Economic – The development would provide significant opportunities for job creation, business expansion and inward investment to the local area.

7.119 Social – The proposals will provide job creation which will assist in providing strong, vibrant and healthy communities. It will assist in providing jobs to local people, reducing commute times and the delivery of goods and services to local residents.

7.120 Environmental – Whilst there would be a moderate impact on local landscape, this would be mitigated through planting and the creation of new habitats. It should be added that the development would make use of a site close to the edge of Milton Keynes, relying largely on existing infrastructure and as a result would remove the need for development in locations further outside the city where more harm would be likely to be caused.

7.121 Overall, the development would be a sustainable form of development, as evidenced through its inclusion as an allocated site within Plan :MK.

### Policy Analysis

7.122 Policy SD14 sets out a number of criteria for the development to comply with. The table below illustrates how the scheme complies with these requirements.

Item	Policy	Comment
1.	Minimum of 195,000m <sup>2</sup> of Class B2/B8 and ancillary B1 employment floorspace.	A minimum of 195,000m <sup>2</sup> will be provided.



2.	Access to be taken from Brickhill Street, which will be upgraded to grid road standard.	Access will be provided to Brickhill Street. Brickhill Street will be upgraded to dual carriageway in part, as the Transport Assessment shows is necessary. A grid road reserve will be provided across the entirety of the Brickhill Street to facilitate possible upgrading if required in the future.
3.	The development will be subject to a Transport Assessment, which will investigate the development's impact on the local highway network, including the A5/Watling Street roundabout. The development will contribute to any necessary improvements, as agreed by the relevant highway authorities and Highways England. The Transport Assessment will also set out the basis for effective public connections to and from the site to be implemented prior to completion of the development.	The planning application is accompanied by a comprehensive Transport Assessment.
4.	A green open space link will be created on the site, linking into Caldecotte Lake to the north and providing future opportunity to link the park to the south/east. The open space link should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds as part of a Sustainable Urban Drainage system across the site.	A green link is provided which links the site to Caldecotte Lake. Provision for Sustainable Urban Drainage is provided in full compliance with the policy.
5.	Direct footpath connections to Bow Brickhill railway station and the existing Public Right of Way running along the site's northern boundary will be effectively integrated into the development.	Direct footpath connections will be provided as required by the policy.
6.	Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets.	A full Landscape and Visual Impact Assessment has been undertaken. This has informed the scheme as demonstrated in the Design and Access Statement.
7.	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.	The scheme has been fully designed to take into account wider landscape sensitivities.

8.	Existing vegetation to site boundaries should be maintained and enhanced to screen the development from wider views where a LVIA deems this necessary. New planting should be of native species to mitigate the loss of hedgerows necessary to facilitate development.	The scheme will retain significant vegetation to the site boundaries, allowing for a substantial buffer in order to ensure that the proposals integrate well into the environment.
9.	A desktop Archaeological Assessment should be undertaken to understand the likely presence of archaeological remains within the site. The recommendations of the Assessment will be implemented prior to each phase of development commencing. It may be necessary to undertake a field investigation to understand the archaeological potential and significance of this site and to inform the layout of development.	A desktop archaeological assessment, geophysical survey and written scheme of investigation have been provided to accompany the scheme. This fully accords with the policy requirements in policy SD14.

**Figure 5. Table Illustrating compliance with policy SD14 of Plan :MK.**

## 8.0 CONCLUSION

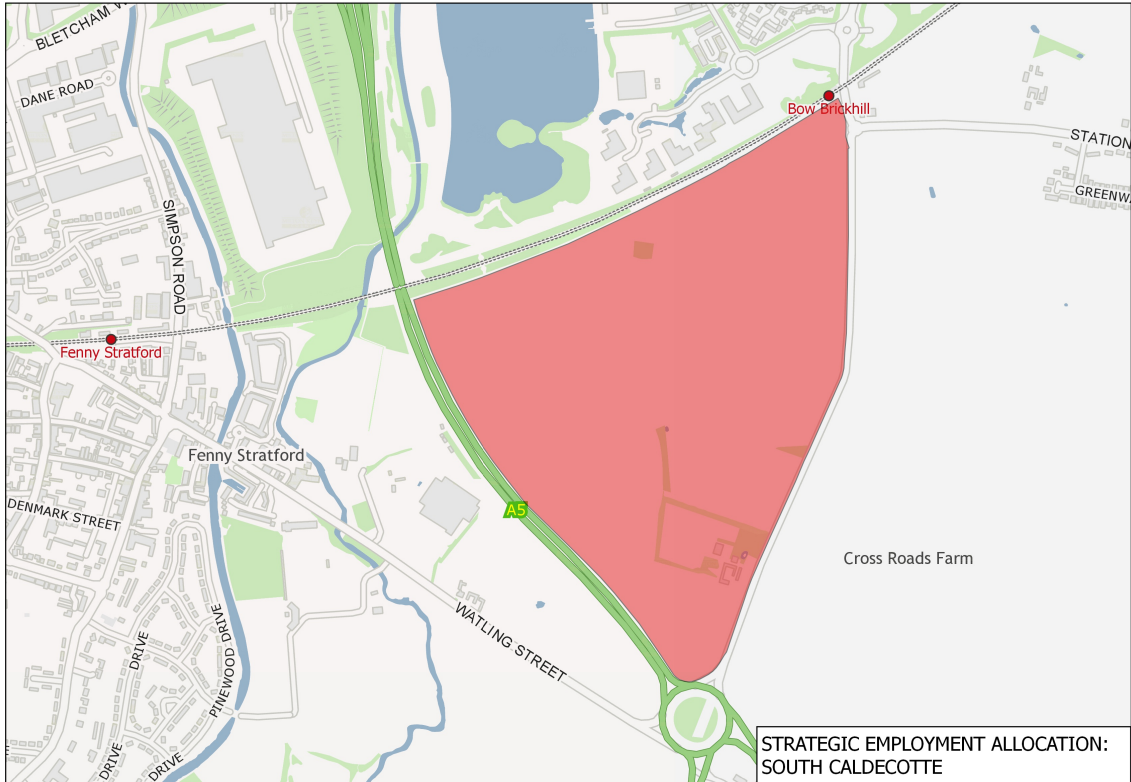
- 8.1 Section 38(6) of the Town and Country Planning Act sets out that planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 The site is an allocated site for employment land within policy SD14 of Plan :MK. The development of the site would therefore be in accordance with the development plan and should be supported.
- 8.3 This planning statement has identified in more detail how the proposals will comply with policy SD14. It demonstrates that the development will deliver considerable employment benefits to the region which should be given significant weight in any planning balance.
- 8.4 The following other material considerations also need to be considered:
- The development proposed is a sustainable form of development that is compliant with the National Planning Policy Framework.
  - Whilst the scheme would have some landscape impact, it has been designed in a way to mitigate these impacts so that these will not be significant.
  - The need for habitat and archaeological mitigation, which will be provided by the scheme.
  - The wider strategic benefits of providing employment land in this location, given the development is located within the Oxford-Cambridge Corridor and identified for development within the development plan.
- 8.5 The above reasons provide compelling reasons for granting planning permission for the development, and it suggested that, taking into account the development plan and other material considerations, that the balance of considerations weigh heavily towards the grant of planning permission.
- 8.6 Planning permission should be granted accordingly.

