

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22<sup>nd</sup> December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

This form has two parts –

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details\***

**2. Agent's Details (if applicable)**

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

Mr

First Name

Alex

Andrew

Last Name

Jenden

Wright

Job Title

Development Surveyor

Partner

(where relevant)

Organisation

Kirkby Diamond

Kirkby Diamond

(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number



**Part B – Please use a separate sheet for each representation**

Name or Organisation:

**3. To which part of the Local Plan does this representation relate?**

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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**4. Do you consider the Local Plan is: (Please tick as appropriate)**

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see the attached submission document which reviews a number of policies which need to be reconsidered.

The key elements relate to Castlethorpe’s suitability as a sustainable settlement capable of delivering proportionate growth with a meaningful private housing/affordable housing contribution. The submitted sites also provide an immediately deliverable scheme that can be built out very quickly. As such, we are of the view the submitted parcels should be allocated for housing in the emerging Milton Keynes City 2050 Plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the attached submission document and accompanying plans.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

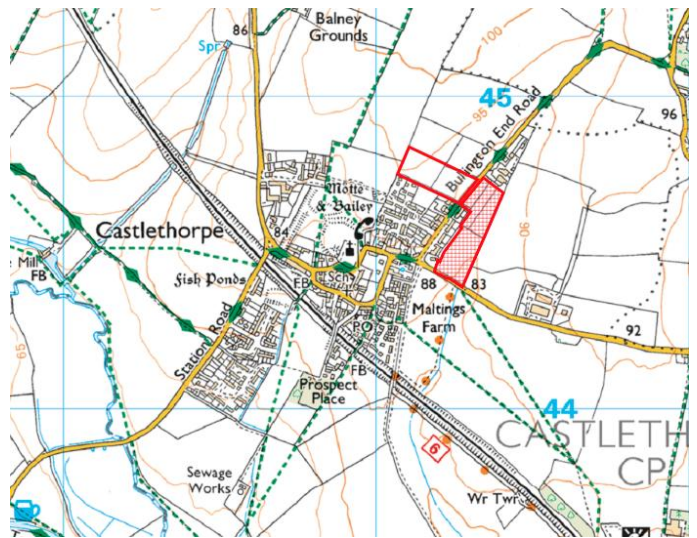
**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

### **Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

**Representations cannot be treated as confidential and will be published on our website alongside your name.** *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*



# Milton Keynes City Plan Regulation 19 Submission

Land at Bullington End Road, Castlethorpe

December 2025

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# 1 Introduction

- 1.1 The following report has been prepared on behalf of the landowners at Bullington End Road, Castlethorpe, Milton Keynes by Kirkby Diamond. The submission has been prepared in response to the Milton Keynes City Council's Regulation 19 Consultation, having regard to relevant national and local planning policy.
- 1.2 The subject site is undeveloped, currently being used for agricultural grazing. Given the location of the site, immediately adjacent to existing residential development, our suggestion is for the land at Bullington End Road to form a new residential allocation in the upcoming Milton Keynes City Plan. The site can contribute to Milton Keynes' housing delivery numbers in a sustainable settlement. Whilst a number of proposed allocations around Milton Keynes can deliver a significant quantum of residential development, the Council should also consider smaller/medium sized sustainable villages which can deliver meaningful housing contributions which can be delivered more quickly. The landownership is owned by one family meaning there are no complexities with delivery.
- 1.3 Milton Keynes Council is a strategic policy making authority. Section 5 of NPPF states, that '*strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment*', (SHLAA). The SHLAA will help to identify development sites to meet the councils five-year land supply<sup>1</sup>, providing a sufficient supply and mix of housing.
- 1.4 The subject site is deliverable for residential development within the next 1-5 years and should therefore be considered in the emerging local plan for residential development to help meet the Council's 5-year land supply and meet the local needs for housing. There have been numerous direct approaches made to the landowners by developers, illustrating that demand already exists. This site provides the opportunity for delivery of residential dwellings immediately in line with local demand and needs for housing in the area, taking into consideration mix and typology.
- 1.5 The NPPF details that, small and medium sized sites can make an '*important contribution to meeting the housing requirement for the area...and are often built-out relatively quickly*'.<sup>2</sup> The subject site has the ability to deliver a small sized scheme in a sustainable settlement with potential to also contribute to affordable housing numbers. Given the need to '*support development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*',<sup>3</sup> it is suggested that the land at Bullington End Road should be included within the MK City Plan 2050 for the purposes of residential development.
- 1.6 The MK City Plan 2050 states that they are proposing the housing requirement over the plan period to provide '*59,779 homes to ensure our needs are met*'<sup>4</sup> with an additional '*buffer of 19% to provide considerable flexibility to ensure our full local housing need is met by 2050*'.<sup>4</sup> This site offers an opportunity to make a positive contribution towards housing land supply and could deliver a sensitive form of development, as well as meeting the housing needs of Milton Keynes and Castlethorpe respectively.
- 1.7 Kirkby Diamond have undertaken a site inspection to assess the physical characteristics of the land and its relationship to the surrounding area. We have also reviewed the character of the village and the availability of facilities and services within the settlement. This submission demonstrates that the

