



The Civic Society For Milton Keynes

## **PLANNING APPLICATION 21/00999/OUTEIS MILTON KEYNES EAST – LAND EAST AND WEST OF A509**

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

We are keen that the development of MK East (MKE) should learn from the development of the other expansion areas on the edge of Milton Keynes and result in an attractive place to live that is valued by its residents and visitors alike. Whilst there is much to commend regarding the application (such as the focus on high quality open space) we are concerned that it does not take into account the lessons of the development of the Western Expansion Area, to which we refer below.

We also feel that the application makes a serious, regrettable and ill-judged incision into the grid road network which offers a dangerous precedent for the future.

We make the following points:

### **1. LACK OF A COMPREHENSIVE PLAN FOR MK EAST**

PlanMK (Policy SD12) is clear in requiring a “comprehensive development framework.....for the Strategic Urban Extension as a whole”. Whilst this has happened in part through the approval of the SPD, the application covers only a portion (albeit the major portion) of the SPD area and it is therefore not possible to tell whether the development as a whole will conform to the SPD: the lack of a plan for the “Bloor Homes” area is particularly concerning. By way of an example, the Housing Statement (s3.8) refers to self-build housing and that “...*the parameters provide the flexibility for St James to provide self-build serviced plots in the future and the wider allocation can provide for self-build provision should an area not be provided by St James. It will be for Bloor and MKC to demonstrate collectively how this will be delivered*”. What if Bloor’s application contains a similar comment referencing St James? The Council will be powerless.

Developing this argument further, the SPD requires four grade separated pedestrian/cycle links across the A 422 between Newport Pagnell and MKE. However their spacing is disproportionate, with only one being on the St James land. There could be a risk that Bloor could argue that they are not prepared to bear the cost of all of “their” links due to their cost which, one might argue ought to be borne in part by St James as the majority landholder.

We are particularly concerned about the redway link immediately to the west of Tickford Roundabout, potentially beneath the A442 bridge over the River Ouzel, which will provide critical access into the heart of Newport Pagnell for the residents of MKE. We understand that the land required is outside the control of both St James and Bloor and therefore we need to understand how the link can be delivered. It is vital that it is available for the first residents as they will be relying upon the town for goods and services until the construction of the Community Hub.

The Council should make clear to both Bloor and St James that it requires both applications to be available for their consideration at the same time to ensure that the essential inter-relationships

between the two to be assessed together, and that it would be inappropriate to decide on either application until it has the ability to consider them both at the same time.

We argued this particular point (about a total strategic approach) at MK Council's Development Review Forum and, whilst we are pleased to note that the land owned by both MK Council and Parks Trust are now included within the application, the land controlled by Bloor Homes and SEGRO/Newlands is not.

We note that the Planning Statement (p50 Note 1) states that the plan has been prepared "in conjunction with Bloor Homes": there is no evidence of this and no supporting statement from Bloor within the application.

## 2. PACE OF DELIVERY

The 26 year programme of delivery is far too slow and will mitigate against the early establishment of a thriving community – in this context we note the slow, drawn-out and, apparently, incoherent process in developing the Western Expansion Area where there are two significant but separated pockets of development and no shops or other commercial facilities.

Whilst we are pleased to note that the "Community Hub" is included in Phase 1 it is clear that there will not be sufficient catchment population to enable its successful development and no indication in the application about whether or not it is to be developed in phases.

A long development period also exposes residents to matters such as mud on roads, unmade roads awaiting adoption etc, which can be a very wearing process: we return to this below.

We also note the following:

- a. We understand that St James intend to develop all of the residential land themselves rather than sell parcels to other developers. This eliminates the element of competition and means that St James are the sole determinant of the programme, which they can then arrange to suit their own corporate targets. It runs the risk of St James being accused of inflating house prices and, by association, making housing less affordable to those on lower incomes.
- b. It is reasonable to expect that such a long development programme will be lengthened as it is reasonable to assume that it will be impacted by one, if not two, financial downturns. There is also the risk that, as a public company, Berkeley (St James's parent) are at risk from either a takeover or merger with a company that does not share their current priorities.

We are therefore concerned that, in a nutshell, there are too many chickens in the MKE basket, which could have consequences upon the rate and pattern of delivery elsewhere in the city as well as house prices. It would be a very poor return for the community for the £95m pump priming through the HIF bid.

