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For and on behalf of  
**Hampton Brook**

**Plan:MK Examination in Public  
Response to Inspectors Questions – Matter 2**

**Spatial Strategy**



Insert job number and site name  
Examination in Public  
Response to Inspector's Questions – Matter 2  
On Behalf of Hampton Brook

Prepared by  
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June 2018



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## **0.0 EXECUTIVE SUMMARY**

- a. DLP Planning Limited have been instructed by Hampton Brook to respond to the inspector's questions in respect of Matter 3 and specifically in relation to their land interest in the following location;  
South Caldecotte (Land Allocated within policy SD16)
- b. Hampton Brook is a well-established local land promoter and developer; as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.

## **Matter 2 – Spatial Strategy**

### **Issue 5 – The Open Countryside (Policy DS5) & Linear Parks (Policy DS6)**

#### **1.0 QUESTION 2.20**

##### **IS POLICY DS5 JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY? PLEASE EXPLAIN.**

- 1.1 Policy DS5 is not effective. We have set out the reasons for this in our regulation 19 response, which we expand upon here.
- 1.2 As currently worded, policy DS5 does not make any reference to highway infrastructure. Such works are likely to be needed in open areas both in relation to South Caldecotte and other sites within the development plan.
- 1.3 In the case of South Caldecotte, some highway infrastructure works are likely to be needed outside of the site boundary, and therefore, policies SD16 (Dealt with in comments on Matter 4) and DS5 need to be amended to reflect this, and to ensure consistency.
- 1.4 Amended wording to policy DS5 is suggested within appendix A.
- 1.5 The policy should be revised accordingly to ensure soundness.

#### **2.0 QUESTION 2.21**

##### **ARE THE LINEAR PARKS CORRECTLY SHOWN ON THE POLICIES MAP?**

- 2.1 In order to ensure that policy DS6 is effective as denoted by paragraph 182 of the NPPF, the policies map should be amended to remove the reference to a linear park on the South Caldecotte Site.
- 2.2 Policy DS6 defines the linear parks within Plan MK and does not refer to a linear park at South Caldecotte.

- 2.3 The Policies map should be amended to delete the entry to a linear park extension on the South Caldecotte site.



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Insert job number and site name Examination in Public  
Response to Inspector's Questions – Matter 2  
On Behalf of Hampton Brook

## **APPENDIX A**

### **SUGGESTED AMENDMENT TO WORDING OF POLICY DS5**

The Council defines Open Countryside as all land outside the development boundaries defined on the Policies Map. Planning permission within the open countryside will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement.



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For and on behalf of  
**Hampton Brook**

**Plan:MK Examination in Public  
Response to Inspectors Questions – Matter 4**

**The overall need and requirement for jobs and the strategy and land supply to  
meet the requirement**

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June 2018



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## **0.0 EXECUTIVE SUMMARY**

0.1 DLP Planning Limited have been instructed by Hampton Brook to respond to the inspector's questions in respect of Matter 4 and specifically in relation to their land interest in the following location;

### **South Caldecotte (Land Allocated within policy SD16)**

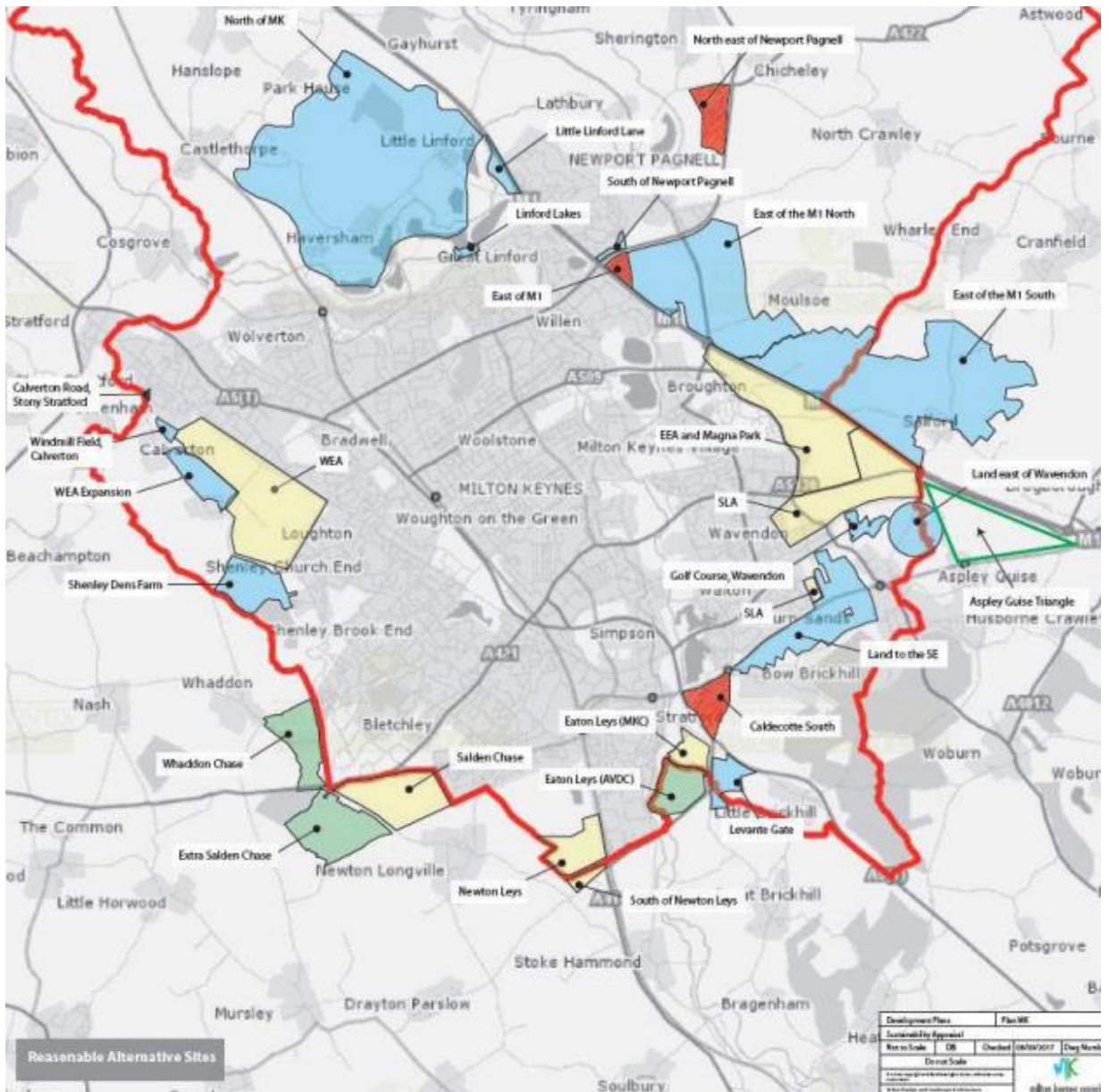
0.2 Hampton Brook is a well-established local land promoter and developer; as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.

## **MATTER 4 - The overall need and requirement for jobs and the strategy and land supply to meet the requirement**

### **1.0 QUESTION 4.7**

**IS THE APPROACH TO THE ALLOCATION OF SOUTH CALDECOTTE AS THE PRINCIPAL STRATEGIC EMPLOYMENT ALLOCATION BASED ON A CLEAR, ROBUST PROCESS OF SITE ASSESSMENT (INCLUDING THE EMPLOYMENT LAND REVIEW AND ECONOMIC GROWTH STUDY PHASE 2 DELIVERY STRATEGY) AND INFORMED BY SUSTAINABILITY APPRAISAL? WERE ANY REASONABLE ALTERNATIVE EMPLOYMENT SITES TO SOUTH CALDECOTTE CONSIDERED WHEN PREPARING PLAN:MK?**

- 1.1 Paragraph 157 of the NPPF states that '*Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate*'
- 1.2 In drawing up Plan:MK, Milton Keynes Council carried out a consultation on Strategic Development Directions. This sought feedback on where growth should take place within Milton Keynes. This was then used to inform Strategic Site Allocations within chapter 5 of the Submission Plan:MK. This contains a number of site specific strategic allocations.
- 1.3 As part of the plan making process the site has been subject to a robust site assessment and is suitable for the delivery of strategically important employment floorspace.
- 1.4 The Council has undertaken a rigorous site selection process as part of their plan-making process.
- 1.5 It is understood that employment site options / alternative approaches to the allocation of land for employment were considered by the Council.
- 1.6 The Plan:MK Sustainability Appraisal refers to other sites considered, and it is understood that land east of the M1 and to the north-east of Newport Pagnell were considered. These are the red sites shown below:



- 1.7 It is particularly noteworthy that there are few sites that are capable of supporting warehousing and distribution at the scale proposed at South Caldecotte. The majority of sites currently available are significantly smaller and none are of the size or strategic importance as this.
- 1.8 Hampton Brook have a proven track record of delivering strategic employment sites such as South Caldecotte and as such there should be no concerns that they are capable of delivering a substantial amount of the Plan:MK employment allocation.

