REPRESENTATIONS RECEIVED ON SOUTH CALDECOTTE DEVELOPMENT FRAMEWORK

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Milton Keynes Council Officers	
1.1	Gill King, Waste Strategy	The waste service is currently seeking sites for a range of waste management purposes to accommodate the growth in waste generated by the growth in population of Milton Keynes. South Caldecotte Employment area is suitable for some of these purposes and we would welcome the inclusion of a site for waste management use in the SPD.	
		MKC Councillors	
2.1	Cllr David Hopkins	 Highways Issues The access onto Brickhill Street means that traffic heading south will be directed onto the AS and through Hockliffe (an area with horrendous traffic issues already). Traffic heading north would be inevitably be directed onto Brickhill Street facing the level crossing as a 7.5 tonne limit exists through Bow Brickhill. The AS Roundabout (The McDonalds Roundabout as it has become known) is already at overcapacity and additional HGV and employee traffic at peaks times will cause gridlock. Up to 4000 employees travelling on to and of the site daily will add to an already congested local traffic system especially at the busiest times when combined with the nearby Tilbrook Business estate (already expanding) and the Caldecotte Business Park (also expanding) 	
2.2		Need This site was identified to overcome the lack of a site coming forward by Junction 14 of the MI and to meet a perceived shortfall of employment capacity in the Plan:MK. That position has now changed with a bid going to government for £94M for a bridge to add capacity for housing and employment on the northern side of the MI at that point. This is where (close to the MI) employers and developers want to locate large warehousing units they do not want to locate	

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	at the Caldecotte South site. The site should be held as a reserve site and reconsidered as part of the review of the Plan:MK due to be published in just two years' time (2021)	
2.3	The Consultation process The consultation contains flawed and misleading information regarding a possible bridge over the railway. The consultation itself is therefore flawed and should be withdrawn. Given that admitted indiscretion by MK Council stakeholders can have no confidence in the reliability of other assumptions/assurances provided in the consultation document. The documents should be withdrawn and independently reviewed by organisations that do not have a vested interest in the ongoing development development of Milton Keynes.	
2.4	Environmental Impacts The site is adjacent to the Greensand Ridge a site of outstanding natural beauty (AAL) and an area that should be protected rather than developed. If development must take place it should be much needed housing and leisure - even a sports training area.	
2.5	A Bridge over the Railway (Brickhill Street) Land needs to be preserved / retained to allow for a full scale bridge to be designed and constructed over the East West Rail line at the Brickhill Street crossing point There needs to be a master plan devised for the entire local area covering developments at Tilbrook, Caldecotte C, Caldecotte South, Expressway route options and linked to the SEMK master planning. No development should be permitted or considered until such a strategic planning document is agreed by MKC.	
2.6	I trust these points will be considered and that the site be removed from any consideration of development until either the review of Plan:MK is undertaken and published in 2021 or until 2023 to align with the earliest possible development allowed for SEMK.	

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	Parish Council	
-	On behalf of our clients Bow Brickhill Parish Council, I am writing to set out their significant objection to the SPD in its current form. Whilst we are of the view that supplementary planning guidance can play an important rol in providing certainty and guidance for both developers and communities, we have a rang of concerns in respect of the document, its scope, contents and understanding of the site. In addition, and perhaps most importantly it should not be used to avoid important policy considerations in Plan:MK or to bypass rigorous technical assessment. In its current form, our clients are deeply concerned over the impact that the proposals will have on their Parish and its residents. Set out herein are our client's objections to the documents that are broadly based on: • the legal requirement and scope for Supplementary Planning Guidance; • conflicts within national guidance; and • conflicts with policy set out within the recently adopted Milton Keynes Local Plan; In addition, I attach a report prepared by Miles White Consultants in respect of transportation. The Role of Supplementary Planning Guidance Our comments are based on the requirements of the Government in relation to the scope and purpose of Supplementary planning documents. Supplementary planning documents (including development briefs) are defined in the NPPF as "Documents which add furthedetail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design". NPPG (Paragraph: 008 Reference ID: 61-008-20190315) indicates that "Supplementary planning documents (SPDs) should build upon and provide more detailed advice of guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the	er

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	development plan. They are however a material consideration in decision-making". The guidance is clear that SPD's must be consistent with the Local Development Plan and not introduce new policy. Furthermore Para 8 (2) of the Town and Country Planning (Local Planning) (England) Regulations 2012 indicates that: • a supplementary planning document must contain a reasoned justification of the policies contained in it; • any policies contained in a supplementary planning document must not conflict with the adopted development plan; and • the policies contained in a local plan must be consistent with the adopted development plan. This position has been shaped by case law. In Westminster City Council v Great Portland Estates plc (1985) and R (on the application of JA Pye (Oxford) Ltd) v Oxford City Council (2002), it was made clear that guidelines ought properly to be included in the Development Plan so that interested parties would not be deprived of the right to object. Supplementary Planning Guidance may be used to supplement existing policies in the development plan but not change them or introduce new policies, and SPD should not be used to delegate the criteria for decisions on planning applications to the guidance. This, along with relevant Policy and Guidance, forms the basis for our comments. Accordingly, it is clearly the case that any documents that are to be adopted as supplementary guidance by a Local Authority must not add new policies to the development plan that would effectively remove the right of an interested party to object and be heard by an independent Inspector. Similarly, it is to be read alongside the adopted Plan so cannot remove the requirement for general compliance with the Development Plan or relevant legislation.	
3.2	We set out our comments based on the main sections of the document as follows: Section 1. Introduction The introduction to the SPD sets out an overview of what the document seeks to achieve, however, we are concerned that this is misleading and not reflective of the content of the	

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	document. Para 5.34 of Plan:MK indicates that a "comprehensive development brief" is to be prepared. Notwithstanding our clients objections to the Plan and the impacts that it will have on their community, we are of the view that it is important that any SPD is comprehensive particularly given the proximity of B2 and B8 land uses to much more sensitive C3 land uses and the significant impact upon the existing transportation network that is under significant strain already. However, we are concerned that the SPD is not comprehensive rather it raises numerous significant and far reaching concerns over the future of the site and the scale of development that the Council will consider acceptable. For instance it only deals summarily with key contextual matters (transport, noise, air quality, landscape, heritage and biodiversity) yet these could have significant impacts upon the nature of the eventual proposals and the SPD indicates that no EIA will be needed on the site without an understanding of the nature and scale of final proposals (limited information was provided in the Screening request). We are of the view that it should be treated as the EIA regulations intended, as a multistage consent and assessment will be required at each consent stage (Outline and Reserved Matters) in order to ensure that the impacts are dealt with robustly and not bypassed. It is in our view highly unusual and inappropriate for a potential outline application covering over 57ha of industrial development not to be subject to the rigour of an EIA especially given the likely significant impacts and need for mitigation. Our more detailed considerations on this are set out throughout our representations. We note at para 1.2.2 that the SPD indicates that it will ensure that the requirements of Plan:MK policy are respected. However, we are concerned that there are inherent conflicts with a number of key policies in Plan:MK and elements of the Development Framework (section 3) fail to make appropriate reference to key policies including	

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	considering how major constraints can be overcome particularly in respect of transport (given the significant likely impacts and level of mitigation that will be required), the unimplementable railway crossing and an understanding of the full extent of the heritage asset. Given the above, summarily (and for the reasons set out within the remainder of the document), our clients are concerned that far from demonstrating deliverability and providing a comprehensive brief, in fact the Brief only highlights all of the various problems and does not suggest how these can be dealt with through a planning application.	
3.3	East West Rail It is noted at para 1.6.5 that there are already significant delays at the Bow Brickhill Rail crossing with the gates closed for 14 to 15 minutes per hour. This excludes freight trains and in any event is expected to double by 2024 when the upgrade works are complete. Given the existing delays and the fact that this will only increase as train numbers intensifies, it seems imperative that any development at the site includes measure to ensure at the very least that the impact doesn't become any worse due to development, absent this then the proposals would not comply with relevant transport policies within Plan:MK. We consider this in more detail later in this submission.	
3.4	Railway Bridge It is our understanding that Network Rail have no intention of implementing the scheme at figure 1.3 nor is there any funding for doing so. Rather Network Rail have prepared two schemes (at appendix 1) that would meet their requirement these are shown below. Clearly these options would require land to be safeguarded within the site area and Network Rail's technical and operational requirements cannot be achieved on the basis of the figure included within the SPD. These options cannot be achieved given the content of the SPD. A Freedom of Information request was undertaken by a local resident in respect of the bridge. The information provided by the Council indicates: "No feasibility work for a bridge over the railway was carried out or commissioned by the council – the layout included in figure 1.3 being provided by the developer's consultant as part of their planning and design work supporting the preparation of a potential future planning submission.	

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	Milton Keynes officers considered the layout in figure 1.3 and agreed, that in principle would be possible to construct a bridge in this location with the existing road alignment. There are therefore no detailed drawings and calculations available for your consideration." It is therefore wholly misleading at para 1.6.3 of the SPD to suggest that the bridge is an option and more troubling that the drawing submitted (figure 1.3) contains no topographical information or consideration of the gradients required. We would expect that in order for this to have any credibility it would need to be accompanied as a minimum for it to be included in SPD to be accompanied by technical specifications setting out in detail how it will be achieved including in respect of the impact of the widened road and bridge, whether the gradients can be achieved, whether Network Rail's requirements can be met and result in an acceptable neighbouring scheme. However, the Council also confirm that no such technical information has been supplied to support this drawing. Our clients have had to commission their own feasibility work to help them understand whether the bridge is realistic or not. This was undertaken by transport consultants Miles White. Richard White of Miles White has significant experience of transportation schemes including previous roles as head of national engineering consultants. It is noted that any bridge over the railway would need to be around 5m above the line. The Brickhill Street/Station Road mini roundabout is approximately 80m south of the railway line and so a 1:16 gradient would be required on the realigned road if this junction is to be retained (and provide access to/from Bow Brickhill and beyond). Such a gradient is above the maximum gradient stated in TD 9/93 "Highway Link Design (Design Manual for Roads and Bridges) and therefore the bridge is not deliverable as shown in the Development Brief. 4.If an acceptable gradient were provided (1:25) then the bridge would meet Brickhill Street much further sout	

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	In light of the above, there is no reason for the inclusion of this drawing. Rather it will only blight properties around it that will be required for land forming to achieve the necessary levels.	
3.5	Section 2. The Site and its Context Currently limited information is available to feed into section 2. We note summarily that much greater detail will need to be prepared in terms of: 1. landscape and visual Impact; 2. the operation of the transport network and various constraints; 3. ecology; 4. archaeological assets; and 5. local built form and relationship with neighbouring land uses; These could all have an impact upon the final development framework with additional land being required for instance for landscape buffering, ensuring appropriate land uses between residential areas and B2/B8 uses, heritage preservation etc. To this extent we note that section 2.10 sets out opportunities and constraints however, little detail is provided on these and other constraints are omitted. For instance, it is clear that local highways infrastructure provides a constraint to development, but this is not identified as a constraint, whereas Plan:MK requires proposals to be acceptable in terms of highways impact and safety. Similarly, adjoining and close by residential uses are not considered to be a constraint however, the proposals will need to ensure that there is no harmful impact upon residential amenity (which could be in respect of the relationship of buildings, noise, air quality, transport etc).	
3.6	Section 3 Development Framework Given the lack of technical detail to inform the development framework, we are concerned that figure 3.5 suggests a very intensely developed site. Land uses We are strongly of the view that greater guidance should be issued on the land uses acceptable and the sizes of units. The scope for ancillary B1 uses needs to be more carefully defined given that there will be a far greater traffic generation from office uses,	

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	presently para 3.6.3 conflicts with the plan policy by stating that "SME Office and light industrial units" will be prevalent in North Brickhill Street, however, the policy wording of the plan does not allow for specific office units rather any offices would only be ancillary to B2 or B8 uses. Given the conflict within the document and the clearly uncertain nature of proposals, we are of the view that it is premature to conclude that an EIA is not required when the proposals are not actually known (we consider the need for an EIA under the next section) and given the wide ranging nature of B2 and B8 uses.	
3.7	In the first instance, we note the significant problems identified by Miles White Consultants with the railway crossing and figure 1.3. We do not repeat our concerns here. However, we set out additional matters that are not addressed in the brief. Grid Miles White have also considered a number of other elements of the Brief. They note that Paragraph 3.5.5 of the SPD states that: "It is the Council's intention to upgrade the whole length of Brickhill Street (south of the railway line) to grid road standard in order to serve growth in the wider area to the south east of Milton Keynes. The developer will be required to upgrade the length of Brickhill Street from the A5 roundabout to the new junction to grid road standard and make any further improvements that are necessitated by the Transport Assessment. The developer will be required to make a financial contribution towards improvements to the strategic highway network, which would include a contribution to the upgrade of the remainder of Brickhill Street to grid road standard." However, it is noted that Policy CT 8 in Plan:MK states that new grid roads will be 60m wide for non-residential land uses. If the Council intend to widen the Brickhill Street road corridor (currently a maximum of 15m) to 60m and avoid existing residential properties, it is clear that a large part of the site area will be required to achieve this. It is also unclear how the upgrading of Brickhill Street to grid road standard would affect the junction with Station Road (currently a mini roundabout). It is important to note that this	

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	junction provides the primary connection between Bow Brickhill, Milton Keynes and the wider road network. The extension of the grid road network will include the provision of a roadway along Brickhill Street and within the site along a new spine road. The MK Redway network (comprising shared pedestrian and cycle paths) stops at the level crossing on Brickhill Street. A public footpath runs along the northern edge of the site and passes under the railway line to provide access to Caldecotte. The Redway ends on the east side of Brickhill Street — so it will be necessary, for it to join up with a Redway on the site (on the west side), for a safe crossing on Brickhill Street will need to be devised otherwise this will not be achievable. It is clearly misleading not to include reference to policy CT2 of Plan:MK. This policy requires that development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport and support the transition to a low carbon future. In addition, section A notes that proposals will not be permitted: Integrate into our existing sustainable transport networks and do not have an inappropriate impact on the operation, safety or accessibility to the local or strategic highway networks; Mitigate impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, through the provision of, or contributions towards necessary and relevant transport improvements including those secured by legal agreement; Ensure that development proposals do not prejudice the future development or design of suitable adjoining sites; Do not result in inappropriate traffic generation or compromise highway safety. Furthermore, section B indicates that development proposals which generate a significant number of heavy goods vehicle movements will be required to demonstrate, by way of a Routing Management Plan, that no severe impacts are caused to the living conditions of residents or the natural environment.	

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	the introduction of grid road standards will have a significant adverse effect upon the existing transport infrastructure. Given this it is clear that the policy requirements of policy CT2 are at odds with the content of the SPD.	
3.8	Design In respect of design there are a number of other important policies within the Plan including SD1, D1, D2, D3 and D5 (in addition to SD14 and D3 that are listed under 3.6). Policy SD1 relates to place making principles for new development, including for the subject site. These include: • development integrates well with the surrounding built and natural environments; • development relates well to the surrounding area in terms of density, scale and materials, with positive site features, views and vistas incorporated into and used to structure the new development. • development takes a strategic, integrated and sustainable approach to water resource management. • development enhances the character of the area within which it is located. • impacts on the road network have been thoroughly identified through appropriate technical assessments and appropriate mitigation measures and improvements to the road network and public transport have been identified and incorporated into the development or the wider area as required. • development should result in a net gain in biodiversity through use of strategic, connected green infrastructure, in line with policies NE1-6 and ensure consideration is given to the historic environment in accordance with HE1 Policy D1 Designing a High Quality Place, indicates that development proposals will be permitted if they meet the following objectives/principles: • The development proposals as a whole respond appropriately to the site and surrounding context. • Continuity of street frontage and locating fronts of buildings to face the street or public	
	space. • Soft and hard landscaping that continues the verdant and green character of Milton	

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	Keynes, enhances the quality of the public realm, is robust to the demands placed upon the public realm, and is appropriate to their context and can be maintained and managed without significant whole life-costs. Policy D2 Creating a positive character requires that development proposals will be permitted if they meet the following objectives/principles: • The layout, massing/scale, boundary treatments and landscaping of a development and appearance of buildings exhibit a positive character or sense of place for a development. • The character of the development is locally inspired where appropriate • Where there is no positive built form character on the site or surrounding area, new development is designed to create its own distinctive character or sense of place using existing site features, the layout of the development and the appearance of buildings. • The design allows for visual interest through the careful use of detailing, where this is appropriate to the character of the area. Policy D3 in respect of the design of buildings requires that inter alia "the appearance of the building contributes to the enhancement or creation of a positive character for the development or of a particular character area for larger development" and "buildings are of appropriate scale in relation to other buildings in the immediate vicinity in terms of their height and massing." Similarly, Policy D5 requires that all proposals create and protect a good standard of amenity for buildings and surrounding areas. Clearly relevant plan policies place a great emphasis on design and ensuring that the amenity and character of surrounding areas is protected. However, these are not reflected in SPD in its current form. We are strongly of the view that the design section should provide more detail in respect of how the proposals will respond to their surroundings. In particular the development; • Relationship with neighbouring properties; • Landscape buffering; and	

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	- Detailed guidance on building parameters, positioning and land uses.	
3.9	Heritage We are concerned that in its current form the SPD is contrary to the requirements of the NPPF. Para 189. Indicates that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected. Where a site on which development is proposed includes heritage assets with archaeological interest as is established, local planning authorities should require developers to submit an appropriate desk-based assessment and, given the likely significant we are strongly of the view that a field evaluation should be submitted. Given the potential significance, there is the likelihood that preservation in situ could be required and elements of the site will need to be left undeveloped. Indeed, para 193 indicates that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The importance can only be known when the field evaluation is undertaken as such this	
3.10	Section 4 Delivery We note that the Council expect an outline planning application and which we would expect to be appropriate for such a development. However, we have significant concerns about an EIA being screened out at this stage. The development would fall under Schedule 2 of the EIA regulations and for any such project that exceeds the thresholds, the local planning authority should consider whether it is likely to have significant effects on the environment. In the case of Industrial Estate development projects, the threshold is 0.5ha. NPPG (Paragraph: 018 Reference ID: 4-018-20170728) indicates that in order to aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development. In this regard the government considers that projects over	

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	20ha are likely to have a significant impact, in particular in respect of potential increase in traffic, emissions and noise. Given that the site is 57ha (nearly three times the indicative threshold) and in close proximity to residential properties we cannot see how an EIA is not required. Particularly as B2 and B8 uses will have a significant impact upon traffic, emissions and noise (as well as a wide range of other impacts). We consider that this approach is contrary to the relevant Act and the requirement for screening. Undeed, we note that the Screening Opinion submitted by the landowner provides very limited information in order to reach anything other than this conclusion. Indeed, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 are clear that any screening request should provide the following detail at section 6 (2) (i): "a description of the physical characteristics of the development and, where relevant, of demolition works;" and at 6 (c): "a description of the aspects of the environment likely to be significantly affected by the development;" However, very limited information was provided in respect of these to enable the Authority to determine robustly that EIA should not be required despite its scale. The description of development given is very limited and the information that is required was effectively delegated to a subsequent planning application with the applicant considering that mitigation can be used to cover potential impacts. Indeed, the screening letter concludes: "Although the size of the development exceeds the indicative threshold where EIA is considered to be more likely to be required, the specific nature of the impacts and the locational characteristics of the Site mean that any effects on the environment, once mitigation measures are considered, are unlikely to be significant." However, we note that there are significant gaps in the information provided to reach such a conclusion, for instance: - Transport – no information is given on traffic g	

		(proposed change in bold, with new text underlined)
mitigation - Cumulate developm East Milto - Health — population screening - Ecology provided; - Archaeo the resour Given this mitigation parameter strongly of The Screen reflects the the Act ind (a) state the in Schedul (b) if it is of features of might othe It is clear the EIA is req prevent signerical.	lack of information we would question how it can be robustly concluded that will be suitably provided when the proposals are not actually known or sprovided? Given the scale of the scheme and the potential impacts, we are the view that insufficient information was provided. In provided that will be suitably provided when the proposals are not actually known or sprovided? Given the scale of the scheme and the potential impacts, we are the view that insufficient information was provided. In provided by the Council during September 2018 as lack of information and does not comply with the regulations. Section 5 (5) of icates that Local Authorities must: In provided in provided by the Council during September 2018 as lack of information and does not comply with the regulations. Section 5 (5) of icates that Local Authorities must: In provided in provided by the Council during September 2018 as lack of information and does not comply with the regulations. Section 5 (5) of icates that Local Authorities must:	

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		 - A Landscape and Visual Impacts Assessment; - A noise assessment; - An Air Quality assessment; - Archaeological Investigations report; and - Detailed parameters for building design and floorspace. In respect of noise and air quality, these are major omissions from the list given that they are the significant impacts that NPPG expects an industrial estate development project that is over 20ha to have. We would have thought that a development of the scale at South Caldecotte will have significant impacts in this regard that are well in excess of the level envisaged by Government advice at 20ha. Indeed, we are strongly of the view that it is a major oversight of the document not to set development parameters that can be assessed properly and through an EIA. Indeed, absent this safeguard Reserved Matters could go beyond the amount of development permitted at outline stage but could each trigger EIA themselves as part of a multi-stage consent. 	
3.11		Conclusion Our clients, Bow Brickhill Parish Council are deeply concerned over the lack of information provided within the SPD in its current form. They are equally concerned that an EIA Screening Opinion was provided that does not comply with the regulations and does not give any comfort that the impacts of such a scale of development can be adequately mitigated within the existing infrastructure and environment.	
4.1	Walton Community Council	Walton Community Council would like to thank you for the opportunity to comment on the consultation document – South Caldecotte Development Framework. The consultation document was discussed by Walton Community Council's Regulatory Committee at its meeting held on 25 June 2019 and was also the subject of discussion at the first meeting of the SE:MK Local Stakeholders Group, of which we are a member. Walton Community Council strongly opposes any development on the site until The requirement for a road bridge across the railway line at Bow Brickhill has been	

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	fully assessed and a solution acceptable to all parties is agreed. 2. The location of the Oxford to Cambridge Expressway has been identified. WCC refers Milton Keynes Council to a statement in its Neighbourhood Plan (Policy WNP6) in respect of the Caldecotte site 'C', but which equally applies to the South Caldecotte development framework. With regard to potential developers, it states that "Applicants shall demonstrate that they have engaged with East West Rail prior to submitting an application and should demonstrate in a planning statement that the proposal does not preclude the delivery of a preferred solution for a new railway crossing." At present the queues forming at Bow Brickhill level crossing during peak hours can be lengthy and can extend along Station Road into Woburn Sands and Bow Brickhill village. At rush hour, when the level crossing gates are closed, large traffic queues form along Brickhill Street between the A5 to the South and as far as Bletcham Way to the North. The level crossing gates are currently closed between 15 and 16 minutes in every hour. Network Rail intend to double the number of passenger trains as part of the East/West rail upgrade with up to 32 minutes of every hour being inaccessible during barrier down time. The rail upgrade, combined with development at Caldecotte site 'C', South Caldecotte and the delivery of 3,000 homes in the South East expansion area will generate untenable levels of congestion and until the location of the Cambridge to Oxford expressway has been identified, it would be inappropriate to commence development at any of these sites. Whilst Network Rail has no plans to provide a road crossing, the South Caldecotte development framework indicates that there is sufficient land available within the adopted highway to enable a bridge to be provided at some future date. At the delegated decision meeting held on 12 March 2019, the responsible Cabinet Member received a report that	
	stated "Feasibility work undertaken by the Council suggests that a bridge could be constructed on the existing line of Brickhill Street, subject to more detailed technical work and planning permission (indicated in Figure 1.3 of the South Caldecotte Development Framework). However, it has since been revealed that the Council has not undertaken any feasibility work and that the indicative drawing had been drawn up by the developer	

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	(Gallaghers). The report went on to further state "that this would not require the safeguarding of any land within the South Caldecotte", and WCC would consider that this has most certainly not been evidenced. Further, feasibility work has been carried out by Miles White Transport Consultants on behalf of Bow Brickhill Parish Council which indicates that the gradient of the bridge as drawn by Gallaghers, would exceed the maximum gradient permitted and is therefore, undeliverable. Walton Community Council would suggest that Milton Keynes Council carries out its own feasibility as soon as possible and that the South Caldecotte development framework should not be adopted until the results are widely known. In June 2015, Neil Sainsbury, Milton Keynes Council's Head of Urban Design and Landscape Architecture contacted Network Rail requesting them to state how much land would need to be reserved at Caldecotte Site 'C' for a future bridge over the railway line. In response, Network Rail had provided a solution for an over-bridge which was not located on Brickhill Street and which required significant land to be reserved on South Caldecotte and Caldecotte site 'C'. See below.	

