

DEVELOPMENT CONTROL COMMITTEE

6 FEBRUARY 2020

COUNCILLORS' ADDITIONAL PAPERS

INDEX OF DOCUMENTS CIRCULATED AFTER PUBLICATION OF THE AGENDA

1. **Speaking Commitment (Page 2)**

2. **Item 7a – 19/01818/OUT – Land at Brickhill Street, South Caldecotte, Milton Keynes**
Officer Update **(Page 3 to 6)**
Submission from Applicant's agent **(Page 7 to 35)**

**SPEAKING LIST
DEVELOPMENT CONTROL COMMITTEE – 6 FEBRUARY 2020**

ITEM NO.	TITLE	REQUESTS TO SPEAK IN OBJECTION	TIME ALLOCATED	RIGHT OF REPLY OR SPEAKERS IN FAVOUR	TIME ALLOCATED
7a - 19/01818/OUT	Land at Brickhill Street, South Caldecotte, Milton Keynes	Ms S Malleson Cllr D Hopkins (Ward Councillor) Cllr B O'Rourke (Bow Brickhill Parish Council)	3 Mins 3 Mins 3 Mins	Mr G Robinson (Agent)	9 Mins

Application Number: 19/01818/OUT

Description: Outline application including access for the development of the site for employment uses, comprising of warehousing and distribution (Use Class B8) floorspace (including mezzanine floors) with ancillary B1a office space, general industrial (Use Class B2) floorspace (including mezzanine floors) with ancillary B1a office space, a small standalone office (Use Class B1) and small café (Use 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 with appearance, landscaping, layout and scale to be determined as reserved matters

AT Land At Brickhill Street, South Caldecotte, Milton Keynes, MK17 9FE

FOR HB (South Caldecotte) Limited

Statutory Target: 03.03.2020

Extension of Time: N/A

Ward: Danesborough and Walton

Parish: Bow Brickhill Parish Council

Report Author/Case Officer: David Buckley, Senior Planning Officer

Contact Details: david.buckley@milton-keynes.gov.uk

Team Leader: Sarah Hine sarah.hine@milton-keynes.gov.uk

Paragraph 5.5 Cllr Jenkins Danesborough and Walton Ward

Consulted 20/11/2019

Response

- The application is premature, the Development Framework for the site has not been adopted and the cabinet member was clear that this was on hold until the matter of the Expressway had been resolved.
- It is likely that the land in question will be required a bridge over the railways to connect the north and south.
- The application itself is poor; little consideration has been given to environmental issues and I was particularly alarmed at the scant disregard shown to the archaeological significance of the site. Little sensitivity has been shown to residents living close by, which could easily be done in design and landscaping.

- I hope very much the committee will be minded to refuse this application and the developer will wait until the development framework has been approved prior to submitting any further applications.

Paragraph 7.5, replacement sentence: The application site is allocated under a specific policy (SD14) in the adopted Plan: MK for the type of development which is proposed. Therefore it does not meet the criteria to be considered premature against this NPPF policy. Where there is conflict between the two, the NPPF is a significant material consideration.

Highways England Update Summary

7.25 Update recommendation received dated 29th January 2020 that the application is not determined before 24 April 2020 to allow sufficient time to address the junction capacity issues on the A5, part of the Strategic Road Network (SRN). Highways England has clarified that with respect to The Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, the purpose of this is to protect the interests of the SRN. Consequently if the application is refused whilst a holding objection is in place, the integrity of the SRN is not compromised and there will be no need to provide a submission to the Secretary of State in line with the direction.

2.14 Application late submissions

Three update letters from applicant, sent by after 5pm on Monday 3rd February, addressing reasons for refusal in relation to Ecology, Archaeology and Highways and requesting members defer making a decision until April for those issues to be resolved.

Ecology/Biodiversity

- Biodiversity Impact Assessment has been submitted, which based on their calculations would provide a minimum 10% biodiversity net gain equivalent to £1.741m.
- Officers would need to consider whether the mitigation hierarchy in national and local policy has been correctly followed, as well as the content of the submitted Biodiversity Impact Assessment.

Archaeology

- Letter states that the archaeological remains within Area B are not of national importance and that the methodology is sound, that justification for excavation of heritage assets is provided.
- Also states that the proposal can be justified against the substantial benefits that the scheme would provide.

Transport

- This states that the outstanding issues can be resolved through conditions and s.106 and that the wider issues are not relevant to the planning application.
- Officers do not consider that this raises new information beyond that in the existing documentation.

Officer summary in relation to late application submissions: Officers consider that the information submitted in relation to ecology/biodiversity and archaeology could potentially have an impact on the recommendation. It should be highlighted that due to the short timescale it has not been possible to undertake the necessary consultations required to take a clear view on this.

However, a deferral until 2nd April DCC is not recommended as it would be prior to the deadline of the Highways England holding response of 24th April. Officers would not be in a position to recommend granting planning permission until the holding response from Highways England has been resolved.

The applicant is not willing to agree an extension of time until June, which would be the first opportunity (subsequent to the Highways England holding response expiry) for DCC to consider the scheme.

Highways England Update 29.01.2020 full text

Annex A Highways England recommended further assessment required HIGHWAYS ENGLAND has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regards to 19/01818/OUT and has been prepared by Shamsul Hoque.

From this proposed employment development site, the nearest access point to the existing SRN is the A5/A4146/Brickhill Street roundabout, also known as Kelly's Kitchen roundabout. We are already in consultation with the applicant's transport consultant team, BWB Consulting Ltd (BWB), for transport assessment reviews since pre-application stage.

After reviewing of the submitted revised transport assessment including VISSIM modelling works for the A5/A4146/Brickhill Street roundabout, it is clear there are still outstanding issues. Given the proposed development site's proximity and predicted

trips in AM or PM peak periods, the impact of both light goods vehicles LGV and heavy goods vehicles HGV showing significant on the A5, part of the SRN.

Therefore, to enhance the smooth operation of A5, the applicant needs to submit revised VISSIM models showing junction's capacity assessments for both the A5

Kelly's Kitchen roundabout and the A5 Redmoor junction; as set out in the Technical Highways England Planning Response (HEPR 16-01) January 2016 Note 06 and 07 (dated 24 January 2020) produced by our Framework Consultant, AECOM.

Therefore, we recommend that the application is not determined before 24 April 2020 to allow sufficient time to address the junction capacity issues on the A5, part of the SRN. If we able to respond earlier than this, we will withdraw this recommendation accordingly.

Extract from Transport Assessment in relation to Bow Brickhill Level Crossing

6.37 **Table 21** below shows the observed queues during the morning and evening peak hours when the level crossing was called for approaching train. On average, the duration the barriers are closed throughout the day is 3:31 minutes.

Table 21: Bow Brickhill Level Crossing Observed Queues

Barrier			No. of Trains	Queue		
Time Down	Time Up	Duration (mm:ss)		V10 Brickhill Street (S) – Lane 1	V10 Brickhill Street (S) – Lane 2	V10 Brickhill Street (N)
Morning Peak Hour (08:00-09:00)						
08:03:00	08:05:36	02:36	1	45	3	34
08:27:05	08:30:25	03:20	1	29	1	27
09:04:06	09:07:22	03:16	1	46	1	18
Evening Peak Hour (17:00-18:00)						
17:12:09	17:15:21	03:12	1	23	2	131
17:38:51	17:42:10	03:19	1	6	3	85
17:48:59	17:50:06	01:07	1	27	1	136

Officer summary: The table shows that the barriers are down three times during each of the peak hours, with the duration in minutes as indicated in the table.

David Buckley
Senior Planning Officer
Planning Service
Milton Keynes Council
Civic Centre
1 Saxon Gate
Milton Keynes
MK9 3EJ

Dear Mr. Buckley,

Re: 19/01818/OUT South Caldecotte - Committee Meeting 06/02/20, Archaeological Issues

We write to you having reviewed your report to the Development Control Committee meeting on 06/02/20, in order to respond to this and set out our position on matters of Archaeology.

We note that your report lists the impact on archaeology as a reason for refusing planning permission. Attached in Appendix A is a response to the issues raised by the Council's Archaeologist, provided by our archaeological consultant, Dr Michael Dawson.

Dr Dawson, a notable authority on Roman occupation archaeology, explains why the assessment by MKC Archaeology response is flawed, namely because:

- It relies too heavily on unsubstantiated speculation stemming from the results of evaluation;
- The use of value laden but inappropriate terminology is misleading;
- The interpretation of the evidence does not take account of current research.

Dr Dawson's response concludes that the archaeology within development site is of local or regional at most interest but is not of Schedulable significance.

Turning to the committee report itself, Para 7.69 of the committee report states that the EIA Screening Direction report provided by the secretary of State states that the impact of development on the environment has potential to impact heritage assets of national or potential national importance. Para 7.71 of the committee report sets out that the archaeological remains within Area B are of probable national significance. This is not consistent with the wording in the Screening Direction report. The issue is further explored within Dr. Dawson's response, which states that the evidence available does not support the view that the archaeology is of national importance.