site is available, suitable and deliverable for new residential development as part of the MK City Plan 2050.

- 1.8 There is also the opportunity to include additional land within an allocation, shown hatched red, that is within the same freehold ownership also capable of delivering residential dwellings, affordable housing and community benefits.

1 'National Planning Policy Framework' 2024 paragraph 69.a

2 'National Planning Policy Framework' 2024 paragraph 73

3 'National Planning Policy Framework' 2024 paragraph 73.d

4 'MK City Plan 2050' page 13 'Our Growth Strategy'

## 2 Site Description

- 2.1 The subject site is located in Castlethorpe Parish Council, forming the north-west part of Milton Keynes. The village is sustainable with some community facilities including community pavilion & playing fields, Castlethorpe Village Hall, Castlethorpe Village Shop, Castlethorpe First School and Acord Childcare nursery. This provides a good level of facilities which are available and that new residential development can support. Additionally, there may be a possibility for the subject land to provide further community facilities.
- 2.2 The land is located at the northern end of the village, immediately adjacent to the existing settlement boundary in the vicinity of Thrupp Close. The land is not subject to any specific landscape designations. Similarly, it is not within Castlethorpe's Conservation Area.
- 2.3 The site comprises an approximate gross area of 5.5 acres (2.2 Ha) and 7.5 acres (3.45 Ha) respectively for the parcels off Bullington End Road and Wolverton Road. See the site location plan to support the submission. A previous submission relating to only the 5.5 acre site included an indicative layout of a low-density development, suggesting the site could deliver just over forty dwellings and we would propose the same density approach to the 7.5 acre site also included in this submission. This is commensurate with the Neighbourhood Plan's desire to see 'small scale' development, reflecting its role in the settlement hierarchy. Despite this, the subject land available can deliver a meaningful number of private market homes and affordable homes whilst also providing onsite biodiversity net gain and community benefits.
- 2.4 The two sites are currently used for agricultural purposes in association with other adjoining land and agricultural holdings. The sites are well defined and are contained by existing hedgerows (that incorporate some trees) on the boundaries (with the exception of the northern boundary where a new hedge would be planted). There is no existing landscaping or mature vegetation within the body of the sites and there are no existing structures on the land. The site at Bullington End Road includes a gentle slope downwards towards the eastern part of the site while the land at Wolverton Road is level.
- 2.5 The quality of the land in agricultural terms is quite poor, being classified as Grade 3, and therefore an allocation of the land for residential development will not result in the loss of the best and most versatile agricultural land. Indeed, its poor quality is why it has been retained for grazing purposes.
- 2.6 In terms of the site's surrounding area, the land off Bullington End Road is currently open to the west and north. The southern border of the site largely comprises residential development on Thrupp Close. It is considered an area with 'consistency of design'. The subject site also adjoins the allotments to the south and the recreation ground to the southwest.
- 2.7 The site at Wolverton Road adjoins existing residential development at its eastern boundary and Glenmore Farm at its northern boundary with the adopted highway forming its western boundary between the two. It also has good road frontage of 100 metres to Wolverton Road at its southern boundary.
- 2.8 The sites are currently served by existing accesses from the adopted highway via neighbouring agricultural land that is within the same ownership. In addition, both areas have significant road