**APPENDIX 1.**

Policy SD14 of Plan: MK

## 5 . Strategic Site Allocations

Map 5.4 Land South of Milton Keynes: Strategic Employment Allocation



### Policy SD14

#### STRATEGIC EMPLOYMENT ALLOCATION, LAND SOUTH OF MILTON KEYNES, SOUTH CALDECOTTE

- A. Land south of Milton Keynes in South Caldecotte, as shown on the Key Diagram and Policies Map, is allocated for the development of a mix of Class B2 and B8 employment floorspace within the plan period.
- B. A comprehensive development framework for the site will be prepared and the development will be brought forward in line with all relevant policies in Plan:MK, particularly Policy SD1, SD9, SD10, NE1-6 and INF1 prior to planning applications being approved.
- C. The development must accord with the following principles:
  1. A minimum of 195,000m<sup>2</sup> of Class B2/B8 and ancillary B1 employment floorspace.
  2. Access to be taken from Brickhill Street, which will be upgraded to grid road standard.
  3. The development will be subject to a Transport Assessment, which will investigate the development's impact on the local highway network, including the A5/Watling Street roundabout. The development will contribute to any necessary improvements, as agreed by the relevant highway authorities and Highways England. The Transport Assessment will also set out the basis for effective public connections to and from the site to be implemented prior to completion of the development.
  4. A green open space link will be created on the site, linking into Caldecotte Lake to the north and providing future opportunity to link the park to the south/east. The open space link should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds as part of a Sustainable Urban Drainage system across the site.
  5. Direct footpath connections to Bow Brickhill railway station and the existing Public Right of Way running along the site's northern boundary will be effectively integrated into the development.
  6. Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets.
  7. 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.
  8. Existing vegetation to site boundaries should be maintained and enhanced to screen the development from wider views where a LVIA deems this necessary. New planting should be of native species to mitigate the loss of hedgerows necessary to facilitate development.
  9. A desktop Archaeological Assessment should be undertaken to understand the likely presence of archaeological remains within the site. The recommendations of the Assessment will be implemented prior to each phase of development commencing. It may be necessary to undertake a

## 5 . Strategic Site Allocations

field investigation to understand the archaeological potential and significance of this site and to inform the layout of development.

### Place-Shaping Principles for Extensions to the City in Adjacent Local Authority Areas

**5.35** The Council recognises the likely possibility of neighbouring authorities allocating land for development close to, or immediately adjacent to, the boundaries of Milton Keynes but outside of its administrative boundary. In these circumstances it is anticipated that the future residents of these developments will use the infrastructure and facilities of Milton Keynes as opposed to destinations within their own authority areas. It is therefore the Council's preference that any such development should function as a sustainable urban extension to Milton Keynes as well as being supported by the local planning authorities responsible, whilst also providing appropriate contributions to infrastructure and service provision within Milton Keynes.

**5.36** Given the considerable effect strategic development proposals in adjacent local authorities will have upon services and infrastructure in Milton Keynes and nearby villages, joint working arrangements with adjacent local authorities will be required to bring these developments forward. Milton Keynes Council therefore wishes the following matters to be addressed during the planning of any such development:

- Create a sustainable, safe and high quality urban extension which is well integrated with and accessible from the existing city. Its structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, the linear parks and strategic flood water management.
- Traffic flows, including highway and junction capacity, in the adjoining area and the development should allow for the future construction of any necessary link roads.
- Development may support regeneration and bring additional trade to shops and services in nearby existing centres, but it is also likely to increase traffic flows and place additional pressure on centre car parking.
- Development should take account of the level of services and facilities and, where there are limited local facilities in the adjoining part of the city, the development will require on-site facilities to meet the day to day needs of its residents.
- Residents are likely to use existing facilities in the city (for example, the city centre, the hospital, leisure centres and household waste sites) so the development should make a proportionate contribution to an increase in the capacity of these facilities to satisfy these increased demands.
- Flooding and drainage - where the development will partly drain into the existing drainage and watercourses within the Borough, a detailed Flood Risk Assessment should be carried out and the development may need to make a proportionate contribution to off-site drainage improvements. It will also be necessary to identify if the existing foul sewerage pumping stations in the surrounding area have capacity to serve the development or if improvements or new pumping stations will be required. If such improvements are necessary for the development, they will require financial contributions from the development.