The remaining points in para 7.71 of your report are fully addressed within Dr. Dawson's response. You allege that the methodology that has been used by the applicant is inconsistent and that the significance of the archaeology within Area B has been 'played down'. We dispute these criticisms of our submission. Dr. Dawson's response is based on the results of evaluation, comparison of adjacent excavation and current research. Justification for the excavation of heritage assets is provided within Dr. Dawson's response, but can also be justified when considered against the substantial benefits that the scheme would provide.

The Historic England response states that less than substantial harm, at the minor end of the scale would result to the setting of the Schedule Monument of Magiovinium. We note that officers do not cite the impact on the setting of the Scheduled Monument as grounds for refusing the scheme, and this is confirmed in paragraph 7.78 of the committee report.



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In summary, the proposal as submitted is compliant with Policy SD14 and does not result in harm to non-designated heritage assets that warrants the refusal of planning permission.

Finally, we request that Members of the Development Control Committee defer the item to allow continued dialogue regarding outstanding items to enable them to be resolved. The planning application is currently well within statutory timescales which can be extended to allow for resolution of the matters discussed in this letter. The deferral of the item until the meeting in April would allow for officers to work with us to resolve the items outlined above.

We look forward to hearing from you.

Yours sincerely,



Graham Robinson MRTPI
Associate Director

Attached: Appendix A – Letter from Dr. Mike Dawson, Director, RPS

South Caldecotte 19/01818/OUT

Re: Development Management Consultation Amended Consultation Response N Crank, Snr Archaeological Officer, 7th January 2020

Summary

The Consultation response to the proposed development of the Allocated Site (Plan:MK 2016-2031 SD14) comprises an **Objection** where the consultee believes their objection cannot be overcome by any amendments or additional information.

This is despite the policy presumption in favour of development, the evident soundness of the Plan:MK 2016-2031 and Policy South Caldecotte Strategic Employment Allocation (SD14) which specifies a *minimum of 195,000m² of Class B2/B8 and ancillary B1 employment floorspace* and that ... *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 to inform the layout of development.*

Despite the policy above which recommends that investigation should be undertaken to understand the archaeological potential and significance of this development site *'to inform the layout of development'* and the presentation of a Desk Based Assessment, a field investigation comprising a Geophysical Survey and Trial Trench Evaluation neither of which recommend preservation in situ the Consultee has chosen to recommend refusal which cannot be overcome by any amendment or additional information. This position is contrary to policy which requires the archaeological investigations to inform the layout of development.¹

The Developer's Case

It is the position of the developer that this Consultee Response is contrary to policy and the basis of the advice is flawed. The basis of the Objection is that the application should be refused due to the *'unjustified total loss of designated (or of equivalent significance) and non-designated heritage assets of archaeological interest'*. In the following section this report will argue that the Objection has excluded any further justification based on policy, economic development and employment by the initial assertion that the *'objection cannot be overcome by any amendments or additional information'* and that this betrays a prejudicial position adopted by the Senior Archaeological Officer. Furthermore the reference to the *'total loss of designated (or of equivalent significance) and non-designated heritage assets'* both overstates the potential impact of development by implying the *'total loss of significance of a designated heritage asset'* (NPPF Para 195) and the significance of a Roman street in terms of its absolute survival and its relationship to the Roman town of Magiovinium (SAM).

The developer's case is that the Snr Archaeological Officer (1) relies too heavily on unsubstantiated speculation stemming from the results of evaluation, (2) that the use of value laden but inappropriate terminology is misleading and (3) that interpretation of the evidence does not take account of current

¹ If no other information can be provided to make the development acceptable to the Snr Archaeological Officer this means that no development can take place at SD14.

research. It is our opinion that the archaeology within development site is of regional and local interest and not of Schedulable significance.

The Non-designated Status of the Heritage Assets²

In Key Considerations the Snr Archaeological Officer has asserted that the buried archaeological remains are ‘of **probable** national significance comprising a metalled Roman street (c.250m in length) and adjacent areas or urban settlement (buildings) forming part of the Roman town of Magiovinium’. In Key Points the significance of the archaeology lies in four ‘well preserved areas’:

1. The remains date from 1st to 4th century with underlying Iron Age activity
2. There is 250m of Roman street,
3. There is evidence for substantial buildings including some of brick construction with tiled roofs,
4. High status pottery is present including regional wares, imported Samian (France) and amphora from Spain.

1. The remains date from 1st to 4th century

The first point is that the remains date from the 1st to 4th century. Taken out of context this is meaningless as the Roman occupation of Britain lasted from AD 43 until after 410 AD. In the SHA I have written that:

‘In summary the areas of Roman activity retain significant evidence in the form of archaeological deposits relating to the 1st to 4th centuries. In relation to periodisation the later Iron Age pottery hints at the location elsewhere of an earlier settlement whilst the Roman pottery suggests that the street was first occupied in the pre-Flavian period until at least the late 2nd century, when the flanking ditches may have been allowed to silt up. The earliest activity at the Unwin’s site may have been quarrying alongside the road before any settlement activity occurred. Enclosures seem to have been established here after the quarry period from the late 1st century onwards and occupied into the 3rd century before the town began to contract in the 3rd and 4th centuries. This is a situation which is comparable to that identified during David Neal’s excavation along the route of the A5 (Neal 1987)’³. (From SHA 2019, 2.14)

This interpretation has not been challenged by the Snr Archaeological Officer, however the implication of the later comments and Conclusion that ‘*The assessment does not properly highlight the complexity, rarity, research potential, good state of preservation*’ implies that this is exceptional and of national significance. However, as Burnham and Wachter writing in 1990 observed “*It can probably now be claimed that a good deal is known about origins. Most sites⁴ have been sufficiently examined to show the origin to be either an existing Iron Age settlement or religious site*” and that “*It is abundantly clear that minor streets in many small towns were only constructed as and when they were required...*’ Burnham and Wachter 1990, 321). With regards to the later period as Rogers, writing in 2011 noted, ‘small towns *‘become more prominent in the late Roman period*’ (Rogers 2011 (2013) 178)⁵.

It is entirely unacceptable, therefore, to promote the activity at Unwins as exceptional when the chronological evidence of activity fits well with a pattern established from the 1990s onwards.

2. There is 250m of Roman street

² This section follows the Consultee response in referring only to the area described in the application as Unwins Land.

³ Neal D S 1987 Excavations at Magiovinium, Buckinghamshire, 1978-80 Records of Buckinghamshire, Vol 29 1987.

⁴ Burnham and Wachter examined 54 out of 80 Roman small towns in Britain recognised before 1990

⁵ Rogers A 2011 *Later Roma Towns Rethinking Change and Decline*, Cambridge

The second point concerns the 250m of Roman street. The metalling of the street has been preserved beneath the ridge of ridge and furrow in the area of Unwins land (2). Although somewhat truncated remains of the flanking ditches survive together with recuts. No figures exist for the extent of surviving Roman streets in Britain. However in the recent research frameworks Prof Fulford has proposed that⁶ *'The hinterland settlement and mortuary landscape of both 'large' and small towns requires further research. Examples with hinterlands relatively untouched by modern development offer major opportunities for research'* (Fulford 2014, 12.7.2, page 181). This echoes Burnham and Wachter in 1991 *'Streets in themselves are also worthy of study , not by a quick section across them but by stripping lengths, which will show the different types of aggregate, the way they were laid down...'*. Neither research frameworks nor *'The Future'* (Burnham and Wachter 1991, 320)⁷ indicate that a street surface alone constitutes more than an object for further research.

3. Evidence of substantial buildings including some of brick construction with tiled roofs

The third point is the most contentious. The observation that there is evidence of *'substantial buildings including some of brick construction with tiled roofs'* is often repeated [Key Considerations, Key Points Assessment 'substantial structural remains']. However the evaluation report is explicit in its Conclusion that:

*"The scope of the trial trenching limits conclusions can be drawn at this stage. It appears that the remains represent an area of roadside settlement associated, forming part of, the Roman town of Magiovinium. The regular layout of the enclosures may indicate an element of formal planning rather than organic growth. Activities within these enclosures perhaps related to the processing of agricultural produce (cereals and animals) as well small- scale craft activities. **No evidence for substantial structural remains was present, as has been seen in the main parts of the Roman town.** Evidence from other extra-mural excavations at Magiovinium have shown the presence of timber buildings, including possible shops and inns, fronting onto Watling Street (Hunn et al 1995), and it is possible that a similar pattern is being replicated here, albeit on a smaller scale along a less significant thoroughfare."* (Burke 2018, Sec 7 discussion).