- 1.9 It is also noteworthy in looking at sites that the area to the east of the M1 Motorway is more rural and any development in this area is more likely to cause serious landscape impact. The M1 Motorway is a congested corridor and significant improvement works would be required at M1 Junction 13 and junction 14.
- 1.10 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. An initial sustainability appraisal has been undertaken and this has analysed the South Caldecotte site; as well as other employment sites. The appraisal of the site is shown below:

| Sustainability Objective   | Rank | Comments   |
|--|------|--|
| 1.Ensure that everyone has the opportunity to live in an affordable, sustainably constructed home    | 0    | No identified impact on this objective.  |
| 2.Protect and improve residents' health and reduce health inequalities                               | +1   | There is potential on the site to provide new areas of accessible green space and opportunities to connect to the existing cycle network which would encourage walking and cycling. New development could encourage healthier lifestyles through well designed urban environments that encourage walking and cycling however this is uncertain until a detailed development proposal is submitted. Development in close proximity to the A5 may encourage car usage. |
| 3.Reduce levels of crime and create vibrant communities  | 1    | New development offers the opportunity to design out crime. The effect against this objective is uncertain until a detailed development proposal comes forward.  |
| 4.Reduce the gap between the most deprived areas of Milton Keynes and the average                    | +1   | Provision of employment floorspace can provide jobs for local people and help reduce the gap between the most deprived areas of Milton Keynes and the average. The types of jobs provided and which groups of the population they will help employ will depend on the type of floorspace provided (i.e. warehousing/distribution, offices or industrial).  |
| 5.Ensure all section of the community have good access to services and facilities                    | +1   | The exact effect of development on this site will depend on what is provided as part of the development in addition to employment land. Provision of employment land in any case will have a positive effect on this objective.  |
| 6.Improve educational attainment and qualification levels so that everyone can find and stay in work | 0    | No identified impact on this objective.  |



|  |     |  |
|--|-----|--|
| 7. Combat climate change by reducing levels of carbon dioxide  | --I | As with all new development on greenfield land there are likely to be negative impacts on tackling climate change as carbon emissions increase. Private road transport is likely to be the main mode of transport given the proximity of the site to the A5 and therefore emissions are likely to increase. There is scope to incorporate a range of renewable energy solutions and ensure employment premises are sustainably constructed.  |
| 8. Maintain and improve the air quality in the borough   | --I | As mentioned above there is likely to be increased car emissions and developing on greenfield land will also impact on air quality in the area.  |
| 9. Maintain and improve water quality and minimise the risk of flooding  | I   | The site is not within a flood zone but flood risk zones 2 and 3 are immediately to the north and north-west of the site. Development on greenfield land reduces surface run-off and can increase the risk of flooding if appropriate mitigation measures are not implemented. Longer term there may be substantial pressures on water resources, although there is scope to introduce water efficiency measures in new development. A more detailed appraisal against this objective can occur once a more detailed proposal comes forward. |
| 10. Reduce waste generation and encourage sustainable waste management in accordance with the waste management hierarchy | -I  | All development will lead to a net increase in waste generation however until a detailed proposal comes forward it is unclear how waste will be managed and therefore the site cannot be fully appraised against this objective as yet. There is an opportunity however to design in resource efficiency measures with new development.  |
| 11. Conserve and enhance the borough's biodiversity  | -I  | There are no designated sites of biodiversity value within the site area. The site is composed of mostly greenfield land however so there will be some impacts on biodiversity, the extent of which will be determined when a detailed proposal comes forward. There are opportunities to extend the existing Linear Parks system into the area.   |
| 12. Conserve and enhance the borough's heritage and cultural assets  | I   | The area contains two archaeological notifications sites. As such there is some historic interest which could be affected by development and potential impacts on heritage would need to be addressed before any development could commence. The extent of this will depend on how the development proposal takes this into account. The site also lies within an Open Countryside area.   |
| 13. Protect and enhance soil quality throughout the borough  | --I | The site has agricultural arable land and so developing on here will likely lead to negative impacts on soil quality. The extent to which green space is provided/retained will determine the exact impact however this will be fully assessed when a detailed proposal comes forward.   |
| 14. Limit noise pollution  | -   | Development would lead to an increase in activity and car usage so noise pollution in the area is likely to increase and affect nearby residents. Proximity to the A5 could affect occupiers of the premises unless suitable mitigation measures are incorporated into development.  |

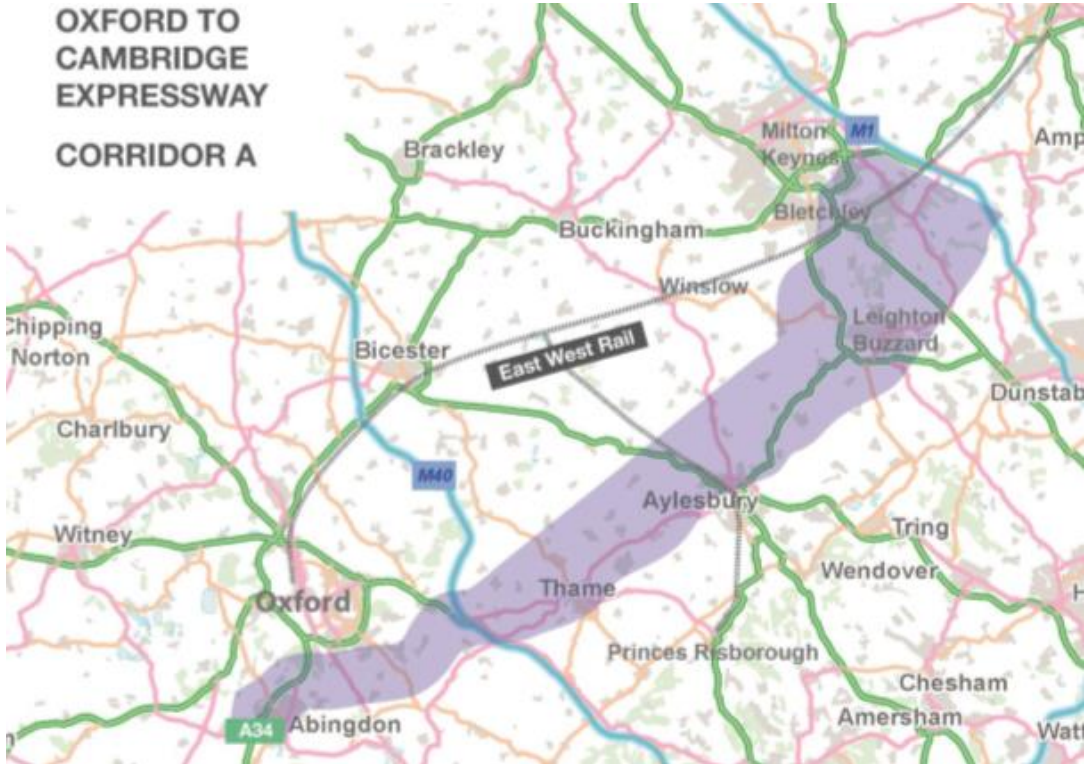
|  |            |   |
|--|------------|---|
| <p>15. Encourage energy efficiency, renewable energy use and efficient use of natural resources</p>                                    | <p>+/-</p> | <p>There is scope to incorporate a range of renewable energy solutions and ensure the premises are sustainably constructed to offset the overall increase in energy usage from new buildings. Higher densities of development would also increase efficiency.<br/>The site lies on agricultural arable land and so developing here would not be considered an efficient use of natural resources.</p>   |
| <p>16. Limit and reduce road congestion and encourage sustainable transportation</p>   | <p>-I</p>  | <p>Car usage is likely to increase without a viable public transport alternative. There may be opportunities to extend the existing public transport network into the area however overall car usage in the short-term is likely to increase. Development adjacent to the A5 is likely to cause significant increased private road transport and congestion is likely to increase. There is a possibility to extend the existing cycle network into the area. Development is close to Bow Brickhill and Fenny Stratford Railway Stations which may encourage sustainable transportation however given the amount of development proposed services from this station may require significant investment and improvement in the long-term.</p>  |
| <p>17. Ensure the sustainable and efficient use of land by encouraging the development of brownfield sites before greenfield sites</p> | <p>--</p>  | <p>Comprehensive design and development of the site, along with higher densities could reduce the impact of development of the land and maximise the efficiency of land use. However, the site is located on greenfield land and so there will be no reuse of previously developed land and no net improvement in efficiency and so it negatively impacts on this objective.</p>  |
| <p>18. Ensure high and stable levels of employment</p>   | <p>+++</p> | <p>Provision of employment floorspace can provide jobs for local people and should contribute to maintaining high and stable levels of employment. The types of jobs provided and which groups of the population they will help employ will depend on the type of floorspace provided (i.e. warehousing/distribution, offices or industrial). The number of people employed will also be affected by the type of floorspace provided as higher density office development will employ more people per sqm than warehouse development. Effects against this objective can be fully appraised when a more detailed development proposal comes forward. Short term employment opportunities associated with development of the site are also possible. Planned transport links to the city will also be important in determining effects against this objective.</p> |
| <p>19. Encourage the creation of new businesses</p>  | <p>+++</p> | <p>Provision of premises out of which businesses can operate could encourage the creation of new business. Effects against this objective can be fully appraised when a more detailed development proposal comes forward</p>  |
| <p>20. Sustain economic growth and enhance competitiveness</p>   | <p>+++</p> | <p>Employment land provided should contribute to providing additional jobs and allow the local economy to grow. Effects against this objective can be fully appraised when a more detailed development proposal comes forward.</p>  |

- 1.11 The appraisal concludes that the site '*...is located in close proximity to two other large employment sites and comprises 56.8ha of land which could deliver a significant amount of employment floorspace. It is not considered that there are any significant planning constraints preventing development of the site and proximity to two railway stations may be beneficial in terms of encouraging public transport use.*'
- 1.12 In this way the proposals comply with paragraph 151 of the NPPF which requires Local Plans to contribute to the policy objective of sustainable development.