**APPENDIX 2.**

Excerpt from Inspector's Report on Plan MK

which was successfully shortlisted in March 2018. It is noteworthy that the bid was supported by Highways England and the SEMLEP amongst others.

115. There is now joint working on a detailed Stage 2 bid which if successful would enable up-front strategic infrastructure to be provided. Even if the HIF stage 2 process were to be unsuccessful other funding options remain such that there would be a reasonable prospect of development at MKE within the Plan period albeit later rather than sooner. Accordingly, as set out above under Matter 2, I find that MKE would be capable of delivering of at least 1,475 dwellings during the Plan period. This is a cautious figure that could increase significantly to around 3,000 homes in plan period if the current HIF bid is positive. Longer term capacity beyond plan period would take the scale of the site identified in Plan:MK to around 5,000 homes.

116. Accordingly, I find it would be necessary to amend Policy SD14 to state that development can take place at MKE prior to 2031 provided the necessary strategic infrastructure is funded and delivered. From all the joint material provided in the MKE Development Statement June 2018 [MK/SOCG/001 and 001a], there is a gathering momentum to boost delivery at MKE sooner rather than later. **MM18** would remove the references to delivery post 2031, link delivery to strategic infrastructure provision and clarify the sequence of a development framework and subsequent planning permissions and I recommend it so that the Plan is justified, effective and positively prepared.

#### *Employment and commercial role of MKE*

117. Policy SD14 allocates MKE as a strategic site for a mix of uses including a variety of employment uses. The anticipated start date of 2023/24 would be a pragmatic approach. To aid effectiveness of Policy SD14, **MM18** would clarify that some 105 ha of employment land, for a mix of employment uses, would be released through the MKE allocation in Plan:MK and I recommend it accordingly.

118. I am satisfied that infrastructure planning to inform Plan:MK has appropriately considered the various infrastructure requirements. In respect of retail specific reference should be made to ensuring no adverse impact on the vitality and viability of Newport Pagnell district centre, which is only a short distance to the northern edges of MKE. **MM18** would do this and I recommend it for plan effectiveness and consistency with national policy.

#### *Conclusions on MKE*

119. The evidence of ongoing and potential funding options for infrastructure to unlock MKE justifies a more positively prepared approach than the submitted Plan:MK. In doing so, it would represent a sizeable addition to the land supply in a sustainable location. It would also not be prejudicial to future growth options. I have recommended the various modifications at **MM17** and **MM18** and on this basis MKE would be soundly based.

#### *South Caldecotte*

120. South Caldecotte would be the principal employment land allocation to meet the identified need for mainly warehousing and distribution uses. The site is a relatively unconstrained greenfield site and any localised environmental impacts relating to local priority habitats and species on the site could be mitigated in accordance with the requirements of policies NE2 and NE3 of the Plan. The Council has prepared and consulted on a Supplementary Planning Document (SPD) for the site which will provide more detailed guidance. This should be referenced in Policy SD16 and at paragraph 5.30 through **MM19** which would make clear that a comprehensive development framework for the site will need to be adopted by the Council prior to any planning applications being approved. This will ensure a coordinated and satisfactory approach to the development of this key gateway site and I recommend the modification for effectiveness.
121. The site would form a new gateway development when approaching the City from the south. This in itself, however, would not be necessarily harmful, particularly given the urban character of the adjacent 'Kelly's Kitchen' roundabout on the A5 and the potential of the Expressway in this area. As such the site would not be a significantly harmful intrusion into the countryside. The reasonably strong vegetation boundary around the site could be strengthened by additional landscaping to mitigate visual impacts.
122. Elsewhere the proposal would not adversely affect the setting of the Greensand Ridge. Due to the intervening distance and the densely wooded character of the Ridge, the setting of the scheduled monument at Danesborough Iron Age fort and the Listed Grade II\* parish church at Bow Brickhill would also not be adversely affected. The South Caldecotte site would be visible from the well-used footpath extending south-west out of Bow Brickhill via London End Lane. However, the development would be seen at some distance over intervening fields, thus reducing the impact of the scale of warehouse and distribution units. The consideration of landscaping, design and building heights as required by Policy SD16, would address visual impact further such that the proposed development would not significantly harm the experience or outlook for users of this rural path.
123. It would be sufficiently separated from the main settlement of Bow Brickhill, although there are residential properties on Station Road that would be particularly close to the site. These properties are set back slightly from the highway and generally face south over open fields rather than towards the allocated site to the south-west. Through careful design and further landscaping the impact on nearby residential properties can be minimised.
124. The allocation would be principally accessed via the A5 although the option exists to connect to the A4146 to the north via V10 Brickhill Street and the level crossing. Taking account of the impact of EWR<sup>11</sup> queue lengths approaching the level crossing and mini-roundabout junction with Station Road, Bow Brickhill would be likely to increase but are unlikely to have a severe impact on highway safety. Longer term the proposed link through SEMK, including over the railway (modelled in MKMMM Scenario 2a) and the wider impact of the Expressway could potentially remove traffic from local

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<sup>11</sup> Pages 136-139 of MK/TRA/004

roads to mitigate the moderate localised impact of South Caldecotte on queue lengths around the level crossing.