It is difficult to understand where this identification of a substantial Roman building originates. The specialist report on the brick and tile in the trial trench evaluation report (Atkins 2019, 53)⁸ does speculate that: *This quantity of Roman tile and brick, found in over 30 separate contexts is **probably** significant. This amount of brick and tile is not usual for an evaluation and suggests that there is/are likely that there had been Romanised building(s) on site constructed with tiles and brick.* However, on close reading of the text it is clear that the author refers to *'the site'* meaning that of Magiovinium generally. This is an interpretation supported by the quantity of brick and tile itself. In total 9.65kgs was recovered from 8 trenches (8, 14, 25, 28, 69, 76, 78, 85). In all some 31 contexts. The trenches are in fact widely dispersed 8, 14, 25, 28 and 76 are east of the brook in Normans land, 69 is to the south in Woburn estates. Only 85 is situated across the Roman street while 78 evaluated a ditched enclosure south of the street. This is not an area of concentrated brick work. Just as importantly the weight of brick and tile

⁶ Professor Fulford was promoted Professor of Archaeology at the University of Reading in 1988. He has served as Dean of the former Faculty of Letters and Social Sciences (1994-1997) and Pro-Vice-Chancellor for Teaching and Learning (1998-2004). His principal research interests are in Roman archaeology, particularly in the fields of rural settlement, urbanism, economy, material culture, technology and trade. He directs: *The Silchester Roman Baths Project*, 2018- has directed *The Silchester Insula IX Town Life Project* 1997; *The Silchester Environs Project* 2014; *The Nero and Silchester Project* 2016-19 and *The Rural Settlement of Roman Britain* project.

⁷ Burnham B, Wachter J 1990 *The 'Small Towns' of Roman Britain*, London:Batsford

⁸ Burke J 2018 Archaeological trial trench evaluation on land at South Caldecott Milton Keynes Buckinghamshire October 2018 (EMK 1365; AYBCM:2018.106)

recovered, 9.65kg, represents approximately⁹ 5 to 6 bricks or tiles. The quantity distributed across 8 trenches and 31 contexts does not constitute the remains of substantial brick built and tile roofed buildings nearby. In trenches 85 (11 frags at 1.193kg) and 78 (4 frags at 0.23kg) the fragments alone do not suggest buildings immediately adjacent rather small amounts of material from elsewhere. Finally the geophysical survey interpretation map (Burke 2019, Fig 4) does not show the location of any substantial buildings. A more realistic interpretation is that some brick material has been brought to the area within the development site (SD14) as backfill of the quarry pits, found its way into silted up ditches and lodged in the road surface.

4 High status pottery is present

Turning to the final point (4), that high status pottery was found during the evaluation and contributes to the equivalent to scheduled status of the site status, it is important to compare this with another site on the east side of Magiovinium, Site 17, excavated by David Neal. In the excavation report Geoffrey Dannell¹⁰ recorded that the excavation produced “**Over 1000 samian sherds...**” which he interpreted as ‘Apart from a few exceptions most of the sherds were in horizons mixed with coarse pottery covering a wide date range, and **perhaps dumped from the town**’.

Dannell went on to note that ‘*Supplies came from **the normal kiln sites** at La Graufesenque, Les Martres-de-Veyre, and Lezoux in the second century. Peripheral sources were the Lezoux first-century kilns and Montans but this evidence is limited to only a few sherds*’ (Dannell 1987, 99).

In the current evaluation the pottery assemblage is described in similar terms to those of Dannell over 30 years ago: “*The pottery assemblage represents a substantial collection and range of wares. The size of the assemblage is no doubt due to the presence of substantial occupation in the area, including the Roman road; while the character of the assemblage can certainly be seen to have been shaped by proximity to the Roman town of Magiovinium and close connections to this centre and others via the roadway. The range of wares present also indicates a wide chronological spread over which there was activity in the area, from the Iron Age through to the later Roman period (late third century at the earliest). **Though being an interesting and sizeable assemblage, the pottery was poorly preserved. Many wares were found to be abraded and/or weathered (many slipped sherds, for example, preserved only traces of their colour-coats as a result of unfavourable soil conditions), and the average sherd weight was low for a Roman assemblage at just 12.1g***”. (Sutton 2019 Sec 6.1 page 43).¹¹

The evaluation report goes on to note that “*Continental imports were limited to samian wares and amphorae. **There is little surprising about the details of the fabrics found.** All of the amphorae were Baetican in origins (NRFRC fabrics BAT AM 1 and BAT AM 2), while the samian was predominantly southern and central Gaulish (predominantly LEZ SA 2) where fabrics could be confidently established. The samian forms occupied a wide range of tablewares, including forms Drag. 18/31, 29, 33, 35, 36, 37, and 38, and one Ludowici Tg. Moulded decoration was encountered four times, on forms 29 and 37. The single example of form 29 included a well-reserved vegetal design (fig.44). One stamp was found in (809), reading MAPILLOF and referring to the potter Mapillus of Lezoux (fig.47). The proportion of samian represented in the assemblage is moderately high, at 4% by sherd count*”. (Sutton 2019 Sec 6.1 page 47)

Overall the evaluation report describes the variety of pottery forms recovered as “*Table 3 presents quantification of the vessel categories recorded. Despite being close to the town at Magiovinium, the assemblage is jar-dominated (61%) and produced only 14% bowl/dishes; **figures expected from a rural***

⁹ There are several Roman brick and tile types on average they weigh between 4.5 and 5.5lbs; the number of bricks and tiles suggested above is based on 0.453g to a 1lb)

¹⁰ Geoffrey Dannell is a nationally recognised Samian specialist
<https://archaeologydataservice.ac.uk/library/browse/personDetails.xhtml?personId=12339> accessed 17/1/20

¹¹ In Burke J 2018 Archaeological trial trench evaluation on land at South Caldecott Milton Keynes Buckinghamshire October 2018 (EMK 1365; AYBCM:2018.106)

site without easy access to a roadway. Beakers occupy a moderately high but not unexpected proportion of the assemblage (compare to the 13.4% from the recently-excavated assemblage from Steeple Claydon, Bucks.: Sutton 2018, fig.46). Mortaria are very well represented, though, at 1.42 EVEs and 5.5% of the assemblage.” (Sutton 2019 Sec 6.1 page 47)

The pottery report for the evaluation makes clear, as I have highlighted, that the area of archaeology at Unwins is on the periphery of the Roman small town comparable to a rural site, may have been in receipt of dumped pottery (perhaps to be expected in an area of backfilled quarrying) and has produced no surprises (exceptional deposits) according to the pottery specialist. It is on the periphery of the Roman town best described as its hinterland. To be of schedulable quality the DCMS guidelines 2013, 6 *Under the terms of the 1979 Act the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance*, and it is the developer’s contention that the independent judgement of the evaluation that *“Though being an interesting and sizeable assemblage, the pottery was poorly preserved”* together with *“There is little surprising about the details of the fabrics”* and that the *“figures expected from a rural site without easy access to a roadway”* do not constitute an interpretation which suggests national importance.

That interpretation of the evidence does not take account of current research

The third concern is that the Snr Archaeological Officer suggests the basis on which the significance of the archaeology has been assessed is flawed due to the use of inappropriate research objectives. In particular it is stated that there is *“no evidence that the archaeology was considered in relation to any national research priorities...”*

Two research frameworks documents have been cited in the ES text: Fulford 2014 and Knight 2012. These are the regional studies of the East Midlands and West Midlands which contribute to the English Heritage’ (now Historic England) national research frameworks project. In paragraph 8.155 the text quotes how *“The investigation will also take account of the national research programmes outlined in Historic England/English Heritage’s ‘Strategic Framework for Environment Activities and Programmes in English Heritage (SHAPE)’ first published in 2008.*

The Roman Research Strategy to which the Snr Archaeologist refers is *“Research Strategy for the Roman-Period Historic Environment”* which originated in 2009, was published in 2012. As the report itself makes clear *“The present draft has been revised to align it with English Heritage’s Corporate Plan for 2010-2015 and the National Heritage Protection Plan (NHPP).”* The latter was described in 2012 by Ed Vaizey MP, Minister for Culture, as *‘effectively the business plan for the historic environment’, the National Heritage Protection Plan comprises a framework for heritage protection built around a clear set of priorities’.*

Furthermore the Snr Archaeological Officer seeks to portray this document as setting out key research objectives and criteria on which to judge the significance of *‘Roman small towns their suburbs and routeways’*. The document makes no reference to Roman small towns. There are three references to towns. The first is the observation that

Roman period deposits in modern towns, in common with those of later intensely urbanised periods, are particularly vulnerable to modern development either directly, or through dewatering or other impacts from off-site activities. In the countryside Roman sites and deposits, like those of other periods, are subject to impacts from infrastructure and other development projects, current farming practices and changes in agricultural regimes, as well as other damage outside the planning process, such as and coastal and other erosion. (page 8)

