

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 196,000m² 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



Graham Robinson MRTPI
Associate Director

Encl: Location Plan

Cc Neil Osborn – DLP
Colin Armstrong – Hampton Brook
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