125. In terms of wider impacts on the local highway network, the MKMMM modelling shows only a modest impact above and beyond the effects arising from background traffic growth to 2031 including committed growth. The location of South Caldecotte, adjacent Bow Brickhill station, on bus routes from CMK and with potential connectivity to the nearby cycle network present significant opportunities to secure modal shift in the workforce. Concern is expressed about Heavy Goods Vehicles (HGVs) weaving through Bow Brickhill, Woburn Sands and Aspley Guise to access the M1 and A421 eastbound. This route is distinctly unappealing and convoluted compared to the existing dualled A4146/A421 to the north connecting to M1 Junctions 13 and 14 and the good A5 connection to the M1 Junction 11a to the south at Dunstable. In the short term a routing plan could be secured in accordance with Policy CT2 of the submitted Plan, so that HGV traffic uses the A5 to access site. Longer term the proposed Expressway would provide alternative east west connectivity.

#### *Conclusion on South Caldecotte*

126. For the reasons above the proposed employment allocation at this location would be soundly based and the allocation would be effective in meeting forecast economic growth in the early to middle period of Plan:MK.

#### *Campbell Park*

127. The area is demonstrably suitable and available (as evidenced through the dialogue with MKDP) for housing and is sustainably located close to services, facilities, employment and public transport. Plan:MK is therefore justified and effective in identifying Campbell Park for principally residential-led development as part of one of the key areas for growth and change within CMK. Policy SD18 adds little to what is set out in Policy SD3 and should be deleted. Consequently, **MM14** and **MM20** would embed Campbell Park firmly into the policy framework for CMK without undue repetition and therefore make Plan:MK effective in this regard.

128. To aid transparency as to the scale of housing development proposed at the various parcels at Campbell Park, **MM6** would include capacities within Policy DS2 as part of the overall housing strategy of the Plan. This includes the sizeable quantum of development at Campbell Park Northside which could deliver around 1500 new homes and commercial uses. Additionally, it would be necessary through **MM42** to identify Land North of Glebe Roundabout, Overgate (60 dwellings) in terms of consistency with the Central Milton Keynes Alliance Business Neighbourhood Plan (CMKAP) so that the Plan is justified, effective and positively prepared.

#### *Other Strategic Sites*

129. Smaller strategic sites are proposed for allocation at Eaton Leys (Policy SD15), Milton Keynes Rugby Club (Policy SD20) and Redhouse Park (Policy SD21). These sites have specific issues which require a particular policy approach in the Plan. The policy content for these sites is sound. Policy

**APPENDIX 3.**

DLP Screening Request

EIA Screening Opinion

Samantha Taylor  
Senior Planning Officer  
Milton Keynes Council  
1 Saxon Gate East  
Milton Keynes  
MK9 3EJ

Dear Ms Taylor

**Re: Town and Country Planning Act 1990 (as amended)  
Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Request for EIA Screening Opinion under Part 2 (6) of the EIA Regulations**

This request for an EIA Screening Opinion is made in relation to land known as South Caldecotte, ('the Site') which lies to the south of Milton Keynes. The Site is identified on the accompanying Site Location Plan (Attached Drawing: Location Plan)

In accordance with the EIA Regulations, set out below is:

- a description of the development, including in particular:
  - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
  - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- a description of the aspects of the environment likely to be significantly affected by the development;
- to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:
  - (i) the expected residues and emissions and the production of waste, where relevant; and;
  - (ii) the use of natural resources, in particular soil, land, water and biodiversity

**Site location and characteristics**

The South Caldecotte Site lies to the south of Milton Keynes. The Site is triangular and is bounded to the north by the Bletchley to Bedford railway line, which provides a visual and movement barrier. To the west lies the A5 trunk road, which is separated from the Site by belt of vegetation, limiting views into and through the Site. To the east is Brickhill Street, which is separated from the Site by a hedge of varying height.

Beyond the Site to the north is a mixed residential and employment area known as Caldecotte. This area is also home to a large balancing lake, which lies within the Milton Keynes linear park system.



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To the west of the A5 lies the River Ouzel which runs through farm land. Beyond this is the edge of Bletchley/Fenny Stratford which includes a large Tesco distribution unit.

To the east lies farm land, which generally slopes upwards towards an extensive area of woodland known as The Brickhills. South of the Site lies further farm land. The area of the south west (known as Eaton Leys) has permission for up to 600 residential units. To the south east, the land (known as Levante Gate) is currently subject to a speculative planning application (reference 17/03233/OUT) for up to 500 residential units and a primary school. This application is presently undetermined.

The Site is currently accessed via Brickhill Street. Brickhill Street connects to the A5 to the south and leads north into Milton Keynes. To the north east of the Site is Bow Brickhill station, which is located on the northern side of the railway line. There is a level crossing on Brickhill Street where it crosses the railway line. The Site is currently not directly served by any bus stops but routes 17 and 18 from Bletchley pass the Site and there are several routes which connect Caldecote in the north to CMK.

The Site itself comprises approximately 57 hectares of arable farm land and pasture, which is mainly identified as agricultural grade 3b on the Natural England maps. The northern half of the Site is in arable cultivation, formed of two fields separated by a hedgerow. The southern half of the Site is used for pasture and is made up of smaller fields again separated by hedgerows. The farm complex, comprising of a farm house and several small associated barns and sheds, is located in the south east corner of the Site.

The fields are generally free from any trees, which are mainly located within field boundaries.

The high point of the Site is towards the north west corner, from where the Site slopes down towards the A5. There is a total drop of around 11 metres across the Site.

There is a Public Right of Way which runs across the northern edge of the Site.

An ordinary watercourse runs generally east to west across the Site. The Environment Agency flood map for planning shows that the Site lies wholly in flood zone 1 with no risk of flooding.

The Site does not lie in a conservation area nor does it contain any listed buildings but does lie in close proximity to a Schedule Ancient Monument which lies to the south west of the Site beyond the A5.