The second reference is under the heading:

Critical Research Priorities for the Roman-period historic environment:

4.1 Identifying and understanding vulnerable site types to support Protection and Management of Change (Topics 1, 2) (NHPP Measures 3 and 4, supporting Measures 5 and 6)

*Elements of the Roman-period historic environment, such as villas and public buildings in the core-areas of **major towns** are readily recognised and relatively easily understood within the context of an established literature and are also easy to justify for designation or protection within the planning system. **Other types of site**, perhaps because of location or constructional characteristics, are less obvious, particularly to the non-specialist, and consequently present challenges in terms of presentation and justification for designation or adequate consideration in the planning process. However, it goes without saying, that an adequate understanding of the Roman, or any, period is predicated on adequate knowledge of the fullest possible suite of site types etc, as is the creation of an adequate and representative body of statutorily protected sites.*

The third reference is to the research objective:

RM 1:

- 1. Identification of sites/components of Roman period sites that are under-represented in the archaeological record.*
- Identification of site components, eg in Roman towns, that are under-represented*

Turning to the use of 'suburbs' the Research Strategy states

RM1

2. Roman period suburbs and cemeteries
 - Assessment of the resource and its significance and vulnerability

The research objective RM1 is intended to indicate which projects Historic England would support with research funds and they are explicitly "*informed by relevant regional and other research frameworks*" (Sec 4, page 13).

RM1 (2) sets out the process of assessment which has been undertaken at South Caldecott.

In other contexts the Research Strategy refers to the vulnerability of suburbs [3] in the particular circumstance where "*piecemeal development ... threatens adequate understanding due to the often disjointed and small-scale nature of archaeological mitigation required under planning legislation*".

The relevance of these research priorities are that they identify the vulnerability of suburbs to misinterpretation in particular circumstances and have resulted in (amongst others) support for the project led by Prof Fulford initially titled 'Assessing the Research Potential of Grey Literature in the Study of

Roman England'.¹² One of the outputs from this project was the 2015 volume, *The towns of Roman Britain - the contribution of commercial archaeology since 1990, Britannia Monograph Series no 27. Edited by Michael Fulford and Neil Holbrook* which is cited in the Supplementary HA para 2.51.

Conclusion

In conclusion the points above indicate that the proposed application has been informed by an assessment and evaluation strategy agreed and approved by the local authority. This has identified a Roman street through a quarried area with later enclosures leading to fields beyond a small brook on the periphery of the Roman small town of Magiovinium.

The archaeology has been identified as regional and local in significance based on the results of the evaluation, comparison with adjacent excavations and of current research priorities. The evaluation has produced results comparable to those of the excavations also on the east side of the Roman small-town during construction of the A5 in 1978-80. Relevant to the character of the evidence recovered by the recent evaluation the earlier excavations were described by the excavator as in an area which was *"outside the town, occupation consisting of buildings fronting Watling Street and field systems aligned with the fort; the structures are industrial - smithies servicing road traffic . Barns and many horse bones in the enclosure ditches indicate the proximity of stabling and knacker's yards..."*¹³ This image is not dissimilar to the that portrayed in Fig 4 of the trial trench evaluation (Burke 2018)¹⁴ in which enclosures flank a Roman period street. The evaluation is further from the Roman town (SAM) than Neale's excavation and seems to have recovered rather more evidence for quarrying during the earliest period of Roman activity which may relate to the construction of the original A5.

In light of the information provide above it remains the developer's case that archaeology at the allocated site SD 14 is of regional and local significance, that national and regional criteria have been cited in determining its significance together with relevant nearby investigations and that the justification for further investigation lies with the implementation of policy, economic development and employment.

¹² See Smith A, Allen M, Brindle T, Fulford M 2016, *The Rural Settlement of Roman Britain*, Britannia Monograph xix

¹³ Neale 1987 Excavations at Magiovinium, Buckinghamshire 1978-80, *Records of Buckinghamshire* Vol 29, 1 Summary

¹⁴ Burke J 2018 Archaeological trial trench evaluation on land at South Caldecott Milton Keynes Buckinghamshire October 2018 (EMK 1365; AYBCM:2018.106)

David Buckley
Senior Planning Officer
Planning Service
Milton Keynes Council
Civic Centre
1 Saxon Gate
Milton Keynes
MK9 3EJ

Dear Mr. Buckley,

Re: 19/01818/OUT South Caldecotte - Committee Meeting 06/02/20, Ecological Issues

We write to you having reviewed your report to the Development Control Committee meeting on 06/02/20, in order to respond to this and set out our position on matters of Ecology.

We note that you have recommended that the issue of ecology forms a reason for refusal within your committee report. Para 7.96 of the committee report sets out the Biodiversity Officer's objection to the proposals.

We strongly disagree with the approach taken in the report and would highlight the following as reasons why the impact on biodiversity should be considered acceptable:

- Whilst the proposals do result in the partial loss of habitats on site, new habitats will be created as part of the development.
- There is no evidence that the development will result in harm to protected species.
- The proposals would comply with the mitigation hierarchy set out within para 175 of the NPPF, which requires that the decision maker consider whether biodiversity harm can be avoided, adequately mitigated or as a last resort compensated for, before it takes the step of refusing planning permission.
- The development would result in a demonstrable net gain – a Biodiversity Impact Assessment prepared by Aspect Ecology is attached in Appendix B.

The Lowland Meadow habitat, is a poor example of its type (which is not disputed by the Council), and in the absence of suitable management its quality, and therefore value, is expected to decline; potentially to the point that it is no longer recognised as a Priority Habitat.

The development proposals represent the opportunity to create species-rich grassland that is managed for biodiversity, whilst other habitats are proposed within the site, such as the new Green Link Corridor, to reduce overall impact on biodiversity. This would accord with the principles within the National Planning Policy Framework, and policies NE2 and NE3 of Plan: MK all of which make allowance for the mitigation and compensation of impacts on biodiversity. In this way, the proposals would comply with local and national biodiversity policies.

The submission of the BIA demonstrating a biodiversity net gain in line with policy NE3 and para 175 of the NPPF addresses any concerns raised in para 7.99 of the committee report. Furthermore, through the biodiversity offsetting scheme via Environment Bank a minimum 33% increase (above that lost from the site) in Lowland Meadow creation/restoration could be achieved, with a 30-year

management and monitoring plan, contributing to the Buckinghamshire and Milton Keynes LBAP for this habitat type.

Para 7.101 of your report ignores that there would be additional habitats created as a result of the scheme, as outlined above. The loss of some habitats on site should be weighed within the planning balance.

The Council Ecologist has requested a number of additional documents be submitted, namely the Biodiversity Enhancement Scheme and a Habitat Management Plan, and we confirm that we are happy for these to be conditioned in any outline approval and to provide these documents, at reserved matters stage as is standard.

Para 175 of the NPPF sets out that when considering planning applications planning permission should be refused if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. The proposals would fully comply with this hierarchy, as discussed above.

To summarise, the proposals entirely comply with Policy NE3 with regard to biodiversity and para 175 of the Framework.

Finally, we request that Members of the Development Control Committee defer the item to allow continued dialogue regarding outstanding items to enable them to be resolved. The planning application is currently well within statutory timescales which can be extended to allow for resolution of the matters discussed in this letter. The deferral of the item until the meeting in April would allow for officers to work with us to resolve the items outlined above.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Robinson', written in a cursive style.

Graham Robinson MRTPI
Associate Director

Attached: Appendix B – Biodiversity Impact Assessment, Aspect Ecology

South Caldecotte, Milton Keynes (ECO5263)

Biodiversity Impact Assessment

Date: 23rd January 2020

1. Introduction

- 1.1. A planning application is being prepared for new strategic employment development, including nine warehouses, with offices, parking and associated access and infrastructure at South Caldecotte, Milton Keynes, hereafter referred to as 'the site'.
- 1.2. Aspect Ecology has been commissioned by Hampton Brook to undertake a Biodiversity Impact Assessment (BIA) to inform the application. The DEFRA 2.0 Biodiversity Impact Calculation Tool has been used to conduct the BIA in accordance with the supporting information for Policy NE3 of the Milton Keynes Council Plan:MK 2016-2031 which states the assessment can be undertaken utilising the Defra metric. This briefing note appends the Defra BIA Calculator (see Appendix 5263/1) and provides a summary of the results and justifies the choice of habitat definitions, distinctiveness, target habitat condition and temporal factors where appropriate.

2. Biodiversity Impact Assessment

- 2.1. The information obtained from the Phase 1 habitat survey (pre-development – as set out within the Ecological Appraisal produced in June 2019 by Aspect Ecology; see Appendix 5263/2) and the Illustrative Landscape Strategy Plan (post-development; see Appendix 5263/3) were inputted into the DEFRA 2.0 Biodiversity Impact Assessment Calculator Tool in November 2019. This enables the change in 'biodiversity units' for both 'Habitat units' and 'Hedgerow units' and 'River units' pre and post-development to be measured.
- 2.2. This section references, justifies and discusses the habitat categories and their condition chosen from the drop-down menus of the BIA Calculator (see Appendix 5263/1).

