



The Civic Society For Milton Keynes

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20 September 2018

Dear Sir

**PLANNING APPLICATION 18/01469/FUL
ALDI, STANTONBURY LOCAL CENTRE, CENTRAL MILTON KEYNES**

We object to this application and ask that it be refused.

By way of introduction it is worth recording that, until recent years, the Local Centre seemed to function well and was important in offering a range of services to the local community - general store, pharmacy and a hot food takeaway along with other uses (such as a vets) that changed over the years, as is the nature of such developments. We are aware that the current owner (Sainsbury's) made an unsuccessful attempt to build a large supermarket but, when that was unsuccessful, it would appear that, rather than commit to new investment, the centre has been allowed to decline. It is our assumption that prospective tenants were not offered leases upon appropriate terms to make their own investment worthwhile.

Local centres are important and integral parts of the local communities that they serve and it was a logical, and conscious, decision that one should be sited adjacent to the largest planned school in MK, as well as being in an area with a significant catchment population. The purpose of such a facility is to provide a range of convenience goods to the local population - groceries, household products, pharmaceutical goods, newspapers, cigarettes, hot food takeaways etc as well as other uses that could have a wider catchment eg charity shops. The applicant's business model does not provide such a range of uses. It is also reasonable to assume that it will be a less sustainable use in that it will tend to draw from a wider area than would a conventional local centre supermarket.

The basic effect of the application is to demolish a local centre and replace it with a single unit that does not provide the full range of services that one would expect in such a location. This is a major step within Milton Keynes and is not one that we can support. We therefore feel it appropriate, in the circumstances, to ask the applicant for a full marketing report that details why it is considered that this is no longer a suitable location for a local centre. For the sake of clarification, this should also confirm the commercial terms that have been on offer to prospective tenants along with examples of terms offered on other local centres in MK eg Oakridge Park.

As far the plans are concerned we have the following comments:

1. The design of the school, local centre and associated buildings was a co-ordinated scheme to integrate a number of differing uses into a cohesive design around a square and we have included it as a proposed entry for the New Town Heritage Register. It is typical of the domestic style of architecture being promoted by Buckinghamshire County Council in the 1970s who designed the Campus and, we believe, may have designed the Local Centre also (which is mentioned in Pevsner). The development also contains the "Bicycle Wall" mural by John Watson, created by local schoolchildren in the 1970s, on the end of one of the buildings proposed for demolition and a noted example of community art that was an integral part of the creation of Milton Keynes.
2. The design and finishes of the proposed building are inappropriate for the location: pitched roofs and brick would be more appropriate.
3. There has been no attempt within the proposal to accommodate "Bicycle Wall", although we note the statement within Para 4.7 of the Design and Access Statement that it will be "removed carefully ...and retained for community use elsewhere". We do not feel that this is appropriate and we feel that the applicant/owner should accept the responsibility for ensuring either a) that it be incorporated within the scheme or b) if it is to be removed, then the applicant should provide a suitable sum to ensure its relocation at an appropriate alternative location, preferably as an integral part of this exercise. The mural has a clear local resonance and should ideally stay within the site, adjacent to the school whose children helped to create it. The proper relocation of the artwork should be seen as a creative challenge by the applicant to respect those people who will form its customers and should be seen as an integral part of this planning application. We note that the Sainsbury family are noted patrons of art.
4. The proposed building is a poor neighbour to the school and seems to have been planned in ignorance of its scale and location. It is far too close to the school building and will present an abysmal prospect when viewed from the school windows. The gap between the two buildings appears to be c5m, which is unacceptable, particularly if the rooms within the Campus are classrooms that will be occupied by students during the schoolday. The building will clearly deprive the Campus buildings of daylight and sunlight and we see no reason not to use the same distance (13.7m) to separate the two buildings that is applied to "back to flank" situations in the design of housing layouts.
5. The Energy Report makes no mention of the embodied energy that will be lost in demolishing the existing, perfectly serviceable buildings. Nor is there any reference to the loss of daylight and sunlight in the Campus buildings and the extra energy that will be consumed in compensation.
6. The lack of additional retail units means that the redevelopment cannot support the full range of Local Centre services that one would expect in such a location. At present, for example, the existing pharmacy covers both Stantonbury and Bradville. However, on the assumption that it will have to close to permit the redevelopment, it will cause great inconvenience to the local residents. There is no opportunity within the redevelopment for local centre uses such as hot food takeaways, a post office, newsagent etc.
7. We have a concern about the change in the parking arrangements. The current local centre parking offers a "safety valve" for the non-shopping users of the local centre -

patients at the medical and dental surgeries, the church etc - when the other parking is in use, notably during the schooldays. The new arrangements would essentially "privatise" this space and there is no guarantee that the applicant will continue to allow such free use - spaces could, for example, become time-limited or exclusively restricted to shoppers at the applicant's store. This would be unacceptable and runs contrary to the general principles of the way that local centres operate. We would ask that a full survey be undertaken as part of the application process to show the way in which parking demand fluctuates throughout the week.

8. We have a concern about the extent of traffic at either end of the schoolday, which can approach gridlock. The fact that the proposed store will draw from a wider area will exacerbate this situation by increasing car borne traffic and we would ask that the appropriate traffic surveys be undertaken.

The removal of a local centre is a significant and unwelcome step and we therefore ask that the application be rejected on the following grounds:

1. It is contrary to Policy LC3 of the Local Plan, which states that "Planning permission will only be granted for new retail....provided the scale and nature of the proposal is consistent with their role as Local Centres". It is clear that this application is not consistent with the role of Stantonbury Local Centre: it is proposing its removal and replacement with a single store, limited to a particular range of goods provided by the applicant. It will also draw from a wider area than appropriate for a Local Centre.
2. It is contrary to Policy CS13 of the Core Strategy in that it does not exhibit "high design quality" - it is, in essence, a standard design as used elsewhere throughout the country by the applicant. We appreciate that this is an integral part of the applicant's business model but we note that it is possible to design alternatives, as with the applicant's store on the A5 on the northern edge of Towcester.
3. It is contrary to Policy CS19 of the Core Strategy in that it does not protect and enhance the significance of the Borough's Heritage Assets, in particular, Bicycle Wall.

If however the Council is minded to grant approval then we would ask for three conditions to be imposed:

1. That the car parking be freely available to all with no restrictions whatsoever.
2. That the existing buildings are properly recorded prior to demolition as with other "First Generation" New Town buildings that have been demolished.
3. That Bicycle Wall should be carefully removed, packed accordingly and handed to a suitable body eg Stantonbury Parish Council with the appropriate funds to secure its re-erection in due course.

The loss of a local centre is a critical issue and we would ask that this application be determined at Committee rather than by officers under delegated powers.