

DEVELOPMENT MANAGEMENT CONSULTATION

From: Elizabeth Woodhouse, Senior Landscape Architect

Application no: 19/01818/OUT

Proposal: Outline application including access for the development of the site for employment uses, comprising of warehousing and distribution (Use Class B8) floorspace (including mezzanine floors) with ancillary B1a office space, general industrial (Use Class B2) floorspace (including mezzanine floors) with ancillary B1a office space, a small standalone office (Use Class B1) and small café (Use Class A3) to serve the development; car and HGV parking areas, with earthworks, drainage and attenuation features and other associated infrastructure, a new primary access off Brickhill Street, alterations to Brickhill Street and provision of Grid Road reserve to Brickhill Street with appearance, landscaping, layout and scale to be determined as reserved matters (Environment Statement received)

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

Application Type: MAJOR

RETURN TO: David Buckley

DEADLINE STATED: 11th December 2019

CONSULTEE ADVICE - Based on the information provided:

No Objection

Comments, amendments or additional information

Objection *

* Where the Consultee believes their objection cannot be overcome by any amendments or additional information.

RELEVANT POLICY

NPPF paragraph 180
NPPF paragraph 170
Policy D1 (Designing a High Quality Place)
Policy D2 (Creating a Positive Character)
Policy D5 (Amenity and Street Scene)
Policy NE3 (Biodiversity and Geological Enhancement)
Policy NE5 (CONSERVING AND ENHANCING LANDSCAPE CHARACTER)

KEY CONSIDERATIONS (Related to specialist area of advice and in bullet point form as a summary)

- Principle of development
- Impact on the character and appearance of the area
- Impact on natural features and biodiversity
- Impact on the setting of a scheduled ancient monument and buried archaeological remains

DETAILED CONSULTEE ASSESSMENT

The outline development proposal in its current form raises an objection on landscape grounds. However, I may be in a position to remove my objection if significant changes are made to the proposal that take a landscape led planning approach to the site with its various constraints.

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Trees & Hedgerows

- I object to the proposed significant loss of existing landscape assets i.e. the trees, copses and hedgerows including trees the arboricultural survey grades as 'A' (trees of high quality) and 'B' (trees of moderate quality) which should be retained within development proposals for the site. The viable retention of trees 39 to 46 and their associated hedgerows, this would pose minimal constraint to the development proposals.
- The proposal provides minimal space for new landscaping and trees which doesn't equate to sufficient mitigation for that which will be lost.
- The existing trees should be retained in place (by serving a site TPO) until such time as an acceptable alternative layout is submitted which seeks to retain as much of the tree and hedgerow assets as possible.
- Tree loss should not be the only option considered however where it is unavoidable significant on-site and off-site contributions should be part of planning obligations for an outline consent for the establishment of mitigating tree cover (and to mitigate climate change) using the CAVAT metric for trees.
- Trees should be assessed for veteran tree features at this stage to ensure that irreplaceable habitats are not destroyed but are incorporated into an indicative landscape masterplan and parameter plans for development.

Landscape led Planning for Biodiversity

There are significant amounts of high quality and priority habitat that will be lost if development of the site in its current form is granted permission (i.e. hedgerows, ponds, lowland meadow, woodland, streams and orchard). Therefore:

- The development's scale, layout and developable area should be revisited. Proposals should include within an indicative landscape masterplan the retention and improved management of important and priority habitats.
- The biodiversity mitigation hierarchy should be closely followed in a revised scheme to fully consider avoiding and reducing impacts first and foremost, before considering mitigation.
- Development proposals should demonstrate that a net gain for biodiversity is possible by the submission of a BIAMetric and a biodiversity enhancement scheme and used to inform the indicative landscape masterplan and parameter plans.
- Revised proposals have the potential to provide significantly more ecological benefits through sensitive outline master planning of the site.

Missing Information - The BIAMetric is a key piece of baseline data which is missing from the application submission and should be provided prior to determination.

Landscape led Planning for Archaeological Remains

I note that the proposed development will result in the complete loss of heritage assets within the site. However it is possible that the more significant areas of buried archaeological remains (in particular the Roman street and adjacent areas of Roman urban settlement) could be protected and retained within the development layout. Therefore:

- The development's scale, layout and developable area should be informed by the archaeological constraints of the site to be compliant with Plan:MK Policy SD14(9). Proposals should include within an indicative landscape masterplan and parameter plans the retention of the more significant areas of buried archaeological remains.
- Revised proposals have the potential to protect heritage assets through sensitive outline master planning of the site.

LVIA

The setting of the scheduled ancient monument (SAM) 'Magiovinium' is assessed briefly in the LVIA where it is acknowledged that the site is located in the immediate setting of the SAM. A single viewpoint is illustrated, but no wireframe is presented from this viewpoint to illustrate how the proposed large warehouses will change the

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views from the scheduled monument. Also it is unclear how the proposal has taken into account Plan:MK Policy SD14 (6) in relation to proposed building heights and the impact on the setting of the SAM. Therefore in a revised LVIA:

- The impact on the setting of the scheduled ancient monument (SAM) ‘Magiovinium’ needs to be fully assessed in the LVIA.
- Additional viewpoints and selected wireframes agreed between MKC and the applicant’s LVIA consultant should be included (taken in winter) to accurately illustrate how the proposed large warehouses will change the views from the scheduled monument.
- Wireframes should include examples of different building heights and demonstrate that building heights (incorporating the proposed finished floor levels) has been informed by the LVIA
- The LVIA should clearly state the recommended maximum limit of building heights to avoid unacceptable impact on the wider landscape and heritage assets

The Illustrative Landscape Plan included within the LVIA demonstrates that the proposal is not a landscape led development proposal and will not deliver the robust landscaping needed to screen the impact of the development. For example the developable area is proposed right up to the edge of the road reserve along Brickhill Street relying entirely on new landscaping within the grid road reserve after the complete removal of all existing hedgerows along Brickhill Street to accommodate visibility splays and levels. In reality the detailed development will include little more than thin hedgerows of vegetation of insufficient substance to mask the appearance and lighting of the warehouse sheds. To protect visual amenity minimum 30m buffers of woodland planting are needed along the boundaries of the site in addition to any proposed easements, structures and paths or other surfacing.

The LVIA does not include a section on recommendations with specifics on mitigation measures such as recommended maximum limit of building heights to avoid unacceptable impact on the wider landscape and heritage assets, depth of woodland buffers, protection of significant trees and hedgerows providing instant mitigation, designing in service corridors / easements as well as space for tree planting infra-structure within the development, building design including roof-scape and materials to reduce visual impact.

RECOMMENDATION

The outline development proposal in its current form raises an objection on landscape grounds.

The development submission doesn’t fully consider through sensitive outline master planning of the site: the constraints of visual impact on the wider landscape and heritage assets, the benefits of retaining significant trees and hedgerows, the retention of significant amounts of high quality and priority habitat, the retention of heritage assets; all of which should be incorporated within a landscape masterplan and parameter plans.

However, I may be in a position to remove my objection if significant changes are made to the proposal that take a sensitive landscape led planning approach to the site with its various constraints.

Date response sent:	12/12/2019
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