The northern and western boundaries of the Site, following the A5 and railway line, lie within Wildlife Corridors as defined on the Local Plan Proposals Map. A part of the Site to the west is designated as a priority habitat, a lowland meadow. This is defined in the UK Biodiversity Action Plan as: *'a key habitat, important for flowers, invertebrates and ground-nesting birds. Sensitive to changes in hydrology and nutrient status.'*

The Site lies within an area generally defined as an Area of Attractive Landscape on the adopted Local Plan Proposals Map. From the Site there are views to the Brickhills to the east. From the Brickhills the Site is viewed in the context Milton Keynes to the west.





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Aside from the proximity to the Scheduled Ancient Monument, the Site is not in, nor adjacent to, an environmentally sensitive area as defined by Regulation 2(1) of the Regulations (i.e. SSSIs, National Parks, World Heritage Sites or AONBs).

There is a high-pressure gas pipeline which runs north to south adjacent to the eastern edge of the Site. This follows the route of the A4146 to the south.

The Site lies within a mineral safeguarding zone identified in the Milton Keynes Minerals Local Plan.

### **The Development Proposal**

The proposal relates to the development of the Site in general accordance with an emerging policy designation in Plan:MK. This requires the Site to be developed for at least 196,000m<sup>2</sup> of B2 and B8 floorspace with ancillary B1 uses.

The broad principles of the development are expected to encompass the following considerations.

It is expected that the split of development will be 80% B8 Class floorspace and maximum 20% B2 Class.

The height of buildings will be limited to no more than 23metres. As part of the proposal, the existing farm buildings will be demolished. A suitable palette of materials will be provided to ensure that impact on the landscape is minimised, particularly in views from the east towards the village of Bow Brickhill.

The Site will be accessed off Brickhill Street via a new roundabout to be created as part of the development. Brickhill Street is proposed to be upgraded to a dual carriageway between the A5 and the new roundabout, a distance of approximately 400 metres.

Within the Site, the main estate road will be built to adoptable standard and designed to allow public transport to penetrate into the Site. It is expected that the Site will be served directly by public transport, with bus routes linking into Bletchley and Milton Keynes. Discussions on provision are ongoing with the service provider.

The Site will be serviced by a 'redway', connecting both north towards the railways station and Caldecotte beyond, and south, meeting an existing redway which connects to Watling Street and into Bletchley/Fenny Stratford.

The existing Public Right of Way to the north of the Site will be maintained and enhanced. This will include improving the currently unkempt route through to Caldecotte Lake and the connections beyond. The public footpath is likely to require diversion within the site.

Within the Site, in line with the emerging development brief for the Site, it is expected that there will be four development zones. Within each, level development platforms will need to be created to accommodate development. Smaller scale units are expected to be accommodated on higher ground towards the north east corner. Larger footprint units will be accommodated within the other development zones.

Buildings located in the east of the Site will have their short ends oriented towards the Brickhills breaking up the extent of development and the impact on long and short-range views of the Site. Although at this stage the detailed design is to be confirmed, landscape impact will be minimised as much as possible for this form of development. The scheme will be designed in a way that is sensitive to the nearby settlement of Bow Brickhill.

To the western side of the Site, an area of open space will be created. This area will be multi-functional containing new vegetation to soften views of the development, surface water attenuation features as well as leisure routes for use by pedestrians and cyclists. The greenspace will also act as a wildlife corridor, as currently designated on the adopted Proposals Map.

Given the large footprint nature of the proposed use it is inevitable that the majority of hedgerows within the Site will need to be removed. However, the proposed development will see a significant increase in the overall length of hedgerow within the Site as a result of new boundary planting and additional landscaping. Landscaping will be designed to support a net increase in the biodiversity value of the Site. Whilst the proposals would result in the loss of at least part of the lowland meadow, mitigation measures are suggested to improve linkages across the Site.

All surface water will be dealt with sustainably. In addition to drainage ponds within the open space, swales will also be created within the development. Both the swales and the drainage ponds will be appropriately designed and planted to enhance the ecological value of the Site.

Within the Site, the existing ordinary water course will be re-routed to allow development platforms to be created without the need to culvert long lengths of the stream.

To the western edge of the Site, a landscaped buffer will be created. This will include taller planting to act as a partial screen to development, softening its impact.

### **The requirement for EIA**

The proposed development does not fall within Schedule 1 of the Regulations.

Under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 the proposal falls under Category 10 (a- Industrial estate development) of Schedule 2 as the site area exceeds 0.5 hectares. Therefore, a Screening Opinion is required to establish whether the proposal will have significant impacts on the environment and therefore will require an Environmental Statement to form part of a future planning application.

In considering whether the proposal will lead to significant environmental affects, the decision maker is required to consider the selection criteria in Schedule 3 of the 2017 Regulations.

To aid consideration of the proposal, set out below is an analysis of the principal effects, based on the description of development and the Site's characteristics outlined above, against the criteria in Schedule 3. As appropriate, the analysis refers to any features of the proposed development and mitigation measures envisaged to avoid what might otherwise have been significant adverse effects on the environment, as encouraged by Regulation 6 of the EIA Regulations. Suggestions as to how it is expected that these measures will be secured are also referenced.

The Indicative Thresholds provided as part of the Planning Practice Guidance suggest that EIA is most likely to be required for 'industrial estate' developments of over 20 hectares and indicates the most likely impacts are as a result of the potential increase in traffic, emissions and noise. Whilst this guidance is discussed further below as appropriate, it should be noted that EIA should not simply be required as the size of the Site is above the indicative threshold.