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	Access to red track Provision for public footway required	
	Engaging with Network Rail is, in our view, more than merely requesting their plans or inviting their comment, but instead, should be about engaging and feasibility planning that can be demonstrated through documentation. It is clear to Walton Community Council that land must be reserved for a bridge on both sides of the railway line at both South Caldecotte and Caldecotte Site 'C' sites. The South Caldecotte development framework also states that "it is the Council's intention to upgrade the whole length of Brickhill Street (South of the railway line) to grid road standard in order to serve growth in the wider area to the south east of Milton Keynes".	
	Walton Community Council would suggest that this is delivered with the development of South Caldecotte and not delayed until delivery of SE:MK. Until Milton Keynes Council can finance their contribution to the road upgrade, the development framework should not be	

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		adopted Walton Community Council requests that Milton Keynes Council carries out a Transport Assessment of the entire SE:MK, accounting for all development in the area, prior to	
5.1	Wavendon Parish Council	 adoption of the SPD and any development taking place. Highways Issues The access onto Brickhill Street means that traffic heading south will be directed onto the A5 and through Hockliffe (an area with honendous traffic issues already). Traffic heading north would be directed onto Brickhill Street facing the level crossing as a 7.5 tonne limit exists through Bow Brickhill. Up to 4000 employees travelling on to and off the site daily will add to an already congested local traffic system especially at the busiest times with the nearby Tilbrook Business estate (already expanding) and the Caldecotte Business Park (also expanding). 	
5.2		Requirement? • This site was identified to overcome the lack of a site coming forward by Junction 14 of the M1. That position has now changed with a bid going to government for E94M for a bridge to add capacity for housing and employment on the northern side of the M1 at that point. This is where (close to the MI) employers and developers want to locate large warehousing units they do not want to locate at the Caldecotte South site.	
5.3		The Consultation process	
5.4		Environmental Impacts The site is adjacent to the Greensand Ridge a site of outstanding natural beauty and an area that should be protected rather than developed. The site should be reclassified for housing.	
5.5		A Bridge over the Railway (Brickhill Street) • Land needs to be preserved / retained to allow for a full scale bridge to be	

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		 constructed over the East West Rail line at the Brickhill Street crossing point. There needs to be a master plan devised for the entire local area covering developments at Tilbroook, Caldecotte C, Caldecotte South, Expressway route options and linked to the SEMK master planning. No development should be permitted or considered until such a strategic planning document is agreed by MKC. 	
6.1	Whaddon Parish Council	No comment.	Noted.
7.1	Broughton and Milton Keynes Parish Council	Broughton and Milton Keynes Parish Council (BMKPC) Planning and Licensing Committee has read and given due consideration to the detail of the South Caldecotte Development Framework Supplementary Planning Document 2019. The outcome of this is that BMKPC share many of the concerns expressed by both Bow Brickhill Parish Council and Woburn Sands Town Council. With specific regard to our Parish, BMKPC are concerned about the 'knock-on' impact of possible congestion and traffic issues on grid and more minor roads within the boundary of the Parish, caused by this development and in combination with others being proposed, for example the MK East Development Framework. BMKPC view is that these developments have to be viewed in combination, not in isolation	
8.1	Wolverton and Greenleys Town Council	We are pleased to see that the proposal for large employment site helps to strengthen the upgrade work on the Marston Vale Rail Line which in turn will help the Oxford to Cambridge upgrade.	
9.1	Little Brickhill Parish Council	Little Brickhill Parish Council wish to object in the strongest terms to the South Caldecotte development plan and our reasons are as follows: Highways and traffic issues Traffic on the A5 Kelly's Kitchen roundabout and the feeder roads are already exceeding maximum capacity. The new M1 junction 11a has created a substantial increase in A5 traffic and is already causing significant delays especially during	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	rush hours; this is prior to the impending increase created by the forthcoming Eaton Leys development. • Up to 4000 employees travelling on to and off the site daily will add to an already congested local traffic system especially at the peak times with the nearby Tilbrook Business Estate and the Caldecotte Business Park cunently undergoing expansion. • The Brickhill Street access means that North travelling traffic will be directed to cross the level crossing, particularly heavy goods vehicles as a 7.5 tonne limit prevents such vehicles using the Bow Brickhill route. • Brickhill Street experiences considerable queuing and delays at present when the level crossing is closed to enable passenger (and sometime freight) trains to pass. • The Revised Consultation Draft of the South Caldecotte Development Framework Supplementary Planning Document (SCSPD) states that the level crossing is currently closed for 15 minutes (or 25%) of every hour. Therefore, the capacity of Brickhill Street is significantly reduced and congestion regularly occurs • South travelling vehicles will be direc'ted onto the A5 though Hockcliffe and onto Junction 11a; Hockcliffe junction is already prone to extreme traffic problems with delays often exceeding 30 minutes during peak times, it would be madness to exacerbate this problem.	
9.2	 Need The South Caldecotte site was identified as a solution to the lack of sites by M1 Junction 14. That situation has now been resolved as a bid for 894 million has been put to the government for a bridge which will increase the capacity for housing and employment opportunity in that area. This is the preferred location by developers rather than the South Caldecotte site. When and if warehousing is required south of Junction 14, there are huge opportunities for such development around Junction 11a which would not create the local traffic issues likely with the South Caldecotte scheme. 	
9.3	A Bridge over the Railway (Brickhill Street) • Land needs to be preserved / retained to allow for a full scale bridge to be	

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	 constructed over the East West Rail line at the Brickhill Street crossing point. However, Plan MK Policy CT2 (B) states that developments that generate a significant number of heavy goods vehicle movements (as the site would) 'will be required to demonstrate that no severe impacts are caused to the efficient and safe operation of the road network and no material harm is caused to the living conditions of residents". Again, the current bridge and grid road proposals appear to be at odds with this policy. It transpires, following a Freedom of Information request, that the scheme was designed by the developers consultants and that no "feasibility work' has actually been undertaken by MKC. Any bridge over the railway would need to be around 5m above the line. The Brickhill Street/Station Road mini-roundabout is approximately 80m south of the railway line and so a 1:1 6 gradient would be required on the realigned road if this junction is to be retained to provide access to/from Bow Brickhill (and beyond). Such a gradient is above the maximum gradient stated in TD 9/93'Highway Link Design" (Design Manual for Roads and Bridges) and therefore the bridge crossing shown in the proposed development is not deliverable. If a suitable gradient were provided (1:25) the bridge would meet Brickhill Street much further south of the Station Road mini-roundabout, which begs the question how would Bow Brickhill be accessed from Brickhill Street. 	
9.4	Environmental Impacts The site is adjacent to the Greensand Ridge a site of outstanding natural beauty and an area that must be protected rather than developed.	
9.5	The Consultation process The consultation contains flawed and misleading information regarding a possible bridge over the railway. It follows that the consultation is flawed and should be Withdrawn. Little Brickhill Parish Council believes that Milton Keynes must devise plan for the entire local area covering developments atTilbroook, Caldecotte C, Caldecotte South, Expressway route options and that should be linked to the SEMK master plan. No	

Comment	Officer Response (proposed change in bold, with new text underlined)
development should be permitted or considered until such a strategic planning document is agreed by MKC.	
Other Stakeholders	
a vast industrial hub on the outskirts of the village. It is a totally inappropriate proposal for this area, which does not have the infrastructure to support it. Bow Brickhill is a rural village of some 260 properties situated in a designated area of natural beauty on the edge of the Greensand Ridge. The residents are justifiably proud of their village and its history and enjoy a strong community spirit in a safe, quiet, law-abiding environment — which cannot be said of everywhere these days. With heavy commercial vehicles roaring through 24 hours a day, this environment will be totally destroyed, property values will plummet, the lives of pets and children will be put at risk, the air will be even more polluted and the villagers' quality of life will be ruined. The rights of those who have chosen to make their homes and bring up their families in the tranquillity of a country village and not on the edge of a huge, noisy industrial complex, have to be respected. Already the infrastructure is struggling to cope with the demands of the new buildings in the area. Station Road, which was originally a sleepy track linking Bow Brickhill to Woburn Sands, has become the main route for those from the increasingly built-up outlying villages to access Milton Keynes and so is carrying far more traffic than it was designed to do. At busy times it can already take up to 15 minutes to join the traffic on Station Road from one of the side roads. There is only one pedestrian crossing (situated outside the school) and trying to cross anywhere else on foot is hazardous — due to the number of vehicles on the road. This country road can barely cope with the amount of traffic already using it and is not equipped for an influx of heavy vehicles.	
	development should be permitted or considered until such a strategic planning document is agreed by MKC. Other Stakeholders Bow As a long term resident of Bow Brickhill I object most strongly to the scheme of developing a vast industrial hub on the outskirts of the village. It is a totally inappropriate proposal for this area, which does not have the infrastructure to support it. Bow Brickhill is a rural village of some 260 properties situated in a designated area of natural beauty on the edge of the Greensand Ridge. The residents are justifiably proud of their village and its history and enjoy a strong community spirit in a safe, quiet, law-abiding environment — which cannot be said of everywhere these days. With heavy commercial vehicles roaring through 24 hours a day, this environment will be totally destroyed, property values will plummet, the lives of pets and children will be put at risk, the air will be even more polluted and the villagers' quality of life will be ruined. The rights of those who have chosen to make their homes and bring up their families in the tranquillity of a country village and not on the edge of a huge, noisy industrial complex, have to be respected. Already the infrastructure is struggling to cope with the demands of the new buildings in the area. Station Road, which was originally a sleepy track linking Bow Brickhill to Woburn Sands, has become the main route for those from the increasingly built-up outlying villages to access Milton Keynes and so is carrying far more traffic than it was designed to do. At busy times it can already take up to 15 minutes to join the traffic on Station Road from one of the side roads. There is only one pedestrian crossing (situated outside the school) and trying to cross anywhere else on foot is hazardous — due to the number of vehicles on the road. This country road can barely cope with the amount of traffic already using it and is

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	crossing, (where the entrance to this proposed development is to be) is frequently congested. When the railway barriers are down traffic can be backed up on Brickhill Street almost to the A5 roundabout and Station Road, our Village Street, becomes impassable. These roads are not designed to carry the size and weight of traffic which would be inflicted upon them if the South Caldecotte Commercial Hub were to be built, leading to a permanent traffic gridlock – impacting not only on those already using these roads but also making it difficult for the 'new traffic' to access the warehouses. I do wonder if those who put these proposals together have ever actually visited the area to research the resulting problems. I fear not!	
	The 'modernistic' design of these warehouses is totally outside the style and nature of the existing buildings in the area which are residential not commercial. Although there is an employment site north of the railway it is drastically different in appearance to that proposed for South Caldecotte.	
	The area designated for these buildings is at present, farm land, where crops are grown and sheep graze. On leaving the EU it will be more important than ever for this country to become as independent as possible in the production of food so it seems to be a crazy decision to destroy even more of our productive countryside – especially when there are already local commercial sites standing empty. If further warehousing is needed in the area would it not be a more sensible and economical decision to develop these rather than allowing them to become derelict and desecrating the countryside by building new?	
	There are also two small copses on the site, a haven for our native wild flora and fauna, which will be destroyed. Whatever is happening to our 'green and pleasant land'? If greedy developers have their way there will soon be nothing but concrete for our children to 'enjoy'.	
	I am at a loss to understand how this development can possibly benefit the village. It will grossly overload, with heavy traffic, roads which are even now struggling to cope; add enormously to the problems of an already congested village street and be an unsightly blot	

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	on our rural landscape with huge warehouses totally out of keeping with the village architecture and even with the commercial buildings in North Caldecotte. I can only hope that sanity will prevail and that the scheme to develop South Caldecotte in	
11.1 Christine French, Bow Brickhill	I am a resident of Bow Brickhill and the above proposed development is within the parish boundary. I believe there is a consultation set to run between 8th May and 3rd of July relating to the above development. I will be away for a few days next week so I am putting my views to you today. The Planners seemed to think that all traffic from the site will turn right and go south along the A5 to junction 11a to access the M1. Of course, if they are going north or east they will turn left and go across the railway line and across MK to access the M1 either at Junction 13 or 14. This will incur increased traffic for MK. Traffic turning left means that there is a need for a bridge across the railway line otherwise the bottleneck at the level crossing will become a major problem given traffic builds up at peak times and reaches back almost to the Mc Donalds roundabout. I believe that the land earmarked for a bridge has now been designated for housing. I realise that a dual carriageway has been promised, and, although this would help, it will not stop a bottleneck at the level crossing, nor at the roundabout. The McDonalds roundabout causes a large build up of traffic at peak times already. What implication does increased traffic have for Hockliffe given that they have a bottleneck problem there already? Given that the land is within the broad area of the intended Oxford - Cambridge Expressway surely the decision for this development should be shelved until a final decision on the route has been made?	

Consultee		e Comment	
		What plans are there for the archaeology and Magiovinium? I believe the site of a possible Roman Fort is within the boundaries. Why is it assumed that warehouse operators will want to locate here? Surely they are better off nearer to junction 14? I assume that the Council has some data on which to	
12.1	Gemma Lumsdon, Caldecotte	Thank you for sending your report on the proposed South Caldecotte development to local residents. I had no prior knowledge of this development and am quite concerned to hear about it. I agree with your comments regarding road access and location of the site. It does not seem like the most cost effective location for businesses when there is the current expansion of warehousing units out by J13 of the M1. I would have thought businesses would wish to be much closer to the M1 as whilst they can go south on the A5 to the M1, to go North, they would need to get across Milton Keynes. I am also strongly concerned about the parking provision at the site, given there are already considerable issues with the Caldecotte business park. If there were not enough spaces provided on the site, there are few other places employees would be able to park other than in Caldecotte or Bow Brickhill. This would only add further to the problem we already have with the businesses here and it is very concerning. Furthermore, traffic at rush hour is already extremely heavy on the roads around Caldecotte and out to the A5 along Brickhill Street. Queues out to the A5 often stretch down Brickhill Street and this is then compounded by the railway line crossing. A development of size would generate a significant amount of traffic at rush hour and cause lengthy queues and delays. If the development is to go ahead, I would like to see more than one entrance to the site from another road so that the volume of cars on Brickhill Street does not increase so substantially.	
		Overall, this development feels unnecessary given the volume of warehousing units	

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		already being constructed on the A421 to J13 and I believe it would have a considerable impact on the traffic and add to existing congestion with no proposed development of the road to be able to take additional traffic.	
13.1	Laura Shine	We would like to raise objections to the above development particularly on the following grounds:	
		1. Highways: traffic heading north or east will drive either up Brickhill Street or through Bow Brickhill/Woburn Sands. There is absolutely no chance that the traffic will go down to Junction 11A of the M1 unless heading south.	
		 The level crossing is already hazardous as the increased traffic over the last few years causes tailbacks. This will be worse as the Bow Brickhill to Woburn Sands development takes place with 3000 extra houses. A bridge will be needed to cross the railway, bearing in mind the additional rail traffic from the East- West line. No consideration seems to have been given for the so called Oxford-Cambridge expressway route (undetermined as yet) 	
		4. Environmentally we should avoid development adversely affecting the Greensand Ridge.	
		5. Is there a need for more warehousing in MK? If so isn't the best place alongside the M1.	
14.1	Mrs Marlborough	My suggestion for the proposed warehousing needs are:	
		There needs to be more thought for car parking needs. Caldecotte has a massive problem which I know you must be already aware.	
		2. I think a good idea would be to use this planning to put a railway link to MK1 via the Bedford to Bletchley line. MK is a thriving town, to provide a link to this shopping centre and the stadium would help keep cars off the road and also ensure the prosperity of the shopping centre that is there. With Bedford now loosing M and S, a lot of its customers	

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		would i think prefer a short train trip into MK1.	
15.1	Claire Feeley, Caldecotte	As a local resident in Caldecotte, may I voice my (loud) objection to this proposal. Increased traffic including HGV's driving through will significantly increase pollution and traffic congestion to already struggling section of highways. Caldecotte has already been detrimentally affected by parking issues due to the business park, and does not further disruptions. Additionally, as future plans to develop the area for the Oxford-MK rail service, surely, this area needs to be preserved to account for increased traffic/use/access to the area. Given the multitude of warehouse sites (with space) in other parts of MK, with better road access, this does not appear to be a good use of land.	
		As well as infrastructure concerns, I am also concerned about the environmental impact to the local area.	
16.1	Paula and Mike Ritschel	We are very concerned re the planned development for Caldecotte MK policy SD12. Surely a main concern would be the highways issues and although planned that the large vehicles would go down the A5 I am sure most would take the easy option and cut through very close to Caldecotte – this would cause a massive traffic increase/congestion and not only cause issues with volume of cars/lorries but also environment concerns. Surely the area would be best positioned next to the motorway for access? The trainline will also cause issues and would like to know what is happening re the bridge at Bow Brickhill – surely a massive concern and not left until this causes a problem – pre planning. The area is going to be so built up and open spaces for the green environment taken – resulting in a congestion problem and pollution from the continuous vehicles.	
17.1	Carol Gale, Bow Brickhill	It was disappointing to read that planning permission is being sought to build a number of unsightly and inappropriate warehouses on the land from Bow Brickhill railway station to the A5 roundabout. Can you please write and explain to me why you feel that covering productive arable land with concrete and warehouses is a good move.	
		I am almost certain that you will try to justify this by claiming it will generate much-needed	

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		employment. I think that you know that in reality development of this type provides very little additional employment. You are obviously au fait with modern technology and you will know that warehouses today are so designed o need very little manual input. How can you even think that cutting down hedgerows that have been there for decades, sheltering wildlife and pollinators, etc. will be a good move? It is obvious from what I have observed from new developments in Milton Keynes that the first thing you do will be to slice through the hedgerows without a second thought. May I just pose the question What will be the future for our children and grandchildren if we continue to concrete over fields that are generating food for us all. As a beekeeper I am saddened by every move that reduces forage for the bees. Not only that, we are being told weekly that our planet is under threat and a staggering number of pollinators and other wildlife is being destroyed and I can't help feeling that this development will be another nail in the coffin of our children's and grandchildren's future. Surely you can see that!	
18.1	Edmund Richards, Caldecotte	Being a current resident in the apartments near Caldecotte lake I am aware of the high levels on traffic around the Caldecotte area, and the large tailbacks that occur during rush hour on Brickhill street. I am currently not in support of further development of this area because the traffic and parking issues that occur in the area would significantly worsen. There would also be an increase of traffic on the A5 which again at rush hour already incurs large tailbacks at Hockcliffe and this would surely be pushed to unsustainable levels. I have however read the proposals and seen that there are plans for development of Brickhill street. I would be supportive of the plans if Brickhill street was developed during construction to a Grid street standard along its full length. I see no point in only improving the road between the site and the A5 as a bottleneck would still occur.	