## 3. DEVELOPMENT PLAN

Plan:MK Policy SD10 requires that applications for Strategic Urban Extensions should be accompanied by a "Delivery Framework". We do not believe that the submitted documents fulfil this requirement as they are too general in nature. We believe that there should be a detailed plan showing how the site will be split into individual development parcels and the disposition of house price ranges (eg High, Medium, Low, Starter) across the whole area: we need to be able to get a feel for the way in which the site is to be developed. We appreciate that the proposals indicate differing character areas (eg Riverside, Primary Street etc) but we do not think that documents are explicit enough. What will be the architectural approach – one firm doing everything or will there be a variety of differing styles?

## 4. ROAD LAYOUT

We cannot support the proposed road layout.

We objected to the location of the bridge crossing the M1 during the consultation on the SPD and we see no reason to change our views. If anything, now that the development plans for the area are becoming clearer, the folly of the proposed bridge location is becoming ever more apparent. It is our view that the appropriate place to cross the M1 is in the vicinity of the Tongwell Roundabout. Given the apparent convenience of such a location, we are surprised that no comparison has been

undertaken between the two alternatives to justify the selection that has been made.

The general thrust of the development pattern of MKE is to move traffic southwards towards J14 with one of the arguments being that an extra M1 crossing provides “resilience”. We would argue that this is a mistaken belief: it is the existence of the “grid”, rather than an extra crossing point that provides resilience in giving people alternative routes to their destinations. Whilst the proposals might indeed provide an extra M1 crossing in addition to the three that already exist, the proposals destroy the “resilience” of the existing grid that would enable residents of the area to use H4 as an alternative to H3 (unless they “rat run” through the Bloor land).

It is clear to us that J14 represents a huge challenge for the future and that it will have to be remodelled in due course, as the city expands further to the east. We believe that it is important therefore that the design work is undertaken **now** to ensure that the development of MKE does not remove any potential options for such development. Can we be absolutely sure, for example, that the St James development does not use land that might be required if a junction flyover needs to be constructed in the future?

We also suspect that using the H4 as the crossing point would be cheaper due to the landform.

The proposed M1 crossing location has given rise to the following issues:

- a. The removal of the southbound carriageway of V11 between the Tongwell roundabout and Carleton Gate which, we presume, has arisen because of the difficulty of making a clean junction with the new road (which, in itself, is indicative of the contrived design brought about by the location of the M1 crossing). This means that traffic from the Tongwell and Blakelands South Employment Area will now have to make longer journeys to reach Junction 14 using V10, which has a single carriageway (unlike V11, which is being dualled as part of this application). Significantly too it removes the “left turn exit” option from Tongwell onto H4 meaning that all traffic wanting to travel to J14 will have to exit Blakelands South and Tongwell onto V10. Whilst we may have overlooked it, we could not find any justification within the application for the closure of this stretch of road.
- b. People living in the area south of the MKE Community Hub who wish to travel into the northern part of MK have no realistic opportunity to access H4 other than to “rat run” through the Bloor Land to Willen Road. Similarly, for people living west of the M1 who wish to drive into MKE. It is longer (and, therefore, less efficient) to encourage people to go further north to H3, only to go south again.
- c. Logic therefore suggests that that the “Bloor Homes rat run” should become, at the worst, a non-frontage road or, at best, a short piece of grid road. However, because we cannot see Bloor’s proposals, we have no idea what is intended. Even if it were to be made a grid road, it would be an inelegant, over-engineered solution to a problem that need not exist.
- d. The layout will also create a “rat run” through Willen gridsquare from the H4 to the new Carleton Gate roundabout for residents who might otherwise use the grid roads (eg H4) to access areas outside the gridsquare.

We have serious doubts whether the planned “treatment of the A509” south of the Holiday Inn will be effective in preventing rat-running.

We object to the new road on the eastern side of the site (which, presumably, will become the A509 in due course) being largely single carriageway. The A509 is a dual carriageway from the A422 junction and the opportunity should be taken to continue this to J14.

There are only four gridroad access points for residents of MKE: we think that this is insufficient, given the scale of MKE and the fact that the road on the eastern side of MKE will carry a large amount of through traffic from outside the immediate area travelling to J14. We think that this could lead to traffic congestion at peak times for residents. Also, because there are no apparent separate access points for construction vehicles, it means that these roads will inevitably become dirty for the construction period (see below 6. Phasing).

The cross-sections (DAS pp 149-151) do not show the typical corridor widths. According to the Milton Keynes Planning Manual (p47) the corridor width (centreline to boundary) for a residential area

should be 40m with 30m elsewhere: this that Link 103, for example, should have a total width of 70m rather than 60m.