### **Schedule 3 considerations**

#### Characteristics of development

##### *(a) the size and design of the whole development*

The area of the Site is approximately 57 hectares which, as set out above, is over the indicative threshold set out in the Planning Practice Guidance. However, as is discussed further below, the Site is located on the edge of Milton Keynes and main sensitive views from the east are seen in the context the urban area, limiting the urbanising effect of the development. Whilst some change to landscape views will be inevitable, a landscape and visual impact study is being prepared to accompany the planning application for the development and this will help illustrate any impact of the scheme. Furthermore, the scheme will be designed in a way to minimise any landscape impacts as much as possible.

The proposal will include the development of a range of large footprint buildings with a maximum ridgeline limited to no more than 23m. To mitigate the impact of the built form on the wider landscape, building nearest the more sensitive eastern boundary of the Site will be set back behind a landscape buffer and will also be orientated to avoid long elevations fronting the boundary, allowing views to penetrate into the Site.

These buildings will also be designed to include features to mitigate their possible impact on both immediate and longer views including considerations of colour, external appearance and materials. In addition, because of the level change across the Site, it is expected that they will be partly cut into the existing landscape, reducing their overall height in relation to the existing ground level. These factors can be secured through the approval of detailed plans and are also in part covered in the emerging Development Framework for the Site.

Therefore, although the size of the development exceeds the indicative threshold in the Planning Practice Guidance, it is not considered that the Site would have environmental impacts that should be considered to be significant. This has regard both to the mitigating factors arising from the intended design and layout of the development and also from consideration of the factors outlined further below.

It should also be acknowledged that the scheme would provide significant socio-economic benefits in terms of the provision of significant employment floorspace.

##### *(b) cumulation with other existing development and/or approved development*

In the vicinity of the Site there is one other approval for large scale development. This is the development of 600 homes and associated uses proposed as part of the development of Eaton Leys to the south west of the Site. Aside from the potential impacts as a result of increased traffic movement discussed further below, it is not considered that there are any other cumulative impacts on matters identified as potentially affected by either development that would result in significant environmental effects.

(c) *the use of natural resources, in particular land, soil, water and biodiversity*

Land

The proposed development would not make use of natural resources through the operational phase. As is covered further below, the development would make use of land which is largely identified as agricultural grade 3b. A small area of 3a is located along the western edge of the Site. This land is in plentiful supply around Milton Keynes and its loss would not have a significant effect on the environment.

The Site lies within a mineral safeguarded area. However, the resource of any value is limited to a small area in the north west corner of the Site and this would be uneconomical to remove. Given the prevalence of other areas of similar resources across the area, the loss of this area is not considered to give rise to significant environmental effects. A Geo-technical study has been carried out at this stage this has not identified any notable concerns, either in regard to this or land contamination.

Soil

The scheme would involve cut and fill in order to create level development. This would focus on the regrading of land rather than wholesale importing or removal of soil. This is unlikely to have significant environmental impacts.

Water

The proposals involve the re-routing of the existing water course to allow development platforms to be created without the need to culvert long lengths of the stream. This would not involve significant impacts in terms of drainage or flood risk. In terms of water consumption this impact is capable of being dealt with within the planning application.

In terms of ecology relating to the water course, surveys of the water course have been carried out and adequate mitigation will be provided through the submission of the planning application.

Biodiversity

The development of the Site does contain an area of priority habitat that would be lost as a result of the development. This is covered further under the 'Location of the Site' section. It is considered that the scale of this loss and the deliverable mitigation measures outlined below mean it is not considered to give rise to a significant effect on the environment.

A Preliminary Ecological Appraisal has been carried out. This suggests a number of surveys to be done to accompany the proposed planning application. This will include:

- A detailed botanical survey of the Lowland Meadow area and additional fields which provide microclimatic variability
- Woodland survey on the three small woodland parcels on the Site
- Bat surveys for roosting bats and foraging/commuting bats
- Watercourse survey (Water voles/otters)
- Great Crested Newt surveys
- Reptile Surveys
- Winter and breeding bird surveys

The loss of the lowland meadow habitat is likely and a scheme of mitigation taking into account the results of the ecological survey will be proposed in order to offset any loss of biodiversity.

Subject to these surveys and a package of ecological mitigation measures it is suggested that any planning application itself would be able to adequately mitigate the impact on protected species and biodiversity.

(d) *the production of waste*

Although the development would lead to the production of waste during construction and during operation, the levels produced would not give rise to significant environmental impacts. The construction phase will see spoil created as a result of cut and fill to create level development platforms, but indications are that this process will not generate excess soil to be removed from the Site, rather it would focus on remodelling what exists. The proposals would include Class B2 industrial uses however these would be housed in modern buildings, with an appropriate site-wide waste management programme.

Anglian Water have provided a Pre-Planning Assessment Report which states that the development will not cause any significant detriment to the capacity of the sewer system and will not result in the increased flood risk downstream of the proposed connection point. Therefore, there are no offsite reinforcements required. The works will involve cut and fill to regrade the Site in preparation for the development.

(e) *pollution and nuisances*

The construction process will generate pollution and nuisances generally associated with standard construction practices. These processes are not considered to trigger significant environmental affects with any effects mitigated through the implementation of a Construction Environmental Management Plan that would be expected to be agreed and implemented as a condition to any planning consent.

Land contamination on the Site is likely to be limited. Historical mapping has identified the potential for localised 'made ground' or isolated pockets of possible contamination, mainly associated with the farm buildings, and the potential for the use of pesticides on a site-wide basis. The potential for migration of gases from off site has also been identified. An initial study has been carried out which does not indicate significant impacts.