Existing Site Habitats (Pre-development)

- 2.3. **'Cropland – Cereal Crops'** – condition 'N/A – Agricultural'. The arable land within the site has been attributed to this category as the survey work undertaken by Aspect Ecology found the arable land to be seeded with cereal crops at the time of survey. For the purposes of the BIA calculations, the condition of 'cropland – cereal crops' is not required and a condition score of 1 is automatically applied.
- 2.4. **'Urban – Amenity Grassland'** – condition 'poor'. The amenity grassland within the site comprises a limited diversity of common and widespread species and is under regular management to maintain a short sward height. Accordingly, a condition of 'poor' was given to the amenity grassland within the site.
- 2.5. **'Grassland – Other Neutral Grassland'** – condition 'moderate'. The semi-improved and rough grassland within the site has been included under this category. These areas of grassland are moderately species-rich and contain a number of lowland meadow indicator species, albeit

these are localised and not sufficiently abundant for the grassland to qualify as a Priority Habitat. Accordingly, a 'moderate' condition was assigned to this category.

- 2.6. **'Grassland – Other Neutral Grassland'** – condition 'moderate'. The site contains the Priority Habitat 'Lowland Meadow', which is not a prime example of this habitat and given its affinity with common mesotrophic (MG6) grassland, is considered to be in 'poor' condition. However, selecting this category within the metric prevents the calculator from producing a biodiversity impact score. Through consultation with the Environment Bank, the decision was made to account for the presence of Lowland Meadow through the use of category 'Grassland: Other Neutral Grassland'. To ensure the multiplier score remained the same for the 'Other Neutral Grassland' as would be generated for 'Lowland Meadow', the condition of the habitat was increased to 'moderate'.
- 2.7. **'Grassland – Modified Grassland'** – condition 'poor'. The improved grassland within the site is dominated by a low diversity of common and widespread species, typically associated with improved grassland, such as Perennial Rye-grass. The grassland is grazed regularly and enriched through animal droppings and is therefore considered to be in a 'poor' condition.
- 2.8. **'Cropland – Traditional Orchards'** – condition 'moderate'. The orchard within the site may potentially qualify as the Priority Habitat 'Traditional Orchard' as it is not intensively managed and, as such, has been included in this category in the metric. However, the orchard within the site is not a good example of a Traditional Orchard, with the trees being regularly managed such that little deadwood is allowed to accumulate and the grassland regularly mown as part of the garden setting in which the orchard is located. Accordingly, the condition of the orchard is considered to be 'moderate'.
- 2.9. **'Woodland and Forest – Other Woodland; Broadleaved'** – condition 'moderate'. The plantation woodland and the broadleaved woodland within the site have been included under this category. The woodlands meet a number of the woodland condition assessment criteria within the Biodiversity Metric 2.0 Technical Supplement, but not sufficiently to qualify as 'good' condition.
- 2.10. **'Heathland and Shrub – Mixed Scrub'** – condition 'moderate'. The dense and scattered scrub at the site comprises a limited range of species that are common and widespread in the local and national context. This habitat does not meet the 'high environmental value' categorisation defined in the Farm Environment Plan (FEP) Manual. Overall, the scrub within the site is considered to be in 'moderate' condition.
- 2.11. **'Urban – Introduced Shrub'** – condition 'poor'. The amenity planting within the site comprises a range of common and non-native species managed for their amenity rather than biodiversity value. For the purposes of the BIA calculations, the condition of 'urban – introduced shrub' is not required and a condition score of 1 is automatically applied.
- 2.12. **'Sparsely vegetated land – Ruderal / Ephemeral'** – condition 'poor'. The tall ruderal within the site comprises a limited range of species that are common and widespread in the local area and the national context. The tall ruderal does not form an important ecological feature and overall is considered to be in 'poor' condition.
- 2.13. **'Lakes – Ponds (Non-Priority Habitat)'** – condition 'poor'. The ponds within the site are either stocked with large numbers of fish, are relatively recently cleared to contain water, or are highly ephemeral in nature. Accordingly, the ponds within the site are not considered to form important ecological features and fail to meet a number of the pond condition assessment

criteria within the Biodiversity Metric 2.0 Technical Supplement, such that a condition score of 'poor' has been allocated.

- 2.14. **'Urban – Developed land; sealed surface'** – condition 'N/A-other'. The remainder of the site is comprised of agricultural buildings and hardstanding which are largely devoid of vegetation and do not form an important ecological feature. For the purposes of the BIA calculations, the condition of developed land is not required and a condition score of 0 is automatically applied.

Habitat Creation (Post-development)

- 2.15. **'Grassland – Other Neutral Grassland'** – condition 'good'. This habitat includes semi-improved grassland which will be created along the northern boundary of the site and species-rich grassland which will be created along the western site boundary. The aim will be to manage these grasslands based on ecological principles, which should enable the grasslands to reach 'good' condition within 15 years.
- 2.16. **'Urban – Amenity Grassland'** – condition 'poor'. This includes the grassland in close proximity to the built development. The amenity grassland is likely to comprise a seed mix that is tolerant of frequent mowing and is unlikely to be managed for biodiversity. Accordingly, a condition score of 'poor' has been allocated for this habitat type.
- 2.17. **'Woodland and Forest – Other Woodland: Broadleaved'** – condition 'moderate'. Native woodland planting is to be incorporated into the scheme, planted at the boundaries of the site. The moderate condition is based on the woodland planting being native and diverse and the habitat receiving on-going management as part of the landscape strategy. Subject to this management, it is considered that the woodland should achieve 'moderate' condition within 30 years.
- 2.18. **'Urban – Introduced Shrub'** – condition 'poor'. This will include all amenity planting in proximity to the built development. For the purposes of the BIA calculations, the condition of introduced shrub is not required and a condition score of 1 is automatically applied.
- 2.19. **'Urban – Sustainable urban drainage feature'** – condition 'good'. This habitat represents the SuDS features to be created at the north of the site. Assuming all of the SuDS are seeded with a diverse native wet grassland seed mixture and management incorporates ecological principles for the benefit of biodiversity, it is considered achievable for this habitat to be of 'good' condition in five years.
- 2.20. **'Urban – Developed Land; sealed surface'** – condition 'N/A – other'. This habitat includes all new buildings, roads, parking and tarmac footpaths and, as such, is not assigned a condition under the DEFRA 2.0 metric.

Habitat Biodiversity Impact Score

- 2.21. The BIA calculator computes a Net Project Biodiversity Units (Habitats) score of **-156.34**, a biodiversity loss of **74.52%**.

3. Hedgerow Impact Assessment

Existing Hedgerows (Pre-development)

- 3.1. **'Line of Trees'** – condition 'moderate'. A number of tree lines are present within the site which contain a range of native species and are fenced from livestock, such that they are outgrown in

nature. The tree lines achieve a condition score of 'moderate' utilising the condition assessment for a line of trees, as provided in the Biodiversity Metric 2.0 Technical Supplement.

- 3.2. **'Native Species Rich Hedgerow'** – condition 'moderate'. This habitat refers to the species-rich hedgerows within the site which are well connected and generally outgrown in nature. Accordingly, the species-rich hedgerows are considered to be in 'moderate' condition.
- 3.3. **'Native Hedgerow'** – condition 'moderate'. The remainder of the hedgerows within the site are species-poor; however, they are well established and provide good connectivity within the site. As such, the species-poor hedgerows are considered to be in 'moderate' condition.

New Hedgerows (Post-development)

- 3.4. **'Native Species Rich Hedgerow'** – condition 'good'. This includes all new hedgerows within the scheme which will be planted with a diverse range of native tree/shrub species to ensure that the hedgerows are species-rich. The hedgerows will be managed in perpetuity of the scheme to ensure their value for biodiversity is maximised and it is considered that a condition of 'good' can be achieved for the hedgerows within 10 years.
- 3.5. **'Line of Trees'** – condition 'good'. A number of tree lines are proposed within the development scheme. These will include native species and will be managed for biodiversity in perpetuity of the scheme. It is anticipated that a condition of 'good' can be achieved for the tree lines within 30 years.

Hedgerow Biodiversity Impact Score

- 3.6. The BIA calculator computes a Net Project Biodiversity Units (Hedgerows) Score for the proposals of **-3.73 units**, a biodiversity loss of **17.55%**.

4. River Impact Assessment

Existing River (Pre-development)

- 4.1. **'Rivers & Streams (Other)'** – condition 'moderate'. A small stream passes across the site from east to west. The stream is semi-natural, contains aquatic and marginal macrophytes and has well vegetated banks and bank tops. However, the stream is silted and heavily shaded in places, such that very little aquatic vegetation is present. In addition, littering is present within the stream, particularly at the eastern end. Overall, the stream is likely to function as a wildlife corridor in the local context and has been categorised as being in 'moderate' condition.