## **2.0 QUESTION 4.8**

### **IS DELIVERABILITY OF THE SOUTH CALDECOTTE SITE LIKELY TO BE AFFECTED BY ANY FINAL ROUTE OPTIONS OF EITHER THE EXPRESSWAY AND/OR EWR**

- 2.1 The route of the Expressway is yet to be finalised, however it is understood that the currently favoured route does not extend through the site.
- 2.2 Although the precise route for the Expressway is not yet known, the preferred corridor will be announced in either July or August. There are three main corridors shown in appendix A (Corridor's A B and C) all of which abut the southern edge of Milton Keynes and extend across the area to the south.





- 2.3 The siting of a number of constraints in relation to the site, namely the siting of the Magiovinium Schedule Monument, Eaton Leys development and the Marston Vale railway line mean that the expressway is unlikely to cross through the site or affect the deliverability of South Caldecotte.
- 2.4 In this way the Oxford – Cambridge Expressway will not affect the deliverability of the South Caldecotte site.
- 2.5 It would be manifestly unfair for the possible and unconfirmed route of the expressway to prevent development of the South Caldecotte site. It would also go against the principals of positive planning as mentioned in paragraph 182 of the NPPF.
- 2.6 With regard to the East-West Rail Line, it is understood that the proposed route would make use of the existing Marston Vale Line, upgrading this. Associated upgrades would improve access to the site and its public transport accessibility. In this way they are will not impact deliverability in any negative way.

### 3.0 QUESTION 4.9

**WHAT WILL BE THE IMPACT ON THE LANDSCAPE CHARACTER OF THE GREENSAND RIDGE, THE SPECIAL INTERESTS OF BOW BRICKHILL CHURCH AND DANESBOROUGH IRON AGE FORT, ON-SITE PRIORITY HABITAT (LOWLAND MEADOW) AND THE SETTLEMENT IDENTITY AND LIVING CONDITIONS OF RESIDENTS AT BOW BRICKHILL? CAN ANY POTENTIALLY ADVERSE IMPACTS BE SATISFACTORILY ADDRESSED?**

#### Landscape

- 3.1 Milton Keynes Council have adopted a Landscape Character Assessment (2015). The area to the east of the site has been noted as forming part of the Greensand Ridge. The Greensand Ridge is a notable landscape feature though is not itself of heritage value (The impact on heritage assets is dealt with elsewhere within this statement). The LCA notes panoramic views to Milton Keynes to north from the slopes and the A5, high proportion of woodland cover including areas of both deciduous and conifer plantations and patchwork of pasture fields to the lower slopes and open land on the slopes with over mature hedges.
- 3.2 The South Caldecotte site lies within the Clay Lowlands Farmland LCT, which comprises low lying and generally flat landscape on the urban edge of Milton Keynes. The Assessment notes that development should ensure that open views across the landscape character area to the Brickhill Greensand Ridge are retained.
- 3.3 The scheme would have some impact on the landscape, as would any form of development on the South Caldecotte site. A Landscape and Visual Impact Assessment is being prepared and will accompany the planning application on the site. This will include an assessment of viewpoints from the Greensand Ridge. Policy Site SD16 is self-contained within the existing boundary infrastructure to the site (A5 dual carriageway, Brickhill Street and the Railway)

- 3.4 Although the site is designated as an Area of Attractive Landscape (AAL), this does not preclude the deliverability of development on the site. This can be taken into account within the LVIA and the development considered taking this into account. The scheme has been designed so that the smaller units will be located in closer proximity to the village of Bow Brickhill.
- 3.5 Ultimately the impact of any proposals on landscape character is a planning judgement. The development of the site will be significant in size but there are no landscape constraints that would have significant implications for deliverability. In this way, any impact on the landscape character of the Greensand Ridge is capable of being addressed within a planning application. This approach would accord with the aims of paragraph 170 of the NPPF with regard to landscape character.

#### Heritage

- 3.6 Bow Brickhill Church is a Grade II\* listed church within the nearby village of Bow Brickhill.
- 3.7 As a designated heritage asset, the impact on the church and its setting are a material consideration within any planning application on the site.
- 3.8 The distance from the site to the church is approximately 1.5km. This intervening distance and the vegetation on the Greensand Ridge between the site and church mean that it is extremely unlikely that there would be any loss of significance. There are no views from the site to the church or vice versa. A Planning, Design, Access and Heritage Statement will accompany any planning application on the site and will account for the impact of the proposals on the church and its setting as a designated heritage asset.
- 3.9 The impact on the church as a designated heritage asset will be assessed under any planning application. Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. In our view heritage issues are highly unlikely to have any impact on the deliverability of South Caldecotte.
- 3.10 Danesborough Iron Age Fort is a scheduled ancient monument.. The remains of Danesborough Camp hill fort can be found within the dense woodland to the west of

Aspley Heath. The camp is 2.4km to the east of the site, there is 1km of woodland between the village of Bow Brickhill and the camp itself. There are no views from the site to the camp and vice versa. It is suggested that this is too far from the application site to have any implications for South Caldecotte and its deliverability.

- 3.11 The Historic England entry for the development states that '*Despite some disturbance to the interior caused by afforestation, Danesborough Camp survives well and is a good example of its class. Partial excavation of an area of the site demonstrated that archaeological remains will survive relating to the occupation of the hillfort, the economy of its inhabitants and the landscape in which they lived.*'
- 3.12 Closer to the south-west of the site is the Magiovinium Scheduled Ancient Monument. As a result of preliminary archaeological geophysical assessment, the development would not adversely affect or be constrained by any heritage assets related to the nearby Magiovinium Scheduled Ancient Monument. Further archaeological assessment will be undertaken to understand more fully the nature of any remains, which shall include a field investigation if necessary to inform the final design.
- 3.13 The impact on Scheduled Ancient Monuments as a designated heritage asset will be assessed under any planning application. Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Heritage issues are highly unlikely to have any impact on the deliverability of South Caldecotte.

#### Lowland Meadow

- 3.14 Part of the west of the site is designated as a Lowland Meadow priority habitat. Priority habitats can be sensitive to development and both national and local priority species and habitats are capable of being a material consideration when determining planning applications.
- 3.15 Surveys of protected species have been commissioned to look at the presence of such species in and around the site, and mitigation will be provided if these are found.
- 3.16 The proposed planning application will be accompanied by a scheme of biodiversity



mitigation measures, and there is scope for a planning application to make such improvements. One notable potential improvement would be to improve connectivity to the Caldecotte Lake to the north of the site.

- 3.17 It is possible that the development may impact the lowland meadow however it is likely that this could be mitigated as part of any planning permission put forward. Whilst suggested that any proposals should try to retain such designations, a priority habitat could be replaced or compensated for, if it cannot be preserved as part of the scheme. The loss of the land would not be so great a material consideration as to be fatal to the prospects of any scheme coming forward. Any planning application will be supported by appropriate ecological surveys which shall identify schemes for the mitigation of any habitats affected by the development and shall also have regard to the potential impacts on the overall ecology of the area.
- 3.18 In this way the presence of the lowland meadow is unlikely to impact the deliverability of South Caldecotte. Ecology issues are capable of being addressed through surveys and adequate mitigation and a scheme can provide material ecological benefits.
- 3.19 The majority of the arable land on the site is grade 3b, which does not have any implications for the deliverability of the South Caldecotte site.

#### Living Conditions & Settlement Identity

- 3.20 To the north, residential properties in Caldecotte are 160m from the site separated by the Railway and Caldecotte Business Park
- 3.21 South of the site beyond the A5 dual Carriageway are individual residential properties the closest is 173m
- 3.22 To the east, the nearest properties are at 1 and 3 Station Road which are 35 and 50m from the site respectively. Beyond this, properties at Greenways in Bow Brickhill are 400m from the site
- 3.23 Of the above nearest residential properties, the closest and most likely to be affected are at 1 and 3 Station Road. The development will be visible from these properties, though mitigation will be incorporated into the scheme in order to ensure that the visual impact of the building is softened as much as possible. A mitigation scheme in terms of planting

to the edges of the site will be incorporated into the masterplan and a detailed LVIA will accompany and inform the planning application for the site.

- 3.24 The distance to Millward Drive in Bletchley to the west of the site is 280m
- 3.25 The site is located some 400m from the village of Bow Brickhill. It is a linear village and separated from the site by countryside. The countryside between the site and Bow Brickhill will remain as a permanent boundary between the edge of Milton Keynes itself and Bow Brickhill, they will be two distinct entities in visual and notional terms.
- 3.26 There are no specific amenity issues that are likely to impact the deliverability of the scheme. The buildings would have potential to screen noise to neighbouring buildings through their siting and design. A number of potential reports could assist in demonstrating mitigation for possible impacts, such as:
- Construction Management Plan
  - Delivery and Logistics Plan
  - Transport Assessment and appropriate mitigation measures
  - Noise and Air Quality Reports
- 3.27 These issues will need to be assessed in detail within any planning application for the site. there are no noise or noise attenuation issues which would prevent the development of the site which cannot be resolved or be addressed by planning condition.