frontage to Bullington End Road of approximately and lie within the 30mph speed limit on the approach to the village. The nearest bus stop is located on North Street, close to its junction with Bullington End Road. This provides services to Central Milton Keynes, Wolverton and Leadenhall, as well as Northampton, Roade and Hartwell.

2.9 Our previous submission for the site at Bullington End Road included a proposed site layout, which we have included again. The proposal would comprise a mixture of two and three-bedroom properties, consistent with the needs identified in the Castlethorpe Neighbourhood Plan. There would be a small number of larger four and five-bedroom dwellings. It is expected that the development would incorporate affordable housing, and the indicative layout makes provision for thirteen affordable homes, representing 31% of the total. The affordable housing element would comprise two-bedroom bungalows, and two- and three-bedroom houses.

2.10 The design has had regard to the settlement's design, providing scope for a spacious layout with a landscape context with site density being 18 dwellings per hectare. It also affords greater outdoor space for the properties and better access to recreational areas for future occupant, satisfying increasing demand for this. The proposed housing could be sympathetically designed to adopt an appearance complementing the local setting and character of Castlethorpe. Furthermore, delivery of the scheme would be in accordance with the design principles set out in the Castlethorpe Neighbourhood Plan.

2.11 The proposed development would be set within a robust landscape context, including a landscape buffer around the site's perimeter to provide a soft edge. More extensive landscaping would be provided at the site's frontage, and this would incorporate the surface water attenuation area. This offers an attractive frontage to the site and a landscape approach to the village from Bullington End Road. It also provides significant scope for environmental enhancements.

2.12 The outline design approach identifies the following key steps and opportunities:

- Formation of a new hedgerow with native species to bolster existing landscaping
- Reinforced landscape with a margin providing soft edges adjacent to neighbouring open land
- Provide surface water attenuation at the lowest point on the site
- Provide a new vehicular access off Bullington End Road in the centre of the site's frontage
- Establish a built form that integrated naturally with the existing character of the village
- Form perimeter development, with an internal access road
- Provide connections to existing open space etc

2.13 The additional land that we have identified hatched red is level in topography and adjoins existing residential dwellings. This is also deliverable within the same timeframe as the land to the west of Bullington End Road and benefits from significant road frontage with Bullington End Road and Wolverton Road. Again, the important principle of the design for the Bullington End Road proposal would also be applied to the site at Wolverton Road, which shares many of the same characteristics.