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		Similarly, a bridge crossing the railway would simply have to be introduced alongside the development plans for them to be in any way successful. This is surely to be required at some point in the future with the development on the railway infrastructure in the East-West railway.	
		In summary:	
		I cannot support the current proposal. If all of Brickhill street was developed into a Grid road with 2 lanes and a bridge or underpass was built over the railway line during the development of this site I would be supportive.	
		It seems mindless to plan to develop the area before improving the transport infrastructure, and equally an ideal time to develop this infrastructure during the disruption that developing the site would enivitably bring.	
		However there are many aspects that I see as being exciting, having read the development proposals. If the brief of sustainable construction is acheived, if the transport is improved as above and if there actually is genuine need for this development I wish you luck with the plans, and look forward to seeing the results.	
19.1	Anthony Brett & Brian Lancaster	I would like to lodge my objection to the allocation of this site on the following grounds.	
		1. Is there really a need for any more big warehouses in the area and if so is this the right area for them? There are already large warehouses alongside the A421 near Kingston and in neighbouring Bedfordshire more are being built alongside the A421. If there is a need then surely it is better to build them near the M1 or roads like the A421 with easy access to the M1 without travelling through residential areas.	
		 Is it right to reserve this site when there will most likely be a need to replace the Bow Brickhill Railway level crossing with a bridge when the East-West Railway expansion happens? Any bridge will surely impact this site. 	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		 3. Also this site is in the East-West Expressway corridor and could again be impacted by an Expressway. 4. The traffic from this site will cause increased congestion to the local area. In terms of employee cars, some of which will increase traffic through Bow Brickhill as people travel to and from work adding to already intolerable levels of traffic, others will need to cross the railway therefore if this site prevents a bridge being built there will be intolerable delays at the level crossing at peak times. Lorries from the site will also cause congestion and pollution in the area, those turning left out of the site will cause congestion at the crossing or will travel through Bow Brickhill increasing traffic and pollution and damaging roads not meant for heavy lorries. Brickhill Street between the proposed site entrance and the level crossing is already suffering subsidence due to increased use by heavy lorries. 5. This plan will be detrimental to the village of Bow Brickhill and ruin it's rural appeal as these huge warehouses would be visible from the village and from Brickhill Woods making it appear that the area is part of urban Milton Keynes. 6. Once again planners want to build on greenfield land currently in agricultural use, how are we going to feed people if we keep building on this type of land? Are we going to import more food which adds to climate change in transporting it? I hope you will give these comment serious consideration. 	
20.1	Victoria Bishop, Bow Brickhill	I write to object to the proposal to allocate industrial units to the south Caldecotte site. The traffic volume and speed through Bow Brickhill is currently a massive problem. The village cannot cope with the existing traffic let alone to add to the volume. We live at the end of the village and at 8.30 every morning the traffic is at a stand still outside our house and all the way to the railway crossing. Cars turn round in the road to avoid such traffic jams. The road leading up to the A5 roundabout is a dangerous bit of road with cars refusing to wait for the level crossing and driving on the wrong side of the road to turn right into the	

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21.1	Bill Mather	village. There have been so many near misses and I dread to think what would happen with a greater volume of traffic. The Kelly's kitchen roundabout (A5 roundabout) is at a stand still during rush hour and this cannot be added to. We need to reduce the traffic round here and not add to it. I object to the development of industrial units. We should make use of all the empty units across Milton Keynes before we decide to build anymore. I write in response to the consultation on South Caldecotte Employment. I live at 2 Woburn Sands Rd, Bow Brickhill which is less than a mile from this site and have been at this property for 21 years. I do not understand why such a large distribution warehousing development is planned for a location that is not suitably situated for access to the M1, but rather will generate road haulage traffic that will: • stack up at the railway crossing on the route to and from the M1 north Junction 14 (an already huge blockage on a daily basis) • travel the busy A5 to and from the new Dunstable / Luton interchange with the M1 for south, or • drive through the communities in Bow Brickhill and Woburn Sands to connect to and from the Bedford and Cambridge route to the East. Perhaps the hope is that the lorries will all be heading to and from local north via the A5 – a very unlikely norm. And where is the incoming goods traffic going to come from if it's not	underlined)
		the M1? Warehousing produces little employment now that so much is automated, and the pay is at the lowest end. This plan provides too many logistics stores on completely the wrong side of MK for which we will suffer disruption and a down grading of the special environment of Greensand Ridge.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		As this site is in the corridor of the Oxford to Cambridge arc and express way it should be reserved until its relevance to the bigger picture can be established – not more of the same that has been MK's long standing fallback position as a warehousing city with cheap land near to the M1. Life is moving on. In summary I strongly object to what is an ill-conceived proposition for a significant site adjacent to special environment and village settings.	
22.1	Chris Evans, Caldecotte	I offer the following comments in respect of the Consultation regarding the allocation of the site known as Caldecotte South. First and foremost I would support the questioning of whether this is a site where any large warehouse operator would want to be located. It is patently obvious that links to the MI from this site are very poor. The idea of trucking goods South through the Hockliffe bottleneck is patently ludicrous and would soon result in demands for an expensive Hockliffe bypass and upgrading the A5 to all dual carriageway and the alternative of going North via the single carriageway A508 is only marginally better. As can already be seen, there are far more suitable sites for warehousing located very close to the MK motorway junctions.	
		I don't believe we should rush into building a bridge to replace the level crossing on the V10. That would surely come in just a few years anyway with the development of the Oxford/Cambridge Expressway.	
		Should the site be reserved for the Expressway? Yes, of course some of the site should be reserved for that now if it is known already that the route will pass through it.	
		Alternative uses for the site? I would leave it untouched for the time being and look urgently and very hard at finding emloyment sites on the west side of MK instead. Why? Because the original designers of MK took a look at Slough, where housing and employment were poorly integrated with consequential gridlock twice a day as half the city	

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		tries to drive across town to the other half, and made sure that housing and employment were very closly sited together in MK. The Slough mistake is now being repeated on the West side of MK with so much housing development and so little local employment. (Don't believe me? Try driving from Westcroft to the Hub at 8.30am on a weekday and, when stuck in traffic, spare a thought for how much worse it going to get as the new housing comes on stream on the West side)	
23.1	Richard Ogden	The plan assumes that traffic (whether construction traffic or related traffic once the development is constructed) would access the M1 via the A5 and the new junction near Dunstable. However, we think this is an optimistic assumption given the sometimes substantial delays caused by the Hockliffe traffic lights. Residents here fear that much traffic bound for the M1 would use either of two other routes. The first being V10 Brickhill Street, using the level crossing. This road is frequently subject to delays, particularly at peak times. The new development at Red Bull is expected to cause further problems. Unless V10 and its intersections are significantly upgraded, the roads infrastructure will not cope. Air pollution will increase. The second route is through Bow Brickhill via Station Road. Certainly unsuitable for HGV vehicles, the road passes Bow Brickhill Primary Schoolwhich sits at the side of this road. There is a 20mph speed limit at school arrival and departure times. Has anyone considered the impact on the schoolchildren of traffic fumes, inevitably to be much worsened through a combination of additional traffic likely through housing development of the agricultural land which runs along its length as well as traffic travelling from and to the proposed Caldecotte South employment site? This could be politically difficult for local representatives and seriously problematic if pollution limits apply. A further point. Sightings of Red Kites over this area are increasing. The woodland areas behind Bow Brickhill may already be used for nesting by these birds. This large bird is listed in Schedule 1 of the Wildlife and Countryside Act 1981. Any act which can lead to	

Consulted	9	Comment	Officer Response (proposed change in bold, with new text underlined)
		development, if it proceeds, is likely to cover a few years, both the current and future nesting sites of these rapidly expanding (in terms of territory) birds perhaps should be considered.	
		I'm no NIMBY, but one wonders why other sites much closer to the M1 are not considered more suitable for development. The Caldecotte Lake area is both an amenity to residents and visitors and an important green site for wildlife in Milton Keynes. Does it make any sense to introduce higher levels of disturbance and pollution into this area?	
24.1	Jeeten Patel, Bow Brickhill	I would like to raise my concerns for the site identified for the South Caldecotte Employment.	
		I am a resident of Bow Brickhill, and have witnessed traffic tailbacks during the peak the hours. With this potential development of warehouses, it will increase the footfall of traffic that bypasses on the A5 and more importantly through Brickhill street which is already heavily congested. This will only increase with other developments in the pipeline, and the infrastructure will not be able to cope with the additional traffic it will bring. When the rail crossing is closed, the tailbacks are over half a mile long, with this development it will mean it could potentially go all the way back to the A5. A number of people use this route to cut through the M1 onto the A5 and vice versa.	
		In times when the A5 is blocked, it could potentially mean the HGV vehicles use station road and into Woburn Sands to cut through to junction 13 of the M1. The roads are not suitable for this type of vehicles, nor the disruption and impact it brings to the wildlife.	
		The warehouses would not fit into the character and appearance of the surrounding area and open space. There is already vacant warehouses situated in close proximity which Tesco have recently vacated. Junc 13 & 14 have a number of warehouses which have better transport links and the infrastructure needed to support.	
		I note that there is a mention of traffic modelling and maybe a bridge for the railway,	

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		however I have great concerns that this needs to be carefully considered and modelled based on existing traffic problems, increase in volumes with this development and those within the surrounding areas currently in plan and considering along with others within the MK Plan to ensure it not only meets the needs of today, but the next 15-20 years.	
25.1	Janet & John Harper, Bow Brickhill	We would like to express our concerns at the proposed South Caldecotte development. We believe that the location of this project with its restricted access to the MI makes the site completely unsuitable as a warehousing and distribution centre. The distribution centre at Fenny Lock appears to have been unsuccessful, why is a project on an adjacent site likely to prove any better.	
		We understand from the presentation made by the planners in Bow Brickhill on 14 March 2019 that should the project go ahead, this will result in the movement of up to 85 heavy goods vehicles per hour, 24 hours per day and 400 additional commuters entering and leaving the site.	
		We think that insufficient thought has been given to the impact of this increased traffic on the local area.	
		At the presentation, it was indicated that vehicles travelling northbound on the MI would be "encouraged" (not sure how) to leave the M1 at J11A and travel via the A5. This route passes through Hockliffe which is already heavily congested and is a bottleneck for much of the day. As a result, drivers are more likely to leave the M1 at J13 which will inevitably result in them passing through Woburn Sands and Bow Brickhill.	
		The road through both of these villages is completely unsuitable for large vehicles. Station Road, Bow Brickhill and Brickhill Road already experience long tailbacks at peak times when the Bow Brickhill railway crossing is closed. Currently there are two trains per hour plus some freight trains and this is scheduled to increase to four trains per hour in the future which will further increase local congestion even without additional traffic from the South Caldecotte project. Travel for local residents in and out of Bow Brickhill is likely to	

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26.1 David Pettit, Bow Brickhill	become extremely difficult. With current Government initiatives on reducing traffic pollution, particularly near schools, it seems entirely inappropriate to be considering any project that has the potential to increase the volume of heavy traffic passing Bow Brickhill primary school which opens directly on to Station road, Bow Brickhill. No consideration appears to have been given to the proposed east – west expressway. Documents published so far seem to indicate a preferred route through Milton Keynes close to the Bedford to Bletchley railway line. It therefore seems completely inappropriate to consider any development in the area until the plans for the expressway and any upgrades to the Bedford Bletchley line are finalised. However, should this project go ahead, in spite of the numerous objections, action must be taken to restrict the movement of heavy vehicles through Woburn Sands and Bow Brickhill. As a resident of Bow Brickhill for the past 4 years, I would wish to make the following comments and voice my concerns. 1. Bow Brickhill is a small village situated on a "B" road, with a primary school along this road. We already have traffic queues causing pollution and risks to children. Currently there is a steady influx of traffic (including heavy lorries) already using Station Rd as a "rat run". This will only get worse and more dangerous. At the recent meeting, both the architect and developers claimed that heavy vehicles will turn right out of the site onto the A5, BUT as we all know, drivers will always try to find a quicker route. Surely this can be stopped by putting a weight restriction on Station Road. 2. At the meeting, I asked the developers how many of the units had been sold. He replied that at this time there was just 1 company showing an interest! How many empty warehouse units are there in Milton Keynes at present? I have just driven along the A421 to Bedford, and have seen the whole north side from the Motorway	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
27.1 Frank & Elizabeth Morris, Bow Brickhill	up to Kempston is currently under construction for warehouse units!!! 3. The future of the whole area is now under threat, with the Oxford-Cambridge expressway, and the upgraded rail-line running through Bow Brickhill. We will lose our village as it stands now and be swallowed up into the greater conurbation of MK. 4. When I moved to Bow Brickhill, I was advised that the Government had agreed a moratorium on building in the area until at least 2026. It now seems we are to get a further 3,000 houses between Wavendon and Bow Brickhill. What is there in place for additional infrastructure? 5. As it is, we remain partially cut-off, with only a bus every two hours, that does not even go to central Milton Keynes, our nearest shop is Woburn Sands 1½ miles away, will this improve with the proposed additional building? We write to express our grave concerns about the proposed South Caldecotte Employment Area. We have lived in the village of Bow Brickhill since 1968 and my parents, grandparents and great grandparents also lived in the village, so we feel that we have the right to comment. When we first moved here Station Road and Woburn Sands Road were typical village roads, used by cars, the occasional lorry, farm machinery, horses, cyclists and pedestrians. Not anymore! Although the roads themselves have not changed we estimate that the traffic has increased at least twentyfold. At peak times congestion at the junction with Brickhill Street and the Railway Crossing cause the traffic to come to a standstill through the village. Only the bravest horse riders venture onto the road and nearly all cyclists use the footpaths, some at very high speeds. Whilst this is totally illegal and very dangerous, their reasons for doing this are understandable. The traffic noise is now a continuous roar from early morning until late evening and it is impossible to have a normal conversation outside our house or in our garden. It lessens slightly during the night, but never stops completely for more than a few moments. The planned	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	between it and Junction 14 and when the A421 is finished their will be 12 roundabouts between it and junction 13. The site is next to the A5D. We understand a new roundabout is to be built on Brickhill Street adjacent to the proposed site. Having negotiated this traffic will then face the A5D south roundabout (already a notorious bottleneck). If going south. It will then come to Hockliffe (another bottleneck) before either joining the M1 link road north of Dunstable or continuing south on the A5 through Dunstable (another bottleneck). Vehicles heading north on the A5D will arrive at the Old Stratford roundabout (yet another bottleneck). They will then have a choice of going left to Buckingham, straight on to Towcester or right to Roade, all of whom already have major traffic problems. Undoubtedly some drivers will also decide to come through Bow Brickhill. Bearing in mind that, given the planned usage most of the extra traffic will be large articulated lorries not cars or small vans, it begs the question whether any of those proposing this development have ever driven around the area at peak times or even looked objectively at a road map. I doubt they have ever driven a heavy goods vehicle either! Turning to environmental issues, we believe that nationally there is major and increasing problem of traffic congestion. Listening to traffic reports on the radio whilst sitting daily in traffic jams you realise that every day throughout the country there are thousands of drivers doing the same thing, costing the UK economy millions of pounds and polluting the atmosphere. Add to this the recent United Nations proclamation that the global increase on greenhouse gases resulting from burning fossil fuels and deforestation of green areas and rural landscapes are leading to catastrophe, we wonder how MKC can support these proposals and yet claim to be "forward thinking". The original concept of Milton Keynes being "the city of trees" with "no building being taller than the tallest tree" seems to have been long since aband	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Recent events both nationally and locally indicate that we no longer live in a democracy. Nonetheless we believe that the views of local people should be respected and we request that you take our comments into account during your deliberations.	
28.1	Anne Burkle, Caldecotte	We live in Caldecotte and share the concerns of many of our neighbours, and Cllr. David Hopkins, about plans for this site.	
		Parking in streets around and near the Business Park is already ridiculous! Any plans which would increase traffic and parking problems are insupportable. The proposal for a bridge over the railway at Brickhill Street would seem to be a sensible and useful idea. We also believe that the Oxford - MK - Cambridge Expressway is an important future project merits support – rather than the proposal for warehousing.	
29.1	Steve Revill- Darton, Parks Trust	The Parks Trust would like to express their support in principle for the proposals outlined in the South Caldecotte Development Framework Supplementary Planning Document for the provision of public open space and green infrastructure. We welcome the opportunity to submit comments on this document as part of the consultation process to improve the quality of the development framework going forwards. Please find our comments in detail below.	
29.2		2.3 Surrounding Area and Edge Conditions Section 2.3.1 bears no reference to the fact that Caldecotte Lake is situated in an area of linear park. Linear parks are one of the defining characteristics of Milton Keynes and should be referred to in this section as the site borders one of these areas and is required to integrate with it through pedestrian and cycle connections. We would also recommend that further reference is made in section 2.3.4 to the area of linear park to the south of the site at Waterhall Park as the site is required to improve connections between these strategically important greenspaces.	
29.3		2.5 Landscape Character The Parks Trust would recommend that section 2.5.2 is used to stress the importance of the site location on the urban-rural fringe, an area of landscape transition from Linear Park	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	to Greensands Ridge.	
29.4	2.6 Habitat and Vegetation Section refers to the area of Priority Habitat in the central west of the site. The Parks Trust consider this to be an important environmental asset that has the potential to be further enhanced by the development of South Caldecotte. We would request that the following line is omitted from the development framework document: 'Overall it is considered that the grassland represents a fairly poor quality example of lowland meadow habitat type.'	
29.5	2.8 Existing Road Hierarchy, Pedestrian and Cycle Routes The Parks Trust would recommend that in this section reference is made to the existing underpass of A5 and the potential to connect from the site to the scheduled monument.	
29.6	3.2 The Vision The Parks Trust would like to express its support for Section 3.2 The Vision. However, we feel that the second paragraph could be amended in order to add further impetus and importance to the provision of well-designed, multifunctional green infrastructure. For example: 'A strategic employment development, founded on best practice in urban design, sustainable development and green infrastructure, providing and creating a well-landscaped transition from countryside to the built up area.'	
29.7	3.4 Landscape and Open Space Strategy Section 3.4.1 states that the site should provide 'a landscaped buffer along the northern boundary (railway line) of the site.' This feature does not appear in Figure 3.1 Open Space and Landscape Strategy, this drawing should be amended to include this. This feature is also missing from Figure 3.5 Development Framework Plan. The Parks Trust welcomes the encouragement to retain existing trees and hedgerows in section 3.4.2 and where this is unavoidable and justified compensatory mitigation is provided. It is however, important that the mitigation hierarchy is clarified and upheld in order to ensure that mitigation is of a satisfactory standard. We would recommend that that the final sentence of section 3.4.5 is amended to reflect the importance of appropriate measures being put in place to enable sufficient mitigation of wildlife habitat should preservation and restoration not be possible. We would recommend that the following text used: 'Applications should seek to preserve and restore this habitat.	

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	If evidence indicates that this is not possible, appropriate and sufficient mitigation measures must be demonstrated at the planning stage.' The Parks Trust would also recommend that further clarity is given over the evidence required to demonstrate that preservation and restoration is not possible. Can a threshold point be identified here? The Parks Trust would like to express concerns over the requirements stated in section 3.4.8 for the Green Link. Whilst we support and promote the use of multi-functional green infrastructure in this instance it may be the case that too much is being asked of a restricted and constrained area. It is very likely that should the green link be required to cater for all these functions it may result in them being compromised. It may be more appropriate to promote the use of other areas of the site, such as the area of priority habitat, as more appropriate locations for some of these functions, for example ecological enhancement and sustainable drainage, thereby reducing the pressure on the green link and improving the provision of the remaining functions. The Parks Trust support the inclusion of section 3.4.10 however, we would request that this paragraph is revised to reflect the wording in the forthcoming planning obligations SPD. We would also recommend that is stated at this point that the design of the green link, as well as other areas of POS and green infrastructure, is undertaken in conjunction with The Parks Trust. We would recommend that the following text is used: 'The green link, and other areas of public open space and green infrastructure, should be planned and designed in conjunction with The Parks Trust as the Council's preferred body for the ongoing management and maintenance. Upon completion the green link, POS and green infrastructure on the site should be transferred to an appropriate and adequately-resourced stewardship body, such as The Parks Trust as is the council's preference, to ensure that these spaces are managed and maintained in perpetuity.'	
29.8	3.5 Movement Framework In regard to both sections 3.5.5 and 3.5.6 The Parks Trust would like clarity regarding the future status of the grid road and the landscaped grid road corridor. Elsewhere in Milton Keynes the grid road corridors are under ownership, maintenance and management arrangement between Milton Keynes Council and The Parks Trust. This allows The Parks Trust to maintain these corridors as strategic green infrastructure that supports the grey	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	infrastructure function and maintain the grid roads as one of the integral characteristics of Milton Keynes. Will this arrangement be extended through this aspiration to upgrade Brickhill Street to grid road standard? If so this should be designed in conjunction with The Parks Trust. Any upgrading should also be done with further future proofing in mind to enable further infrastructure improvements such as public transport provision and carriageway widening to mitigate any further impact on any green infrastructure developed as a part of the initial upgrade. The Parks Trust supports section 3.5.10 and the reference to the site connections and offsite footpath/leisure route provision to Caldecotte lake to the north and future connections to the SEMK Strategic Urban Extension. This section should also refer to the potential future connections to the south and the scheduled monument and Waterhall Park and the design of pedestrian and cycle links should be done in a way that enables these connections. We would recommend that this sections also states that all pedestrian and cycle connections must to be designed in conjunction with The Parks Trust as the current and future land owners. This must include provision for signage and wayfinding at key thresholds. The Parks Trust supports the inclusion of section 3.5.11 however, the same queries raised around section 3.5.5 also apply here and we would require clarity on this. The Parks Trust recommends that the opportunity is taken here to stress the importance of the intrinsic link between green infrastructure, active travel and the promotion of healthy communities. The Parks Trust supports the inclusion of 3.5.12 and where the redirection of existing public rights of way is required to accommodate development The Parks Trust encourages the developers to work closely with Milton Keynes Council's Public Rights of Way Officer, as well as the party responsible for the ongoing management and maintenance of the public open space in which the footpath is accommodated.	
29.9	3.6 Design The Parks Trust would like to encourage the council to use this opportunity to emphasise the importance of green infrastructure in Milton Keynes by amending the character area described in section 3.6.2 from the 'Gateway' to 'Green Gateway'. This could be an	

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		opportunity to encourage and promote the latest in sustainable construction methods in a well-designed landscape, an example of best practice in a prominent and visible location at an entry point to Milton Keynes. This could be an opportunity to address policies D1, D2 and D4 of Plan:MK as well as policy SC1. The Parks Trust would also like to stress the importance of highlighting the significance of well-designed landscape and green infrastructure in section 3.6 Design .	
29.10		3.7 Sustainability The Parks Trust supports the inclusion of section 3.7.2 and the recommendation that SuDS provision should be multi-functional. It could be appropriate to emphasise the opportunity presented by appropriately designed SuDS provision to enhance biodiversity. It is imperative that SuDS provision is seen to contribute to the wider provision of a network of multi-functional green infrastructure that extends beyond the extents of the site. The Parks Trust supports section 3.7.3 and would encourage the relevant parties to involve The Parks Trust in the design process at the earliest possible opportunity to ensure the delivery of the best results and seamless integration into the wider green infrastructure network.	
29.11		4.2 Management and Maintenance The Parks Trust request that section 4.2.3 is revised to reflect the wording in the forthcoming planning obligations SPD. We would recommend that the following text is used: 'The developer will provide for maintenance of the completed green space link. This should include transfer of the green link, POS and green infrastructure on the site should be transferred to an appropriate and adequately-resourced stewardship body, such as The Parks Trust as is the council's preference, to ensure that these spaces are managed and maintained in perpetuity.' The Parks Trust supports the inclusion of section 4.2.4 however, we would request that this point is reinforced in section 3.7.3 as requested above	
30.1	Colin Cornish, Bow Brickhill	I have a few significant concerns regarding this proposal: 1. Traffic: I suggest you go and look at the current traffic at rush hour along the road proposed as an entrance. It is already close to gridlock and the queuing produces some very dangerous driving round the wrong side of the mini roundabout when the level	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		crossing is shut. When you add on lorries turning right to get to the A5 and you will block the traffic coming in from the A5, causing an accident hotspot, and the jam will escalate backwards onto a very busy roundabout. If lorries from the site turn left onto this road, it has a good chance of becoming gridlocked, effectively isolating the village and Woburn Sands, and blocking the south exit of Milton Keynes. I cannot see the queuing drivers becoming more patient as the waiting time increases, and the potential for accidents will magnify.	
		2. The proposed business park will increase heavy traffic through both Woburn Sands and Bow Brickhill where there is a primary school - it is no use kidding yourself this won't happen - it will.	
		3. Increased traffic is bound to impact on the environment through air and noise pollution.	
		3. Despite the best effort of Council planners, and the usual shark developers, the village of Bow Brickhill is just about hanging on to being a village, I strongly suspect that if this goes ahead will become just another subsumed living area - no character or independence.	
		This is a catastrophic idea for this locality.	
31.1	Claire Cornish, Bow Brickhill	I suggest you go and look at the current traffic at rush hour along the road proposed as an entrance.	
		It is already close to gridlock and the queuing produces some very dangerous driving round the wrong side of the mini roundabout when the level crossing is shut.	
		Add on lorries turning right to get to the A5 and you will block the traffic coming in from the A5, causing an accident hotspot, and the jam will escalate backwards onto a very busy roundabout. So I suspect the planners will not allow a right turn from this new development.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Add on lorries from the site turning left onto this road, and it has a good chance of becoming gridlocked, effectively isolating the village and Woburn Sands, and blocking the south exit of Milton Keynes. I cannot see the queuing drivers becoming more patient as the waiting time increases, and the potential for accidents will magnify. Just for traffic reasons this is a catastrophic idea for this locality.	
32.1	Annie Ottaway, Berks, Bucks & Oxon Wildlife Trust	Para 3.4.7 BBOWT agrees that wherever possible net gains for biodiversity should be incorporated into the development site. However, this paragraph should be extended to be clear that where this is not possible then net gains for biodiversity will be required via an off-site compensation scheme as per policy NE3. The SPD should specify that overall a measurable 20% gain (as a minimum) in biodiversity should be provided by the development. Net gain is in line with current Government proposals and best practice guidance and the Natural Environment Partnership have recommended a 20% gain as appropriate for Bucks and Milton Keynes.	
33.1	Kathryn Renacre & Colin Whitford, Caldecotte	We are residents of Caldecotte, Milton Keynes. We are writing to strongly object to the proposals we have seen known as the South Caldecotte Development, including the particular proposals of the developers, Hampton brook. The development proposed is of large scale and would have a potentially enormous detrimental impact on our local environment and community here. Our main objections are summarized below:	
33.2		Environmental. This proposal is to develop an industrial site on an enormous scale, on a green field site, in an environment of farmland, near to residential housing. The proposed development will destroy countryside and a thriving environment for wildlife. It will irrevocably change the environment of this rural area. It appears that the area is currently farmland. If it is not to continue to be farmed for some	