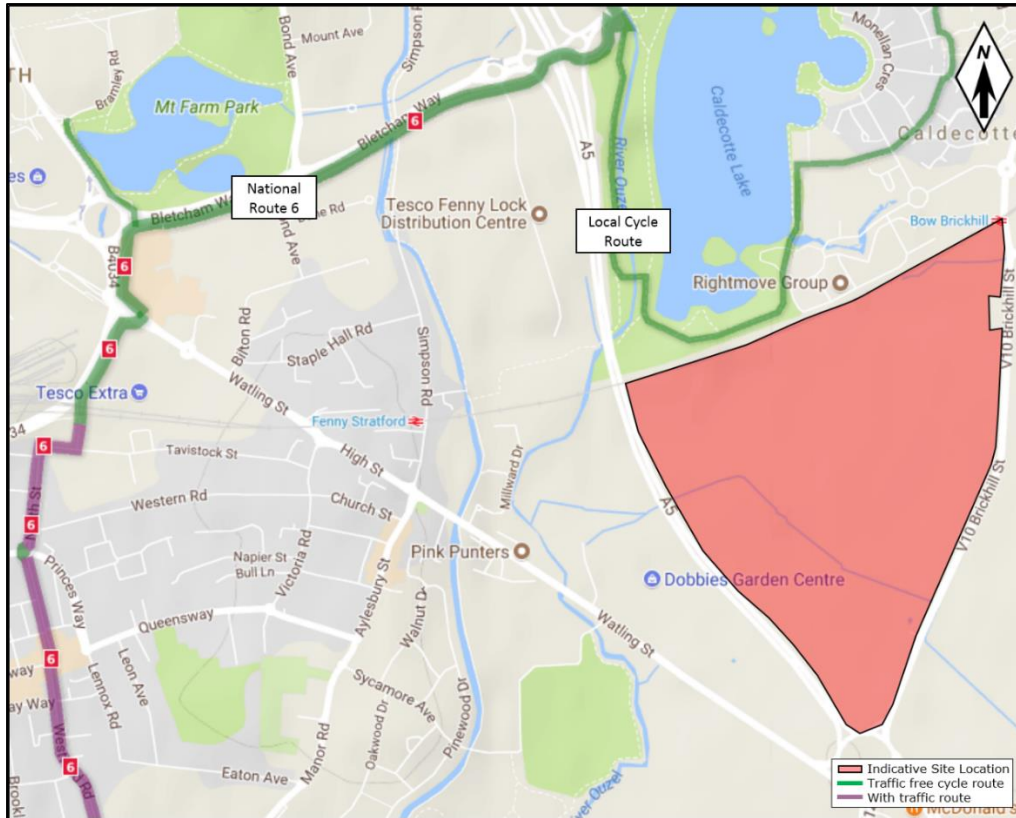
#### 4.0 QUESTION 4.10

**GIVEN THE SITE IS PRIMARILY INTENDED FOR WAREHOUSE AND DISTRIBUTION USES IS IT REASONABLY RELATED TO THE STRATEGIC ROADNETWORK AND WIDER ACCESSIBILITY VIA THE M1? IS THE SITE REASONABLY CONNECTED BY TRANSPORT MODES OTHER THAN THE CAR FOR EMPLOYEES? ARE THERE ANY LOCAL HIGHWAY FACTORS (FOR EXAMPLE PROXIMITY OF LEVEL CROSSINGS) WHICH WOULD LEAD TO A CONCLUSION THAT THE TRANSPORT IMPACTS WOULD BE SEVERE?**

- 4.1 The site is located adjacent to the A5 major arterial road, which converges at the south of the site with V10 Brickhill Street. The site is located moderately close to the M1 Junction 13 and 14 and on a strategic transport corridor, and indeed a transport corridor that is a national focus of growth (the Oxford to Cambridge Corridor). The site is well connected via the A5 and A5-M1 link road to M1 motorway junction 11A; it also links south and west via the M4 and M40.
- 4.2 The site is located close to Bow Brickhill railway station which is a short distance walk from the site. Furthermore, public transport accessibility to the site is only likely to improve with improvements made to the Marston Vale line/ East-West Rail Line. The line currently operates between Bletchley, Fenny Stratford and Bedford and is intended to be incorporated into an Oxford – Cambridge line. The site is also accessible from buses in central MK, such as the 11, 12 and 602

| Service   | Route (two-way)   | Time of Operation & Frequency     |                                   |            |
|---|---|-----------------------------------|-----------------------------------|------------|
|   |   | Weekdays                          | Saturdays                         | Sundays    |
| 17  | Kingston -Woburn Sands - The Brickhills - Bletchley                                   | 09:19-16:39<br>(every 2-3 hours)  | 09:19-16:39<br>(every 2-3 hours)  | No Service |
| 11/11A and 12/12A   | Milton Keynes Central - Kents Hill (12/12A) - Monkston - Open University - Caldecotte | 06:30-22:05<br>(every 30 minutes) | 06:27-22:04<br>(every 30 minutes) | No Service |
| Source: <a href="https://www.milton-keynes.gov.uk/highways-and-transport-hub/bus-and-taxi/bus-timetables-maps-and-travel-updates">https://www.milton-keynes.gov.uk/highways-and-transport-hub/bus-and-taxi/bus-timetables-maps-and-travel-updates</a> |   |                                   |                                   |            |

- 4.3 The site is located adjacent to local cycle routes shown below:



- 4.4 The site would make provision for a significant amount of employment floorspace of which a significant proportion is warehousing and distribution. The location of the level crossing to the north is noted however it is suggested that traffic will predominantly be directed south towards the A5 and junction 11A of the M1 Motorway.
- 4.5 Whilst any such development will necessitate transportation for employees, deliveries and construction works, the site is located reasonably close to public transport and the strategic road network. One of the issues that logistic developments have along the M1 corridor is the limited availability of labour close by to these facilities, which is not an issue given the close proximity of Milton Keynes and Bletchley.
- 4.6 It should also be noted that any planning application would be accompanied by a comprehensive Transport Assessment. The Transport Assessment would cover issues such as an assessment of existing conditions, an assessment of the proposed development, trip generation, assessment parameters, a highway impact assessment including Road Safety, and mitigation. Any proposals would also be accompanied by a routing plan in accordance with policy CT2 to ensure that access to the site is primarily

from the A5 to the south towards junction 11A of the M1 Motorway, rather than through Milton Keynes to junction 13. The issue of the specific wording of policy SD16 is dealt with below.

4.7 Surveys have been completed on the frequency and duration of the level crossing activity and the resulting queues. The results of the survey are below. Queues occur on Brickhill Street towards the site when the level crossing is active, but the observations and capacity models demonstrate that the queues quickly disburse once the crossing is open.

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

4.8 The maximum observed queue on Brickhill Street toward the site is presented above . This clearly demonstrates that the queue will not interfere with the proposed access to the employment site at South Caldecotte.

4.9 Detailed impact assessments of the proposed development have been undertaken on an agreed study with Milton Keynes Council and Highways England. The impact assessment, which are in the process of being finalised, have demonstrated that following the implementation of appropriate mitigation the residual impacts will not be severe.

- 4.10 The most congested junction in the local area is the A5/Brickhill Street/A4146 Kelly's Kitchen junction. The development is forecast to add 438 two-way vehicle movements in the morning peak and 365 two-way vehicle movements in the evening peak. The junction is forecast to accommodate over 8000 vehicles in the peak hours and the development impact is therefore around 5%. A development impact of this scale can be mitigated, and the residual impact will not be severe.
- 4.11 In this way the site has good strategic transport links and is within a growth corridor. Impacts on traffic, highway and pedestrian safety would be mitigated and would not be severe. The site can be delivered with minimal infrastructure improvements. As a result, the site is considered to be deliverable in highways terms.

#### Policy SD16 Wording

- 4.12 The current wording of policy SD16 assumes that V10 Brickhill Street will need to be upgraded to 'Grid Road' standard. Based on initial technical reports it is not considered that it is necessary for the road to be upgraded to this standard as a result of this development.
- 4.13 It must be noted that the general principles of SD11 suggest that infrastructure improvements '*should be appropriate scale and support the proposed development.... make a contribution proportionate to it's scale and impact*'.
- 4.14 It is suggested, to ensure the policy is sound, that the reference to upgrading Brickhill Street is removed from policy SD16 as this is not justified in accordance with paragraph 182 of the NPPF. Any improvements should be guided by an assessment of the developments impacts as covered elsewhere in policy SD16.
- 4.15 The changes would bring the policy in line with Policy CT2 which sets out requirements for developments not to prejudice the future development or design of suitable adjoining sites.
- 4.16 In order to ensure that policy SD16 is sound, it is suggested that it is amended as appendix A.