The approved SPD was clear that the main roads within MKE were to be Grid Roads, by which we understand that they run through corridors 60-80m wide (depending upon the adjoining uses). We are concerned to note that this does not appear to be the case and that, for example, Link 103 does not contain a dualling reservation – the submitted drawings (DAS p151) shows woodland planting within what, we assume, could be the line of the second carriageway.

#### 5. **QUALITY OF PLANS**

We are concerned about the general quality of some of the plans, which are confusing because of the amount of information (often needless) which they contain. We feel that, attractive as they are, they appear to be more like promotional brochure plans rather than ones that communicate specific proposals. For example, on the Movement and Access Plan (DAS p99), it is very difficult to pick out the Redways. It does not help, for a start, that the widths of lines in the key have a different weight to those used on the plan, but it is completely impossible to understand the nature of the N/S spine road through the eastern area of development, which has a yellow/purple colouring that is not in the key. Fundamentally though, the plan fails in its primary purpose of showing “Movement and Access”: one cannot determine, at a glance, how one might cycle from Newport Pagnell to the employment area at J14.

#### 6. **PHASING AND CONSTRUCTION MANAGEMENT**

We are concerned that the Phasing Plan (DAS p216) does not seem to have been designed to enhance the creation of a settled community. We also do not believe that the statement on Construction Management (DAS p220) is strong enough.

Large development areas such as MKE are bedevilled by problems caused by construction traffic, mud on roads and unmade roads serving completed houses. This will be exacerbated in MKE due to the elongated development period.

We therefore make the following comments:

- a. The current plans for Phase 1 leave the Community Hub in isolation from the area that it serves – this is wrong – the development should be contiguous. As currently proposed, how, for example, would construction traffic reach Phase 2 other than by using the roads through Phase 1?
- b. There should be provision for “Clean” and “Dirty” accesses to ensure that construction traffic does not mix with that of residents. We suggest that there should be two dedicated construction access points from the eastern grid road (one for the northern half of MKE and one for the southern) and that the building work “draws back” to them as it progresses. This would also mean that there could be a proper wheel washing facility to eliminate the transmission of mud onto the adjacent grid roads.

#### 7. **LINKS INTO NEWPORT PAGNELL**

The approved SPD showed four grade separated links across the A422 into Newport Pagnell for pedestrians and cyclists, of which the current application shows only one – the route through the Interchange Park Industrial Estate. This is not good enough and shows the importance of having a combined plan that shows the whole of the SPD area (see above). The links into Newport Pagnell are critical for MKE because its residents will rely upon the town for shopping and other matters that MKE cannot provide – particularly in the early days when MKE is still growing.

At least one crossing should be built to serve the St James housing at the outset, in addition to a crossing from the Bloor development: it is vital that the development of MKE is undertaken in a co-ordinated manner and that the first residents of **all** areas have redway access to Newport Pagnell.

#### 8. **OPEN SPACE**

We welcome the attention given to the provision and design of the open space, particularly the lattice of landscape woven through the housing areas and alongside the roads but have a number of queries:

- a. We welcome the principle of passing the open space to the Parks Trust but we feel that the statement in the DAS (p186) could be more positive eg “*It is our intention to pass the open*

*space to the Parks Trust*” would be better. It should also be made clear that such transfer should be accompanied by sufficient funds to ensure ongoing high quality management, maintenance and enhancement as may be appropriate in perpetuity.

- b. We would argue that the location of the allotment sites is too peripheral. They should be tucked within the housing areas to provide supervision against vandalism and should be provided within each development phase. The site near Moulsoe is particularly unsuitable due to its general remoteness from MKE.
- c. A downside of an Outline Planning Application followed by years of Reserved Matters applications is that some key strategic issues are not dealt with adequately at either stage. We propose that a comprehensive plan for specific and scaled surface water management systems should be required before full Outline Planning Consent is decided. This will ensure that an area-wide plan (for all three main developers’ sites) is decided at this stage, with only minor refinements of this at Reserved Matters stages. This will ensure that imaginative ideas for open space, landscaping and housing area design are not compromised at later stages. The comprehensive SUDS plan should make much clearer the different SUDS techniques and designs to be used in specific locations and what outcomes these will achieve to manage run-off effectively, and that these are truly compatible with public access and enjoyment of open spaces. It should also be created in close conjunction with the Environment Agency, Internal Drainage Board and Anglian Water and be subject to specific public consultation.
- d. The Community Orchard is too remote and should be in a more central location to encourage its use and adoption by the community.
- e. We are concerned about the lack of open space penetration into the employment areas: they should not be seen as “no-go areas” for local residents and should form part of an integrated open space network .