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	other reason, then it could alternatively provide an area of natural parkland, an amenity which is increasingly disappearing from Milton Keynes.	
	If the proposals do go ahead, there is no evidence in the proposals of the nature of landscaping and sound-screening to be provided by the developers - surely these should be an important requirement? Further, there is no evidence that the developers are intending to contribute any other facilities or support for the community in 'exchange' for the severe damage to the local environment and countryside. Surely some considerable contribution for the local community benefit should be a minimum requirement for this reduction in amenity locally?	
33.3	Need for the Development We have seen no evidence to support the need for further large scale warehousing, nor the smaller industrial units proposed, in this area. There are many existing industrial sites within Milton Keynes that are not fully occupied/utilised, and in that context, it is inappropriate.	
33.4	Highways Issues: Making Brickhill Street Dangerous: The proposed site access from Brickhill Street will make Brickhill street into a major through route, with much more industrial traffic, in particular large lorries. The road is totally unsuitable for this. It is currently a country road and the proposal is dangerous. If in view of this, it is subsequently proposed to increase the size of the Brickhill Street road from the A5 roundabout to the proposed site entrance, this will not alleviate the problems, since in addition to accessing the site from the A5 roundabout, lorries will inevitably come through MK, southwards down Brickhill Street. The road is already busy at most times of the day and in particular the start and finish of the working day, when there are frequent queues. Increased, industrial traffic will make it dangerous.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
33.5		The Need for a Bridget at Bow Brickhill Station:	
		The railway crossing at Bow Brickhill is already a bottleneck. Additional traffic will be dangerous and will lead to further traffic jams. We understand that, at some point, a bridge is proposed for that crossing. It appears however from the developers' plans, that their boundary goes right up to the junction and crossing. While the developers say that it is the Council's responsibility to ensure that these issues are overcome, surely the whole development and safe road access should be considered and resolved at the same time?	
33.6		Car Parking in Caldecotte: Car parking is already a significant issue in Caldecotte, due to the Tilbrook industries and Caldecotte Business Park not providing sufficient parking for their employees. Workers are	
		parking in the station car park all day and increasingly in residential areas of Caldecotte. The developers again say that this would be a Council problem, not theirs. We can only think that unless the issue is addressed as a strategic part of the proposal, the nature of the problem will increase significantly with this development.	
34.1	Andy Keene, Caldecotte	Please find listed below some comments I would raise in respect of the varioius proposals for Caldecotte and the local area: 1) Car Parking	
		The Council seem to think that the introduction of a Residents Permit scheme will sort the problem. It is obvious that all that will happen is that the workers who currently park in the proposed restricted areas will move elsewhere in Caldecotte and cause frustation and issues for other residents. How is that a solution?	
		Why have the Council not worked with the Business Park owners to develop the waste land near the entrance to the Business Park and turn it into car parking for the employees? In addition why have there not been regular patrols by traffic enforcement officers to deal with the sometimes reckless parking on the estate. There have been times	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
35.1	Carolyn Naylor, Caldecotte	busses have struggled to get through, heaven forbid if a Fire Engine or Ambulance tried to get through! 2) Proposed Warehousing Developments Why choose a location so far from the M1 when there are plenty of areas nearer the Motorway which would not have impact on local residential areas? 3) Railway crossing at Bow Brickhill With the proposed increase in rail traffic and potential impact of the Warehouse Developments there must be a need now for a bridge to cross the railway line at Bow Brickhill. The tail back of traffic during peak times can be huge and even stretches back to the roundabout where the V10 crosses the H11 leading to potential problems for other vehicles trying to cross town. I am writing, as a resident of Caldecotte, to express my support of the proposal by Councillor David Hopkins to delay the various plans in the Caldecotte area until a comprehensive and inclusive master plan for the area can be formulated. This proposal will be raised at the MK Council Cabinet meeting on Tuesday 4th June. I am deeply concerned that piecemeal development in the Caldecotte area will cause issues of infrastructure because of the impact on the local road system and the level crossing at Bow Brickhill station. It seems wholly inappropriate to develop a warehousing hub along the V10, close to the level crossing and the future route of the East -West Oxford to Cambridge train line. Should a bridge not be built over the railway line when the East's West route is opened, then the barriers on the level crossing will be down for 30 minutes in each hour, with the attendant knock on effect of queuing traffic. Alternatively, heavy lorries attempting to join the M1 by going south down the A5 will need to pass through the built up area of Hockcliffe. At this point there are already traffic problems and delays at the traffic lights.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	I attach below the proposal by councillor Hopkins for your reference:- Item from Councillor D Hopkins - Bedford to Bletchley Railway Line "The Cabinet member may be aware that the second consultation has commenced on the South Caldecotte Development Framework Supplementary Planning Document for 57 hectares of employment with access from Brickhill Street, V10. A consultation was recently concluded on Caldecotte C which is to the north of the Bedford to Bletchley railway line and is under the indirect ownership of this Council. The site which is destined for housing is to be accessed mainly from V10. The earliest preparatory work is underway with key stakeholders into the development in Plan:MK (from 2023 onwards) of the South East Milton Keynes urban extension, which will derive much of its access from V10. This area of land is also under consideration as a route for the planned Oxford – MK – Cambridge Expressway. Inadequate parking for Caldecotte Business Park is leading to a soon-to-be- implemented Caldecotte residents'-only parking scheme, which will displace parking problems to neighbouring areas on either side of V10. Red Bull is about to embark upon a major campus redesign and extension at its site, adjacent to the railway and V10 at Tilbrook. This will see its partners Aston Martin moving back into MK in a significant way, increasing employee numbers and enhancing our brand 'MK' and its reputation for attracting innovative and forward focused businesses. The V10 currently serves as an important east-west link and will increasingly do so, for Eaton Leys development and future housing allocations to the west as required by the inspector of the Aylesbury Vale Local Plan. Currently the level crossing at Bow Brickhill on V10 is shut (with the barriers down) for up to 15 minutes in the hour, leading to long queues at rush hours. The Bedford to Bletchley railway forms part of the East West rail project which anticipates increasing levels of freight traffic and a doubling of passenger services from 2023.	
	There is speculation and considerable confusion about the future need for a road bridge at this point to replace the level crossing so that V10 can remain open, operating as a grid road for this essential traffic gateway into a significant area of south Milton Keynes.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
36.1	Brian Naylor, Caldecotte	Given the enormous importance of this area for the future of Milton Keynes, the apparent disconnect between the various projects highlighted above and the need to ensure that options for future solutions are retained, the Cabinet member is requested to: 1. Halt the current Caldecotte South consultation (until 3 and 4 below have been completed); 2. Declare a planning moratorium on any decisions relating to any development of the land known as Caldecotte C (until 3 and 4 below have been completed); 3. Arrange a meeting involving all interested parties, examining the options for the reservation of land for a properly designed and budgeted grid road bridge on V10 across the Bedford to Bletchley railway; and 4. Arrange a broader series of meetings with local stakeholders (including Bow Brickhill Parish Council, Walton Community Council and local elected members), Network Rail, land owners, Red Bull and the Caldecotte Business Park management company to prepare a local area masterplan that takes into account all the competing priorities listed above." I am deeply concerned that piecemeal development in the Caldecotte area will cause issues of infrastructure because of the impact on the local road system and the level crossing at Bow Brickhill station. It seems wholly inappropriate to develop a warehousing hub along the V10 / A5 corridor. 1. The V10 to A5 roundabout route already suffers from severe delays, delaying travel by	
		up to 30 mins when it should only take 2 mins. It is at its worst during rush hours or when more than one train goes across the crossing in short succession. 2. The traffic chaos overflows into Caldecotte during rush hour causing grid lock. 3 The proposals do not allow for a bridge to be built over the crossing which impacts the proposed east west rail proposal. We need joined up thinking on this development. 4. I don't understand why this is being planned without demand for extra warehouse space. 5. Wouldn't it be better to keep warehouse planning close to the M1 which is better designed for high volume trucks.	
37.1	Rosemary Kemp, Caldecotte	The proposed development concerns a huge swathe of land between Bow Brickhill station and the AS roundabout. I cannot quite believe that this entire section of land will be swallowed up by warehouses.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	As I drive past the area, I see lots of trees, a large amount of hedges, and fields. (see 2.6) I know for a fact that there are a lot of nesting birds in this swathe of countryside and I think it would be unthinkable to just wipe them all out, which is effectively what your plan would do. In 2.5, you refer to Landscape Character. You talk about promoting hedgerow restoration and improvements throughout the area to provide links between existing and proposed woodland. Whilst I applaud the restoration of hedgerows, I wonder if that would actually happen. The thing about hedges is they take time to establish and it is a well-documented fact that the grubbing up of hedgerows in the UK has impacted massively on bird populations. I would argue that it would be better to leave the hedges intact in the first place. In 3.4.2, you state that 'where possible existing trees and hedgerows should be retained' and 'where the loss of the former is unavoidable.and 'can be justified' compensatory planting should be undertaken elsewhere within the site. With respect, I think we know that this would not make up for the removal of the said trees and hedgerows.	
	Furthermore, in 3.4.6, a 'wildlife corridor' is identified to the western boundary, adjacent to the AS and also along the northern boundary, adjacent to the railway. You state that these should 'be retained and enhanced as ecological habitats'. How can they possibly be retained when the proposal intends to fell the existing trees, hedges and develop the land which they border? You may consider that you have saved the 'wildlife corridors' but there may not be any wildlife left to use them! The lowland meadow in the west of the proposed site is important despite the fact that your document appears to have nearly written it off (2.6) and should be a cause for concern in terms of development. In 2.6, the wildlife habitat provided by watercourses running through the site are mentioned. So there is an acknowledgement that there are issues concerning loss of habitat here. However all the so-called provision states is that there will be 'further survey work' which does not give any reassurance that any positive steps will be taken to look after this particular habitat.	
37.2	Moving onto archaeological matters. There is 'an area of buried archaeological	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	remains in the southern part of the site.' The surveys have apparently revealed a Roman street with buildings besides. (2.7) I cannot imagine why you would continue with a development when this is the case. Surely such remains should be carefully preserved intact within their original position	
37.3	Finally, the impact upon those living in Caldecotte nearby cannot be disputed. In 2.8, the pinchpoint at Bow Brickhill level crossing is referred to. As someone who lives directly behind the crossing, I can confirm that there is already a problem with traffic at this point. I am very concerned that the proposed development will only add to the already chaotic situation. With HGVs going up and down Brickhill Street and in and out of the proposed site, this will have a hugely detrimental effect on the estate of Caldecotte. In 3.5.4, a new junction off the Brickhill Street is proposed to take traffic leaving the site, however, this will not mitigate the traffic at the Bow Brickhill crossing as far as I can see, and can only add to it. The vehicles using the site will still have to go somewhere and inevitably there will be a build-up of traffic and congestion along that stretch of the road and over the crossing affecting Caldecotte. In 1.6.7 it states that Network Rail has 'no plans to provide a bridge over the railway line' at Bow Brickhill but there is considered to be sufficient land available 'within the adopted highway' for a bridge to be built at a later date. It is of concern that the said bridge may or may not be built at a future date. There is obviously a need for a bridge sooner rather than later and I would have thought that it would be the very least that the MK Council should do given the sheer scale of the proposed development.	
37.4	In section 3.7.6 Noise and Air Quality is referred to. This is of great concern to local residents. I read that a Noise and Vibration Impact Assessment and Air Quality Assessment will be required to be conducted in the event of any application. I think that reading between the lines here, we know that it is going to be both noisy, living near the proposed site and that the air quality will obviously be affected adversely.	
37.5	When we moved to Caldecotte, it was a beautiful estate with the lake just 5 minutes	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		walk away, and relatively quiet. Now, Caldecotte is blighted by the business park and subsequent traffic, and is about to get a whole lot worse if the South Caldecotte Employment plan goes ahead. I suggest to you that there must be better sites for this frankly, ugly development elsewhere in Milton Keynes, and respectfully ask you to reconsider your position in the light of the impact upon local wildlife, the important archaeological remains and lastly and most importantly, the impact that this development will have upon local residents situated as it will be, so very close to us in Caldecotte.	
38.1	Mr & Mrs Hewitson, Fenny Stratford	There are several aspects of this development which are of concern but a major one is the increase in road traffic. The roundabout at the southern end of the A5, already at a standstill at busy times, will experience further traffic after the development of 1800 dwellings alongside Galley Lane/.Manor Fields. This proposed development of South Caldecotte will generate even more traffic. Not only will this affect the roundabout, there is a further pinchpoint at the Bow Brickhill railway crossing. In view of its proposed East West Expressway and the upgrading of the railway line this proposal seems premature. The loss of productive agricultural land should also be considered bearing in mind the brownfield sites along the canal in the north of the city.	
39.1	Miss Sinfield, Little Brickhill	I am writing with regard to my concerns in respect of the proposed allocation of land at South Caldecotte for employment (warehousing). I do not feel that this is the correct use of land in this particular location for various reasons. 1. The adjacent roads are already heavily congested at certain times of the day and to add to this with heavy vehicles turning onto them is not sensible. We already have the housing site adjacent to the B4146 to add into the mix. 2. Do wereally need a lot more warehouses, particularly in this location? It would be more practical to locate them nearer to the M1 for easy access.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		 The decision is still awaited on the building of a bridge across the railway at Bow Brickhill. This is something that is greatly needed, particularly with the East-West Rail Link shortly to be completed. Land will certainly need to be allocated for this reason. The Oxford-MK-Cambridge-Expressway is also being considered along this corridor and land needs to be held in reserve should this route be chosen. It would be wise for this site to be held for that reason. I would ask you to take the above comments into account when considering this proposal. 	
40.1	Gloucestershire County Council	No comment	Noted
41.1	Helen Bailey	I am horrified to see the proposed plan for warehousing at the site near Bow Brickhill. As a resident of Little Brickhill I know, all too well, that the road network simply could not cope with the additional traffic, much of it which I expect will be HGV, on either the A5 heading south or on Brickhill Street over the Bow Brickhill rail crossing. A site, closer to the M1, would be much more appropriate. As a landowner, with fields whose only direct access is straight onto the A5 going south of the MacDonald's roundabout, I also know how difficult, and dangerous, it is to join the A5 in a slow vehicleadditional heavy traffic would only exacerbate this. Just outside the Woburn estate and picturesque Brickhill, the proposal will be an eyesore, completely out of character with its immediate surroundings. Finally, I understand that the proposed Oxford to Cambridge Expressway could run close to this site - surely there is no sense in a development that would further restrict the available options.	