## 5.0 QUESTION 4.11

### **WOULD THE ALLOCATION BE EFFECTIVE? (WOULD IT BE DELIVERED?) IS THERE MARKET DEMAND FOR THE INTENDED USES AT THIS LOCATION?**

- 5.1 Hampton Brook have a track record of delivering strategically important employment sites in the area. Recent projects in Milton Keynes include the award winning 250,000 sq. Ft Pinnacle office scheme in Central MK. The delivery of Trek Cycles European HQ at Tilbrook (82,700 sq. ft) and more recently the completed French Bakery Brioche Pasquier at Wymbush (240,000 sq ft) which has attracted a considerable number of new jobs and significant inward investment to the area.
- 5.2 A Planning Performance Agreement has been signed between Hampton Brook and Milton Keynes Council. The current intention is to submit the planning application in September 2018 with a view to breaking ground in Spring 2019 if permission is granted.
- 5.3 In terms of market interest, A letter of support has been provided by Burbage Realty, indicating strong market demand for employment uses in the area. This is attached as an appendix. (Appendix B)

## 6.0 QUESTION 4.12

### **THE COUNCIL HAS PREPARED A CONSULTATION DRAFT DEVELOPMENT FRAMEWORK SPDFOR THE PROPOSED ALLOCATION DATED FEBRUARY 2018. WITH REGARD TO NPPF PARAGRAPH 153 WHATIS THE INTER-RELATIONSHIP BETWEEN THE SPD AND THE CONTENT OF POLICY SD16? SHOULD POLICY SD16 AND/OR ITS SUPPORTING TEXT CROSS-REFERENCE THE SPD?**

- 6.1 Paragraph 153 of the NPPF states that each local planning authority should produce a Local Plan for its area. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they

can help applicants make successful applications or aid infrastructure delivery.

- 6.2 The draft South Caldecotte Framework SPD provides a helpful guide to how the South Caldecotte site can be developed, outlining any issues needing to be addressed through a planning application. In this way it's aims are fully complaint with paragraph 153 which sets out that SPDs *'should be used where they can help applicants make successful applications or aid infrastructure delivery'*. It has been subject to consultation.
- 6.3 We would have no objection to policy SD16 cross referencing the SPD if the inspector considers that this is necessary.



## APPENDIX A

### SUGGESTED WORDING FOR POLICY SD16

Land south of Milton Keynes in South Caldecotte, as shown on the Key Diagram and Policies Map, is allocated for the development of a mix of Class B2 and B8 employment floorspace within the plan period. The development will be brought forward in line with all relevant policies in Plan MK, particularly Policy SD1, SD11, SD12 and INF1. The development must accord with the following principles:

1. A minimum of 195,000m<sup>2</sup> of Class B2/B8 and ancillary B1 employment floorspace.
2. Access to be taken from Brickhill Street, which will be upgraded to grid road standard.
3. The development will be subject to a Transport Assessment, which will investigate the development's impact on the local highway network, including the A5/Watling Street roundabout and Brickhill Street. The development will contribute to any necessary improvements, as agreed by the relevant highway authorities and Highways England. Should this necessitate highway works outside the site boundary defined on Map 4, these will be deemed as appropriate development in the Open Countryside in accordance with policy DS5. The Transport Assessment will also set out the basis for effective public connections to and from the site to be implemented prior to completion of the development.
4. Highway works and the agreed layout for the development should not preclude the future upgrade of Brickhill Street to grid road standard, in accordance with policy CT8 should this be necessary in accordance with the other policies of this plan.
54. A green open space link will be created on the site, linking into Caldecotte Lake to the north and providing future opportunity to link the park to the south/east. The open space link should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds as part of a Sustainable Urban Drainage system across the site.
65. Direct footpath connections to Bow Brickhill railway station and the existing Public Right of Way running along the site's northern boundary will be effectively integrated into the development.
76. Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets.
87. The design and appearance of buildings should be sensitive to the neighbouring uses, with development fronting Brickhill Street being sensitive to views into the site from the wider landscape. Buildings should be designed to provide an attractive entrance to Milton Keynes from the south.
98. Existing vegetation to site boundaries should be maintained and enhanced to screen the development from wider views where a LVIA deems this necessary. New planting should be of native species to mitigate the loss of hedgerows necessary to facilitate development.
109. A desktop Archaeological Assessment should be undertaken to understand the likely presence of archaeological remains within the site. The recommendations of the Assessment will be implemented prior to each phase of development commencing. It may be necessary to undertake a field investigation to understand the archaeological potential and significance of this site and to inform the layout of development.

## APPENDIX B: Letter from Burbage Realty



Our Ref: JAH/co/8550

21<sup>st</sup> June 2018

I Jackson BSc MRICS  
Hampton Brook Developments Ltd  
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Dear Ian

Re: Land at South Caldecotte, Milton Keynes

To inform your thinking about Milton Keynes Council's proposal to allocate for employment use land at South Caldecotte in the Milton Keynes Draft Local Plan, you have asked me to provide a concise review of the Milton Keynes large scale logistics property market (i.e. units and land that can accommodate over 100,000 sq ft).

### 1.0 Burbage Realty

- 1.1 Burbage Realty was formed in 2003 as the first "logistics and industrial property consultant" in the UK. The practice, with offices in Northampton and London, is recognised as the foremost niche real estate consultancy in the UK national distribution sector.
- 1.2 Burbage Realty is, and has been, involved in some of the largest and most prestigious logistics development sites in the United Kingdom including Magna Park Milton Keynes (M1 Junction 13), Marston Gate (M1 Junction 13), Pineham (M1 Junction 15A), Daventry International Rail Freight Terminal (M1 Junction 18) and SEGRO Logistics Park East Midlands Gateway (M1 Junction 24).

### 2.0 Site Description

- 2.1 The subject site in South Caldecotte, is located immediately to the south of Milton Keynes and is directly adjacent to the A5. The A5 dual carriageway is a major trunk Road in its own right with links to the M1 and wider motorway network. Access to the M1 has been enhanced by the completion of the A5-M1 Link at M1 Junction 11.
- 2.2 The M1 corridor, in which Milton Keynes sits, provides exceptional access throughout the UK, via links with the A5, M25, M6, M40, A1(M) and wider motorway and trunk road network.
- 2.3 This connectivity means that the site provides good access to the country's major commercial markets (e.g. London, Birmingham, Manchester and Liverpool), container ports (e.g. Felixstowe, Southampton, Tilbury, London Gateway and Liverpool), and international air and rail terminals.



- 2.4 The investment decisions of National Distribution Centre (NDC) and Regional Distribution Centre (RDC) operators are based on a number of key specific locational demand requirements, all of which are intrinsic to the success of their operations; these include:
- Certainty of deliverability
  - Excellent proximity and connectivity to the motorway/trunk road network;
  - Maximisation of access to potential markets;
  - Minimisation of drive times to potential markets;
  - Availability and accessibility to an appropriately skilled workforce;
  - Ability of a site to accommodate the necessarily large footprint and building height involved with units of this size; and
  - Absence of neighbouring uses where conflict is likely to arise/restrictions may be placed on business operations (e.g. adjacent residential use, which may result in conditions limiting hours of deliveries).
- 2.5 The site's excellent location in relation to the A5 and M1, and its central position in relation to major population centres, means that an operator with a logistics facility on this site has the capability of reaching 19.3 million people within a 2 hour drive time and 54.8 million people within a 4.5 hour HGV drive time.
- 2.6 The attractiveness of the site is further enhanced by its situation to the south of Milton Keynes, close to a robust labour force in Bletchley and surrounding areas that are within walking distance of the site. A readily available labour force is a key consideration for logistics property operators. Labour statistics were accumulated for the authorities of Milton Keynes (which includes the subject site and neighbouring authorities of Bedford, Central Bedfordshire, and Luton. There is a total of 578,300 people of working age (16-64) within this area of which 23,100 are unemployed accounting for 4% of the total population, compared with 5.4% nationally. The area has a relatively low economically inactive population, 116,300 (20.25%) in relation to 22.3% nationally. Of the economically inactive 23,000 (19.4%) want a job. Reference can be made to Table 1 below for a further breakdown of the labour statistics.

**Table 1: Regional Labour Statistics of Possible Labour Force for Logistics Site at Newport Pagnell**

| Area                 | Total Number of People Within Working Age (16-64) | Number of People Unemployed | Economically Inactive | Economically Inactive But Want a Job |
|----------------------|---|-----------------------------|-----------------------|--------------------------------------|
| Milton Keynes        | 168,000   | 7,700                       | 31,000                | 7,000                                |
| Bedford              | 102,900   | 4,600                       | 16,400                | 2,300                                |
| Central Bedfordshire | 171,200   | 4,900                       | 31,600                | 9,100                                |
| Luton                | 136,200   | 5,900                       | 37,300                | 4,600                                |

Source: Nomis  
Nomis, Official Labour Market Statistics, Milton Keynes, Bedford, Central Bedfordshire, Luton, downloaded 16<sup>th</sup> March 2016.



### 3.0 Market Demand

#### 3.1 Market Drivers

3.11 Occupier demand for large-scale logistics properties is driven by a number of key 'sectors' which require these facilities for a variety of reasons. In particular –

- Retailers require logistics facilities to replenish their stores but also to meet growing online sales;
- Manufacturers require facilities to manage inbound materials and parts, work in progress and for the storage and distribution of finished goods;
- Third party logistics contractors require these facilities to service contracts secured from retailers, manufacturers, and other operators;
- Wholesalers require these facilities primarily to service smaller retailers;
- Post and parcel operators require these facilities to meet expanding parcel volumes, which is largely attributable to the growth in online retail;
- Waste and recycling companies require facilities to process waste and recycle and this has become more important over recent years due to requirements to reduce the amount of waste sent to land fill.