The future use of the Site for employment uses is unlikely to give rise to instances of pollution or nuisance. The primary use will be warehousing and distribution (B8) which will create limited noise and emissions, limiting scope for pollution to ground water, surface water, soil or air. Class B2 uses

in this location will not give rise to any significant pollution or nuisance that could be considered to trigger a significant effect on the environment.

The transport related pollution and nuisance associated with the development are addressed below.

(f) *the risk of major accidents*

The proposed use is unlikely to give rise to any risk of major accidents (including those caused by climate change) either as a result of the construction or operational periods. The uses within the buildings would be non-hazardous and would not expose workers or local residents to any abnormal risks.

(g) *the risks to human health*

As above, the use of the buildings and their construction will not give rise to any risk to the health of the population. The development will give rise to increase traffic movements in the vicinity of the Site. Road users already experience delay as a result of the level crossing to the north of the Site.

The Site is not in the vicinity of a densely populated area nor an area approaching any environmental thresholds.

Though the exact details of any highways improvements are not confirmed at this stage, the proposals could make reasonable provision towards improvements directly related to the development provided these meet the relevant tests of the National Planning Practice Guidance.

The proposed development would not lead to any severance of either driver or pedestrian routes. The proposal would see the urbanisation of one length of Public Right of Way used for recreational purposes, but this route is already located alongside a railway embankment and is affected by noise from the A5 trunk road meaning the scope for impact on pedestrian amenity is limited.

Whilst the increase in traffic as a result of the proposal has potential to increase the risk of accidents. However, a review of accidents in the area does not suggest there are currently any specific highways issues in the vicinity of the Site that contribute to accidents. Therefore the development is unlikely to need to mitigate these.

Further, the future application will be supported by a finalised Transport Assessment which will identify if there are any matters of highway safety that would need to be addressed as part of the proposal. Any requirements identified would be secured via either a condition to a planning consent or within a planning obligation.

The construction of the development has the potential to generate dust and dirt which could have an impact on the local area. However, there are limited residential properties in the immediate vicinity of the Site who would be affected by any particulate matter in the air. Dust and dirt could also be transported on to the public highway during construction, but this could be mitigated by the imposition of a condition requiring wheel cleaning facilities to be installed and operational prior to the commencement and utilised throughout the construction of development.

The nature of the proposed use will increase the number of HGVs on the highway network in the vicinity of the Site. These have the potential to have impacts on human health through increasing



vibration, including travel at night. This impact could be mitigated though a HGV routing plan which would be implemented and is expected to require HGV's to access the Site from the south. This will mitigate against HGVs affecting the nearby population in Bow Brickhill who could be most affected by increased HGV movements.

The proposed uses will be located within purpose-built buildings and designed to mitigate air pollution that may result of such industrial uses. The surrounding area does not contain any Air Quality Management Zones where environmental standards have already been breached or are being approached. As noted above, although the development will increase traffic in the local area, increasing the potential for congestion and increases in transport related pollution, the level of the increase is not considered to be significant and the surrounding area is not densely populated. The nearest main residential populations to the development will be residents of Caldecotte (c.200m north beyond the railway line at the nearest point) and Bow Brickhill (c.400m to the east), minimising the potential for impacts on human health. Such uses are unlikely in this case to cause risks to human health. The development would be served appropriately in terms of access to water and would be unlikely to give rise to any harmful levels of water contamination.

### **Location of development**

The Site is not within an environmentally sensitive area as defined by Regulation 2(1) of the Regulations (i.e. SSSI, World Heritage Site, National Park, ANOB).

The Site does lie near to a Scheduled Ancient Monument, but this is separated by the A5 trunk road.

Any planning application will be accompanied by a heritage impact assessment which addresses the impact on the neighbouring scheduled Ancient Monument as a designated heritage asset.

The Site falls between known areas of archaeological remains to the north at Caldecotte, to the west at Fenny Stratford and to the south and south-west at Magiovinium and Watling Street.

There are no designated heritage assets within the boundaries of the Site.

Evidence suggests that the proposed development occupies an area of land that has remained as undeveloped farmland and low-level gravel extraction since at least the 18th century. Farm buildings have been depicted on the south-east boundary of the Site on maps dating from the early 19th century.

An archaeological geophysical survey has been carried out for the site and has detected two areas of archaeological remains which, given their location and form, seem very likely to comprise suburbs associated with the Roman town of Magiovinium. Most of these lie in the western half of the survey area, to either side of a what appears to be a leading north from the town, though a smaller area of remains has been detected in the south, alongside to Watling Street. Three ditched enclosures have been detected which area undated but most probably Iron Age or Roman in origin. All lie in Field 3, two of them alongside each other at the edge of the northern suburb and the other in isolation, 200m to the north east. Apart from these, the only definite archaeological features to have been detected are ridge and furrow and a possible trackway of medieval to early post-medieval date.

The potential presence of associated archaeological remains will be investigated in detail as part of the application process and any required mitigation required secured via condition. Given the





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severance of the A5, it is not considered that the proposal will have any significant effect on the Scheduled Ancient Monument and as a result the location of the development is not considered to be sensitive.

The Site does lie adjacent to an area identified locally as an Area of Attractive Landscape. This designation covers a wide area extending to the east covering the Brickhills and the surrounding land. As noted earlier, the scale of development has the potential to affect views from and to the Brickhills, which could be mitigated against through the use of appropriate design, which will be refined upon completion of an Landscape and Visual Impact Assessment. (LVIA)

The planning application will be accompanied by a LVIA, which assesses the impact of the proposals on the appearance and character of the local landscape. The LVIA will refer to the Bow Brickhill conservation designation, the wildlife corridor on-site and the Scheduled Ancient Monument to the south west of Watling Street. The LVIA will consider connectivity and the need to provide activity to the northern green buffer. It will consider key views from the A5 over the Site towards the Greensand ridge, the maximum heights of buildings and appropriate design and colour for the roofscapes.