Consultee		ultee Comment	
		I implore Milton Keynes council to show some sense and not proceed with this proposal.	
42.1	Lynne Hall & Alison France, Caldecotte	 We have received information from our councillor, David Hopkins, about the proposed building of warehousing units in Caldecotte and, as residents, we would wish to register our objection to this plan as follows: There are clear environmental and archaeological reasons why this site should not be used in this way. The roads around the site are not suitable for, nor were ever intended to carry, heavy vehicles. As the roads are already in a very poor state in the area, this will simply compound the problem. Likewise the volume of traffic will increase to the detriment of those of us who live in this residential area. Surely warehousing units should be built in close proximity to the main motorways? The A5 is certainly not in that category. A most important aspect of any plans to increase the workforce is this area is parking. Those of us who live in Caldecotte have seen this significant problem increasing in recent times. The short-sighted view of the government that parking should be limited in an attempt to force people onto an erratic and unreliable public transport service has already created streets full of cars in an area which was once quiet and a pleasant place to live. Current measures are simply pushing those vehicles to another section of this area and, should the proposed plans go ahead, then the problem will only increase, for we have no doubt that any parking planned for future employees will also be inadequate. Perhaps a more sensible use of the land would be to create car parking to accommodate those who already work in this area, thus improving the environment in which many of us live, with the rest of the area being developed as leisure facilities to enhance and complement those already available around the lake. This area does not need facilities such as shops, pubs or hotels with the 	
		inherent social/noise problems they bring, but needs to be maintained as a quiet residential area on the edge of the city.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
43.1	John Oldfield, Bedford Group of IDBs	Section 2.4 & Figure 2.5/2.9 Part of the site is within the Buckingham and River Ouzel IDB's Drainage District. This should be shown on the figure as appropriate – utilities? In section 2.4, the 9m offset also applies to strategic SUDs assets, to ensure they have sufficient access around them for maintenance.	oriate – utilities? In section 2.4, the 9m offset also
43.2		 3.7 Surface water drainage & flooding As per the South East Milton Keynes work, the SPD should review the surface water flood map as well as the flood zone 3 flood map to determine likely extent of flood plain, given catchment parameters. All flood risk management/SUDs assets to be integrated, strategic and maintainable. Risk Management Authority Byelaws and Land Drainage Consenting requirements are to be taken into account for all flood risk management infrastructure. As per clause 3.5.3. (Highways), the developer will be required to fully contribute to improvements to the existing infrastructure for local drainage and the future long term maintenance and management of the new FRM infrastructure provided by the developer. 	
43.3		 Section 4.1 & 4.2 Contributions towards flood risk management and sustainable drainage systems infrastructure should be included in 4.1. As with the Eastern expansion areas, the Buckingham and River Ouzel IDB and the Parks Trust work jointly to manage SUDs and drainage infrastructure in the IDB's drainage district. This should be replicated for South Caldecotte. 	
44.1	Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues: Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	
44.2	Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.	
44.3	Protected species Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.	
44.4	Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	
45.1	Stuart Wright, Caldecotte	Traffic - the area and Brickhill Street already has congestion due to the route through to either the M1 (via Station Rd) or A5	
45.2		 Parking - Caldecotte Business Park does not have enough parking for existing employees/visitors. Cars are parking on pavements, grass verges and 'doubling up'. Parking - this is a known problem hence the recent resident parking permit survey in Caldecotte 	
45.3		 Bow Brickhill level crossing - due to the train crossing the road, traffic has to stop and queue already, more traffic to the warehouses will only increase this queue and traffic congestion. 	
45.4		5. Need - is there a need for additional ware housing in Milton Keynes?	
46.1	Mark Johnson, Caldecotte	I object to the development being used as an industrial site for the following reasons - 1. Unacceptable traffic congestion * Brickhill Street is an already congested road with the level crossing a particular problem. As rail traffic increases as a result of the East West rail project, this will become further congested. If the development proceeds with resultant increase in traffic, some of it HGVs, this will create a gridlock situation. This will have knock on effects - more traffic will use Station Road, which the document acknowledges is unacceptable, many HGVs travelling through the village of Bow Brickhill	
		creates a safety issue. The alternative route to motorways south via the A5 is unattractive as traffic is already congested at Hockliffe. As a resident of Caldecotte, I have noticed an increase in traffic using the estate as a "rat run", avoiding the queues on Brickhill Street by cutting through the estate to access the H10. This will increase if the development proceeds, some of the increase being HGVs, an unacceptable safety issue. The development at Eaton Leys will have already have increased the traffic using Brickhill Street to gain access to CMK, this development will make the situation intolerable. * Pollution - recent studies have highlighted the contribution by traffic, particularly diesels,	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		to poor air quality creating a health issue. If the development proceeds, there will be many lorries stationary in queues along Brickhill Street, creating a health issue for local residents. 2. Destruction of archeologically significant sites. * Magiovinium is largely unexplored and is likely to be a highly important site. This development will create major damage to the site. In conclusion, the proposed development is sited in a totally inappropriate area. The commercial traffic created will cause massive transport delays and dangerous road safety issues. It should be sited much closer to existing motorway access either at Junction 13 or 14 of the M1	
	Julian Price, Bow Brickhill	 This development framework seeks to make fundamental changes to the prescribed area without taking into account major material factors. The rout of the expressway has not yet been determined. No feasibility study has been undertaken on a bridge over the railway at Bow Brickhill. No account has been taken of the increased rail freight and passenger traffic which will increase the amount of barrier down time in Bow Brickhill. No environmental impact study, particularly with regard to noise increase, has been undertaken. The building of warehouse units will have a major impact on the A5 McDonalds roundabout. No account has been taken of this. Milton Keynes Council has not scheduled and is unable to finance the upgrade of their part of Brickhill Street not attributable to the developer (see Plan:MK Policy SD14, para 2), There is a serious flaw in the logic behind the SPD regarding the changes required for Brickhill Street. The upgrade of Brickhill Street is directly attributable to South Caldecotte in Plan:MK policy SD14 (""Access to be taken from Brickhill Street, which will be upgraded to grid road 	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	development generally. This takes responsibility away from any future developer and will lead to a gap in funding and an unsuitable low cost solution.	
47.2	Page 2 "This document has been prepared by Milton Keynes Council's Urban Design and Landscape Architecture Team." This statement is not entirely accurate, as Fig. 1.3 has been prepared by another organisation yet bears no attribution to that organisation.	
47.3	1.2.1 " A further 6 week period of consultation will be undertaken on a revised draft before the Development Framework is adopted as a Supplementary Planning Document (SPD)." The consultation period is 8 weeks, not 6.	
47.4	1.3.1 "The Development Framework will be adopted as a Supplementary Planning Document (SPD) to Plan:MK. In the interim it will be used to guide discussions with developers of the site, and to demonstrate the site's deliverability. " Without the results of the consultation and any necessary amendments (substantial in this case) the deliverability of the site cannot be assessed.	
47.5	1.4.2 "The Commission's final report "Partnering for Prosperity: a new deal for the Cambridge - Milton Keynes - Oxford Arc" was published in November 2017." I very much doubt this report is, or will be, the NIC's final comment on the Oxford – Cambridge Arc.	
47.6	1.5.2 The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and the scheduled monument of Magiovinium that lie immediately adjacent south-west of the site	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
47.7	1.6.5 The level of freight use is also going to increase	
47.8	"Figure 1.3 Alignment of Potential Railway Bridge Crossing at Bow Brickhill Level Crossing" This should not have been included in the SPD, as it introduces a new element, previously not included in Plan:MK and is therefore contrary to national planning guidance and contrary to Plan:MK.	
47.9	1.6.7 "A long term solution to these delays is the provision of a bridge over the railway line in place of the level crossing at Bow Brickhill. Whilst Network Rail currently has no plans to provide such a bridge, it is considered that there is sufficient land available within the adopted highway to enable a bridge to be provided at some future date. The indicative drawing at Figure 1.3 suggests that a bridge could be constructed on the existing line of Brickhill Street, subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site." On 17 June 2015 Neil Sainsbury, Head of Urban Design and Landscape Architecture wrote to Network Rail to ask how much land would be required to be reserved for a future bridge over the railway line in respect of the neighbouring site at Caldecotte C. Abdul Jamal, Scheme Project Manager for East West Rail Phase 2 replied on 17 th June indicating two draft solutions for an over bridge and road solution. Neither route was on the line of Brickhill Street; both routes required significant land to be reserved on South Caldecotte and Caldecotte C.	
	The South Caldecotte SPD approved for consultation at the Delegated Decisions meeting which took place on 12 March 2019 contained the phrase: "Feasibility work undertaken by the Council suggests that a bridge could be constructed on the existing line of Brickhill Street (see fi g 1.3), subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site."	
	The phrase claiming that feasibility work had been undertaken by the Council was removed from this document when a Freedom of Information request revealed that the Council had	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	done no feasibility work. It is the altered document upon which consultation is sought. Therefore Figure 1.13 which "suggests that a bridge could be constructed on the existing line of Brickhill Street" is no more than an uninformed sketch upon which no-one may rely. This in turn means that the phrase: "This would not require the safeguarding of any land within the South Caldecotte site." is not born out by any evidence whatsoever. Furthermore, feasibility work which has been undertaken by Miles White Transport Consultants on behalf of Bow Brickhill Parish Council shows the gradient of a bridge as drawn would exceed the maximum gradient permitted, and is therefore undeliverable. Though it is not within the scope of this document, (neither should be a possible bridge on the line of Brickhill Street), it is quite clear that land must be reserved both on this site and also on Caldecotte C for a future bridge to meet the requirements outlined in 1.6.7.	
47.10	"* The development plan also includes the Council's Waste and Minerals DPDs and any applicable Neighbourhood Plans. At this time no made Neighbourhood Plans cover this site." Walton Neighbourhood Plan, made 11th January 2017, contains specific policies relating to future railway crossings and the width of the grid road Brickhill Street and must therefore be taken into consideration when considering Brickhill Street as an access to this site.	
47.11	2.3.2 and 2.3.3 Best practice for planning documents suggests that neighbouring sites, whose operations may have a bearing on the site in question, should be noted in the context of the site description. The planning application for land adjacent, approved for Red Bull's remodelling of Tilbrook Roundabout and the stopping up of Bradbourne Drive, is not mentioned; neither is the extant planning permission for Tilbrook Pastures on Station Road.	
47.12	2.3.7 "The Bedford to Bletchley railway line forms the northern boundary of the site. The line is raised up above the level of the site in the north west corner. There is existing planting along the boundary. The railway provides a visual and movement barrier." The site will be extremely visible to passengers on the railway line, particularly as the line	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	rises on the north west corner of the site.	
47.13	Existing Road Hierarchy, Pedestrian and Cycle Routes Bullet point 3 "Station Road, east of the site, is a rural road running through Bow Brickhill and therefore would be unsuitable for regular HGV use." The word "regular" should be removed and a weight limit indicated on Station Road, because Woburn Sands now has a weight limit, so HGV traffic cannot legally use that route.	
	Bullet point 5 "The redway network north of the site stops at the level crossing on Brickhill Street." The redway network north of the site stops at the east side of the level crossing i.e. the wrong side of Brickhill Street for the site.	
47.14	2.9 Utilities The 6 inch foul sewer, serving the village of Bow Brickhill and Woburn Golf Club, runs across the north east corner of the site.	
47.15	2.10 Edge Conditions "The A5 and Bedford to Bletchley railway line are noise generators. Brickhill Street is likely to become noisier as its use increases." It is not a likelihood; Brickhill Street will become noisier as its use increases.	
47.16	Topography, Views and Drainage Main local views into the site are also from Greenways, Church Road, London End Lane and Drakewell Road – the last three due to their elevated positions on the Greensand Ridge. Last bullet point "There is an area of well-preserved ridge and furrow system surviving in the area of the priority habitat. This is an area of constraint that needs to be considered with mitigation dealt with through a planning application." There is also a significant area of "well-preserved ridge and furrow system surviving"	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	between Cross Roads Farm and the southern corner of the site.	
47.17	Road Hierarchy The word "regular" should be removed and a weight limit indicated on Station Road because Woburn Sands now has a weight limit, so HGV traffic cannot legally use that route.	
	"Brickhill Street, which south of the railway line is not a grid road, will provide vehicular access to the site."	
	"Brickhill Street, which currently south of the railway line is not of grid road standard, will provide the only possible vehicular access to the site."	
	Pedestrian and Cycle Routes	
	"The redway network north of the site stops at the level crossing on Brickhill Street." "The redway network north of the site stops at the level crossing on the east side of Brickhill Street."	
47.18	3.4.8 "The green open space link should connect Caldecotte Lake in the north to areas of existing and proposed open space to the south."	
	There is a mere 3 metre wide passageway, a public right of way, beneath the railway bridge connecting Caldecotte Lake to the site. The railway line is fenced. How exactly might a developer create a "green open space link" given these constraints?	
47.19	3.5.5 "It is the Council's intention to upgrade the whole length of Brickhill Street (south of the railway line) to grid road standard in order to serve growth in the wider area to the south east of Milton Keynes."	
	That is not what Plan: MK says. SEMK will not be delivered (if at all, depending upon the Expressway route) until substantially later than South Caldecotte. It should be incumbent upon MKC to upgrade the whole length of Brickhill Street as part of the delivery of South	
	upon MKC to upgrade the whole length of Brickhill Street as part of the delivery of South Caldecotte in accordance with point 2 of Policy SD14 which says: "Access to be taken from Brickhill Street, which will be upgraded to grid road standard." The upgrading of Brickhill Street in Plan:MK is directly attributed to Policy SD14, not the "wider area to the south east	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	of Milton Keynes." Therefore, the upgrading of the entire length of Brickhill Street adjacent to the site must be delivered with South Caldecotte and not delayed.	
47.20	3.5.6 "Building to grid road standard will require the provision of a redway, and a landscaped grid road reserve within the site." The redway stops on the north east side of the railway crossing. A safe road crossing on Brickhill Street must be delivered in order to facilitate a link with the existing redway route. That should take place in conjunction with the upgrade of Brickhill Street north of the proposed site access, and be of sufficient safe distance from both the junction of Station Road and the railway crossing.	
47.21	3.5.7 "In order to direct traffic from the development onto the A5, the developer will be required to prepare and adhere to a Lorry Routeing Plan through an obligation under \$106." HGV drivers will head north on Brickhill Street, over the level crossing, then to the M1 north via H10 and V11. This will create noise, congestion and danger along these internal MK roads.	
47.22	3.5.10 and 3.5.11 As mentioned under 3.5.6 above, the redway stops on the wrong side of Brickhill Street, therefore in order to connect it to the site and to enable future connections a safe redway crossing of Brickhill Street will be required. This will probably need to be a traffic controlled crossing.	
47.23	Figure 3.2 Movement Framework This illustration shows the position of the entrance to the site in close proximity to the A5 junction, at a point where traffic currently queues. The queues, even with upgrade of Brickhill Street, will be much longer in future. The single access into the site is inherently dangerous. There is no possible vehicular access other than Brickhill Street. Because of the railway crossing queues and the traffic lights queues onto the A5, the siting of this development could be a major problem in an emergency. Were the one access proposed to be blocked, there is no other vehicular	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		access to the entire 57 hectares. Both the railway and A5 trunk road present impassable barriers. I understand that a similar area of housing would not be allowed with just one access into the site.	
47.24		3.6.3 North Brickhill Street This is the area designated for SMEs which is likely to be required to be reserved for a future bridge over the railway.	
47.25		4.3.3 "The local planning authority has provided a Screening Opinion, which confirms that an Environmental Impact Assessment (EIA) is not required for this site." Doubt has been cast on the legitimacy of the process regarding the process of the Screening Opinion for the EIA.	
48.1	Stuart Copeland, Wavendon Gate	The SPD is premature and should be withdrawn: 1. until the precise route of the Expressway is known, 2. until it is known what work is required (under the Eaton Leys proposals) to McDonald's roundabout, 3. until Milton Keynes Council has scheduled and is able to finance the upgrade of their part of Brickhill Street not attributable to the developer (see Plan:MK Policy SD14, para 2), 4. until Milton Keynes Council has carried out the Transport Assessment (Plan:MK SED14 para 3), 5. until Milton Keynes Council has carried out a Transport Assessment of the entire south east Milton Keynes area. There is a major flaw in the logic behind the SPD regarding the changes required for Brickhill Street. The upgrade of Brickhill Street is directly attributable to South Caldecotte in Plan:MK policy SD14 (""Access to be taken from Brickhill Street, which will be upgraded to grid road standard"). Yet in this document, in section 3.5.5. the onus is on the south east development generally. This takes responsibility from any future developer and will lead to a gap in funding and an unsuitable solution done on the cheap. There are examples of this all over MK, e.g. the creation of at grade crossings on Watling Street.	e legitimacy of the process regarding the process of the EIA. should be withdrawn: the Expressway is known, rk is required (under the Eaton Leys proposals) to McDonald's ncil has scheduled and is able to finance the upgrade of their ttributable to the developer (see Plan:MK Policy SD14, para 2), ncil has carried out the Transport Assessment (Plan:MK SED14 ncil has carried out a Transport Assessment of the entire south logic behind the SPD regarding the changes required for reet is directly attributable to South Caldecotte in Plan:MK policy in from Brickhill Street, which will be upgraded to grid road ment, in section 3.5.5. the onus is on the south east is takes responsibility from any future developer and will lead to suitable solution done on the cheap. There are examples of this
48.2		Page 2 "This document has been prepared by Milton Keynes Council's Urban Design and	

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	Landscape Architecture Team." This statement is not entirely accurate, as Fig. 1.3 has been prepared by another organisation yet bears no attribution to that organisation.	
48.3	1.2.1 " A further 6 week period of consultation will be undertaken on a revised draft before the Development Framework is adopted as a Supplementary Planning Document (SPD)." The consultation period is 8 weeks, not 6.	
48.4	1.3.1 "The Development Framework will be adopted as a Supplementary Planning Document (SPD) to Plan:MK. In the interim it will be used to guide discussions with developers of the site, and to demonstrate the site's deliverability. " Without the results of the consultation and any necessary amendments (substantial in this case) the deliverability of the site cannot be assessed.	
48.5	1.4.2 "The Commission's final report "Partnering for Prosperity: a new deal for the Cambridge - Milton Keynes - Oxford Arc" was published in November 2017." I very much doubt this report is, or will be, the NIC's final comment on the Oxford — Cambridge Arc.	
48.6	1.5.2 The likelihood of the expressway passing through the site is considered low as this would affect the consented Eaton Leys residential scheme and the scheduled monument of Magiovinium that lie immediately adjacent south-west of the site. The assumption that the site will not be required for the Expressway is without foundation. Were the Expressway to pass in the vicinity, there is every likelihood that part of this site at least would be required for a junction of the Expressway with the A5, for the very reason that the scheduled monument of Magiovinium would be excluded from any land take for the purpose. It should also be noted that a significant part of Magiovinium is likely to lie beneath South Caldecotte.	
48.7	1.6.5 The level of freight use is also going to increase	
48.8	"Figure 1.3 Alignment of Potential Railway Bridge Crossing at Bow Brickhill Level Crossing" This should not have been included in the SPD, as it introduces a new element, previously not included in Plan:MK and is therefore contrary to national planning guidance and contrary to Plan:MK.	

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48.9	1.6.7 "A long term solution to these delays is the provision of a bridge over the railway line in place of the level crossing at Bow Brickhill. Whilst Network Rail currently has no plans to provide such a bridge, it is considered that there is sufficient land available within the adopted highway to enable a bridge to be provided at some future date. The indicative drawing at Figure 1.3 suggests that a bridge could be constructed on the existing line of Brickhill Street, subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site." On 17 June 2015 Neil Sainsbury, Head of Urban Design and Landscape Architecture wrote to Network Rail to ask how much land would be required to be reserved for a future bridge over the railway line in respect of the neighbouring site at Caldecotte C. Abdul Jamal, Scheme Project Manager for East West Rail Phase 2 replied on 17 th June indicating two draft solutions for an over bridge and road solution. Neither route was on the line of Brickhill Street; both routes required significant land to be reserved on South Caldecotte and Caldecotte C. The South Caldecotte SPD approved for consultation at the Delegated Decisions meeting which took place on 12 March 2019 contained the phrase: "Feasibility work undertaken by the Council suggests that a bridge could be constructed on the existing line of Brickhill Street (see fi g 1.3), subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site." The phrase claiming that feasibility work had been undertaken by the Council was removed from this document when a Freedom of Information request revealed that the Council had	
	done no feasibility work. It is the altered document upon which consultation is sought. Therefore Figure 1.13 which "suggests that a bridge could be constructed on the existing line of Brickhill Street" is no more than an uninformed sketch upon which no-one may rely. This in turn means that the phrase: "This would not require the safeguarding of any land within the South Caldecotte site." is not born out by any evidence whatsoever.	

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	Consultants on behalf of Bow Brickhill Parish Council shows the gradient of a bridge as drawn would exceed the maximum gradient permitted, and is therefore undeliverable.	
	Though it is not within the scope of this document, (neither should be a possible bridge on the line of Brickhill Street), it is quite clear that land must be reserved both on this site and also on Caldecotte C for a future bridge to meet the requirements outlined in 1.6.7.	
48.10	 "*The development plan also includes the Council's Waste and Minerals DPDs and any applicable Neighbourhood Plans. At this time no made Neighbourhood Plans cover this site." Walton Neighbourhood Plan, made 11th January 2017, contains specific policies relating to future railway crossings and the width of the grid road Brickhill Street and must therefore be taken into consideration when considering Brickhill Street as an access to this site. 	
48.11	2.3.2 and 2.3.3 Best practice for planning documents suggests that neighbouring sites, whose operations may have a bearing on the site in question, should be noted in the context of the site description. The planning application for land adjacent, approved for Red Bull's remodelling of Tilbrook Roundabout and the stopping up of Bradbourne Drive, is not mentioned; neither is the extant planning permission for Tilbrook Pastures on Station Road.	
48.12	2.3.7 "The Bedford to Bletchley railway line forms the northern boundary of the site. The line is raised up above the level of the site in the north west corner. There is existing planting along the boundary. The railway provides a visual and movement barrier." The site will be extremely visible to passengers on the railway line, particularly as the line rises on the north west corner of the site.	
48.13	Existing Road Hierarchy, Pedestrian and Cycle Routes Bullet point 3 "Station Road, east of the site, is a rural road running through Bow Brickhill and therefore would be unsuitable for regular HGV use." The word "regular" should be removed and a weight limit indicated on Station Road, because Woburn Sands now has a weight limit, so HGV traffic cannot legally use that route.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
48.14	Bullet point 5 "The redway network north of the site stops at the level crossing on Brickhill Street." The redway network north of the site stops at the east side of the level crossing i.e. the wrong side of Brickhill Street for the site. 2.9 Utilities The 6 inch foul sewer, serving the village of Bow Brickhill and Woburn Golf Club, runs across the north east corner of the site.	
48.15	2.10 Edge Conditions "The A5 and Bedford to Bletchley railway line are noise generators. Brickhill Street is likely to become noisier as its use increases." It is not a likelihood; Brickhill Street will become noisier as its use increases.	
48.16	Topography, Views and Drainage Main local views into the site are also from Greenways, Church Road, London End Lane and Drakewell Road – the last three due to their elevated positions on the Greensand Ridge. Last bullet point "There is an area of well-preserved ridge and furrow system surviving in the area of the priority habitat. This is an area of constraint that needs to be considered with mitigation dealt with through a planning application." There is also a significant area of "well-preserved ridge and furrow system surviving" between Cross Roads Farm and the southern corner of the site.	
48.17	Road Hierarchy The word "regular" should be removed and a weight limit indicated on Station Road because Woburn Sands now has a weight limit, so HGV traffic cannot legally use that route. "Brickhill Street, which south of the railway line is not a grid road, will provide vehicular access to the site."	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	"Brickhill Street, which currently south of the railway line is not of grid road standard, will provide the only possible vehicular access to the site." Pedestrian and Cycle Routes "The redway network north of the site stops at the level crossing on Brickhill Street." "The redway network north of the site stops at the level crossing on the east side of Brickhill Street."	
48.18	3.4.8 "The green open space link should connect Caldecotte Lake in the north to areas of existing and proposed open space to the south." There is a mere 3 metre wide passageway, a public right of way, beneath the railway bridge connecting Caldecotte Lake to the site. The railway line is fenced. How exactly might a developer create a "green open space link" given these constraints?	
48.19	3.5.6 "Building to grid road standard will require the provision of a redway, and a landscaped grid road reserve within the site." The redway stops on the north east side of the railway crossing. A safe road crossing on Brickhill Street must be delivered in order to facilitate a link with the existing redway route. That should take place in conjunction with the upgrade of Brickhill Street north of the proposed site access, and be of sufficient safe distance from both the junction of Station Road and the railway crossing.	
48.20	3.5.7 "In order to direct traffic from the development onto the A5, the developer will be required to prepare and adhere to a Lorry Routeing Plan through an obligation under \$106." HGV drivers will head north on Brickhill Street, over the level crossing, then to the M1 north via H10 and V11. This will create noise, congestion and danger along these internal MK roads.	
48.21	3.5.10 and 3.5.11 As mentioned under 3.5.6 above, the redway stops on the wrong side of Brickhill Street, therefore in order to connect it to the site and to enable future connections a safe redway crossing of Brickhill Street will be required. This will probably need to be a traffic controlled crossing.	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
48.22		Figure 3.2 Movement Framework This illustration shows the position of the entrance to the site in close proximity to the A5 junction, at a point where traffic currently queues. The queues, even with upgrade of Brickhill Street, will be much longer in future.	
		The single access into the site is inherently dangerous. There is no possible vehicular access other than Brickhill Street. Because of the railway crossing queues and the traffic lights queues onto the A5, the siting of this development could be a major problem in an emergency. Were the one access proposed to be blocked, there is no other vehicular access to the entire 57 hectares. Both the railway and A5 trunk road present impassable barriers. I understand that a similar area of housing would not be allowed with just one access into the site.	
48.23		3.6.3 North Brickhill Street This is the area designated for SMEs which is likely to be required to be reserved for a future bridge over the railway.	
48.24		4.3.3 "The local planning authority has provided a Screening Opinion, which confirms that an Environmental Impact Assessment (EIA) is not required for this site." Doubt has been cast on the legitimacy of the process regarding the process of the Screening Opinion for the EIA.	
49.1	Sue Malleson, Bow Brickhill	The preparation of this SPD is premature for the following reasons: (a) Highways England's indicative timetable gives autumn 2019 for the announcement of preferred route options for the Oxford to Cambridge Expressway. This will be followed by an extensive consultation exercise with the earliest date for the announcement of the preferred route being late 2020. (b) Development of the site - with the accompanying increase in traffic on Brickhill Street as well as that due to Red Bull, Tilbrook Pastures, Eaton Leys and Caldecotte C, plus at least a doubling of the current rail crossing closure times - indicates that a bridge over the railway will be required sooner rather than later. (c) Though the SPD acknowledges a bridge over the railway at Bow Brickhill will become	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	necessary, Network Rail currently has no plans to build one. Drawings produced in 2015 by Network Rail indicate the land required for such a bridge, but feasibility work by Milton Keynes is yet to be undertaken. (d) The inquiry into the Transport & Works Order for this section of the railway has not yet reported. (e) All HGV traffic is to be asked nicely to travel in the direction of the A5 roundabout. The nature of the upgrade to the roundabout, funded by Eaton Leys development, is as yet unknown. (f) Upgrade of part of Brickhill Street, that part not allocated to the developer, as included in and required by Plan:MK policy SD14, is currently not programmed or funded. (g) The Transport Assessment specified in para 3 of Policy SD 14 Plan:MK to "investigate the development's impact on the local highway network"" will also set out the basis for effective public" connections to and from the site " is essential prior to preparation of the SPD. (h) The Local Transport Plan (LTP4), Mobility Strategy for Milton Keynes sets an ambitious mode shift target. The SPD does not mention this Strategy, nor does it address the capacity for mass transit access. Taking all these points together, it is clear that without the information required to plan the area in the vicinity of South Caldecotte, the preparation of an SPD is premature.	
49.2	Page 2 Part of the document, namely Fig. 1.3, has been "prepared" by another organisation and not Milton Keynes Council.	
49.3	1.2.1 The period of consultation for the SPD was 8 weeks.	
49.4	1.3.1 The resulting consultation has raised significant issues which will necessitate substantial re-drafting of the SPD, therefore negotiations with developers are premature. The Development Framework does not accord with the National Planning Policy Framework, nor Plan:MK.	
49.5	1.4.2 Suggest removing the word "final" as it is unlikely to be the NIC's final report on the Oxford – Cambridge Arc.	
49.6	1.4.3 The Expressway and East West Rail runs east-west. Heathrow is due south. It is very	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	difficult to see how either infrastructure project would improve connections to Heathrow given that the Bletchley to Bedford rail line is already in operation.	
49.7	1.5.2 If the Expressway passes through the narrow corridor between Bow Brickhill village and the railway, a significant amount of land will be required for a junction with the A5. Because of the scheduled monument, Magiovinium, it is likely that South Caldecotte, or at least part of it, would be required for this junction.	
49.8	1.6.5 As East West Rail investment is being sought on the basis of freight traffic, the frequency of lengthy freight trains passing will also increase. "Figure 1.3 Alignment of Potential Railway Bridge Crossing at Bow Brickhill Level Crossing" Discussion of a future bridge and this drawing have no place in the SPD, introducing, as they do, something not included in Plan:MK.	
49.9	1.6.7 Calculations by an independent transport consultant, Miles White Transport Consultants on behalf of Bow Brickhill Parish Council, have proved that there is not sufficient land within the adopted highway for a bridge as drawn in Fig. 1.3 and the length of road indicated would result in a bridge with too great a gradient. Land within both South Caldecotte and Caldecotte C would therefore need to be reserved for the provision of a future bridge, contrary to the claims in this paragraph. Correspondence between Neil Sainsbury, Head of Urban Design & Landscape Architecture and Abdul Jamal of Network Rail in 2015 discussed the reservation of land for a future bridge over the railway line at Bow Brickhill. Drawings of two possible solutions were provided, both of which required land to be reserved on South Caldecotte and Caldecotte C. Network Rail gave a presentation of these proposals to the residents of Bow Brickhill in the same month. On 12 March 2019 a previous version of South Caldecotte SPD was approved for consultation at a Delegated Decisions meeting. The phrase which claimed feasibility work on a future bridge had been undertaken by the Council was subsequently revealed by an Fol to be inaccurate. This phrase was removed and the altered document is now presented for consultation. Therefore Figure 1.3, is rendered no more than a sketch of an improbable idea and consequently carries no weight of evidence.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Walton Neighbourhood Plan, made 11th January 2017, contains specific policies relating to future railway crossings and the width of the grid road Brickhill Street and must therefore be taken into consideration when considering Brickhill Street as an access to this site.	
49.10	2.3.2 and 2.3.3 Extant planning applications for adjacent sites have been omitted from mention in the document. Red Bull's stopping up of Bradbourne Drive and redesign of Tilbrook Roundabout will alter existing traffic movements. Tilbrook Pastures on Station Road is not mentioned either.	
49.11	2.3.7 Passengers on the railway line will have a very good view of the site particularly when trains pass on the elevated section.	
49.12	Existing Road Hierarchy, Pedestrian and Cycle Routes, Bullet point 3 A weight limit should be applied to Station Road, because Woburn Sands now has a weight limit, so HGV traffic cannot legally use that route. The word "regular" should be removed and the paragraph reworded to state no HGVs through Bow Brickhill. Bullet point 5 The redway stops at the wrong side of Brickhill Street to enable access into the site; it terminates on the north-east side of the level-crossing.	
49.13	2.9 Utilities There is a 6 inch foul sewer which crosses the north east corner of the site and serves Bow Brickhill and Woburn Golf Club.	
49.14	2.10 Edge Conditions Brickhill Street will become noiser as its use increases; it is a fact not a likelihood.	
49.15	Topography, Views and Drainage There are main local views from Greenways and other locations, particularly those which are elevated: Church Road, London End Lane and Drakewell Road. How visible the site will be from Tilbrook Pastures remains to be seen. Last bullet point At the southern corner of the site, running from the A5 up to Cross Roads Farm, there is also a significant area of "well-preserved ridge and furrow system surviving".	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
49.16	Road Hierarchy The word "regular" should be removed and a weight limit indicated on Station Road. Brickhill Street south of the railway line will be upgraded to grid road standard (under Policy SD14 bullet point 2) and will provide the only possible vehicular access to the site.	
49.17	Pedestrian And Cycle Routes The redway network north of the site stops at the level crossing on the east side of Brickhill Street and therefore does not connect with the site.	
49.18	3.4.8 The 3 metre public right of way, a passageway, beneath the railway bridge connecting Caldecotte Lake area to the site is the only access to the other side of the railway line. The requirement in SD14 cannot be satisfied for a "green open space link" without creating another wider connection beneath the railway to the area beyond.	
49.19	Movement Framework Mention should be made of the Local Transport Plan (LTP4), Mobility Strategy for Milton Keynes 2018 to 2036 and its requirements for facilitating a mode shift in transport, including design with capacity for future mass transit.	
49.20	3.5.5 Policy SD14, para. 2 says "Access to be taken from Brickhill Street, which will be upgraded to grid road standard." This policy is unequivocal. The upgrading of Brickhill Street between the station and the A5 is a condition of Policy SD14 and therefore must be carried out under the development proposals for South Caldecotte. The upgrade may well serve the wider area to the south east of Milton Keynes but it must be delivered in conjunction with the development of South Caldecotte and the SPD should say so	
49.21	3.5.6 The redway stops on the north east side of the railway crossing. It will be necessary to construct a safe traffic crossing on Brickhill Street in order to link with the existing redway route.	
49.22	3.5.7 The concept of asking HGV drivers nicely to turn right instead of left, when they want to reach the north east of the city, is risible - as illustrated by laughter at the Plan:MK inquiry.	
49.23	3.5.10 and 3.5.11 As mentioned under 3.5.6 above, the redway stops on the wrong side of Brickhill Street, therefore in order to connect it to the site and to enable future connections, a traffic-controlled redway crossing will be necessary on Brickhill Street, which in turn will	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		probably necessitate the remodelling of the junction of Brickhill Street and Station Road	
49.24		Figure 3.2 Movement Framework This illustration shows the position of the entrance to the site in close proximity to the A5 junction, at a point where traffic currently queues. The queues, even with an upgrade of Brickhill Street, will be much longer in future so this positioning is unwise. The single access into the site seems to be inherently dangerous. No other possible vehicular access, other than any from Brickhill Street, exists for all 57 hectares. Railway crossing and traffic lights queues mean that access could be a major problem in an emergency. Both the railway and A5 trunk road present impassable barriers. A similar area of housing would not be allowed with just one access into the site.	
49.25		3.6.3 North Brickhill Street	
		The land required for reservation for a future bridge lies in this area.	
49.26		4.3.3 The process of screening for the Environmental Impact Assessment is probably flawed.	
50.1	Peter Winter	I would like to comment upon the consultation for the South Caldecotte Development. I would like to strongly oppose this plan. As a local resident we are already in the position where the existing commerical units in Caldecotte adversely effect us greatly. At certain times of the day we find the traffic is unbareable and it takes a significant amount of time to even exit our road let alone the village. This is made far worse should there be a train coming in which happens around 2/3 times per hour. Noise pollution is currently a significant problem, we already regularly find ourselves woken by traffic starting as early as 5am, because in general the traffic does not adhere to the speed limit at our end of the village this can be exceptionally loud even with the windows closed, the increased traffic would make this so much worse if this development goes ahead. Making living in bow brickhill unbareable.	
50.2		I think it is also important to note that there are several other plans which look like they will have a significant adverse impact on the village such as the high speed rail link, the plan to build 3000 houses between woburn sands and Bow Brickhill the fact we do not know the route of the expressway but it is very likely to impact us directly. All of this adds up to adversely impacting the local environment in a huge way, I think it is irresponsible to even	