New River (Post-development)

- 4.2. **'Rivers & Steams (Other)'** – condition 'moderate'. The stream is to be diverted as part of the proposals and will achieve a greater length than the existing stream. Over time, the diverted section of the stream will become colonised with marginal and aquatic vegetation established through seeding and natural colonisation. The stream will be managed in perpetuity of the scheme to ensure that the stream does not become over-shaded and to remove any litter that may enter the stream. Furthermore, the stream will be buffered by wildflower grassland and native shrub planting which will also be managed long-term. Subject to management of the stream for the benefit of biodiversity, over time (~5 years) it is considered achievable for the stream to reach 'moderate' condition.

River Biodiversity Impact Score

- 4.3. The BIA calculator computes a Net Project Biodiversity Units (Rivers) score for the proposals of **-3.75 units**, a biodiversity loss of **65.96%**.

5. Summary & Conclusion

- 5.1. In order to inform the planning application, a Biodiversity Impact Assessment calculation has been carried out. The BIA calculates that a net loss of -156.34 habitat units, -3.73 hedgerow units and -3.75 river units is likely to occur under the proposed development. This represents a biodiversity loss of 74.52% for habitat units, 17.55% for hedgerow units and 65.96% for river units.

6. Consultation with the Environment Bank

- 6.1. Following the completion of the Defra 2.0 Metric, the Environment Bank was approached to provide a quotation for a biodiversity compensation scheme to offset the biodiversity impact of the proposals, based on the results of the metric calculation. The Environment Bank would devise a scheme achieving a total of 177.29 biodiversity units which would secure a minimum 10% biodiversity net gain for the proposals. The cost of these 177.29 biodiversity units is £1,741,000 +VAT and this sum includes:

- A biodiversity offset scheme adhering to local standards of delivery;
- Liaison with local planning authority on offset approval;
- Ecological assessment of the offset site;
- Negotiations with the offset landowner;
- Preparation of legal agreements for long-term offset delivery;
- A 30 year costed management and monitoring plan; and
- Monitoring and oversight of the offset site over 30 years with reporting to the LPA.

- 6.2. The biodiversity compensation scheme proposes to target the creation/restoration of grassland to Lowland Meadow within the Milton Keynes authority, in combination with the enhancement of a wider mosaic of habitats. The Environment Bank has confirmed a minimum threshold for the extent of Lowland Meadow creation/restoration can be set, in order to achieve a minimum 33% increase over the extent of Lowland Meadow lost from the site. This would contribute to the local BAP target to increase Lowland Meadow in Buckinghamshire and Milton Keynes by 33%¹.

¹ Forward to 2020: Buckinghamshire and Milton Keynes Biodiversity Action Plan

Appendices:

Appendix 5263/1 – Completed BIA Calculator

Appendix 5263/2 – Plan 5263/ECO3 – Habitats and Ecological Features

Appendix 5263/3 – Illustrative Landscape Strategy Plan

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Appendix 5263/1:

Completed BIA Calculator

South Caldecotte
Detailed Results

Return to results menu

Summary Figures

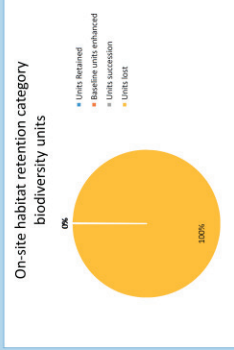
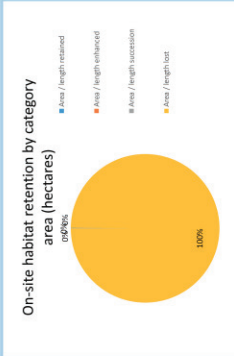
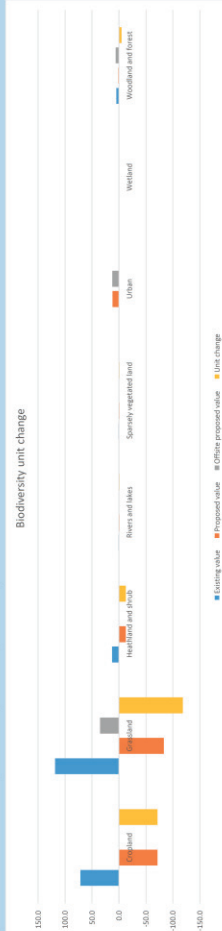
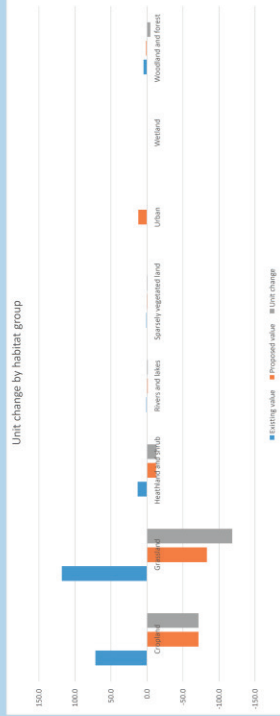
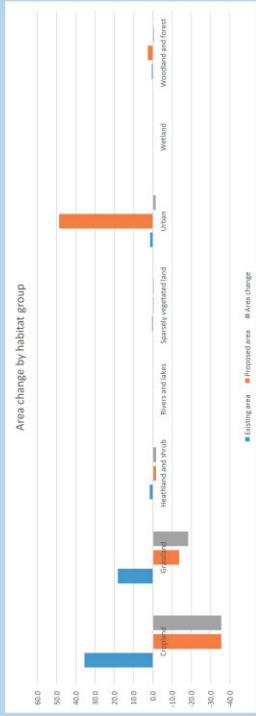
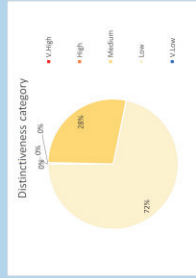
Net project biodiversity units (including all on-site & off-site habitat retention/creation)	Habitat units	-156.34
	River units	-3.75
Total project biodiversity % change (including all On-site & Off-site Habitat Creation + Retained Habitat)	Habitat units	-74.52%
	River units	-65.96%

On-site habitat retention and enhancement

Habitats	Hedges	Rivers
Total site area / length	298.78	5.02
Total site units	209.78	21.24
Area / length retained	0.04	0.10
Units Retained	0.32	0.40
Area / length enhanced	0.00	0.00
Baseline units enhanced	0.00	0.00
Area / length succession	0.00	0.00
Units Succession	0.00	0.00
Area / length lost	98.12	4.92
Units lost	209.46	20.84

Area lost by distinctiveness band

Category	Area lost (hectares)	Area lost (%)
V.High	0	0
High	0.1978	0
Medium	15.8304	28
Low	40.7285	72
V.Low	0	0



Habitat group	Pre-development		Post development on site		Post development off site		Total post development		Change		
	Existing area	Proposed area	Existing value	Proposed value	Offsite proposed value	Proposed area	Proposed value	Proposed area	Proposed value	Area change	Unit change
Cropland	35.6	71.5	-35.6	-71.5	0.0	0.0	0.0	0.0	0.0	-35.6	-71.5
Grassland	18.3	118.3	-13.6	-83.4	4.7	34.9	0.0	0.0	0.0	-18.3	-118.3
Heathland and scrub	1.7	12.9	-1.6	-12.6	0.0	0.3	0.0	0.0	0.0	-1.7	-12.9
Rivers and lakes	0.2	1.0	-0.2	-1.0	0.0	0.0	0.0	0.0	0.0	-0.2	-1.0
Sparingly vegetated land	0.4	0.9	-0.4	-0.9	0.0	0.0	0.0	0.0	0.0	-0.4	-0.9
Urban	1.4	0.1	48.8	12.1	50.2	12.3	0.0	0.0	0.0	-1.4	-0.1
Wetland	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Woodland and forest	0.6	4.7	2.6	1.2	3.2	5.9	0.0	0.0	0.0	-0.6	-4.7