A preliminary field survey of the Site and surrounding area has been carried out during early January 2018 and due to the reduced leaf cover within the surrounding vegetation structure is considered to reflect a winter survey, demonstrating a worst-case scenario in terms of identifying the likely landscape and visual effects of the proposed development upon the Site's setting.

Views of the Site are considered to be highly contained and limited to immediate locations from within the localised road network and the elevated Greensand Ridge which lies to the east.

Initial assessment by the project landscape consultant has found that as a result of the existing vegetation and undulating topography which both physically and visually contains the Site to the immediate north, west and south, views of the Site are highly contained. As such views of the Site from these locations would be perceived within a changing landscape that has seen the recent introduction of extensive development within the immediate, localised and wider setting of the Site. Development within the Site would add to the existing built form.

As noted above, the Site lies within a mineral safeguarding zone, which generally covers the Ouse/Ouzel river corridors. The Site contains a small area of sand and gravel, but this is not of a scale that could be economically removed. Given its scale and the abundance elsewhere in the area, the sterilisation of this resource is not considered significant. An initial geo-technical study has been carried out.

A high-pressure gas pipeline which runs to the east of the Site does pose a risk of significant effects, as a result of explosion if there were to be a defect with the pipe. However, the proposal is located outside of the Health and Safety Executive buffer zones for the type of development, mitigating against either the proposal impacting on the pipeline, or any incidents with the pipeline affecting uses of the development.

Although the Site does not fall within any designated areas, it does contain an area of Priority Habitat in the form of a small area identified as Inventory Lowland Meadow. This area will fall in part in the area to be retained as open space, however it is likely to be affected as a result of the construction process and will be in part lost as a result of the proposal.

In terms of the Site's location, the loss of an area of priority habitat is seen as being the only use of resource that would be considered to lead to a significant environmental impact and given the ability for this to be effectively mitigated, the residual impacts would not be considered to give rise to significant environmental effects. The Site does therefore lie in a location which can be considered to be environmentally sensitive in the meaning of the Regulations.

### **Types and characteristics of the potential impact**

The above sections have provided an overview of the potential significant effects of the development on the environment. This has considered:

- (a) the magnitude and spatial extent of the impact
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

Although the development is large scale and there is potential for increases in traffic (and related noise, pollution, vibration and queuing) associated with both the construction and operation of the proposed development, the effects of these will be localised and not result in environmental thresholds being exceeded, and the development will mitigate towards any effects. There will be some change visually but it is not considered that the local environment is so sensitively that this would irrevocably damage local landscape character.

The proposal will see the loss of some natural resource, but these impacts, considering their characteristics and deliverable mitigation, are not considered to give rise to significant effects on the environment and trigger the need for EIA either in isolation or cumulatively with other approved development.

### **Summary**

In light of the above analysis, it is not considered that the development proposal is required to be subject to an EIA. Although the size of the development exceeds the indicative threshold where EIA is considered to be more likely to be required, the specific nature of the impacts and the locational characteristics of the Site mean that any effects on the environment, once mitigation measures are considered, are unlikely to be significant. This statement has analysed a number of different potential impacts from the scheme, including the impacts on transportation, landscape, the historic environment, biodiversity, drainage, trees, and socio-economic impacts and has concluded that the impacts resulting from the development are not significant in this case.

We look forward to receiving your formal opinion on the need for an Environmental Statement to be submitted with a future planning application within the prescribed period following receipt of this request. If you do consider you require further information to be able to issue a screening opinion, please let me know.



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I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Robinson'.

**Graham Robinson MRTPI**  
**Associate Director**

Encl: Location Plan

Cc Neil Osborn – DLP  
Colin Armstrong – Hampton Brook  
Ian Jackson – Hampton Brook



**Duncan Sharkey**  
Corporate Director - Place

**Anna Rose**  
Service Director Planning and  
Transport  
Our Ref: 18/01760/EIASCR

Your Ref: South Caldecotte

Reply To: Samantha Taylor

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DLP Planning Limited  
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MK44 3WH

11<sup>th</sup> September 2018

Dear Mr Robinson,

**TOWN & COUNTRY PLANNING ACT 1990  
TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
(ENGLAND AND WALES) REGULATIONS 2017 (AS AMENDED)**

**SCREENING OPINION UNDER PART 2 OF THE EIA REGULATIONS IN RESPECT OF:**

**Reference: 18/01525/EIASCR**

**Location: Cross Roads Farm, Brickhill Road, Bow Brickhill, Milton Keynes**

**Proposal: Environmental screening opinion request for the commercial development of the site at Cross Roads Farm,**

I write with reference to your request for a Screening Opinion in respect of the above development, received on 17th June 2016.

**Assessment EIA Regulations 2017**

The Screening process should consider the development proposals against the criteria and thresholds which are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the Regulations') and the guidance contained within the National Planning Practice Guidance in determining whether or not an EIA is required to accompany an application.



Unfortunately, in this instance, due to a technical validation error, the Authority was unable to respond within the required timescale.

## **DECISION**

The Council hereby adopts an opinion that an Environmental Statement is **NOT REQUIRED** for the proposal.

Should you wish to discuss this matter further please contact Samantha Taylor on 01908 252724 or [samantha.taylor2@milton-keynes.gov.uk](mailto:samantha.taylor2@milton-keynes.gov.uk).

Yours sincerely,

A handwritten signature in black ink that reads 'S Taylor'.

Samantha Taylor  
Senior Planning Officer

Counter signed by

A handwritten signature in black ink that reads 'D Law'.

Duncan Law  
Senior Planning Officer  
For and on behalf of the Council

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