Consulted	е	Comment	Officer Response (proposed change in bold, with new text underlined)
		consider this without a long term traffic assessment as there are already significant unacknowledged problems relating to this and it unnreasonable to assume that these developments would not make this much worse. I think at times of such environmental uncertainty it is important that the local government actively tries to protect the countryside and wildlife not seek to destroy it for the sake of commerce.	
51.1	Debbie Mayer	Please note my objection to the inclusion of this land for an employment site. My reasons are listed below - Highway problems - HGV's travelling to and from this site will cause considerable congestion to an already overloaded area. When turning left they will approach the village of Bow Brickhill and need to cross the level crossing which requires to be bridged. When turning right they will access the M1 by travelling via Hockliffe - both directions are not suitable for this kind of activity and will cause considerable congestion.	
51.2		Need/Suitability - Warehouse operators would prefer a site located on land closer to the M1. A Warehouse site of this type should be located away from residential areas - again a site closer to the M1 would be ideal.	
51.3		Other uses for the site - This site is in an area of attractive landscape and therefore consideration for this site to be used for an alternative purpose, to compliment the surrounding areas, should be considered. It should be kept and developed as an open space, of some description, to be used by residents currently living locally and also in consideration of the many thousands of extra housing in the pipeline for the surrounding areas therefore giving more of a reason for useful open space for this site.	
51.4		Oxford-MK-Cambridge Expressway - It is understood that this site will sit within the corridor of this expressway and should be reserved accordingly.	
52.1	Celia & Ian Sherratt, Bow Brickhill	We attended a consultation in Bow Brickhill on the 14th of March held by DLP, regarding the proposed South Caldecotte Development of a 56 hectare commercial development in that locality.	
		It seems absurd to us that this is even being considered, given the congestion that already exists in the area and that will exponentially increase with the proposed Tilbrook	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		development and upgrade of the Bedford to Bletchley railway line to part of the East-West Oxford to Cambridge route. The additional traffic accessing Brickhill Street or the A5 from the new housing, combined with longer and more frequent periods during which the railway crossing barriers are down can only spell gridlock. Not to mention the lorries and the staff employed at the site trying to come and go, we understand to be potentially 400 cars per day.	
		Station and Woburn Sands Roads are already backed up with traffic using them as a rat run at busy times of the day. Add to this the above mentioned factors and it will become impossible situation. The road also remains very busy at all other times of the day.	
		We ask that common sense prevail in this situation, as the all of the factors mentioned here suggest the area will be building up to a 'perfect storm' of congestion and pollution of idling traffic.	
	Scott Carruthers	 Why oh why would you destroy more of our beautiful countryside and ruin the village with this. the traffic problems are too great already and the Brickhill Street upgrade isn't scheduled there's no schedule for a bridge over the railway we don't yet know the route of the Expressway the upgrade to the A5 roundabout hasn't taken place the Transport & Works Order inquiry for the railway hasn't reported yet no Transport Assessment has yet been done The Local Transport Plan Mobility Strategy for Milton Keynes hasn't been taken into account. 	
	Jon Casey & Pippa Kempton	We are writing to strongly raise concerns related to the consultation for the South Caldecotte Development Framework. There are current infrastructure issues in the local area caused by the expansion of the	
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Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		It is very apparent that the volume of traffic driving through the residential area has increased in the past 18 months, and in our view the proposed development of the area under consultation will only make this more of an issue. When the level crossing at Bow Brickhill Station is down, vehicles queue and stack up in a matter of minutes. To avoid the queue, it can be seen that employees at the Business Park either exit caldecotte via Monellan Grove on Bletcham Way to the AS or, if travelling toward Bow Brickhill from the Walnut Tree direction, drive down the centre of VIO Brickhill Street, past the stationary traffic and into Caldecotte via Heybridge Crescent. The increase, and the size, of vehicles that will use the proposed warehousing will increase the length of such queues and undoubtedly have an adverse impact on local residents trying to get out of caldecotte during peak times. The further urbanisation of the Caldecotte area will irreversibly impact the environment. Caldecotte Lake is one of the most pleasant and regularly visited areas of Milton Keynes. The proposed development has the potential to ruin the skyline seen across the lake but also the increased volume of HVT's in the area will not doubt increase the level of pollution and noise levels. It goes without saying that stringent assessments of environmental issues must be made prior to development. In summary, we would fundamentally challenge whether the Caldecotte area has the necessary infrastructure and whether it is the most appropriate location for further warehouses. Caldecotte is still in essence a residential area with just enough green areas for families to feel that they do live in a semi-rural area and are not enclosed or trapped by industry.	
55.1	Helen Linder	I am writing to object to the concerning plans. The traffic is already far too heavy at peak times in Bow Brickhill to the A5 roundabout. With the railway crossing in Bow Brickhill being down twice an hour the traffic will just be horrendous. Bow Brickhill is also known for having horse riders in the village that ride across the train crossing, I am assuming that the number of large vehicles will increase	

Consulted	е	Comment	Officer Response (proposed change in bold, with new text underlined)
		which will affect the many riders in the area. Has a transport assessment even been carried out?	
56.1	Louise Archer Bow Brickhill	I am a very concerned resident of Bow Brickhill. We have 3 young children that attend the village school. The amount of traffic has always been a concern for us anyway without the proposed warehouse being built which will undoubtedly create more traffic problems for our village. We moved to a village for a healthier lifestyle for our children. Bring near to green spaces is a major priority to us. The thought of countless lorries being driven so close by with its noise pollution as well as actual enviromental pollution is just unacceptable. Please please reconsider the options.	
57.1	Philip Ball	1. The SPD is being pursued too early because - a. We do not know the route of the proposed Highways England Expressway, however the indicative maps show it coming through or very close to South Caldecotte b. The Eaton Leys proposals would impact on the McDonald's (was Kelly's Kitchen) Roundabout so impacts on the S Caldecotte plans c. There has not been a Transport Assessment of the south eastern Milton Keynes area d. There is a length of Brickhill street that requires upgrading by the MK Council that has not been planned, nor has it appeared in financial MK Council plans	
57.2		2. I understand the document has not been prepared by Milton Keynes Council's Design and Landscape Architecture team as claimed, leading to serious concerns about the veracity of the document overall.	
57.3		3. The stated Consultation period is inaccurate as stated at 6 weeks when the period is 8 weeks.	
57.4		4. The rise in freight train use on the Bedford Bletchley line (future East West Rail) has not	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	been allowed for in terms of the current and future estimated level crossing down times.	
57.5	5. The increased use of the railway and coming East West rail will create further disruption and pollution from road traffic if a bridge is not provided to replace the level crossing	
57.6	6. Network Rail are understood to have said they need more land for such an over bridge that would take part of the South Caldecotte and Caldecotte C sites.	
57.7	7. The Council's plan show a bridge over the railway following the current line of Brickhill Street where no such space is sufficient; they do not allow sufficient space for a bridge over the railway to be built based on the current development plans, and the regulations for building such a bridge in terms of gradients and road width.	
57.8	8. Bow Brickhill Parish Council have a report from Miles White Transport Consultants that shows the gradients involved would exceed those permitted so cannot be built based on what the SPD document shows.	
57.9	9. No feasibility work has been undertaken by the MK Council on the building of the bridge using the current line of Brickhill Street, as discovered through a FOI request	
57.10	10. The assertion that the bridge would not need land from the S Caldecotte site is therefore false. This is another example of a lack of veracity in key areas of the document.	
57.11	11. Considerable changes proposed to the north of the Brickhill Street level crossing – stopping up Bradbourne Drive and the Red Bull plans for Tilbrook Roundabout have not been taken into account	
57.12	12. The route through Station road is now illegal for HGV traffic with the weight limit in Woburn Sands; this will impact on the use of Brickhill Street in both directions and across the level crossing	
57.13	13. Brickhill Street will become noisier, and as mentioned before there's a real rick of a reduction in air quality.	
57.14	14. HGV drivers are likely to head north up Brickhill Street (V10 on to V11) to access northbound M1 and even A5 if traffic at the MacDonald's Roundabout is queuing up as often happens in rush hour.	
57.15	15. A single entry/exit point appears dangerous and has a high risk in an emergency on or	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)	
		near the site.	
57.16		16. The redways do not extend south of the level crossing so there's a current and future risk to pedestrians and cycle users unless specific provision is made for them.	
57.17		17. The development will be visible to much of Bow Brickhill residents, particularly those living in Greenways, Church Road, London End Lane and Drakewell road. This raises the prospect of comment and publicity similar to those raised in Blakelands.	
57.18		18. General observation around Milton Keynes shows lots of similar existing warehouse developments that are open to being let, even closer to the motorways and A trunk roads reducing the attractiveness of this site for potential users.	
57.19		19. Utilities – there is poor internet speeds in the Bow Brickhill village close to Brickhill Street; the foul sewer for Bow Brickhill village and Woburn Golf Club pass through the north east corner of the site.	
58.1	Alistair Twigg	There seems to be no acknowledgement of the increased level of traffic on the A5 due to the opening of Junction 11a M1. This new junction means that anyone heading South to the M1 from the North and West of the city will find it much quicker to head down the A5 to 11a rather than the A421 to jctn 13. The roundabout is becoming more snarled up with traffic building back to the station compounded when the level crossing is close This will be the logical route for perhaps 50% of the new traffic from this ind. est. compounding the problem which will only be exacerbated when the Eaton Leys development is built. Hockcliffe will suffer with increased queues through the traffic lights. How about some joined thinking and discussion with Aylesbury Vale on this problem. DO WE REALLY NEED THIS SPECULATIVE DEVELOPMENT?? Which old industrial estates can be re-developed sympathetically to accommodate this.	
59.1	Catriona Thomson	Whilst accepting that this site has been approved within Plan:MK, it's clear that the fundamental building blocks which are required to ensure any development is viable within the environment it is planned for are currently and catastrophically absent.	
		It is abundantly clear that not only has there been countless errors and oversights in the planning of this allocation to date, but in fact, fictitious statements have been made within	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	official documentation, and then removed. Specifically, I refer to The South Caldecotte SPD approved for consultation at the Delegated Decisions meeting which took place on 12 March 2019 which stated: "Feasibility work undertaken by the Council suggests that a bridge could be constructed on the existing line of Brickhill Street (see fig 1.3), subject to more detailed technical work and planning permission. This would not require the safeguarding of any land within the South Caldecotte site."	
	No such feasibility study was ever carried out, so the significant traffic and congestion issues that will be created by this development have in no way even begun to be mitigated with respect to Brickhill Street and all routes leading from it. The upgrade to the A5 roundabout hasn't taken place yet either.	
	The traffic problems in this area are already significant and there are no plans to upgrade Brickhill Street in order to ease the current or future issues.	
	As it stands, we are not yet privy to the planned route of the Expressway. How can any of this go ahead before we know if this area will be affected by it?	
	Furthermore, the Transport and Works Order inquiry for the railway hasn't reported yet which is crucial information required before any plans can come forward.	
	Why hasn't a Transport Assessment been completed for the area, and why hasn't the Local Transport Plan Mobility Strategy for MK been considered here? More fundamental flaws that really should halt these proceedings before Milton Keynes Council makes some very serious mistakes with some very far reaching consequences.	
	Before the South Caldecotte development allocation can go any further, the above points need to be thoroughly investigated. Blindly forging ahead as has seemed to be the attitude thus far needs to stop. To date, these plans are extremely poorly thought out (if thought out	

Consulted	е	Comment	Officer Response (proposed change in bold, with new text underlined)
		at all) and potentially detrimental to every aspect of the surrounding areas.	
60.1	Beverley Thompson, Bow Brickhill	My main comment is that the SPD is premature, as I believe you will have heard from others.	
		First of all, we have major national infrastructure projects scheduled right on the doorstep of the proposed development. We have no idea where the Oxford-Cambridge Expressway is going, but the site is certainly within the "corridor" identified by those concerned. We also have the upgrade of East-West Rail which, if it ever happens, will greatly increase the traffic on the Bletchley-Bedford line and mean frequent closure of the level crossing. You have come up with a crazy design for a bridge over the railway. At least East-West Rail came up with a sensible design but guess what - it goes right through your site.	
60.2		Secondly, the traffic problems in this area have been well aired but, obviously, insufficiently for you to have taken them into proper account in this document. I see lots of references to "noise generators" (i.e. traffic) but little about how to manage the impact, other than planting a few trees. Where is the Transport Assessment? How can you do this consultation without one?	
60.3		You also refer to the upgrade of Brickhill Street. However, the schedule only covers the section from the A5 roundabout to the proposed access to the development at Crossroads Farm. You're hoping that the developers will pay for the rest to be upgraded. Good luck with that.	
60.4		The document also seems oblivious of the fact that other developments are planned in the immediate vicinity which will also have huge impacts, namely Caldecotte site B (the other side of the railway line) and the 3000 houses to be built between Bow Brickhill and Woburn Sands. Can we please see evidence of some coherent thinking on these issues in the Planning Department?	
61.1	Mary Preen	The fore fathers of Milton Keynes headed by Jock Campbell laid down the framework of an innovative new town based on clever planning which offered a synergistic solution to the issues faced at that time. They exhibited wonderful joined up thinking, allowing for immediate development and expansion over time. The current planning team are being offered the same exciting opportunity but from what I have read in the Milton Keynes	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Council documents the current proposals fall well short of that of their predecessors! At the time of consultation there are a number of unknowns which mean it is impossible to make any sensible decisions; namely the route of the much publicised expressway, the upgrading of East West rail with the associated increase of not just passenger, but also freight traffic with the knock on effect to the crossing at Bow Brickhill and the impact of the development already planned or taking place at Eaton Leys, Woburn Sands and Tilbrook Pastures plus the industrial expansion of Red Bull. These sites alone will have a massive effect on traffic in the area, which is already challenging when the rail barriers are down, especially at peak times. It is crucial that the impact of these are fully understood before further expansion can be considered and properly consulted upon. In my opinion a proper infrastructure needs to be established. The grid road system and red way network needs to be fully integrated and properly expanded with safe access across the railway line. This is a major entrance to Greensand Country. South East Milton Keynes is blessed with the only highly visible, major topographical feature i.e. The Greensand Ridge in the region. The views to and from are exceptional and should be considered in all future plans. Convenient and safe access should be provided for all. The MKC documents regarding a possible railway bridge are confusing and conflicting. It would appear that the proposed gradient would be way above the maximum permitted. The crossing will need to be future proofed and will require sufficient land to be reserved, on both the Caldecotte S and Caldecotte C sites. Do not build on everything and leave an apparently unsolvable situation as at Woburn Sands. The documents we are being asked to comment upon seem to me to be rushed, ill considered and totally flawed. A complete rethink is not only recommended but completely essential. This is an opportunity for some excellent planning, don't waste it and	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		Please think again!	
62.1	Victoria Burton, Bow Brickhill	I would like to send my comments on the south Caldecotte development. I strongly object to the plans for the following reasons;	
		The traffic is already terrible during peak hours in Bow Brickhill. The traffic backs up from the railway all the way through the village to the new development (Brickhill sands).	
		The roads around this area can't cope with the current traffic let alone traffic going to an industrial site.	
		The railway crossing is closed twice an hour currently (not including freight trains) this again leads to a backlog of traffic through the village and up to the A5 roundabout near hunters farm shop.	
		The A5 roundabout of often grid locked and does not operate smoothly. We should not add to the stress of the current volume of traffic.	
		I cannot see any transport assessment and that is necessary. We need that in place so that the councillors can see the impact on the area. Without that we are guessing on current volumes and the impact of adding to the network. I strongly object to these plans.	
63.1	Colette Horne, Bow Brickhill	I am a Bow Brickhill resident and am writing to strongly object to the proposed area of yet more monstrous warehousing which you think is a good idea to put on our doorstep. With all the proposed areas of development currently being considered there is no joined up thinking and it is wrong to be considering this development for the following reasons;	
		The traffic around and through Bow Brickhill is far too great already and the sheer volume and speed of traffic through our village is dangerous at peak times, with no	