## 3 Planning Policy

### Milton Keynes City Plan 2050

- 3.1 Milton Keynes Council are currently undertaking a regulation 19 consultation on The Milton Keynes City Plan 2050 plan. Consideration will need to be given to available and achievable sites that can contribute to the Council's 5-year land supply following the commitments from the Government to significantly increase housing delivery over the next five years.
- 3.2 Castlethorpe is categorised in the settlement hierarchy in tier 3 as a 'village and rural settlements' and for development to come forward through neighbourhood plans, as outlined in policy DS1 from Plan MK. However, there is an opportunity for further housing to be delivered in Castlethorpe to help meet the MK City Plan 2050's ambitions, to contribute to the vitality of this village and to support small to medium developers, the importance of whom forms a large part of the Governments current proposed NPPF update.
- 3.3 On reviewing the draft policy set out in the MK City Plan 2050, the following policy is applicable to the subject site:
- GS2 – Strategy for Homes - The plan makes provision for nearly 60,000 new homes to be developed over the plan period, aiming to allocate land that can deliver 37,000 homes by 2050.<sup>5</sup> The site proposes to deliver 40 dwellings which can provide a meaningful contribution to the Council's land supply in a sustainable settlement while providing the benefits highlighted in the paragraph above. Furthermore, the MKCC SHLAA (July 2024) table 4, makes reference to potential site options to deliver housing numbers in line with the plans requirement. This refers to potentially 3,267 homes coming forward from Rural Areas and reference to windfall allowance between 2,470 – 4,056 dwellings. However, the SHLAA also states, '*The plan will however be required to allocate further land to ensure that requirements are met as there are not enough current existing commitments or policy compliant sites to deliver the full housing requirement for the plan period*'. Therefore, we consider that the site should be considered for residential allocation in the MK City Plan 2050.
- 3.4 The plan states that one of its principles is to provide more affordable homes for those most in need including affordable homes<sup>6</sup>, to which the sites at Castlethorpe will also contribute and which will provide additional affordable homes in a village location where there is always a particular shortage. There is also an expectation for local communities to plan for growth<sup>8</sup>. The sites can provide logical and sustainable growth to the village which has suitable facilities including Castlethorpe First School, a childcare nursery, recreation and community facilities. The sites are therefore very much in a sustainable location.
- 3.5 We would point out that the subject site is not subject to any constraints against deliverability and is able to be delivered with minimal impacts on the Scheduled Ancient Monument in the village. Additionally, the subject site is of a size which can provide meaningful developer contributions to requirements for Hanslope GP surgery or other local community facilities.

PFHP7 – Well-designed Buildings and Spaces – The plan states that development proposals will be permitted where they meet certain objectives and principles. We note one objective reads, *'Buildings are of an appropriate scale, massing and height in relation to their context'*<sup>12</sup>. The proposed houses would be sympathetic to the local design and comprise a mixture of two and three-bedroom properties, consistent with the needs identified in the Neighbourhood Plan.

- 3.6 HQH1 – Healthy Homes – A development of the sites in Castlethorpe will provide an opportunity to provide M4(2), (3) and M4(3) homes to meet the changing need of residents over time in a village location where such homes are very rare.
- 3.7 HQH2 – Affordable Homes – The subject site is able to deliver affordable housing in accordance with policy requirements. Again, these will be delivered within a village location where the availability of affordable homes is so often lacking.

5 'MK City Plan 2050' page 13 Our Objectives 'Our Growth Strategy'

6 'MK City Plan 2050' page 12 'Our Growth Strategy'

8 'MK City Plan 2050' page 17 'Role of Neighbourhood Plans and Small Sites'

12 'MK City Plan 2050' page 129 Policy PFHP7 ' Well-designed Buildings and Spaces'

#### 'Castlethorpe Neighbourhood Plan 2015 to 2030' 2017

- 3.8 The Castlethorpe Neighbourhood Plan was 'made' in 2017, predating both the current version of the National Planning Policy Framework and the statutory development plan, and it provides context for the history of Castlethorpe.
- 3.9 Turning to consider land use policies, the Neighbourhood Plan identifies the extent of the settlement boundary.<sup>16</sup> Development proposals within the boundary are to be supported, while those outside are subject to provisions relating to the control of development in the countryside.<sup>17</sup>
- 3.10 The Castlethorpe Neighbourhood Plan identifies one site for housing development, which has since subsequently been developed, referred to as Maltings Field. This is located on the southeast edge of the settlement and accommodates 32 dwellings, with emphasis on smaller, open market affordable homes. The allocation set out specific requirements for the site. <sup>18</sup>
- 3.11 The plan goes on to provide other policies concerning the design of development in the village and the improvement of community facilities including the recreation ground buildings and the allotments amongst others, which are identified as 'proposed assets of community value'.<sup>19</sup> The recreation ground and Castle Field, together with the South Street paddock are also identified as Local Green Spaces. <sup>20</sup>