#### 3.2 Market Demand

3.2.1 In general, most demand for large-scale logistics buildings is concentrated in key towns and cities along the major motorways and trunk roads which make up the Strategic Road Network (SRN). The SRN comprises all trunk motorways and 'A' roads. In 2014, the SRN was 4.4 thousand miles long, made up 2.4 percent of the total road length in England, but carried 32.7 percent of road traffic in England. 2016 saw strong take up of Grade A large scale logistics premises across the UK with overall take up almost 40% higher than in 2015 and the second highest level of take up for 10 years. Take up across the East and West Midlands totaled some 13,250,000 sq ft with approximately 6,750,000 sq ft in the East Midlands and 6,500,000 sq ft in the West Midlands. This shows a marked improvement over the 5 yr average take up in the Midlands of 8,100,000 sq ft. Manufacturers take up was also pronounced accounting for around 47% of take up in the West Midlands and 16% in the East Midlands.

3.2.3 Occupier take up in 2017 was 36% down on 2016 take up at 16 million sq ft, 11% lower than the 10-yr annual average. The first half of 2018 have proven much stronger than the first half of 2017 reflecting the underlying robust nature of the industrial/logistics sector.

3.2.4 World Bank data shows that from 2013 – 2014 the UK economy grew at about 2.5%, with a height of 2.9% in 2014. The economy slowed to 2.0% in 2016. The Office for Budget Responsibility forecasts continued growth between 1.6% and 2.0% from 2017 until 2021. The economic statistics do indicate a slowing of the UK market in comparison to the 2013-2015 period, however, the signs allude to the economy growing at a steady and consistent rate in the medium-term. These forecasts should be supportive of sustained demand for large logistics facilities.



3.2.5 There continues to be a large number of market requirements that have yet to be satisfied showing ongoing and strong demand for the identified market area, a sample of some of the named occupiers with requirements in the identified market area are shown below. A number of these requirements are specific to Milton Keynes whilst others will look over a wider area.

|               |                         |
|---------------|-------------------------|
| • 4PX         | 300,000 – 500,000 sq ft |
| • Amazon      | 500,000 – 650,000 sq ft |
| • Bertlesmann | 400,000 – 500,000 sq ft |
| • Bunzl       | 250,000 – 350,000 sq ft |
| • Europa      | 200,000 – 300,000 sq ft |
| • K+N         | 250,000 – 400,000 sq ft |
| • Makita      | 350,000 – 500,000 sq ft |
| • Unipart     | 400,000 – 500,000 sq ft |
| • Wayfair     | 400,000 – 500,000 sq ft |
| • Sainsbury   | 200,000 – 300,000 sq ft |
| • DSV         | 300,000 – 500,000 sq ft |
| • Whirlpool   | 400,000 – 500,000 sq ft |

#### 4.0 Market Supply

4.1 The strong level of take-up in the UK market over the past few years both from second hand Grade A stock and recently constructed speculative space has reduced availability as at June 2018 to a near record low of 6%.

4.2 At the beginning of 2018 there was approximately 4.5 million sq ft of Grade A industrial/logistics space available in the East and South Midlands. Based on 2017 take up figures that would only be around 8 months' supply. There is still an appetite for speculative development but the tight supply of ready and available sites will restrict the ability to deliver these new buildings exacerbating the supply constraints in the market increasing upwards pressure on rents.

4.3 There are currently only three Grade A units available in the Milton Keynes area highlighting the scarcity of available large-scale logistics properties in the market area:

- Magna Park, Milton Keynes, Building 330 - 186,443 sq ft
- Altitude, Magna Park, Milton Keynes - 574,258 sq ft.
- MK360, a modern 359,272 sq ft building currently undergoing refurbishment.

4.4 Further to the limited available supply of buildings there is also very little land available for large-scale logistics buildings in Milton Keynes. Below are listed the current employment site allocations in Milton Keynes which on first inspection would seem to offer numerous site opportunities but once the characteristics of the individual sites are considered in detail, the true total available for large scale logistics operations is very limited.



- 4.5 For the sites to be truly appealing to the logistics market they need to be well located for access to motorway and key trunk roads, ideally exceeding 5 hectares in order to provide the scale of the units required by the market, and also have an implementable planning permission (i.e. B2 and B8 planning permission). Vacant employment sites have been identified (see table below) using market knowledge and adjusted information contained within the Milton Keynes core strategy document. As at June 2018 there are 30.07 hectares of land potentially available for B2, B8 and ancillary B1c development in the town. The small sites are unsuitable for large scale logistics development. For the avoidance of doubt sites allocated for alternative uses (i.e. residential, retail, leisure and offices) have been excluded from the table below, as well as those that have now been developed or have been sold.

| Location              | Size (hectares) | Use Classes | Comments   |
|-----------------------|-----------------|-------------|--|
| Magna Park            | 9.04            | B2/B8       | Final plot within Magna Park which may be speculatively developed with a 312,700 sq ft building in Quarter 3 2018. |
| Snelshall East & West | 5.75            | B1/B2/B8/C1 | Two different sites – both too small for large scale logistics development.  |
| Fox Milne             | 3.65            | B1/B2/B8    | Existing site likely to be redeveloped.  |
| Denbigh West          | 3.36            | B1/B2/B8    | Brownfield site designed for data centre use.  |
| Knowlhill             | 2.37            | B1/B2/B8    | The site is too small for large scale logistics operations.  |
| Redmoor               | 1.68            | B2/B8       | Expansion area for neighbouring factories.   |
| Crownhill             | 1.19            | B1/B2/B8    | Site owned by adjacent occupier for business expansion.  |
| Wymbush               | 1.9             | B1/B2/B8    | Consented site for 48,222 sq ft.   |



|                     |              |             |  |
|---------------------|--------------|-------------|--|
| <b>Shenley Wood</b> | 0.95         | B1/B2/B8/C2 | The site is too small for large scale logistics use. |
| <b>Tongwell</b>     | 0.49         | B2/B8       | The site is too small for development                |
| <b>Kiln Farm</b>    | 0.4          | B1/B2/B8    | The site is too small for development.               |
| <b>Total</b>        | <b>30.07</b> |             |  |

4.6 In addition to the committed sites, we have also appraised those sites proposed to be allocated in the Milton Keynes Draft Local Plan. The most significant of these being Land East of Milton Keynes which is being proposed for delivery of both an Enterprise Park (small and medium sized B1(b) Research & Development), B1(c) Light Industrial) and B2 (General Industrial) units which is currently envisaged to be 2031 as per the Draft Local Plan.

4.7 There is also the 7.68 hectare site at Pineham which, if brought forward, is well located being situation very close to J14 of the M1. This site will not add much to the overall availability of land for large scale logistics facilities due to its size as in reality it would only take a single unit of circa 350,000 sq ft.

## 5.0 Conclusion

5.1 In summary this site benefits from all the key attributes required for an employment site, it is well connected, deliverable and in close proximity to a strong work force. In addition it is likely to benefit further from the opportunities that east/ west rail will bring. This site totalling 56.8 hectares would meet the demand for employment land highlighted in the GVA Reports of 2015 and 2017.

The GVA Report 2015 stated that *'in quantitative terms there is sufficient supply in MK to meet demand but this is not the case qualitatively. Many Existing, Proposed and Potential site are not in prime geographical locations to meet the needs of the market, most notably for logistics based employment. Only two sites, providing a potential supply of 45.36 hectares could be brought forward for logistics use. This leaves a shortfall of 49 hectares to meet the demand of 94 hectares'*.

The updated Milton Keynes Economic Growth and Employment Land Study (June 2017) states that there is *'less employment land supply now than in 2015 the figure having reduced by 39.75 hectares.. some potential/ vacant employment sites have been developed or received planning permission for alternative land uses other than employment'*.

5.2 The site at South Caldecotte is well suited to service a wide range of logistics requirements. Lying adjacent to the A5 with excellent road communications to the M1, M40 and wider motorway



and trunk road network, the site would provide a warehouse operator with exceptional connectivity to the country's major commercial markets, container ports, international air and rail terminals. Accessibility to the major trunk and motorway network is a key factor for occupiers as well one of the major cost factors to them is transportation, making the proximity of major trunks roads and motorways a key decision factor in site selection. There is also an adequate labour force in Milton Keynes.

- 5.3 The site is close to a robust labour force in Bletchley and surrounding areas that is within walking distance of the site, which is a key consideration for logistics property operators.
- 5.4 Continuing demand for large scale logistics buildings reflect the improved economy and growth of online retailers. South Caldecotte as a deliverable site of size has already attracted significant investment and occupier interest.
- 5.5 The subject site can be delivered very quickly, we understand that the developer is proposing to submit a planning application in early Autumn 2018 with a target for breaking ground on site in Spring 2019.
- 5.6 With the pre-let to H&M and the completion of the speculative construction at Eagle Farm North, Milton Keynes currently has no land to accommodate large scale logistics facilities save for one plot on Magna Park where a single unit of 312,700 sq ft has been consented.
- 5.7 The M1 J14 Pineham site, at 7.68 hectares, would not add significantly to the overall availability of the land in the town as it will effectively only be suitable for a single c350,000 sq ft logistics facility.
- 5.8 Having assessed the unsatisfied occupier demand, the increasing demand for distribution buildings and the attractiveness of Milton Keynes as a location, the current land supply position and lack of availability of existing units leaves Milton Keynes unable to benefit from the long term economic advantages that occupiers bring to the town. South Caldecotte provides a significant development and economic opportunity.
- 5.9 The site at South Caldecotte has all of the attributes necessary for a key distribution park being immediately adjacent to the A5 with good motorway links, including the benefits of the new A5/M1 Jn 11A link road. The site is well positioned to meet the growing demand for large scale logistics properties in Milton Keynes.