Consulted	е	Comment	Officer Response (proposed change in bold, with new text underlined)
		 upgrade of Brickhill Street planned. There is no schedule or land set aside for a bridge over the railway. Once this land is developed for warehousing it is then too late for land allocation for a bridge so this will no longer be an option to alleviate traffic congestion, which will only get worse. The route of the East – West Expressway is not yet known. No transport assessment has been carried out yet. In conclusion, unless you are a resident in Bow Brickhill you will be clueless as to the amount of traffic congestion we are currently having to deal with, but it seems you think it is acceptable to make this worse. I reiterate there seems to be no joined up thinking considering all the other schemes which are underway and there seems to be an unwillingness to look at the whole picture for Bow Brickhill and the surrounding area. Instead the easy option to keep developers, councillors, government happy is to keep making the quality of our lives worse with more traffic, pollution, slower journey times, increased risk of accidents, etc. Perhaps when south MK is at absolute gridlock and what was once a 10 minute journey will take an hour, you will be happy. I would strongly urge you to please re-consider this warehousing development and plead that for once you 	
64.1	Mrs J Theobald	consider the impact it will have on Bow Brickhill residents and local wildlife. Enough is enough. I wish to register my concerns about the South Caldecotte Development Framework as I strong feel it is far too soon for consideration being given to the above development allocation based upon the facts that:	
		- the traffic problems are far too great already and the Brickhill Street upgrade isn't scheduled	
		- there's no schedule for a bridge over the railway	
		- we don't yet know the route of the Expressway	
1		- the upgrade to the A5 roundabout hasn't taken place	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		- the Transport & Works Order inquiry for the railway hasn't reported yet	
		- no Transport Assessment has yet been done	
		- The Local Transport Plan Mobility Strategy for Milton Keynes hasn't been taken into account.	
65.1	Alan Francis, Milton Keynes Green Party	We are pleased to note that the errors in the first version of the DF that we pointed out last year have been corrected. Level Crossing This DF should include space on the west side of Brickhill St for ramps and a bridge over the railway line. There will be an increase in both road and rail traffic at the level crossing and it will cease to function effectively. Road traffic will increase because of this proposed development and those at Eaton Leys, Levante and SEMK. The proposed EW Expressway may also increase traffic over the level crossing. Rail traffic will increase because of EWRL. There is currently 1 train per hour (tph) in each direction. This will increase to 2tph each way when the western section of EWRL opens in 2022 and 5tph or more each way when the central section of EWRL opens some years later. Barrier down time will be about 30 mins in each hour. The barriers will often remain down for a second train because of the proximity of the single track section of the EWRL over the A5 and through Fenny Stratford station. Thus barriers will be closed for as much as 7-8 mins. The traffic queues will tail back to the A5 roundabout and cause congestion on the A5. Highways England will object to that and may impose an Article 15? direction preventing the development taking place until the traffic issues are resolved. These long closures and associated queues would also disrupt bus services and be very inconvenient for pedestrians and cyclists. Pedestrians and cyclists would be tempted to go round the barriers and cross the tracks. Consequently the level crossing at Bow Brickhill station will need to be replaced by a bridge over the railway line at some point in the future. MKC made a mistake two decades	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	ago when it gave planning permission for housing at Turnpike Close on the north side of Woburn Sands level crossing. This development has made it almost impossible to replace Woburn Sands level crossing with a bridge over the railway line. This mistake should not be repeated at Bow Brickhill. It is therefore essential that space is reserved for a bridge. The DF should be changed to include space on the west side of Brickhill St for ramps and a bridge over the railway line. The bridge should accommodate a Redway as well as the road carriageway. We also addressed this in our main proof to the EWRL Public Inquiry. See paras 38-41, attached. All of the above also applies to Caldecotte Site C. The DF states that Brickhill St from the level crossing to the A5 will be upgraded to grid road status. So V10 would be a grid road with a level crossing in the middle of it. That is not compatible with the definition of a grid road in the Mobility Strategy. Fig 1.3 shows a possible design for a bridge on the current road alignment. However to construct that the road would have to be closed for about a year. A temporary road and level crossing would have to use part of the South Caldecotte site. So, whatever the route of the bridge, on-line or west of existing road, some land that forms part of South Caldecotte would be required, either temporarily or permanently. We would also note that the ramps in Fig 1.3 appear to be very steep and would not satisfy DDA requirements for any footpath along side the carriageway.	
65.2	Housing Some of the north eastern part of the proposed employment area, the North Brickhill Street Character area, should be considered for housing. This site is adjacent to Bow Brickhill rail station and so has the opportunity for good sustainable transport links. The vacant employment site Caldecotte C, north of the railway line and adjacent to the station, should also be considered for housing.	
65.3	Rail There should be some Rail connected warehouses in MK. South Caldecotte should be considered as a possible site.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
65.4	2.8 Access and Movement "There are frequent bus routes that serve Caldecotte (although not on Sundays)". The service is approx half-hourly. That is not usually regarded as "frequent". The nearest bus stops served by 11 and 12 are 400m north of the level crossing. So they are not within the DfT recommended maximum walking distance of 400m from the South Caldecotte site. "New bus stops are proposed on the A4146 at the entrance to the new Eaton Leys development." While this is correct it is of little use to anyone on the S Caldecotte site. They are more than 400m away and to access them would involve crossing the A5(T) at grade. There are, as claimed, existing bus stops on Brickhill Street just north of the level crossing. However they are not served by any buses so are irrelevant with regard to accessing the site by bus. To sum up, there are bus stops not served by buses and bus services without bus stops. Neither provide bus access to the site.	
65.5	3.4 Landscape Fig 3.1 The Junction of the spine road and Brickhill St should be moved a little to the north so that the existing group of trees can be retained.	
65.6	3.5 Movement Framework 3.5.9 The DF should require the developers to provide a bus service between the site and both CMK and Bletchley with a frequency of half hourly or better and a bus service between the site and both Woburn Sands and Kingston with a frequency of hourly or better. There should be a short, about 100m in length, bus-only road linking the north end of the spine road to Brickhill St so that bus services can operate through the site without having to double back. This could be along the boundary between the North Brickhill Street Character Area and the South Brickhill Street Character Area.	
65.7	3.5.10 There should be a footpath or Redway link to Fenny Stratford. This could be achieved by using existing or proposed paths, under the railway line, under the A5, back under the	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		railway line. Then there could be a new footbridge across the river Ouzel, just south of the railway line, and a short new footpath to link it to NE corner of Millward Drive, near the play area. From there existing paths and streets could be used to reach the centre of Fenny Stratford. This would require a footbridge over the river and less than 100m of new path.	
65.8		3.5.11 The proposed Redway alongside Brickhill St will end at the A5 roundabout. This is a hostile and dangerous environment for pedestrians and cyclists. Consideration should be given to a grade separated route across the roundabout for pedestrians and cyclists.	
66.1	Milton Keynes Forum	Milton Keynes Forum welcomes the opportunity to comment on the consultation draft of the South Caldecotte Development Framework Supplementary Planning Document. This is an important site at a key gateway to Milton Keynes and which will increase in prominence with the opening of the Oxford- Cambridge Railway line and construction of the Expressway. It will form the first impression of Milton Keynes to those who enter the city from the south and it is therefore important that the buildings on it reflect the high qualities that we seek for buildings in Milton Keynes.	
66.2		That said, we are concerned that this SPD is premature for three particular reasons: 1. Lack of context. The site needs to be planned in conjunction with South-East Milton Keynes so that the proper linkages between the two areas can be accommodated – both above ground (roads and redways) and below ground (underpasses, sewers and services). At the very least there should be provision for a redway and footpaths to pass underneath Brickhill Street but it is also important to understand the way that the road network in SEMK will work and how, and where, it will meet Brickhill Street. Without this work there is a danger of abortive expenditure and the risk that development in South Caldecotte could prejudice the wider plans for SEMK. 2. Lack of information about the railway bridge. It is clear that the level crossing will have to be replaced with a bridge (sooner rather than later) but we are concerned that there is a lack of information about this – particularly an absence of details of the vertical alignment of the bridge and whether it can accommodate the 85kph	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	design speed for the MK Grid Roads (Milton Keynes Planning Manual p41). 3. Lack of a Landscape Visual Impact Assessment (LVIA). The document requires the applicant to undertake an LVIA, which the design of the buildings should then respect. This begs the question as to how this will be achieved – will the Council issue a revised version of the SPD for public consultation once the LVIA has been received? This seems to be illogical and not the best use of resources and we consider that the LVIA should be undertaken first, and the draft SPD amended and then reissued for consultation.	
66.3	There is much use of the words "grid road" within the document (eg 3.5.5, 3.5.6) without a proper definition of what "grid road" actually means. We understand from Plan:MK that, in this context it could relate to a 70m wide corridor (which refers back to the dimension in the Milton Keynes Planning Manual) but the latter also refers to a design speed of 85kph (p41) which does not appear in Plan:MK. This creates uncertainty and ambiguity – on which side of Brickhill Street is the dualling reservation, for example? If it is to be on the east, is it compromised by the high-pressure gas main? There should therefore be a clear plan showing the developable edge of the site.	
66.4	SPECIFIC COMMENTS 1.6.5 Full details must be provided about the current impact of the closed level crossing gates eg a table comprising precise closure times and northbound and southbound queue lengths and how this will be impacted by the proposed development if the level crossing remains in place. The use of "total" figures in this context does not reflect the proper impact that the closure of the level crossing gates is causing.	
66.5	1.6.7 The need for the bridge crossing the railway line is not a "long term solution" but one that must be implemented prior to the commencement of work in South Caldecotte or, at the least, before the units on the site are occupied. More information is needed about the design of the proposed bridge and, in particular, its vertical section and whether the gradients on the bridge together with the forward visibility	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	will impact upon road speeds (Council officers have indicated to us, on an informal basis, that there could be a 30mph speed limit which, if correct, is unacceptable for a road that is described as being a "grid road"). We also need to understand how the bridge will be constructed and the length of time that it will take. Will it be necessary, for example, to close Brickhill Street for the duration of the work and, if so, how this will impact upon local residents and businesses as well as the wider local area? Information from our members confirms that MKDC had reserved a strip of land in Tilbrook for a suitable bridge and which, unfortunately, has been sold by MKC to Red Bull. Given that this is apparently the most logical and efficient alignment for the bridge (and has the additional benefit of enabling it to be built whilst the level crossing remains open), we would ask whether the Council can explore the matter further with Red Bull to see if it is possible to accommodate their needs whilst building the bridge on the most sensible alignment ie the one reserved by MKDC.	
66.6	This statement about the Priority Habitat is unclear when read against Para 3.4.5: Para 2.6 suggests that it is a "fairly poor quality example of lowland meadow habitat type" whereas Para 3.4.5 suggests that it should be preserved and restored. We are concerned that Para 2.6 gives an argument to the developer to remove the habitat whereas it should be a requirement to protect it and pass it to a body such as The Parks Trust that has the appropriate experience in grassland restoration. The fact that a habitat may be a "poor example" is not an accurate judgment upon its long-term potential for restoration and its restoration would accord with the clear and emphatic advice provided by Natural England in its response to the previous consultation. The concept of "re-creating" this kind of habitat by translocation elsewhere is not supported by any objective evidence that this could achieve the necessary outcome. This site exhibits characteristics comparable to some of those of the Oxley Mead SSSI and, if managed properly, could be an important ecological asset for occupants of the development as well as the general public. We suggest alternative wording for Para 2.6 as follows: "Recent National Vegetation	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Classification (NVC) grassland surveys have identified that the grassland type has characteristics of MG5, MG6 and OV23c communities. The applicant should make proposals for retaining this lowland meadow Priority Habitat and for transfer of it with an appropriate endowment to a local body with capability and experience at grassland restoration and grazing management, a task for which The Parks Trust is well suited. This grassland could provide an attractive feature for those working on this site'	
66.7	2.8 (Existing Road Hierarchy) We suggest that it should be made clear that, until the construction of a bridge to replace the level crossing, all HGVs leaving the site should be prohibited from turning left upon leaving the site.	
66.8	3.3.2 Does the reference to "small business units" include the B1 Use Class ie will pure B1 units be permitted?	
66.9	3.4.1 The proposed Landscape Visual Impact Assessment (LVIA) should encompass the visual impacts of proposed development on the Ouzel Valley Linear Park, and in particular on Caldecotte Lake. The Lake provides a visually tranquil landscape at least as important as the surrounding countryside. As MK Council's landscape assessment of the wider areas of the borough specifically excluded assessment of parklands within the 'city', it is deficient in valuing the visual importance of areas such as Caldecotte Lake. High warehouse buildings dominating the views south across Caldecotte Lake would devalue this popular area of parkland, unless large-scale landscape measures within the South Caldecotte site address this issue. We suggest that the first sentence of the text of 3.4.1 should be followed by this additional sentence: "The LVIA should include assessment of the visual impact of the proposed development on views out of Caldecotte Lake parklands. This could well suggest a landscape feature of structural planting parallel to the Bedford to Bletchley Railway at the northern edge of the proposed development". Please note however that, as per the Introduction (Point 3) we believe that the LVIA shold be undertaken before the SPD is finalised.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	We appreciate why the term "landscape belt" has been replaced, but consider "landscape buffer" to be an equally inappropriate way of describing a significant and creative landscape feature. Buffers are usually designed to absorb damage, so have negative connotations. We suggest a more neutral term such as "landscape structure" or "landscape feature". It is a popular myth that landscape provides significant "noise mitigation" but this is not endorsed by acoustics experts. The evidence seems to be that landscape can affect subjective perceptions of noise transmission to a limited extent, although the use of acoustic barriers and bunds makes clear that only solid structures are capable of significant mitigation of noise transmission. We suggest deletion of the reference to landscape providing noise mitigation.	
66.10	3.4.2 The text currently says: "Where the loss of hedgerows or trees is unavoidable and can be justified, compensatory planting should be provided elsewhere within the site in line with the mitigation hierarchy". It should be made explicit that the copse of mature oak trees at the north side of the site, which are probably a century or more old, cannot be compensated for in landscape terms by planting new oaks elsewhere on the site, so these existing trees should be retained. Such trees provide aspects of biodiversity that could not be replicated in new planting. Similarly, ancient hedgerows have biodiversity value that would not be replicated for very many decades by a replacement hedge. We suggest the text at 3.4.2 should be amended to indicate those landscape and biodiversity features that should be retained, as their removal is avoidable.	
66.11	3.4.7 The "Net gains for biodiversity" policy can readily be supported by provision on buildings for those bird species that rely entirely on nest-spaces on buildings. Swifts, in particular, are in serious decline and we suggest that the text should be amended to say: "Swifts are in serious decline and require nest-sites at roof-level on buildings which could readily be provided on warehousing and office buildings, when included within the design. There is excellent guidance on design and provision of groups of swift nest-sites for this colonial species on the Swift Conservation website".	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
66.12	3.4.8 Whilst such a link may serve a purpose as a wildlife corridor we do not consider it suitable as a "pedestrian leisure route" given its proximity to the A5. There should be a strong leisure route link through the middle of the area to link with the underpass under the railway.	
66.13	3.4.10 The link should be transferred to the Parks Trust. If this does not occur then it should be clear that the open space is dedicated to the public in perpetuity. We suggest the following wording: "The completed green link open space should be transferred to The Parks Trust on completion – together with the necessary capital endowment to enable investments that will fund future maintenance and management costs in perpetuity without recourse to any further funding from owners or tenants of the planned buildings, or from a local authority. Alternatively, if not transferred to the Parks Trust, then the space should be transferred to another body with comparable, proven landscape and open space management capabilities that can achieve this on the same funding basis with local accountability as well as providing permanent access to the general public at no cost and in perpetuity".	
66.14	Figure 3.1 There is no indication on the plan of the type of junction into the site. Is it to be a roundabout?	
66.15	3.5.5 Given the magnitude of the development we do not understand why the developer is responsible for upgrading part only of Brickhill Street to grid road standard, given that (presumably) traffic will be entering the site from the north and leaving in the same direction.	
66.16	3.5.10 It should be made clear that footpath/redway connections into the SEMK Strategic Urban Extension are to be via underpasses and not at grade crossings and constructed at the developer's expense. Amend wording of second sentence to read "Urban Extension via underpass(es) to be constructed by the developer".	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
66.17		3.5.11 Amend wording of first sentence to read "grid road corridor on the western side of the road at the developer's expense".	
66.18		3.6.8 Add wording at the end "and the adjoining roads bounding the site".	
66.19		3.6.10 See earlier comment in Introduction about timing of undertaking the LVIA.	
66.20		Figure 3.5 The term "Landscape Buffer" needs to be more fully described in terms of width and types of materials including a specification for the mature heights of trees to be used.	
66.21		3.7.2 We suggest the following be added at the end of the paragraph: "Benefits for biodiversity and visual landscape quality, together with public safety, will be best achieved by gradual and gentle gradients rather than steep sides to pond edges".	
66.22		4.2.3 See earlier comment on 3.4.10	
67.1	Elisabeth Scott, Wavendon Gate	The South Caldecotte Development Framework SPD is fundamentally flawed. I make the following points: Document claiming to be prepared by MKC Urban Design & Landscape Architecture Team has been prepared by another organization. If it claims to have done all the work it should be more transparent.	
67.2		6 week consultations should be 8 and not 6.	
67.3		The 'consultation' of Plan:MK should be just that - a consultation – how can it be delivered without feedback (also known as consultation).	
67.4		The Grid road proposals for Brickhill Street does not accord with Plan:MK as suggested in the plan for Development Framework.	
67.5		Ancient Roman sites namely Magiovinium are under threat of being enveloped by South Caldecotte.	
67.6		The freight level will increase, as will traffic noise and pollution from idling cars waiting for freight to pass – what air quality controls will be undertaken?	
67.7		Removing the phrase "Feasibility work undertaken by the Council suggests a bridge could	

Consultee		Comment	Officer Response (proposed change in bold, with new text underlined)
		be constructed on the existing line at Brickhill Street", when a FOI exposed that this hasn't	
67.8		happened at all suggest that this part of the document needs closer scrutiny. Walton Neighbourhood Plan, of which Brickhill Street lies in its boundary, should be taken into consideration when deciding on it as an access site.	
67.9		Station Road is a rural road and HGVs should never be allowed to access it.	
67.10		The redway stops at the wrong side of Brickhill Street for the site – the information supplied is incorrect.	
67.11		Brickhill Street will become noisier and more polluted – what measures will there be to ameliorate this?	
67.12		Hedgerow habitat is being felled left, right and centre along with mature trees – all important habitats for a rapidly declining insect and wildlife kingdom.	
67.13		Brickhill Street, as it stands will not stand up to the rigours of this extra traffic.	
67.14		Public right of ways such as the one under the railway bridge are at risk of 'disappearing' under this development.	
67.15		Drivers will follow sat nav routes to the detriment of actual proper usage – more robust, decisive signage needs put in place to encourage the 'right turn' intention.	
67.16		Why is an environmental impact assessment not required for this site? Given that the development of this site will have a huge impact on wildlife and insect habitat, noise pollution, traffic pollution and its resultant health implications – surely it needs one? Who decided it didn't?	
67.17		I think or believe very strongly that the SPD is premature and should be postponed for the following reasons: 1. The Expressway route is still unknown, therefore work on the Macdonalds roundabout should be ceased. 2. The council's upgrade of Brickhill Street (for their part of at the very least) finances are viable not attributed to the developer 3. MK Council does need to carry out a Transport Assessment (Plan:MK) of the entire SEMK area.	
68.1	Smith Jenkins on behalf of Red	The Council will be aware that our client operates a motorsport and technology business from their headquarters on Bradbourne Drive, Tilbrook. This is located to the north-east of	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
Bull Racing	South Caldecotte on the other side of the Bedford-to- Bletchley railway line in Tilbrook. Red Bull's headquarters and other premises on Tilbrook are currently accessed via Bradbourne Drive and Sherbourne Drive, which are each served by the V10 Brickhill Street north of the level crossing that is to the immediate north-east of the South Caldecotte 'triangle'. In April 2018 Red Bull were granted planning permission (under application reference: 17/03361/FUL) for the change-of-use of land east of Brickhill Street and the stopping up of Bradbourne Drive to create a new dedicated access to their premises alongside new parking facilities. This development is important to consolidate Red Bull's presence in Milton Keynes and provide a secure environment for their business. Highway matters, and in particular parking and the nearby level crossing, were a crucial consideration in the granting of permission for Red Bull's new access. 4 An extract from the location plan and approved layout for the development is contained in Figure 1 of our supporting letter, which shows how a new secure entrance for Red Bull's estate will be created after stopping up Bradbourne Drive. One hundred new parking spaces will be provided from a new road constructed between the Tilbrook Roundabout and the entrance to Red Bull's estate, along with a new redway for cyclists and pedestrians. The parking spaces are intended to alleviate the disruptive levels of on-street parking that Tilbrook currently experiences. The new access will include ancillary development such as manned security gates to control traffic entering Red Bull and a filter lane back onto the V10 for vehicles that are turned away. The development site when taken as a whole includes a boundary with the V10 at its south-west corner, just to the south of Tilbrook Roundabout. Red Bull have expended considerable time and money pursuing the acquisition of the site for this purpose and are in the process of discharging pre-commencement conditions so that work may start later this year. T	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	included to demonstrate that a bridge could be provided on the existing alignment of Brickhill Street and would not require the inclusion of additional land within the South Caldecotte site. However, it is clear from the plan that the bridge cannot be wholly accommodated within the highway boundary and is likely to encroach into our client's development site. As such, our client considers that it is necessary to reserve some part of South Caldecotte for a future bridge for two reasons. First, the indicative alignment should not assume that third-party land will be available for either permanent infrastructure or temporary construction access. Second, the indicative alignment may appear to be achievable in plan form but the clearance required over the railway track and need to connect appropriately with the surrounding network mean that the bridge as shown might have too steep a gradient to be useable. Our clients would welcome confirmation that Network Rail have been consulted on the Development Brief and have sight of any comments they have made in due course. The inclusion of such a relatively constrained bridge is at odds with the Brief's and Policy SD14's intention for Brickhill Street to be upgraded to full grid road standard. There is little sense in widening and improving the section of road north of the proposed access into South Caldecotte if traffic will still encounter at a pinchpoint over the railway. 5 Our clients consider that the future of the railway crossing is best resolved in combination with the proposed road upgrade so that their respective alignments are compatible and the wider network does not unduly suffer from the proposed development of South Caldecotte. The Development Brief reiterates the requirements of Plan:MK Policy SD14 in respect of the uses and form of development that will be delivered on the site. Our client's view is that the site remains suitable for B2/B8 commercial uses, although regardless of whether a bridge is constructed they would support arrangements that ensure t	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	associated with development at South Caldecotte could then be properly modelled and the overall form of the development planned accordingly.	
68.2	We are instructed by our client to make representations on their behalf to the consultation draft of the South Caldecotte Development Framework Supplementary Planning Document, which has been published for comment until 3rd July 2019. The Council will be aware that our client operates a motorsport and technology business from their headquarters on Bradbourne Drive, Tilbrook. This is located to the north-east of South Caldecotte on the other side of the Bedford-to-Bletchley railway line in Tilbrook. Red Bull's headquarters and other premises on Tilbrook are currently accessed via Bradbourne Drive and Sherbourne Drive, which are each served by the V10 Brickhill Street north of the level crossing that is to the immediate north-east of the South Caldecotte 'triangle'. In April 2018 Red Bull were granted planning permission (under application reference: 17/03361/FUL) for the change-of-use of land east of Brickhill Street and the stopping up of Bradbourne Drive to create a new dedicated access to their premises alongside new parking facilities. This development is important to consolidate Red Bull's presence in Milton Keynes and provide a secure environment for their business. Highway matters, and in particular parking and the nearby level crossing, were a crucial consideration in the granting of permission for Red Bull's new access. An extract from the location plan and approved layout for the development is contained in Figure 1, which shows how a new secure entrance for Red Bull's estate will be created after stopping up Bradbourne Drive. One hundred new parking spaces will be provided from a new road constructed between the Tilbrook Roundabout and the entrance to Red Bull's estate, along with a new redway for cyclists and pedestrians. The parking spaces are intended to alleviate the disruptive levels of on-street parking that Tilbrook currently experiences. The new access will include ancillary development such as manned security gates to control traffic entering Red Bull and a filter lane back onto the V10 fo	
	Red Bull have expended considerable time and money pursuing the acquisition of the site	

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	for this purpose and are in the process of discharging pre-commencement conditions so that work may start later this year. They therefore do not wish for such a substantial investment to be compromised by any inappropriate development of Caldecotte South. We note that Figure 1.3 of the Development Brief refers to the alignment of a potential railway bridge crossing to replace the existing level crossing when the line is upgraded to accommodate additional services. We understand that this is not consistent with Network Rail's own plans, which are currently that the level crossing will remain open (https://www.networkrail.co.uk/our-railway-upgrade-plan/key-projects/east-west-rail/western-section/). According to the Development Brief the indicative drawing is included to demonstrate that a bridge could be provided on the existing alignment of Brickhill Street and would not require the inclusion of additional land within the South Caldecotte site. However, it is clear from the plan that the bridge cannot be wholly accommodated within the highway boundary and is likely to encroach into our client's development site. As such, our client considers that it is necessary to reserve some part of South Caldecotte for a future bridge for two reasons. First, the indicative alignment should not assume that third-party land will be available for either permanent infrastructure or temporary construction access. Second, the indicative alignment may appear to be achievable in plan form but the clearance required over the railway track and need to connect appropriately with the surrounding network mean that the bridge as shown might have too steep a gradient to be useable. Our clients would welcome confirmation that Network Rail have been consulted on the Development Brief and have sight of any comments they have made in due course. The inclusion of such a relatively constrained bridge is at odds with the Brief's and Policy SD14's intention for Brickhill Street to be upgraded to full grid road standard. There is little sense in	