South Caldecotte A-1 Site Habitat Baseline

Condense / Show Columns
 Main Menu
 Condense / Show Rows
 Instructions

Ref	Habitats and areas		Habitat conditions		Ecological connectivity			Strategic significance			Ecologic al		
	Broad Habitat	Habitat type	Area (hectare)	Distinctiveness score	Condition	Score	Ecologic al connecti	Connectivity	Connectivity multiplier	Strategic significance	Strategic position multiplier	Suggested actions to address habitat losses	Total habitat area
1	Cropland	Cropland - Cereal crops	35.5711	Low	MA - Agriculture	1	MA	1	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	71.14
2	Urban	Urban - Amenity grassland	0.0982	Low	Poor	1	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.12
3	Grassland	Grassland - Other neutral grassland	8.8235	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	70.67
4	Grassland	Grassland - Other neutral grassland	4.1982	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	38.36
5	Grassland	Grassland - Modified grassland	4.642	High	Poor	1	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	9.26
6	Cropland	Cropland - Traditional orchards	0.0293	Low	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.35
7	Woodland and forest	Woodland and forest - Other woodland; broadleaved	0.302	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	2.42
8	Woodland and forest	Woodland and forest - Other woodland; broadleaved	0.2897	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	2.32
9	Heathland and shrub	Heathland and shrub - Mixed scrub	1.522	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	6.30
10	Heathland and shrub	Heathland and shrub - Mixed scrub	0.4878	Medium	Moderate	2	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	3.36
11	Urban	Urban - Introduced shrub	0.0123	Low	Poor	1	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.02
12	Sparsely vegetated land	Sparsely vegetated land - Feral/semi-natural	0.4443	Low	Poor	1	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.83
13	Lakes	Lakes - Ponds (Non-Priority Habitat)	0.1687	High	Poor	1	Low	Unconnected habitat	1	Low Strategic Significance	1	Same distinctiveness or better habitat required	1.01
14	Urban	Urban - Developed land; sealed surface	1.5825	V/Low	MA - Other	0	Low	Unconnected habitat	1	Low Strategic Significance	1	Compensation Not Required	0.00
15													
16													
17													
18													
19													
			58.16									203.78	
			0.04	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	58.12	203.46

South Caldecotte A-2 Site Habitat Creation

Condense / Show Columns
 Main Menu
 Condense / Show Rows
 Instructions

Proposed habitat	Ecological connectivity				Ecological connectivity			Strategic significance			Temporal multiplier		Difficulty of creation		Habitat units delivered		
	Area (hectares)	Score	Condition	Score	Ecologic al connecti	Connectivity	Connectivity multiplier	Strategic significance	Strategic position multiplier	Time to target condition/years	Time to target multiplier	Difficulty of creation category	Difficulty of creation multiplier				
Grassland - Other neutral grassland	1.8255	Medium	4	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	15	0.586	Low	1	12.84	
Grassland - Other neutral grassland	2.8563	Medium	4	Good	3	Medium	Moderately connected habitat	1.1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	15	0.586	Low	1	22.09	
Urban - Amenity grassland	3.6907	Low	2	Poor	1	Medium	Moderately connected habitat	1.1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0.965	Low	1	7.84	
Woodland and forest - Other woodland; broadleaved	3.2276	Medium	4	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	30	0.343	Medium	0.67	5.94	
Urban - Introduced shrub	0.9638	Low	2	Poor	1	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0.965	Low	1	1.86	
Urban - Sustainable urban drainage feature	0.7585	Low	2	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	5	0.837	Medium	0.67	2.55	
Urban - Developed land; sealed surface	44.7993	V/Low	0	N/A - Other	0	N/A	Assessment not appropriate	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	0	1.000	Low	1	0.00	
Totals																58.12	551.2

South Caldecotte

B-1 Site Hedge Baseline

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Baseline ref	Hedge number	UK Habitats – existing habitats		Habitat distinctiveness		Habitat condition		Ecological connectivity			Strategic significance			Suggested action to address habitat losses	Ecologic Total hedgerow units	Retention category biodiversity value							
		Hedgerow type	length in KM	Distinctiveness	Score	Condition	Score	Ecological connectivity	Connectivity	Connectivity multiplier	Strategic significance	Strategic significance	Strategic position multiplier			Length retained	Length enhanced	Units retained	Units enhanced	Length lost	Units lost		
1		Line of Trees	0.61	Low	2	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness/ band of better	2.44	0	0	0.61	2.44				
2		Native Species Rich Hedgerow	0.23	Medium	4	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Like for like or better	2.32	0	0	0.23	2.32				
3		Native Hedgerow	4.12	Low	2	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness/ band of better	16.48	0.007	0.4028	4.0193	16.077				
4																							
5																							
6																							
7																							
8																							
Total Site length/KM													5.02					0.10	0.00	0.40	0.00	4.32	20.84

South Caldecotte

B-2 Site Hedge Creation

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Baseline ref	New hedge number	Proposed habitats		Habitat distinctiveness		Habitat condition		Ecological connectivity			Spatial quality			Multipliers			Hedge units delivered				
		Habitat type	Length km	Distinctiveness	Score	Condition	Score	Ecological connectivity	Connectivity	Connectivity multiplier	Strategic significance	Strategic significance	Strategic position multiplier	Time to target condition/years	Time to target multiplier	Difficulty of creation multiplier					
1		Native Species Rich Hedgerow	2.75	Medium	4	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	10	0.700	0.67	15.48				
2		Line of Trees	0.789	Low	2	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	30	0.343	1	1.63				
3																					
4																					
5																					
Creation Length/KM													3.54								17.11

South Caldecotte

C-1 Site River Baseline

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Baseline ref	River type	Existing river type		Habitat distinctiveness		Habitat condition		Strategic significance			Suggested action	Ecological baseline		Retention category biodiversity value				
		length KM	Score	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic position multiplier		Total river units	Length retained	Length enhanced	Units retained	Units enhanced	Length impacted	Units Lost
1	Rivers & Streams (Other)	0.71	4	Medium	2	Fairly Poor	2	Low potential / action not identified in any plan.	Low Strategic Significance	1	Avoid	5.68	0.00	0.00	0.00	0.71	5.68	
2																		
3																		
4																		
5																		
		Total site length KM									5.68		0.00 0.00 0.00 0.00 0.71 5.68					

South Caldecotte

C-2 Site River Creation

Condense / Show Columns

Condense / Show Rows

Main Menu




























Instructions

Baseline ref	River type	Proposed habitats		Habitat distinctiveness		Habitat condition		Strategic significance			Temporal multiplier		Difficulty of creation category	Difficulty of creation multiplier	Riparian encroachment		River units delivered
		Length km	Score	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic position multiplier	Time to target condition/years	Time to target multiplier			Extent of encroachment	Multiplier	
1	Rivers & Streams (Other)	0.778	4	Medium	3	Moderate	3	Low potential / action not identified in any plan.	Low Strategic Significance	1	5	0.837	High	0.33	8+ m	0.75	1.93
2																	
3																	
4																	
5																	
		Creation Length/KM															1.93

Appendix 5263/2:

Plan 5263/ECO3 – Habitats and Ecological Features

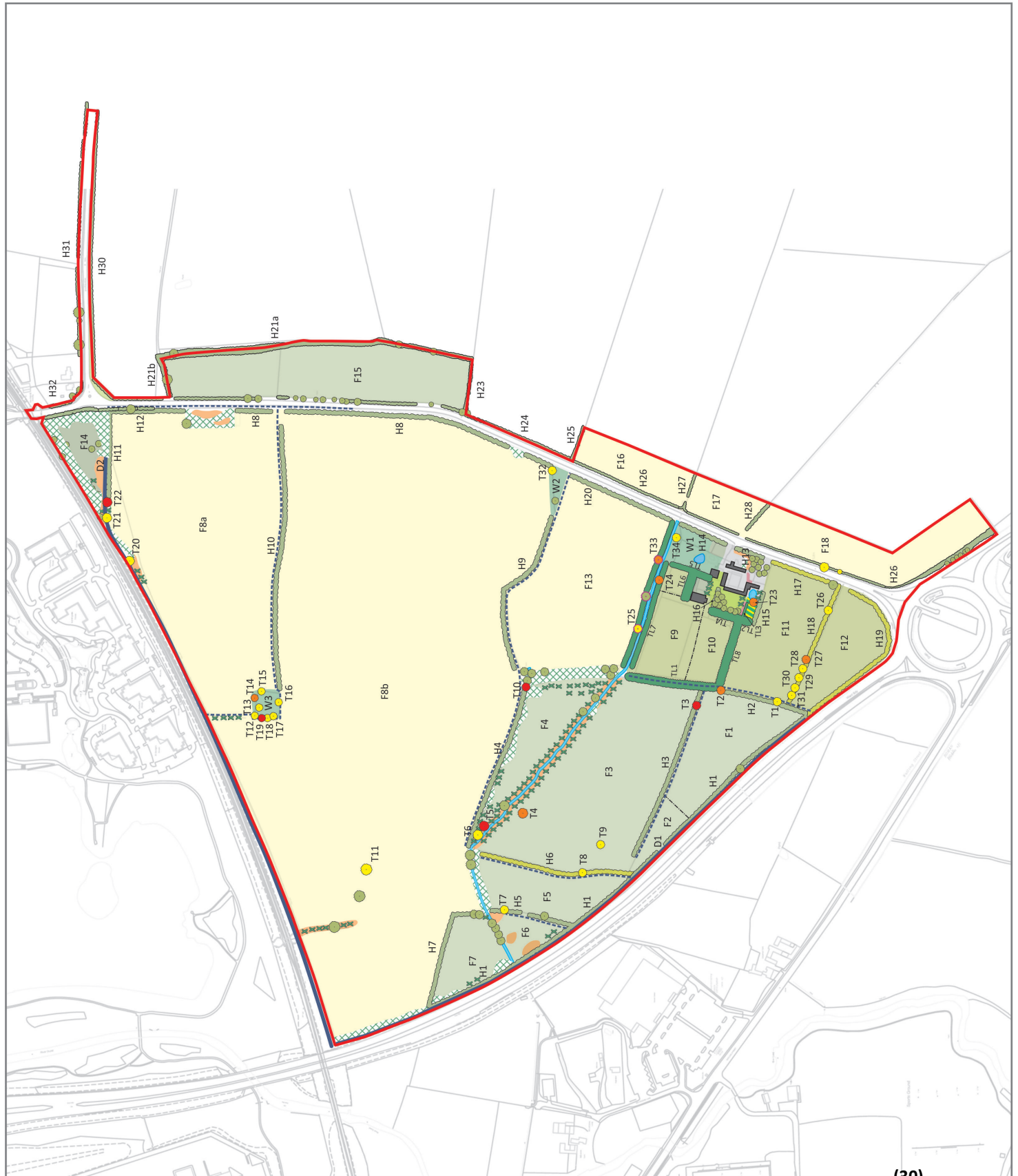
Key:

-  Site Boundary
-  Arable
-  Amenity Grassland
-  Semi Improved Grassland
-  Improved Grassland
-  Rough Grassland
-  Orchard
-  Amenity Planting
-  Tall Ruderal Vegetation
-  Woodland
-  Dense Scrub
-  Scattered Scrub
-  Tree
-  Tree with Low Potential to Support Roosting Bats
-  Tree with Moderate Potential to Support Roosting Bats
-  Tree with High Potential to Support Roosting Bats
-  Mature Black Poplar
-  Treeline
-  Hedgerow
-  Defunct Hedgerow
-  Pond
-  Stream
-  Dry Ditch
-  Wet Ditch
-  Fence
-  Hardstanding
-  Building

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PROJECT	South Caldecote, Milton Keynes		
TITLE	Habitats and Ecological Features		
DRAWING NO.	5263/EC03	REV.	A
DATE	October 2018		

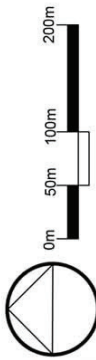


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Appendix 5263/3:

Illustrative Landscape Strategy Plan

NOTES:
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- Key:**
- Application Site Boundary
 - Existing Vegetation Structure
 - Proposed Tree Planting
 - Proposed Hedgerows and Shrub Planting
 - Proposed Native Structural Woodland Planting
 - Proposed Swale and Wetland Planting
 - Proposed Wildflower Meadow
 - Proposed Marginal Planting
 - Pedestrian Links & Public Right of Way Network
 - Redway (Shared Cycle & Footpath)
 - Landmark with Feature Landscaping / Public Art
 - Gas Pipe & 3m Easement (No Tree Planting)
 - 9m IDB Easement (No Planting)
 - Proposed Highway Ditch

REV.	DATE	NOTE	SB	CJ
A	03.07.19	Updated to client comments and IDB easement.	SB	CJ

aspect landscape planning

TITLE
Land at South Caldecotte
 Illustrative Landscape Strategy Plan

CLIENT
HB (South Caldecotte) Ltd

SCALE	DATE	DRAWN	CHKD
1:5,000@A3	JUN 2019	SB	CJ

DRAWING NUMBER	REVISION
6340 / LSP / ASP4	A



NATIVE TREES & STRUCTURAL PLANTING - Trees planting in groups, larger blocks and random drifts to provide varied structural edge habitats and robust landscape buffers. The native tree and structural planting will be primarily located around site boundaries to provide a green setting that assists to integrate the built form. Native tree species will include standards, whips and transplants and will include:

- Acer campestre
- Alnus glutinosa
- Betula pubescens
- Carpinus betulus
- Crataegus monogyna
- Malus sylvestris
- Prunus avium
- Prunus padus
- Prunus spinosa
- Quercus robur
- Salix caprea
- Sorbus aucuparia
- Common Alder
- Downy Birch
- Hornbeam
- Hawthorn
- Crab Apple
- Wild Cherry
- Bird Cherry
- Blackthorn
- Pendunculate Oak
- Goat Willow
- Rowan



FEATURE INTERNAL & ROADSIDE TREE PLANTING - Feature tree and ornamental planting along the primary and secondary roads throughout the development will aim to tie in with species used within South Caldecotte to the north, whilst also creating a high quality environment to the development. A variation in species for each plot, zone or type of area will help to provide variation and separate character areas within the development. The use of a degree of semi-mature tree planting will provide 3-dimensional depth and instant impact to the green infrastructure. Feature ornamental species will include:

- Acer campestre 'Streetwise'
- Betula pendula 'Jacquemontii'
- Carpinus betulus 'Frans Fontaine'
- Liquidambar styraciflua
- Prunus avium 'Plena'
- Prunus x subhirtella 'Autumnalis'
- Sorbus aria 'Lutescens'
- Tilia cordata 'Greenspire'



NATIVE HEDGEROWS & WOODLAND EDGE - Planting using a mix of native hedgerow and shrub species to increase the diversity of hedgerows and woodland edges and provide foraging opportunities for local wildlife. Hedgerow flowering/fruiling species will include:

- Dogwood
- Hazel
- Hawthorn
- Holly
- Wild Privet
- Blackthorn
- Dog Rose
- Common Elder
- Gouldier Rose
- Cornus sanguinea
- Corylus avellana
- Crataegus monogyna
- Ilex aquifolium
- Ligustrum vulgare
- Prunus spinosa
- Rosa canina
- Sambucus nigra
- Viburnum opulus



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David Buckley
Senior Planning Officer
Planning Service
Milton Keynes Council
Civic Centre
1 Saxon Gate
Milton Keynes
MK9 3EJ

Dear Mr. Buckley,

Re: 19/01818/OUT South Caldecotte - Committee Meeting 06/02/20, Transport Issues

We write to you having reviewed your report to the Development Control Committee meeting on 06/02/20, in order to respond to this and set out our position on matters of Transport.

We note from paras 7.45-7.48 of your report that there are no objections that warrant reasons for refusal in respect of transport – other than the lack of a section 106 agreement and the holding recommendation from Highways England.

Transport Matters

We note that the Strategic Transport Team have acknowledged in our discussions that the Council's emerging SE MK Local Transport Study is not relevant to the consideration of this planning application. We further note the updated comments provided by Transport Development Management which are reflected in the committee report in paras 7.13-7.48. The report acknowledges that:

- The width of the grid road reserve has been clarified to an acceptable level and can be addressed through planning condition.
- That necessary improvements to public transport can be secured through section 106 agreement.
- Highways England are reviewing the junction assessment of the A5 Kelly's Kitchen Roundabout.
- The impact on Bow Brickhill level crossing is not significant.
- It is unclear what the status of the Strategic Transport Study has in terms of determining the planning application.
- Required mitigation at the Walton Park Roundabout will be secured under a section 106 agreement.
- The issue of the (Oxford-Cambridge) Expressway and a possible Rapid Mass Transit route do not have sufficient certainty at this stage to have any bearing on the determination of the planning application.
- A safe and suitable layout for the Brickhill Street/Station Road Roundabout can be provided.
- The Redway route on Brickhill Street cannot be provided along the entirety of Brickhill Street due to the location of the Anglian Water compound.



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Highways England

As you know, our client's transport consultants BWB are in dialogue with Highways England. We were surprised to receive only last week, 29-01-2020, Highway England's latest response requesting further assessment of an additional junction that has already been assessed, some 4km from the development site. We confirm that the matters about which Highways England required clarification are close to being satisfactorily addressed and that this will enable the holding recommendation to be removed.

Planning Obligations

Necessary infrastructure can be secured through an appropriate legal agreement and conditions, and on this basis the suggested reason for refusal based on these grounds is unnecessary and should be removed.

Summary

The development would not give rise to any severe impact on the highway network and we note that neither Highways Development Management nor Strategic Transport suggest that the development proposals should be refused. This reflects the Council's evidence to the EiP in allocating the site and consequently the scheme demonstrably complies with Policy SD14 with regard to transport matters.

Finally, we request that Members of the Development Control Committee defer the item to allow continued dialogue regarding outstanding items to enable them to be resolved. The planning application is currently well within statutory timescales which can be extended to allow for resolution of the matters discussed in this letter. The deferral of the item until the meeting in April would allow for officers to work with us to resolve the items outlined above.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Robinson', is written over a light blue horizontal line.

Graham Robinson MRTPI
Associate Director