I trust this brief overview is of assistance, please do not hesitate to contact me if you require any further information.

Yours sincerely

James Harrison MRICS FAAV  
Director  
Burbage Realty



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*dynamic development solutions™*

For and on behalf of  
**Hampton Brook**

**Plan:MK Examination in Public  
Response to Inspectors Questions – Matter 5**

**Strategic Site Allocations and Urban Extensions**

Prepared by  
Graham Robinson BSc MA MRTPI  
**DLP Planning Ltd**  
**Bedford**

June 2018



Prepared by: .....

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## **0.0 EXECUTIVE SUMMARY**

0.1 DLP Planning Limited have been instructed by Hampton Brook to respond to the inspector's questions in respect of Matter 5 and specifically in relation to their land interest in the following location;

South Caldecotte (Land Allocated within policy SD16)

0.2 Hampton Brook is a well-established local land promoter and developer; as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.

**MATTER 5 - Strategic Site Allocations and Urban Extensions**

**Issue 1 – general approach and principles (Policies SD1, SD11, SD12 & SD17)**

**1.0 QUESTION 5.3**

**ARE THE GENERIC POLICY REQUIREMENTS FOR STRATEGIC SITES IN POLICIES SD1, SD11, SD12 & SD17 JUSTIFIED AND EFFECTIVE? ARE THE VARIOUS PROPOSED MODIFICATIONS TO POLICIES SD1, SD11, SD12 AND SD17 NECESSARY FOR PLAN SOUNDNESS (SEE PMS 23, 24, 34, 35 & 50 IN MK/SUB/004)**

Policy SD12

- 1.1 The Regulation 19 submission made on behalf of Hampton Brook set out why policy SD12 is not justified and this written response seeks to expand upon this.
- 1.2 Paragraph 182 of the NPPF states that policies must be justified, effective and consistent with national policy in order to be sound.
- 1.3 Among other requirements policy SD12 states that design frameworks should include design codes, a document a setting rules for the design of a new development.
- 1.4 The inclusion of design codes within development frameworks is unjustified and would not accord with the NPPF in that such codes are not needed at such an early stage of the process. For an outline scheme for example, such codes could reasonably be secured by a planning condition. Such a requirement has not been justified.
- 1.5 It is more appropriate in the case of an outline strategic planning application for design codes to be secured under master planning conditions, and it is suggested that the wording is amended to refer to design parameters.
- 1.6 Furthermore, the list of parties needed to be included in any design framework is aspirational, and it is not effective for all those listed to be involved on every design framework, as they might not have relevant input.

- 1.7 It is therefore suggested that the wording is amended to state that these could, rather than will be involved.
- 1.8 We have suggested an amendment to the wording of policy SD12 within appendix A to this effect.
- 1.9 Policy SD11 sets out general principles for urban extensions. It must be noted that there is a conflict with policy SD16 which has been discussed in matter 4.

### **Issue 3 – South-East Milton Keynes (SEMK) (Policy SD13)**

#### **2.0 QUESTION 5.21**

**ARE THERE OTHER INFRASTRUCTURE INTERDEPENDENCIES, HOW DO THEY RELATE TO THE PHASING OF DEVELOPMENT, ARE THEY MADE CLEAR IN THE PLAN AND HAVE THEY BEEN ADEQUATELY TAKEN INTO ACCOUNT?**

- 2.1 The Regulation 19 submission made on behalf of Hampton Brook set out why policy SD13 is not effective.
- 2.2 Policy SD13 is not adequately detailed in terms of the highways works that will need to be secured in relation to the development. As a result it would fail to be effective and fail the soundness test of paragraph 182 of the NPPF.
- 2.3 Paragraph 5.24 of Plan: MK sets out that the vehicular access will be from an extended H10 grid road, assumed to be via the grid road reserve from the permitted Church Farm development.
- 2.4 In order to make the policy effective and compliant with paragraph 182 of the NPPF it is suggested that policy SD13 be amended so that it refers to the need for assessment and implementation of works to upgrade the V10 grid road. This would bring the policy into line with policy SD12 in terms of its requirements, as well as policy SD16 in terms of content.

## APPENDIX A

### POLICY SD12 DELIVERY OF STRATEGIC URBAN EXTENSIONS

1. To ensure that Strategic Urban Extensions are brought forward in a strategic and comprehensive manner, planning permission will only be granted for land within Strategic Urban Extensions, following the approval by the Council of a comprehensive development framework, incorporating any ~~necessary design codes~~ relevant design parameters, or phasing of development and infrastructure delivery, for the Strategic Urban Extension as a whole.
2. Development frameworks will be produced by the Council in conjunction with and with the support of the developer(s). Development frameworks will also be prepared in partnership with stakeholders that may include landowners, adjoining local planning authorities, parish or town councils, infrastructure providers, regional and local agencies and services, statutory consultees, the Parks Trust and other stakeholders. Development frameworks will be prepared in consultation with the local community. The Council will adopt development frameworks as supplementary planning documents to guide future planning applications.



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For and on behalf of  
**Hampton Brook**

**Plan:MK Examination in Public  
Response to Inspectors Questions – Matter 7  
Infrastructure and Viability**

Prepared by  
Graham Robinson BSc MA MRTPI  
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June 2018



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## **0.0 EXECUTIVE SUMMARY**

0.1 DLP Planning Limited have been instructed by Hampton Brook to respond to the inspector's questions in respect of Matter 7 and specifically in relation to their land interest in the following location;

South Caldecotte (Land Allocated within policy SD16)

0.2 Hampton Brook is a well-established local land promoter and developer; as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.

## **MATTER 7 – Infrastructure and Viability**

**Issue 1 – Whether the overall approach to transport is justified, effective and consistent with national policy**

### **1.0 QUESTION 7.1**

**WHAT IS THE LIKELY EFFECT OF THE PROPOSED SCALE AND DISTRIBUTION OF DEVELOPMENT IN PLAN:MK (ABOVE THE REFERENCE CASE (EXISTING PLANNED/COMMITTED GROWTH)) ON EXISTING TRANSPORT INFRASTRUCTURE AND TRAFFIC LEVELS? HOW HAS THIS BEEN ASSESSED AND IS THE TRANSPORT EVIDENCE UP-TO-DATE AND ROBUST? ARE THE IMPACTS FROM THE PROPOSALS IN PLAN:MK ON THE STRATEGIC ROAD NETWORK UNDERSTOOD AND IS THERE SUFFICIENT DETAIL IN THE LIP ON THE LIKELY COSTS AND FUNDING SOURCES OF ANY STRATEGIC ROADNETWORK IMPROVEMENTS?**

- 1.1 Our comments on this matter relate solely to policy CT8 in relation to grid roads.
- 1.2 Policy CT8 refers to the Milton Keynes Planning Manual. The manual was last published in 1992 and is no longer in print or available. It is not part of the development framework and it is queried whether this should be included
- 1.3 Policy CT8 sets out criteria for grid roads, stating that grid road corridors should be 60m wide. This is inflexible and makes no assessment for specific sites which may not be able to fulfil these requirements. It would be excessive to preclude sites from development simply because they cannot accommodate the grid road standard. This is neither justified nor effective with regard to paragraph 182 of the NPPF.
- 1.4 A plan setting out the location of grid roads would assist in understanding this policy.

### Issue 3 – Policy INF1

#### 2.0 QUESTION 7.9

**IS POLICY INF1 JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY? DOES THE POLICY STRIKE AN APPROPRIATE BALANCE BETWEEN PROVIDING CERTAINTY THAT THE PLANNING OBLIGATIONS SOUGHT BY THE DEVELOPMENT PLAN MEET THE 3 TESTS AT NPPF PARAGRAPH 204 AND THE CAUTION AT PARAGRAPH 153 OF THE NPPF THAT SPD SHOULD NOT ADD UNNECESSARILY TO THE FINANCIAL BURDENS ON DEVELOPMENT?**

- 2.1 Policy INF1 sets out that infrastructure works will principally be delivered through a Planning Obligations SPD, with infrastructure being delivered for individual schemes under section 106 agreements. Furthermore it gives the flexibility for developers to carry out infrastructure works themselves should this be more appropriate than delivering improvements through section 106.
- 2.2 A key consideration is the National Planning Policy Guidance on Planning Obligations which states that planning obligations must be:
- (a) necessary to make the development acceptable in planning terms;
  - (b) directly related to the development; and
  - (c) fairly and reasonably related in scale and kind to the development.
- 2.3 These tests are reinforced within part 122 of the Community Infrastructure Levy Regulations 2010.
- 2.4 Whilst we generally have no objection to policy INF1, it is somewhat unclear. Part of the fifth paragraph states that *'All infrastructure provision should ensure that it is provided to meet the needs of future growth and take into account external growth of the site'*. This appears to suggest that developments should meet unplanned growth, which goes

against the above guidance and would fail to meet the tests.

2.5 We are therefore suggesting revised wording to policy INF1 suggested in Appendix A.

2.6 The policy also cross references policy SD12 on strategic urban extensions. This suggests that design frameworks will be used for development of strategic urban areas. A separate comment has been made regarding this policy, but for convenience comments are included here. The use of design codes, particularly in the case of outline consents, should be a condition of approval rather than part of a development framework. Furthermore, it should be clarified that not all the parties in part 2 of policy SD12 will need to comment on each framework and a suggested re-wording of policy SD12 is included in the comments on Matter 5.