## 9. TREES AND WOODLAND

- a. Trees are needed amongst housing for visual as well as biodiversity value. We have not been able to find sufficient evidence of the scale of commitment to tree planting within housing areas, other than alongside grid-roads. In a warming climate, trees provide essential shade and mitigation of the ‘urban heat island’ effect as well as contributing to urban landscapes. These need to be along local streets and in small pocket parks, as well as residents having gardens of sufficient size to be able to plant trees.
- b. Design Code principles need to be established to define widths of road verges, etc, sufficient to take trees of appropriate scale. In other new housing areas insufficient widths have been provided for the size of canopy of mature trees.
- c. The existing area is deficient in woodland. We suggest that the small woodland planned for the eastern ridge is far too small. This should be much larger and designed as an accessible green space because residents on the eastern side will be relatively distant from the riverside linear park. This would make a more positive contribution to the overall landscape and break up the skyline of urban development as well as contributing to carbon sequestration to mitigate climate change.

## 10. BIODIVERSITY AND ECOLOGY

We have reservations about proposals for how biodiversity is to be protected and enhanced.

- a. The linear park should become one of the greatest assets of the MK East development and we welcome commitments to do this well as a sensible way to treat land undevelopable for housing or employment. However features of value to wildlife must also be retained within housing areas as a parallel priority. A core principle underlying ‘Biodiversity Net-Gain’ (as in the CIEEM ‘Biodiversity Net-Gain Good Practice Principles for Development’ Principle 1: *“Apply the Mitigation Hierarchy Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.”*). We are not persuaded that the proposed scale of loss of biodiversity within the development area can be justified. For example, the development area has very little woodland and only dozens of substantial ‘potential veteran trees’ yet the proposal is for 11 out of 40 of these to be lost to development. Similarly, we are concerned that not enough of existing hedgerows are to be

retained. These are a fundamental part of habitat to retain birds and other wildlife in and among housing.

- b. While welcoming the proposed 'green lattice' through the housing areas it is not clear what these will include other than grassland. These should be planned for biodiversity as well as visual landscape.
- c. We recognise that bird species breeding in arable fields east of the A509, such as Yellowhammer and Skylark (both of which are in national decline) will be displaced by development. We suggest that Net-Gain funding should be used to enhance conditions for them in farmland in the wider area rather than claim that development to benefit other bird species would compensate for this.
- d. There should be a clear commitment to installing nest-bricks in housing and industrial buildings to benefit bird species that depend on buildings for nest-places, several of which are in national decline, such as swift, house sparrow and starling, as well as boxes for bats.

#### 11. REDWAYS

- a. We are concerned that there appears to be a general lack of understanding about redways eg Illustration 2 in the Foreword shows segregated paths for cyclists and pedestrians, whereas a redway is a combined route. Is this a departure from existing design policy (if so, it is necessary to show how this works across the whole of MKE) or slack drafting with the illustration?
- b. There is a lack of clarity on the various plans concerning cycle routes with the use in the keys to the plans of "Redways" and "Public Routes (including ....cycle links)": are the latter also redways or not? Eg Is the Type A "shared cycle/pedestrian" route on DAS p153 a redway or not?
- c. There is no E/W redway through the main development area east of the River Ouzel.
- d. There should be redway connections to all the schools.
- e. There should be redway connections into the employment areas – particularly to the one by J14 (which should be a continuous through route).
- f. There should be a redway running from the A422 bridge south to the Activity Hub to provide a direct link into the area for the residents of Newport Pagnell.
- g. There should be a comprehensive plan for redways through the **whole** of MKE that we can consider at this stage

#### 12. COMMUNITY HUB

We have been concerned by the introduction of the description of the main focus of Milton Keynes East as a "Community Hub" (which happened at a late stage in the SPD consultation process). This is at variance with Plan:MK which does not mention such a facility and has a clear retail hierarchy of City Centre, Town Centres, District Centres and Local Centres). Consequently, we think that it creates unnecessary confusion.

We therefore suggest that, in planning terms, it would be better to retain the "Local Centre" designation for the commercial heart of MKE. This is not to downplay its obvious function acting as a hub for the community but to provide consistency and clarity with approved documentation (particularly Plan:MK) and avoid the possibility of having created a planning loophole that can be exploited.