16 'Castlethorpe Neighbourhood Plan' 2017 Policy 1 'Settlement Boundary'

17 'Castlethorpe Neighbourhood Plan' 2017 Policy 9 'Surrounding Countryside and Landscape'

18 'Castlethorpe Neighbourhood Plan' 2017 Policy 2 'Housing Development at Maltings Field'

19 'Castlethorpe Neighbourhood Plan' 2017 Policy 4 'Community Facilities'

20 'Castlethorpe Neighbourhood Plan' 2017 Policy 5 'Local Green Spaces'

### National Planning Policy Framework (December 2024)

- 3.12 The National Planning Policy Framework emphasises the purpose of the planning system is to provide for sufficient housing and other development in a sustainable manner.<sup>21</sup>
- 3.13 In rural areas, *'planning policies and decisions should be responsive to local circumstances and support housing developments that reflects local needs, including proposals for community-led development for housing'*<sup>22</sup>. Local planning authorities should identify opportunities for villages to grow and thrive where there are groups of smaller settlements, developments in one village may support services in a village nearby. The subject site presents an opportunity to provide much needed housing in a sustainable settlement with good infrastructure to Milton Keynes.
- 3.14 A key policy within the Government's Framework is *'the overall aim to meet as much of an area's identified housing need as possible, including an appropriate mix of housing types for the local community'*.<sup>23</sup> As mentioned, the site is able to deliver a suitable mix of housing in line with the demands of the Neighbourhood Plan.
- 3.15 It further advises that planning policies and decisions should *'promote and support development of under-utilised land and buildings, especially if this would help to meet identified housing needs for housing'*.<sup>24</sup> The site is available for delivery in the short term and contribute to Milton Keynes' housing land supply via surrounding villages, particularly as this is not constrained by complex deliverability/land ownerships unlike some larger allocations.
- 3.16 It continues to recognise that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium sized sites. The NPPF recognises that *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area'*<sup>25</sup> signifying the importance these sites can contribute to housing requirements particularly given Castlethorpe is a sustainable settlement.

21 'National Planning Policy Framework' 2024 'Introduction'

22 'National Planning Policy Framework' 2024 'Rural Housing'

23 'National Planning Policy Framework' 2024 'Delivering a sufficient supply of homes'

24 'National Planning Policy Framework' 2024 'Making effective use of land'

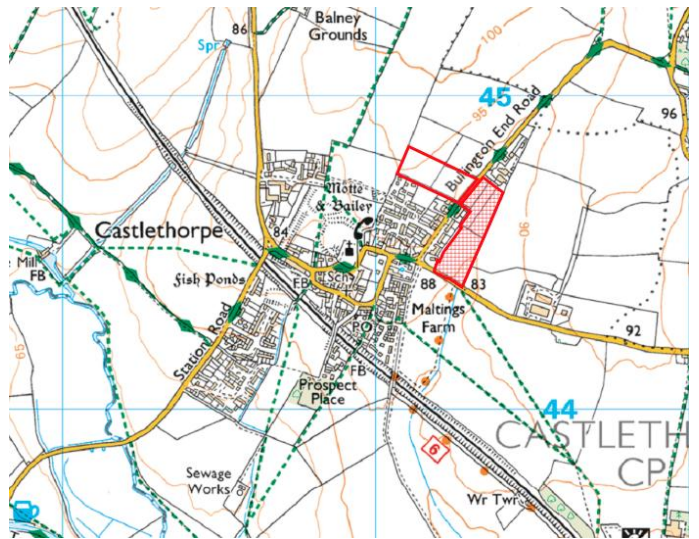
25 'National Planning Policy Framework' 2024 'Identifying land for homes'