2.7 In our view the approach of securing infrastructure improvements through site specific planning obligations is sound in principle, providing that any individual obligations meet the tests of the National Planning Policy Guidance on Planning Obligations.

### 3.0 QUESTION 7.10

**IS THE COUNCIL CONTEMPLATING CIL? WHERE OFF-SITE INFRASTRUCTURE IS REQUIRED IS THERE EVIDENCE OF A DELIVERABLE APPROACH THAT WOULD NOT CONTRAVENE THE POOLING RESTRICTIONS? IS THE APPROACH IN POLICY INF1 TO VOLUNTARY AGREEMENTS FOR JOINT INFRASTRUCTURE, ACROSS SITES, ROBUST AND EFFECTIVE?**

3.1 Policy INF1 suggests that contributions will be dealt with on a site-specific manner. We have no objection to this approach providing that individual planning obligations for sites meeting the tests mentioned above, providing a consistent approach is taken.



## APPENDIX A

### POLICY CT8 GRID ROADS

iv. Grid Road Reserves will be identified in order to safeguard further potential extension of the grid and enable future development to access the grid;

v. Grid road reservations should be 80m in width where residential is on each side and 60m where other land uses occur; unless it can be demonstrated that there is justification for a narrower reservation.

If reference to Manual for Milton Keynes remains within the policy then reference to 'grid roads' should be amended to 'city roads'.

## **APPENDIX B**

### **POLICY SD12 DELIVERY OF STRATEGIC URBAN EXTENSIONS**

1. To ensure that Strategic Urban Extensions are brought forward in a strategic and comprehensive manner, planning permission will only be granted for land within Strategic Urban Extensions, following the approval by the Council of a comprehensive development framework, incorporating any ~~necessary design codes~~ relevant design parameters, or phasing of development and infrastructure delivery, for the Strategic Urban Extension as a whole.
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For and on behalf of  
**Hampton Brook**

**Plan:MK Examination in Public  
Response to Inspectors Questions – Matter 8**

**Policies for Managing Development**



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Response to Inspector's Questions – Matter 8  
Insert nature of document and client

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## **0.0 EXECUTIVE SUMMARY**

- a. DLP Planning Limited have been instructed by Hampton Brook to respond to the inspector's questions in respect of Matter 3 and specifically in relation to their land interest in the following location;  
South Caldecotte (Land Allocated within policy SD16)
- b. Hampton Brook is a well-established local land promoter and developer; as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.



## **MATTER 8 Issue 2 – Design and Sustainable Construction**

### **1.0 QUESTION 8.9**

**ARE THE DESIGN POLICIES IN PLAN:MK JUSTIFIED,  
EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?  
ARE THEY UNDULY PRESCRIPTIVE AND WOULD THEY  
ALLOW FOR APPROPRIATE INNOVATION CONSISTENT  
WITH MKS MODERNITY?**

- 1.1 The Regulation 19 submission made on behalf of Hampton Brook set out why policy SC1 is not justified, effective or consistent with national policy and this written response seeks to expand upon this.
- 1.2 The requirements of policy SC1 are not justified. NPPG Guidance on Housing: optional technical standards (003 Reference ID: 10-003-20140306) sets out how Local Planning Authorities can set out technical requirements for new development.
- 1.3 The Housing Standards Review (March 2015) set out that there are a large number of complex and overlapping technical standards and seeks to simplify this. It also set out that the lack of co-ordination across standards and the way they are introduced, modified and enforced result in unnecessary costs and complexity. It is clear that the government's objective is to simplify and rationalise policy requirements for new development and it is seeking to do this primarily through the Building Regulations, with opt-in elements where justified through local plans.
- 1.4 Milton Keynes does have a unique character and modernity, but it is not demonstrated within policy SC1 or the preamble to this why the requirements set out in the policy are justified when technical standards already exist. There is no overriding reason why the modern nature of Milton Keynes should justify policies that are so out of step.
- 1.5 The policy does not seem to have taken into account viability as a concern. NPPG Guidance (003 Reference ID: 10-003-20140306) states that '*assessing viability*

*requires judgements which are informed by the relevant available facts. It requires a realistic understanding of the costs and the value of development in the local area and an understanding of the operation of the market.'*

- 1.6 It goes on to states that local plans 'should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable... Their cumulative cost should not cause development types or strategic sites to be unviable. Emerging policy requirements may need to be adjusted to ensure that the plan is able to deliver sustainable development.'
- 1.7 Furthermore, the proposed energy requirements in respect of major schemes are not effective. The requirement to provide on-site renewable generation does not take into account site specific concerns
- 1.8 Whilst it may be that the aim of meeting such high levels of environmental performance is well intended and that there may be savings over time, excessively high capital costs will have the effect of putting off development. The target of meeting BREEAM Outstanding is particularly onerous. The policy takes little account of development viability. The requirements of the policy are unduly onerous and will have a seriously detrimental impact on the viability of schemes coming forward within the plan period.
- 1.9 In particular, the uplifts between meeting Outstanding and Excellent BREEAM ratings, and Excellent and Very Good are sharp, as evidenced by the table below taken from a report by Sweett Group and the BRE in 2016:

|             |  Education |  Industrial |  Retail |  Office |  Mixed Use |
|-------------|---|--|--|--|---|
| Rating      | School  | Industrial   | Retail   | Office   | Mixed Use   |
| Very Good   | 0.2%  | 0.1%   | 0.2%   | 0.2%   | 0.15%   |
| Excellent   | 0.7%  | 0.4%   | 1.8%   | 0.8%   | 1.5%  |
| Outstanding | 5.8%  | 4.8%   | 10.1%  | 9.8%   | 4.8%  |

- 1.10 It must be noted that a plan wide viability assessment has been carried out but

assumes development will meet BREEAM 'Very Good' Standard. This is inconsistent.

- 1.11 The policy does not specify how monitoring would take place and there are concerns that this is unworkable as it is not clearly set out.
- 1.12 National Policy is set out within the NPPF and later within the NPPG. The most relevant part of the NPPG is the Housing Technical Standards.
- 1.13 The NPPG states that 'Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment. In considering the costs relating to optional Building Regulation requirements or the nationally described space standard, authorities may wish to take account of the evidence in the most recent Impact Assessment issued alongside the Housing Standards Review.'
- 1.14 Looking at Plan:MK, policy SC1 does not appear to comply with these policy aims in that it sets out additional policy requirements out of step with the national picture. It would be more appropriate to adopt a position more in line with the Building Regulations and any optional requirements, for example.
- 1.15 A number of the elements of policy SC1 are inconsistent with national policy. Government policy is clear that technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. In terms of energy and climate performance, policy SC1 requires major developments to:
  - 'a. Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013, or achieve any higher standard than this that is required under new national planning policy or Building Regulations.
  - b. Provide on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to a further 20% reduction in the residual carbon emissions subsequent to a) above

c. Make financial contributions to the Council's carbon offset fund to enable the residual carbon emissions subsequent to the a) and b) above to be offset by other local initiatives.

d. Calculate Indoor Air Quality and Overheating Risk performance for proposed new dwellings.

e. Implement a recognised quality regime that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of dwellings in d) above.

f. Put in place a recognised monitoring regime to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and the planning authority.'

1.16 The policy is unsound and should be removed from the plan. Issues of environmental performance can be dealt with adequately under the national guidance and technical standards.

## 2.0 QUESTION 8.10

**IS THE REQUIREMENT FOR A 19% CARBON REDUCTION ABOVE PART L 2013 BUILDING REGULATIONS AND ON SITE RENEWABLE ENERGY GENERATION OR CONNECTION TO A RENEWABLE ENERGY SCHEME THAT CONTRIBUTES TO A FURTHER 20% REDUCTION IN THE RESIDUAL CARBON EMISSIONS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY (NPPF PARAGRAPHS 95 AND 96)? WOULD IT BE VIABLE IN COMBINATION WITH OTHER POLICY REQUIREMENTS OF PLAN:MK?**

- 1.18 Paragraph 95 of the NPPF states that 'when setting any local requirement for a building's sustainability, do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards'
- 1.19 It should be noted that the zero carbon buildings policy was cancelled in 2015-16. A review of minimum energy requirements is due to take place in 2018. In this way Part L of the Building Regulations currently sets out requirements for carbon dioxide reduction in new development.
- 1.20 In terms of energy and climate performance, policy SC1 requires major developments to:
- 'a. Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013, or achieve any higher standard than this that is required under new national planning policy or Building Regulations.
  - b. Provide on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to a further 20% reduction in the residual carbon emissions subsequent to a) above
  - c. Make financial contributions to the Council's carbon offset fund to enable the residual carbon emissions subsequent to the a) and b) above to be offset by other

local initiatives.

- 1.21 Policy SC1 makes no reference to viability and as a result does not comply with paragraph 96 of the NPPF which requires development plan policies to make exception for viability.
- 1.22 It is not clear on what basis the policy requires greater carbon reduction above Building Regulations/ Very Good level when this is nationally set and the Government is seeking to simplify such matters. Similarly, it is not clear on this basis how part b) can be justified. Government guidance has been that from 2016 local authorities will not be able to require energy efficiency measures above Building Regulations.
- 1.23 In this way policy SC1 would not meet the soundness tests of paragraph 182 of the NPPF.

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