We are further concerned by the reference within the Retail Study to the (Community Hub) having a "level of self-sufficiency similar to places such as Woburn Sands and Stony Stratford". Both these towns are historic settlements that cater for their own residents and people from outside the immediate locality (eg, Stony Stratford caters for Old Stratford and Deanshanger) and the amount of shopping and business floorspace has grown up over the years. It is also relevant to point out that, in Plan:MK, they are both in the same tier of retail hierarchy as Newport Pagnell itself.

As a consequence we believe that it is clear that MKE should not seek to attract retail customers from outside the immediate area.

#### 13. COMMUNITY RESERVE SITES

There is no mention of the need to provide Reserve Sites for community uses that might emerge throughout the development period, as happened with the WEA. There should be an appropriate

provision for such sites that can be passed to the Milton Keynes Community Foundation (or some such similar body, if appropriate) at nil value at the appropriate time: the sites should allow for the development of buildings to support the local community and the work of the Foundation. This replicates the situation in the Western Expansion Area (ie Fairfield and Whitehouse) but we would argue that there should not be a “use it or lose it” clause or, if there is, then it should be tied to the completion date of the last dwelling in the development area, if not, a set period afterwards to allow for potential demand to arise once the community has “settled down”. The ten year restriction in the WEA is too limiting – not only can it be the case that community demand may not arise until development is well advanced but it also penalises MKCF if development does not occur in accordance with the programme that was originally anticipated – the extended development period proposed by the applicant is particularly relevant in this respect.

#### 14. BUILDING OF COMMUNITY

There is scant mention made in the submitted documentation about the importance of building strong local communities at the outset, and it is important to learn from the experiences in the Western Expansion Area where there are plentiful dwellings but a low level of provision of community facilities – the lack of shops is particularly concerning. We suggest that there should be a firm requirement in MKE to provide, at the very least, a general store of at least 150 sq m and a meeting place following completion of the first 750 dwellings. Consideration should be given to funding community development and arrivals work by a body such as Community Action MK: they are currently doing such work in the WEA having previously worked in other developing areas.

It is also important to appreciate that MKE might split into three communities – two separated by the Ouzel Valley and the third as an outlier of Moulsoe and to understand any implications for this.

Whilst it may seem a minor point at the moment, we wonder whether consideration has been given to the general subject of nomenclature – both for the main roads (are they to follow the H and V naming system?) and the whole area and sub areas. We think that this is important because, not only does it make communication easier but it also helps to formulate ideas. We would ask that this be discussed within the Council as well as Moulsoe PC and Newport Pagnell TC. We would urge that names that are chosen that have a local significance rather than pure marketing names (as happened with Magna Park).

#### 15. ADDITIONAL POINTS

- a. MKE should provide a wide range of housing to cover people at all stages of their lives. Whilst there is reference to “Later Living”, the assumption is made that such residents will be requiring assisted accommodation of some form. However, whilst this will appeal to some people, we believe that an area the size of MKE should be providing accommodation to attract people who may wish to downsize but still require high quality detached houses (or, more realistically, bungalows). We would see this as an important component of being a dementia friendly neighbourhood: there should be the opportunity for such people to live at home, within comfortable surroundings with personal, protected outdoor space.
- b. The Arts Trail (DAS p139) should not be restricted to one area of the parkland but should spread through the whole of MKE amongst housing as well as within the whole green network.
- c. There is minimal mention of self-build housing within the application, which appears in the Housing Statement (3.8) rather than the DAS. The wording is somewhat half-hearted and there seems to be an apparent wish to shift the burden of provision onto Bloor Homes. Such housing is an important component of the overall housing market and is likely to become increasingly so following the Bacon Review. We believe that there should be a clear commitment from the applicant to provide a minimum number of plots (we suggest 200 is the minimum number appropriate for a development of the scale of MKE as a whole) together with at least one site for a self-build group of c20 people.
- d. We suggest that the Local Play Area shown on DAS p170 is too close to the Grid Road. Such facilities should be in areas that are completely safe, overlooked and away from the possibility of noxious fumes from an adjacent Grid Road.

- e. It should be made clear that existing Rights of Way should only be closed once suitable, equally convenient, alternative routes have been provided.
- f. In view of the significance of this application and the issues raised, we feel that it would be beneficial to all parties if the Council were to arrange a meeting with St James, Bloor Homes, the Parks Trust, the local Parish Councils and community groups such as ourselves and Milton Keynes Cycling Forum to have a roundtable discussion about the issues that have been raised by this application. We feel that this will be highly productive in helping all parties to share their concerns and possible solutions that may, or may not, be available.

We hope that our comments will be helpful in developing the proposals into a form which, we feel, will form a better development of this important extension to Milton Keynes.

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