

18<sup>th</sup> November 2019

Our ref: IJ/ML

Mr Jon Palmer, MRTPI  
Head of Planning  
Milton Keynes Council  
Civic Offices  
1 Saxon Gate East  
Milton Keynes  
MK9 3EJ

Dear Mr Palmer,

**Application 19/01818/OUT**  
**Land at South Caldecotte**  
**Adopted Plan:MK (Milton Keynes Local Plan) Site Allocation SD14**

Further to my letter of the 24<sup>th</sup> October and our subsequent meeting with yourself, Tracy Darke, and David Buckley on 13<sup>th</sup> November, I thought it would be helpful to set out and clarify the various matters discussed and our position in order to progress this Planning Application.

1. Following the Secretary of State's Screening Opinion of 27<sup>th</sup> September, we have submitted the ES in respect of the matters identified as being of potential significant impact. This was submitted to MKC on 8<sup>th</sup> November, and received by David Buckley on 11<sup>th</sup> November 2019.

Please can you confirm that the ES is now on the Council's Planning Application website?

2. We discussed the planning application programme and we understand that your target determination date is 17<sup>th</sup> January 2020.
3. You confirmed that an ecology response would be provided by 15<sup>th</sup> November? Please confirm.
4. We are awaiting the Local Flood Authority response and that you are to chase and circulate for consideration? Please confirm.
5. We are awaiting a response from your landscape colleagues. Please confirm?
6. HB updated you following the long awaited meeting with your highways colleagues on 31<sup>st</sup> October 2019. It was agreed this meeting was very positive and I attach a copy of the record taken of the meeting.

Cont/d....

2.

Tracy Darke then advised that MKC are undertaking a “strategic transport study” for MK South area. MKC would like this study to be completed before determination of the PA. You indicated an expectation that that the “Phase 1” part of this work would be completed by the end of March 2020. No timetable was given to the “Phase 2” work nor any details of the scope or methodology to be used for this piece of work.

Given the evidence submitted in support of our application which demonstrates the feasibility of our development, and to the general agreement reached with your highway colleagues, we entirely fail to see what relevance this “strategic transport study” has to the matter in hand. It is patently not part of the considerations that underpinned Plan:MK and should not be used undermine the contents of the adopted development plan.

We entirely accept that a strategic transport study may form the basis for the consideration of a future review of Plan:MK, but are equally unclear how it relates to delivery of the adopted Local Plan. It cannot by definition influence the delivery of that plan, as it was not evidential to the examination of soundness. Policy SD14 is the key strategic employment site and its early delivery contributed to the Plan being found sound. Again, I hope it is helpful to set out below the Inspector’s comments relating specifically to Policy SD14.

- South Caldecotte is to be the “principal employment land allocation”. The site is a relatively unconstrained greenfield site and any localised environmental impacts relating to local priority habitats and species on the site could be mitigated in accordance with the requirements of policies NE2 and NE3 of the Plan.
- The allocation would be principally accessed via the A5, although the option exists to connect to the A4146 to the north via V10 Brickhill Street and the level crossing. Taking into account the impact of EWR11, queue lengths approaching the level crossing and mini-roundabout junction with Station Road, Bow Brickhill would be likely to increase but are unlikely to have a severe impact on highway safety. Longer term the proposed link through SEMK, including over the railway (modelled in MKMMM Scenario 2a) and the wider impact of the Expressway could potentially remove traffic from local roads to mitigate the moderate localised impact of South Caldecotte on queue lengths around the level crossing.
- In terms of wider impacts on the local highway network, the MKMMM modelling shows only a modest impact above and beyond the effects arising from background traffic growth to 2031 including committed growth. The location of South Caldecotte, adjacent Bow Brickhill station, on bus routes from CMK and with potential connectivity to the nearby cycle network present significant opportunities to secure modal shift in the workforce. Concern is expressed about Heavy Goods Vehicles (HGVs) weaving through Bow Brickhill, Woburn Sands and Aspley Guise to access the M1 and A421 eastbound.

3.

This route is distinctly unappealing and convoluted compared to the existing duelled A4146/A421 to the north connecting to M1 Junctions 13 and 14, and the good A5 connection to the M1 Junction 11a to the south at Dunstable. In the short term a routing plan could be secured in accordance with Policy CT2 of the submitted Plan, so that HGV traffic uses the A5 to access site. Longer term the proposed Expressway would provide alternative east west connectivity.

These were the strategic considerations put before the Inspector for his consideration and he was advised and accepted that the site was deliverable without delay. He endorsed the criteria within the Policy as being the matters which the applicant would specifically need to address as part of the application.

Therefore, on a practical level, to be advised at week 17 of a planning submission that this application will now only be determined once a "strategic transport review" has been completed was both a surprise and disappointing. This is particularly so when you could not provide a clear indication of either the scope, methodology or timescale in which such work will be completed to your satisfaction. Moreover, I note that you confirmed that the local ward members and the Parish Council had been advised of this piece of work being undertaken, but that you have not thought it necessary or courteous to inform Hampton Brook as the applicant for the allocated development. This is not withstanding the fact that Hampton Brook entered into a PPA with MKC in January 2018 and supported MKC's delivery of the local plan through its Examination in Public.

Over the last 2 years we have worked with MKC in good faith. We entered into a PPA in good faith on the agreement that it would help expedite the delivery of this important allocation. We have contributed significant funding towards the preparation of Supplementary Planning Guidance, which has now apparently stalled - and we have noted from our previous meeting that you have no programme to adopt in the near future, despite two rounds of public consultation. Furthermore, we have also confirmed through our respective legal advice, that it is not necessary in relation to determining the application, although our application has been drawn up to meet the requirements of the second published draft. We have made significant investment and legal commitment in order to deliver this site, including securing the up-front infrastructure commitments and significant costs to secure the mains statutory utilities. Inward Investment and funding to deliver this £300m employment scheme has been agreed and secured. Those commitments are a substantial burden on us, but demonstrate our commitment to deliver this principle strategic employment site as set out in Plan:MK and confirmed by the Inspector.

We are therefore completely at a loss to understand whether we can reasonably expect your Council ever to determine this application and to deliver the jobs and economic prosperity that it will create, and on which your plan is predicated?

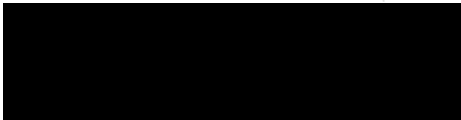


4.

Your position would appear to leave us with little choice other than to take the decision making process out of your hands, as we have very little remaining faith in the conduct of your Authority, unless you can convince us otherwise.

Kind Regards

Yours sincerely



**Ian W Jackson** BSc MRICS  
Director

CC. Tracy Darke MKC  
Neil Osborn DLP / Graham Robinson DLP  
Chris May Howes Percival  
Colin Armstrong HB / Graham Stanton HB