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		the uses and form of development that will be delivered on the site. Our client's view is that the site remains suitable for B2/B8 commercial uses, although regardless of whether a bridge is constructed they would support arrangements that ensure traffic is routed southwards towards the A5 rather than towards Tilbrook. Our client's priority is ensuring the free flow of traffic around Tilbrook roundabout in order to ensure their new access remains fit for purpose. We understand traffic to be a key concern for local residents too and are pleased to note section 3.5.7 of the Brief does refer to a Lorry Routeing Plan being required. However, we believe it would be beneficial if the Brief and proposals were supported by an assessment of the impact of development on queue lengths during the times that the level crossing is closed. The relative benefits of any routeing and travel plans associated with development at South Caldecotte could then be properly modelled and the overall form of the development planned accordingly.	
69.1	DLP on behalf of Hampton Brook	 1.0 INTRODUCTION 1.1 These representations have been prepared by DLP Planning Ltd (DLP) on behalf of HB (South Caldecotte) Ltd and are made in response to Milton Keynes Council's consultation on the emerging South Caldecotte Development Framework SPD (May 2019). 1.2 Hampton Brook are a leading regional property development and Investment company specialising in delivering commercial developments for a wide range of occupiers and Institutional Funds. 1.3 Hampton Brook's emphasis is on delivering premium quality buildings that are based on a full understanding of occupier's requirements. They have delivered a number of schemes supporting inward investment and economic growth throughout the region and specially in Milton Keynes. 1.4 Hampton Brook has an excellent track record for Development and delivery of employment floorspace in Milton Keynes and throughout the east Midlands and South East. Examples of recent developments include: Brioche Pasquier Wymbush Milton Keynes; Magnetic Park, Desborough; Velocity, Knowlhill, Milton Keynes; Reiser Kingston Milton Keynes; J16 M1 Logistics Park; The Pinnacle, Central Milton Keynes; Trek Cycles HQ Milton Keynes; Express Park, Rushden; Luton Airport Office development 1.5 Consultation with Milton Keynes Council (MKC) has been ongoing regarding this draft 	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	SPD.	
69.2	Whilst it is broadly supported there are a number of observations to be made and several amendments are proposed. 2.0 DETAILED REPRESENTATIONS 2.1 The revision of the SPD follows a consultation on a previous iteration of the framework between the 5th March and April 27th April 2018. 2.2 The revised draft provides additional detail and commentary about the site and surrounding area and sets out a number of requirements that should be brought forward when the site is developed. 2.3 The objective of the SPD is to illustrate how the site might be developed. It seeks to provide guidance – it cannot set new policy and as such should be seen as a tool to aid the development of an allocated site. 2.4 The SPD needs to be viewed in the context of the allocation of the site within policy SD14 of Plan:MK. The inspector found within their report that the site could be developed to meet forecast economic growth in Milton Keynes effectively. The inspector further found that the impacts on landscape character, heritage and transport could be dealt with under the planning application process. 2.5 The document has been prepared broadly in consultation with Hampton Brook and DLP Planning. We have reviewed carefully the draft SPD, and generally support its content. However there are a number of inconsistencies, factual inaccuracies or matters which are simply not relevant to the development of the site. 2.6 Our main concern, however, is that the Framework does not seek to address in any detail the contribution that the site can make toward employment growth within Milton Keynes as allocated. This is a matter that should be analysed at some length as it is an important material consideration.	
69.3	Paragraph 1.1.1: This paragraph indicates that the site is approximately 56.8 hectares, whereas paragraph 2.2.1 states approximately 57 hectares. The same figure should be used throughout the document for consistency.	
69.4	Paragraph 1.5.2: It should be noted that the inspector examining Plan: MK found that longer term the proposed Expressway would provide additional east west connectivity.	

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69.5	Paragraph 1.6.5: The text should reflect that once the gates are reopened at the level crossing, the traffic soon dissipates and that the queuing traffic is only a very short term issue.	
69.6	Paragraph 1.7.1: Additional revisions to the National Planning Policy Framework were published in February 2019 and should be incorporated.	
69.7	Figure 1.3: This figure is not relevant to the SPD as a bridge is not necessary to support the proposals.	
69.8	Paragraph 2.3.6: The reference to the Greensand Ridge having "significant nature conservation interest" irrelevant to the SPD, as the value of the ridge is in landscape terms. The inspector in their report commented that the development of the site would not adversely affect the setting of the Greensand Ridge.	
69.9	Section 2.7: In the fourth bullet point it is requested that the word "equal" be removed. It is not designated and an archaeological report that has been carried out suggests that this is not the case. There is no evidence to suggest that it is of "equal value." The section 'Prior to a planning application being submitted the area should be subject to an archaeological evaluation comprising geophysical survey (100% detailed magnetometry) and subsequent trial trenching to a specification agreed with the Council's Archaeological Officer.' Does not accord with para 3.6.11, and does not reflect the fact that this work has already been undertaken.	
69.10	Section 2.8: It should be noted within the text that although the level crossing causes localised congestion that this is only temporary, and once the crossing is open again this soon dissipates. It does not cause long term problems.	
69.11	Section 2.10: Road Hierarchy – grammatical point, should be amended to "Station Road is not suited…" "Brickhill Street, which is south…"	
69.12	Paragraph 3.4.5: This paragraph should be reworded to state that "applications should seek to preserve and restore this habitat where possible" We note that the SPD suggests that development should seek to preserve and restore priority habitats. Any development coming forward will seek to mitigate and/or compensate for any impact on the priority habitat in line with mitigation hierarchy. It should be noted	

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		that, as an allocated site, the significant need for the development as identified within the local plan is a material consideration that must be given significant weight. The inspector commented in their report that the local priority habitat is an issue that be mitigated.	
69.13		Paragraph 3.5.7 Typographical error - "Routing"	
69.14		 3.0 CONCLUSIONS 3.1 The draft South Caldecotte Development Framework SPD provides a detailed background to the site and its surroundings and sets out a number of requirements for any planning applications on the site to meet. 3.2 The draft SPD has been a collaborative process, with MKC asking for input from the developer HB (South Caldecotte) Ltd when required although comments have not been fully incorporated. We are nonetheless thankful for the opportunity to comment upon the draft SPD. 3.3 However, there are some inconsistencies within the document, and some points which are factually incorrect or irrelevant to the SPD which we respectfully ask be amended in the final version of the SPD. 3.4 It must be borne in mind the SPD is not a policy document and cannot seek to establish new policy. Rather it is an illustrative document that seeks to show how the development of the site in accordance with policy SD14 of Plan:MK could be realised. 3.5 The contribution that the site can make towards job creation and growth in the district as a result of its allocation should be highlighted and analysed within the document. 3.6 We trust that Milton Keynes Council will amend the document in accordance with our suggested changes and proceed to adopt the document without delay, given that the site has been considered suitable for development by a government inspector in allowing the site to be allocated. 	
70.1	David Lock Associates	Movement Framework (paragraphs 3.51 to 3.5.15, page 46 onwards) Omission of Policy CT8 requirements The Plan:MK policies listed in the box on page 46 do not include all those relevant to the movement framework, most notably Policy CT8 'Grid Road Network' is omitted. At para 3.5.5, the draft SPD states the Council's intention to upgrade the whole length of Brickhill Street (south of the railway line) to "grid road standard". This is supported and	

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	considered to be vitally important to serve both development at Caldecotte South and wider long term development in south east Milton Keynes. It is noted that the development at South Caldecotte will upgrade part of this length and make financial contributions to the upgrade of the remainder of the V10 between Tillbrook Roundabout and the new junction to grid road standard. The "grid road standard" is not, however, set out in the SPD, nor is any reference made to Policy CT8 which is the Council's specific adopted policy in relation to the grid road network which applies to "any major new development areas". (page 137 of adopted Plan:MK) and which sets out a number of criteria for new grid roads. It is considered that reference should be explicitly made to adopted Policy CT8 in respect of grid roads, firstly in para 1.7.6 along with the other policies listed, in the box on page 46, and then throughout the document. The design requirements for grid roads are set out in subsections (i) to (ix) of CT8. This requires a 60 metre grid road reservation for employment or other land uses, with junction design and reservations designed as set out in the MK Planning Manual. The need for a grid road reserve is noted at 3.5.6 although should be amended to make specific reference to the 60 metre grid road width plus other design requirements set out in CT8 to provide clarity and inform the site layout.	
70.2	Safeguarding of land for highways upgrades (Bow Brickhill Street and A5 Junction) Paragraph 3.5.5 of the SPD states that the developer will be required to upgrade the length of Brickhill Street from the A5 roundabout to the new junction to grid road standard with a financial contribution to upgrade the remainder of Brickhill Street to grid road standard. The SPD is not clear on how the grid road would address the railway crossing, other than stating that Network Rail has no plans to provide a bridge. A bridge is fundamental to the upgrading of Brickhill Street to function as a grid road. The funding of the railway bridge may require joint funding with Network Rail to ensure it is delivered in the short to medium term, but sufficient land must be safeguarded through the Development Frameworks for sites in this part of MK to allow for the delivery of a bridge crossing in this location. Similarly, para 3.5.3 states that the development will be "required to contribute to any necessary improvements to the local highway network including the A5 roundabout".	

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	However, the extent of the development area shown in Figure 3.4 runs to the back edge of the highway land and does not provide an offset or safeguard any land within the site for improvements to the roundabout which may be required as mitigation for this site (nor any land required for highway works at the junction for mitigation required as part of the cumulative growth in this part of MK). Equally any future layout may locate surface drainage in the southern portion of the site given its angled element and low-lying topography and/or require a slip road directly from the roundabout. This is a serious flaw in the Development Framework: failure to identify and safeguard land necessary for highway upgrades both at the A5 junction and on the V10 north of the new junction within the site will effectively preclude the Council from implementing such improvements without Compulsory Purchase of land. This omission runs counter to the requirements relating to delivery of strategic infrastructure improvements set out in policies CT8, SD9 and INF1. Paragraph 3.5.7 states that a Section 106 Planning Obligation will be required to prepare and adhere to a 'Lorry Routeing Plan' to direct traffic from the development onto the A5. This does not refer to routeing of HGV traffic to the site. No reference is made to non-HGV traffic which is likely to generate the greatest proportion of vehicular movements to and from the site. Regardless, the control and enforcement of traffic routeing by S106 agreement is unlikely to be successful with additional pressure placed on Brickhill Street and inevitable increased queuing time at the railway crossing.	
70.3	Suggested amendments to the Dev Framework: It is suggested that the following amendments are made to provide an effective SPD which will deliver the infrastructure required to support this development: (i) Include reference throughout the document to CT8 and make explicit reference to grid road requirements (i) to (ix) set out in the text and shown on plans; (ii) Include on the plans areas of land within/adjacent to the site to be safeguarded for (a) the grid road upgrade north of the new junction to the Tillbrook roundabout, and (b) an area in the south of the site to be safeguarded (or at least, be kept free of buildings, perhaps as 'sacrificial landscape') to enable A5 highway improvements to be implemented as a result	

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	of necessary highways mitigation for wider Plan:MK growth; (iii) a plan, timetable and delivery strategy to deliver the full upgrade of Brickhill Street to a grid road. This is particularly relevant given the Council's commitments and allocations for other strategic growth in the south of MK (at Eaton Leys, South East Milton Keynes and others).	
70.4	Movement Strategy (page 46 onwards) - Spine Street Paragraph 3.5.8 - Spine Street Paragraph 3.5.8 states that development plots will be served off a "spine street". Figure 3.5 Development Framework Plan and Figure 3.2 Movement Framework both show the spine street as a cul de sac served off of a single junction onto Brickhill Street. It is acknowledged that the railway line to the north and A5 to the west restrict access to the surrounding highway network. However, a single point of access from a strategic employment site onto Brickhill Street is unlikely to adequate serve the 195,000m2 of B2 and B8 uses and ancillary B1 floorspace envisaged in the SPD. In addition, public transport accessibility will not be acceptably served via a cul-de sac, let alone emergency access requirements. A secondary access onto Brickhill Street is therefore both desirable and likely to be required to meet highway safety and commercial operational requirements. There would be sufficient distance to allow a second junction onto Brickhill Street between the already proposed new junction and the railway. It is suggested that it would be sensible to upgrade the section of Brickhill Street between the proposed new junction shown on the DFP and any secondary access further north to a grid road standard in line with policy CT8 (the road widening/turning lane arrangements between the two junctions would probably equate to a grid road width arrangement in any event). Proper provision for redway connections and crossings along and across the two junctions will also be required, as well as connections with the wider existing and planned redway network associated with new development areas.	
70.5	It should be noted that Milton Keynes Council has an emerging Planning Obligations SPD which is likely to be adopted in due course. Reference to this document under the "Supplementary Planning Guidance" section (page 13) would provide greater clarity. Section 4.1 Infrastructure Delivery does not currently reflect the emergence of this	

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		document or wider scope of items sought within it. It is suggested that section 4.1 be updated.	
70.6		The draft SPD refers to the planning policy context. Reference is made to the July 2018 National Planning Policy Framework. This should be amended to reflect the revised NPPF published in February 2019. Paragraph 1.7 Planning Policy Background Adopted Plan:MK policies are referenced in several locations within the draft document. It is noted that not all relevant adopted policies are included. In particular, we query the absence of the following: Page 12 - FR1 Managing Flood Risk HE1 Heritage and Development CT8 Grid Road Network. Page 42 - NE1 Protection of Sites NE5 Conserving and enhancing landscape character and HE1 Heritage and Development. Page 46 - CT1 Sustainable Transport Network CT2 Movement and Access and CT8 Grid Road Network. Page 50 - D1 Designing a High Quality Place D2 Creating a positive character and HE1 Heritage and Development. These policies should be referenced in the final SPD: they are all of equal relevance to those already included and to not do so will mean that the policy position in the SPD does not reflect that of primary policy in Plan:MK.	
71.1	Tony O'Rourke, Bow Brickhill	East West Rail - Paragraph 1.6 onwards: The draft SPD makes reference to the east-west rail project to re-establish a rail link between Cambridge and Oxford to improve connections between East Anglia and central, southern and western England. At paragraph 1.6.6 it is recognised that stakeholders have concerns regarding existing traffic delays and queues at the level crossing on Brickhill Street. This will worsen with plans to double the number of passenger trains on the line by 2024.	

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	The solution suggested is to provide a bridge over the railway line to replace the level crossing as part of the upgrade of V10 to grid road standard. Network Rail has no plans to do so. Based on a suggested alignment shown in Figure 1.3, the SPD does not include any safeguarding of land within the South Caldecotte site to deliver this railway crossing. The status of this suggested bridge design is not clear; nor has a design solution been tested through any planning application or application for highway works (including through the Transport and Works Act Order undertaken in 2019 by Network Rail). Whilst we have no reason to doubt that a design solution is achievable, the alignment and extent of land required for its delivery is not yet known, including in terms of land ownership or other technical matters such as underpass locations or utilities constraints. This being the case it would seem prudent to safeguard an area of land within the South Caldecotte site for these highway works, or at least to ensure that this part of the site is kept free of built development (we suggest 'sacrificial landscape' as part of the site design) until a bridge design has been tested through a planning application. Therefore, the Development Framework should safeguard land from development in the north eastern corner of the allocation to give sufficient flexibility should the land in this area be needed to deliver the bridge. In addition to meeting policy objectives and a longstanding MK tradition of safeguarding land for future infrastructure, this would avoid any land ransom situation that may otherwise occur by narrowing down the design or delivery options for a crossing at this point. (NB. It is not considered that significant built development would be possible in this corner of the site in any event given its proximity to the railway line and Brickhill Street and so protection of a grid road transport corridor within a landscaped buffer would represent good planning (and reflects the approach taken by MKC in previous	
71.2	This objection is to be read in conjunction with our previously submitted representations on the Caldecotte Site C Development Brief that was submitted by LRM Planning on our behalf, they are now also submitting comments on behalf of the Bow Brickhill Parish Council. We've given our backing to the submission made by the Parish Council and the objections set out therein and we are significantly concerned over the impacts that the	

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	Scheme will have on our community. Notwithstanding the above, we are neighbours of the development site and we are deeply disappointed that so little regard seems to have been made towards safeguarding our residential amenity and the quiet enjoyment of our property. As such our personal objections relate to: 1. The impact of the railway bridge on our property; 2. The fact that the railway bridge is not implementable; and 3. The adverse impacts upon our property from the wider development. We set out below our detailed comments: 1. The impact on our property and garden The plan (at fig. 1.3 of the SDP) shows a large element of our garden (an extract is below) being included as part of a highways improvement scheme, given the nature of the road and proximity to a residential property it is likely that a large area of additional land, potentially including the house would also be required in order to provide the necessary buffers / engineering works etc (similar to the level required as part of the Network Rail options at appendix 1). Should this remain within SPD, then we will be forced to take require appropriate legal advice in respect of the adverse impacts caused from this identified land take and the future blight that it will cause.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Figure 1. Land take from no. 1 Station Road in Figure 1.3 of the Development Brief We are strongly of the view that it is highly inappropriate for the plan to remain in the SPD given that the scheme has not been tested through the planning process (Plan or application) and the Authority has had no discussions with us regarding the land required nor the scheme. The specified descriptions of blighted land are set out in detail in Schedule 13 Town & Country Planning Act 1990 as amended by the Planning & Compulsory Purchase Act 2004. In general terms the specified descriptions may be summarised as including "land on which a highway is proposed to be constructed or land to be included in a	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	highway as proposed to be improved or altered." Clearly it is intended to be adopted by the Council and will be a material consideration in the determination of any future plan. Clearly the plan impacts upon our property in terms of land take, potential overlooking and loss of amenity associated with the ramp. As such it can only have an adverse impact upon our amenity and property. 2. Implementation of the railway bridge It is our understanding that Network Rail have no intention of implementing the scheme at figure 1.3 nor is there any funding for doing so. Rather Network Rail have prepared two schemes (at appendix 1) that would meet their requirement. Clearly these options would require land to be safeguarded within the Caldecotte Site C and South Caldecotte allocations and Network Rail's technical and operational requirements cannot be achieved on the basis of the figure included within the guidance. A Freedom of Information request was undertaken by another local resident in respect of the bridge. The information provided by the Council indicates: "No feasibility work for a bridge over the railway was carried out or commissioned by the council – the layout included in figure 1.3 being provided by the developer's consultant as part of their planning and design work supporting the preparation of a potential future planning submission.	
	Milton Keynes officers considered the layout in figure 1.3 and agreed, that in principle would be possible to construct a bridge in this location with the existing road alignment.	
	There are therefore no detailed drawings and calculations available for your consideration."	

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	It is therefore wholly misleading to suggest that the bridge is achievable and equally troubling that the drawing submitted (figure 1.3) was in fact prepared by the landowners consultants. We would expect that in order for this to have any credibility it would need to be accompanied by technical specifications setting out in detail how it will be achieved. However, the Council also confirm that no such technical information has been supplied to support this drawing, given the impacts that it will inevitably have on our property this is very concerning. Indeed, we would expect that as a minimum for it to be included in any document to be adopted by the Council, there should be much greater detail in respect of the impact of the widened road and bridge, whether the gradients can be achieved, whether Network Rail's requirements can be achieved and result in an acceptable neighbouring scheme. Feasibility work has in fact by undertaken by transport consultants Miles White on behalf of Bow Brickhill Parish Council. It is noted that any bridge over the railway would need to be around 5m above the line. The Brickhill Street/Station Road mini-roundabout is approximately 80m south of the railway line and so a 1:16 gradient would be required on the realigned road if this junction is to be retained (and provide access to/from Bow Brickhill and beyond). Such a gradient is above the maximum gradient stated in TD 9/93 "Highway Link Design (Design Manual for Roads and Bridges) and therefore the bridge is not deliverable as shown. It is concluded that if a suitable gradient were provided (1:25) then the bridge would meet Brickhill Street much further south of the Station Road mini-roundabout, which begs the question how would Bow Brickhill (and beyond) be accessed?	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	Plan 1: Extent of ramp required to "bridge" the railway line In light of the above, it is clearly It would not be a sound nor reasoned justification for its inclusion.	

Consultee	Comment	Officer Response (proposed change in bold, with new text underlined)
	The Impacts of South Caldecotte	
	In addition to the inclusion of the railway bridge shown which will inevitably blight our property. We have significant concerns over the lack of detail in the brief and the flexibility within for the future developers. Plan:MK requires that a comprehensive development brief is required however there is limited detail provided which is a particular concern to us as neighbours given the potential impacts that the development may have on the enjoyment of our residential amenity. - Transport — we are concerned at the lack of detail over the potential traffic generation, impacts upon the local highways infrastructure and lack of any stated mitigation requirements. Indeed, there is scope for the scheme to have significant adverse impacts on the local area. Rather some of the key elements requested are unimplementable (the railway bridge, the redway and linking in). This gives us very little comfort that the gridlock will not extend into the local area and bring with it worsening air quality, noise and traffic;	
	Noise, Emissions & Light spill – there is no indication as to how noise and emissions will be limited from the uses which includes the potential for a wide range of B2 and B8 uses that could significantly impact in terms of both noise and emissions. Indeed, we consider that far greater detail is required in order to demonstrate how the requirements of Policy NE6 of Plan:MK will be complied with. There should be strict guidelines set out within the document as to how our amenity will be protected (including protecting our current noise levels, air quality and general standard of living); and	
	- Scale and impact of structures— we are concerned that there the presence of large industrial buildings will significantly impact upon our residential amenity and the document should set out much greater guidance on how the relevant Plan:MK policies (including Policies D1, D2, D3 and D5) will be complied with; and	
	- Landscaping and buffer – there is limited information on the extent of buffers	

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		required between industrial uses and existing residential uses. We are very concerned that this will cause significant adverse impacts on our home. With 57ha of development of industrial uses, there is clearly significant scope for the proposals to have a major impact upon neighbours. The framework plan within the document indicates a very dense form of development and we believe that far greater guidance should be given by the Council to ensure that the proposals protect and safeguard existing amenity.	
72.1	Caroline Jameson, The Brickhills	I write to express my objection to the proposed re-allocation of purpose to the land area proposed on the Consultation website entitled as above. Having lived in the area for over 14 years I have watched large areas being taken over by 'big sheds' due to our proximity to major N-S and soon to be E-W trunk routes. Whilst new employment may be a positive, jobs will be low skilled and far fewer than anticipated as warehousing systems automate yet further by the time these shed become operative. For a gain of only a handful of jobs, the development proposed will blight the beautiful landscape and peace of the Greensand Ridge and surrounding Woburn/Bow Brickhill woodlands. At weekends this attracts many cyclists and walkers alike from distances as far away as N London and East Bedfordshire to our pubs and restaurants; just 2-3 small pubs will likely employ just as many as in the 'big sheds' and these will be forced to close if the reason visitors come here is taken away and the development goes ahead. This is not a viable, reasonable or well considered location for such a Development for employment or the environment and it must be stopped.	