## 4 Assessment

- 4.1 The indicative layout demonstrates that the subject sites would meet both the housing and affordable housing needs. In particular, it would deliver an opportunity for a small/medium sized development that accords with the character and size of the village.
- 4.2 The sites have access off the main road Bullington End Road via agricultural accesses. A previous submission relating to only the 5.5 acre is currently accessed through neighbouring agricultural land within the same ownership but also comprises considerable road frontage to enable the creation of an access direct from the adopted highway. The 7.5 acre site also included in this submission, has independent access also off Bullington End Road and has the ability to accommodate access off Wolverton Road. The site also has good local connectivity transportation.
- 4.3 The land is not of good quality and as a result has been retained as agricultural grazing land for many years. Development of the land would therefore not result in the loss of the best and most versatile agricultural land.
- 4.4 The sites have been used for agricultural purposes and is very unlikely to be affected by contamination.
- 4.5 The land is not subject to any specific landscape designations. Similarly, it is not within any Conservation Area.
- 4.6 The sites are available and immediately deliverable for residential development.
- 4.7 In addition, the land hatched red is within the same freehold ownership and is also available and deliverable for residential development.

## 5 Conclusion

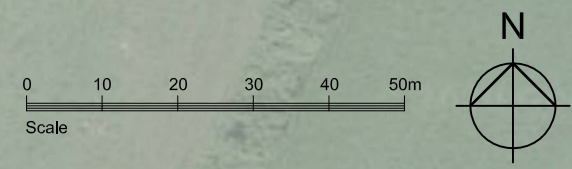
- 5.1 The sites clearly presents an opportunity for residential development and a valuable contribution to the housing land supply for MKCC. The sites provide an excellent opportunity to comprehensively promote development through the new Local Plan process having regard to design and landscape considerations.
- 5.2 It is considered that in all other respects, the subject sites comply with relevant development plan policies and in particular:
- 5.3 The sites are well-related to the settlement and would provide a frontage to the Important Open Space.
- 5.4 The form of development is able to maintain or enhance the Conservation Area.
- 5.5 The proposed access of Bullington End Road is able to serve the development of the sites with suitable visibility splays being achieved.
- 5.6 The layout of the development can minimise visual impact on the open countryside.
- 5.7 A high-quality of development can be achieved.
- 5.8 Existing landscaping can be retained or enhanced.
- 5.9 The opportunity for a biodiversity net gain to be achieved and enhance the surroundings.
- 5.10 Taking account of the above, we believe that the subject sites should be identified as a new residential allocation within the MK City Plan 2050 following the regulation 19 consultation.
- 5.11 The land ownership profile presents an opportunity for the land hatched red to also be included as an allocation, being deliverable within the same timeframe.



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BULLINGTON END ROAD



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REV: BY: DATE: DETAILS:

PROJECT:  
**Land off Bullington End Road  
Castlethorpe**

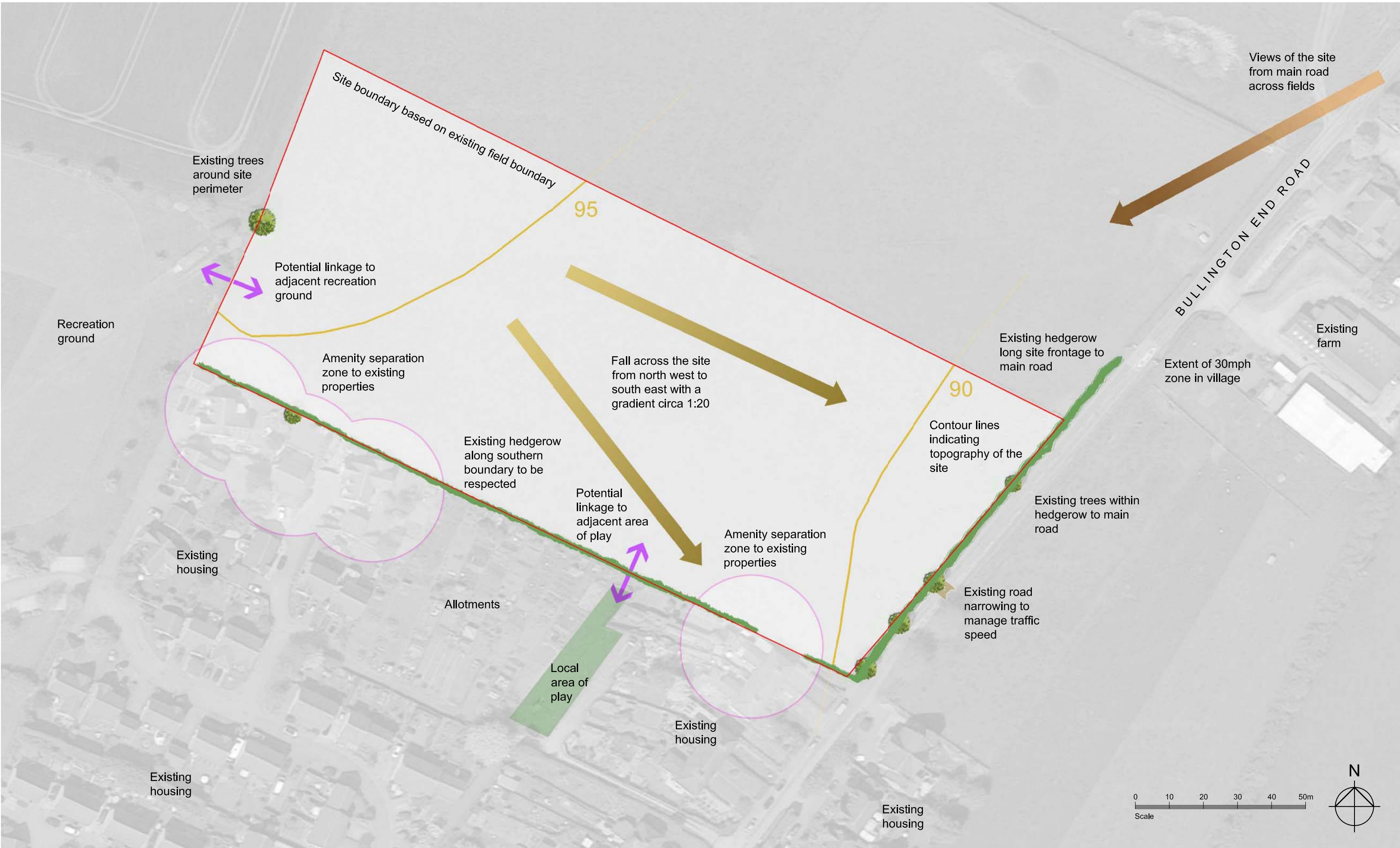
CLIENT:  
ISSUE STATUS:

DESIGN  B of Q  CONSTRUCTION  RECORD

DRAWING TITLE:  
**Location Plan**

SCALE: **1:1000 (A3)** DATE: **June 2020** BY: **JB**

DRAWING NO.: **20067 (B) 001** REVISION:





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REV: | BY: | DATE: | DETAILS:

PROJECT:  
**Land off Bullington End Road  
 Castlethorpe**

CLIENT:  
 \_\_\_\_\_

ISSUE STATUS:  
 \_\_\_\_\_

DESIGN  B of Q  CONSTRUCTION  RECORD

DRAWING TITLE:  
**Initial Sketch Scheme**

SCALE: 1:1000 (A3)    DATE: July 2020    BY: JB

DRAWING NO.: \_\_\_\_\_    REVISION: \_\_\_\_\_

**20067 (B) 021**



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PROJECT:  
 Land off Bullington End Road  
 Castlethorpe

CLIENT:

ISSUE STATUS:

DESIGN  B of Q  CONSTRUCTION  RECORD

DRAWING TITLE:

Street Scene

SCALE:  
 NTS (A3)

DATE:  
 July 2020

BY:  
 CT

DRAWING NO.:

20067 (B) 022

REVISION:



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