



The Civic Society For Milton Keynes

PLANNING APPLICATION 21/02440/OUTEIS MILTON KEYNES EAST - CALDECOTE FARM

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

We do not object to the proposed use or the proposal to build two large warehouses on this site. However we are concerned about their appearance, impact of the development upon Willen Road and the way that it will impact upon the movement of traffic, pedestrians and cyclists.

We have argued from the outset that there should be a combined development plan that covers the three land ownerships within Milton Keynes East because we were concerned about a lack of both co-ordination and overall vision. This is particularly critical for Willen Road because it is the location where all three ownerships rub up against each other.

We are therefore concerned that this application is being made in the absence of an application from Bloor Homes in connection with the land to the east of Willen Road, which is particularly important when looking at traffic flow. For example, whilst we would anticipate that the current proposal will take account of the St James application, how does it reflect the Bloor application, which is yet to be made? This point needs to be clarified.

It is clear, from the presentation made by Bloor Homes to the Council's Development Review Forum on 6 September 2021 that there are likely to be two connections from their land to Willen Road and yet these are not shown on the Newlands plans (which shows only one) and we need to know how they will impact upon the current proposal. We need to understand how all traffic using the road will be accommodated - both through traffic and vehicles entering and leaving via the side roads. If such an assessment has been made, then we need to understand where we can find it, because it is not readily apparent from the current application.

We are particularly concerned that the southern road through the Bloor site, which joins the road leading to the new M1 bridge, will act as a rat run for people travelling from MK East who wish to reach the northern part of Milton Keynes whilst by-passing the proposed convoluted junction with V11. We fear that, as a consequence, the traffic loading on Willen Road will be increased. We ask whether this has been taken into account in the traffic modelling.

We make the following points:

1. We object to the proposed arrangements whereby pedestrians and cyclists have to cross the A422 at grade, via traffic lights, which we think is dangerous and likely to cause people

to take risks in “jumping the lights”.

When originally planned, the A422 (Newport Pagnell By-pass, as it was then called) was designed and built as a high speed rural dual-carriageway road running in open countryside. Unlike a Milton Keynes grid road it had no side road junctions and its major roundabout controlled intersections at Willen Road, London Road and Chicheley Road were more widely spaced. Consequently it had a higher (theoretical) design speed of 60mph compared to 50 mph on a grid road. Additionally, these intersections were designed to accommodate future grade separation, with the North Crawley Road crossing being grade separated from the outset.

With the planned development of Milton Keynes East (a large-scale mixed-use strategic urban extension of Milton Keynes creating a new community of some 5,000 houses, employment and other development, of which this application is part), the A422 will no longer be a major rural road and, whilst remaining part of the national primary road network, will become a major extension of the Milton Keynes grid road network. Hence, we do not understand why it is proposed that traffic lights be installed at its junction with Willen Road to accommodate pedestrians and cyclists who wish to cross both the A422 and Willen Road: this is completely contrary to what happens elsewhere in Milton Keynes, where grade separation, either by bridge or subway, is the norm. We can find no justification for this within the application and can therefore only assume that the decision is cost-related.

We also point out that the Council has recently adopted its *Mobility Strategy (LTP4): Road Safety, Walking & Cycling and Smarter Travel Strategy* which now forms part of the MKC Local Transport Plan (a Plan required by statute) and as such carries considerable weight: more weight indeed than an SPD. One of the principal objectives of this strategy is to reduce the number of pedestrians and cyclists killed or seriously injured on the Milton Keynes transport network and we do not understand how the proposed design at this junction will facilitate this - on the contrary, it seems to be encouraging people to take risks and “jump the lights”. It is a particular curious decision given that other crossings of the A422 to the east are to be grade separated.

The A422 is one of the busiest roads in MK and, in the same way that we would not encourage people to cross V8 at grade, we should not be doing the same here. There will be a flow of pedestrians and cyclists into the Caldecote Farm site from MKE and Newport Pagnell which should be properly controlled to ensure that all routes are safe and logical and does not encourage people to take dangerous short cuts. The A422/Willen Road junction should provide proper grade separated crossings (both north/south and east/west) for pedestrians and cyclists as an integral part of the movement pattern that connects MKE with the surrounding development.

2. The approved SPD for MK East made it clear that Willen Road should become a Grid Road. Section 3.4 (Core Concept) states, in 3.4.1 “*Willen Road is to be retained and **upgraded** (our emphasis) to a grid road*”.

The requirements for Grid Roads are set out in Policy CT8 of Plan:MK and, whilst it is difficult to understand whether the upgraded Willen Road will meet this requirement (because we can only see full proposals for the west side and partial ones for the east), we do not think that it will, for the following reasons:

- a. Junction spacings will not be as set out in the Milton Keynes Planning Manual (which requires a minimum distance of 250 m between junctions on the same side

of the road and 50m between offsets) (Policy D6) (NB the plan presented by Bloor Homes to the Development Review Forum on 6 September 2021 showed a crossroads at the entrance to the Caldecote Farm site).

- b. The redway on the eastern side of Willen Road is adjacent to the carriageway and not set back the required 3m (Policy D6).

Willen Road is a busy road already and its use will increase as a result of the development of Milton Keynes East. We therefore feel that it is essential that any crossing for pedestrians and cyclists to reach the Caldecote Farm site should be grade separated. We feel that a pedestrian crossing (albeit signal controlled) will cause safety issues and increase congestion. Whilst Policy CT6 refers to "controlled crossings where appropriate" we do not think that the wording provides a universal "get-out" clause to install such crossings whenever a grid road is crossed - Willen Road will be busy and have frequent large vehicles passing along it - an underpass or a bridge for pedestrians and cyclists is clearly the required option. We also cite the *Mobility Strategy (LTP4)* as noted in 1. above.

3. The plans are not straightforward and there is no thread of consistency between them, making them difficult to understand: for example, the location of the redway is not shown on the Landscape Parameters plan on p25 of the Design and Access Statement and it is only by deep examination of the various submitted documents and a certain amount of guesswork that we were able to understand its location. As far as we can tell, there is no proposal to extend the redway across the M1 bridge into Tongwell, to connect with the city's redway system, despite this being a requirement of the SPD.
4. The application site forms part of the gateway into MK from the north-east. The northern unit will be particularly visible to traffic entering and leaving MK and requires a design of the highest order, together with a suitable tree screen to lessen the building's impact. We do not think that the proposal shown within the Design and Access Statement will achieve this, in particular because the SUDS area on the northern side of the northern building does not appear to be wide enough to accommodate the required depth of screen planting. The opportunity should be taken to ensure that all spoil removed during construction is retained on site to provide earth mounding for landscaping.
5. We note from the Ecology & Nature Conservation (Environmental Statement) (Chapter 6) that surveys found a count on the site of 12no skylark and 7no meadow pipit (both declining species) that were possibly of breeding status, and that the conclusion under "Breeding Bird Assemblage Value" is that this site "... was considered to be of no more than Local nature conservation value" to these two species. We feel that this kind of conclusion illustrates why biodiversity is in decline nationally: it is the cumulative effect of numerous decisions that mistakenly treat local habitat loss as only of local importance. We request that these losses should be fully compensated for in Biodiversity Net-Gain by provision of offset sites paid for by this development, to be provided elsewhere in the near vicinity, specifically to benefit these two species.

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By email to dcadmin@milton-keynes.gov.uk