



The Civic Society For Milton Keynes

**DEVELOPMENT BRIEF OPTIONS
SAXON COURT
AND
ADJOINING LAND**

**A Response to
Milton Keynes Council's
Consultation Draft**

February 2018

1. The Forum views this draft brief with considerable concern. Saxon Court is a fine building (being described in Pevsner as being “handsome”, no less) and with its twin 500 Avebury Boulevard, forms a key built statement at the crossroads of Saxon Street and Avebury Boulevard. It is a symmetry of form and materials that occurs nowhere else in CMK.
2. We struggle to understand the rationale that would even contemplate the demolition and redevelopment of such a high quality building with no apparent structural problems and which is less than forty years old and how this satisfies the Council’s “Green Agenda”.
3. Saxon Court and 500 Avebury Boulevard were designed as a gateway to CMK either side of the central gridroad into the city centre. Whilst it is true that this symmetry can no longer be fully appreciated from the V7 outside CMK (due to the growth of the trees), it is still very much apparent from the within CMK and views of the two buildings are an important part of the journey driving south through CMK, which is notable for a series of buildings that are all set back from Saxon Gate.
4. If redevelopment is to be contemplated, then the Introduction of the Brief should clear state what is wrong with Saxon Court and how it fails to achieve satisfactory placemaking in order properly to establish the agenda for its redevelopment. This should then be followed by a full explanation of what is required from any redevelopment (along with illustrated examples from elsewhere) so that we can understand how any proposed redevelopment scheme can be assessed. At the moment this is tucked away (in some part) in s4.2.10 - it should be at the front of the document. Everyone should properly understand precisely why redevelopment is necessary, what it will achieve and how its success will be judged.
5. Whilst the brief refers in a number of places to the principle of placemaking, this all seems to be in reference to the creation of suitable spaces within the site itself and not the way in which the buildings upon the site will integrate with the wider landscape. There is nothing within the brief that requires the ability of the public to be able to access the site - we can therefore envisage a large lump of a building that disrupts existing circulation for pedestrians, cars and cyclists with no apparent benefit other than a visual one. There is a general assumption (see especially para 4.2.10) that successful placemaking requires bulk, which is incorrect - it requires skill, a good brief and a good development team.

6. We would argue that Saxon Court (together with 500 Avebury Boulevard) is already successful placemaking in its own right and there is nothing within the Brief that contradicts this. It will therefore be a huge challenge to improve upon this by redeveloping Saxon Court site by itself, given the nature of its neighbours. Buildings of the scale envisaged under Options 3a and 3b will destroy the existing harmony of the site and its neighbours and will be the very antithesis of successful placemaking.
7. Certain options within the Brief, which look to build upon the "Classic Infrastructure", will remove the symmetry across Saxon Gate and run the risk of creating something akin to the situation either side of Witan Gate between The Hub and Witan Gate House, which is widely judged to be unsuccessful.
8. If we are to countenance building upon "Classic Infrastructure" then there has to be a clear set of guidelines as to the type and form of development that will be considered "exceptional". This cannot be done on an ad hoc site-by-site basis (as with Hotel la Tour) and the Council, CMKTC and the wider community needs to agree upon a proper document with a wide range of exemplars before this brief is developed any further.
9. In our view a building of the quality of Saxon Court should be properly protected and we envisage that it will be an automatic candidate for inclusion upon the Local Heritage Register in the near future.
10. Despite the recognised quality of Saxon Court, the Council has not taken the steps referred to in the NPPF (paras 128 and 129) to assess the building. We would argue that, given the particular situation of this building, the Council is negligent in not undertaking these steps as part of the **briefing** process rather than the **planning** process. It is clear that some of the proposed options will cause a total loss of a "heritage asset" and therefore the Council will be obliged to refuse consent unless there are "substantial public benefits that outweigh the harm or loss" (para 133). It is therefore incumbent upon the Council to outline these "public benefits" as part of the Brief so that prospective purchasers will understand the complete situation regarding the site.
11. It is very difficult given the nature of the plans to assess with certainty the precise impact of Options 3a and 3b because there is no way of comparing with accuracy the site boundaries and building lines with the existing infrastructure. This is particularly important in seeking to understand how the redway would bend around the NW corner of the development and into the underpass. There is a noticeable change in levels here and the plan gives

the impression of having been worked out in two dimensions rather than three. The plan also seems to imply that there is no opportunity for both landscaping and a redway between the site boundary and Saxon Gate, which is a deplorable situation.

12. The Brief needs to take proper account of the site. Inspection reveals that the current development is a subtle and clever response to a tricky site that slopes from front to back - notice especially the treatment of the balconies alongside Saxon Gate and South Eighth Street and the access to the lower floor. It is a function of the brief to explain how this will be handled in the future. It could, for example, mitigate against public access to the ground floor colonnade (which is the case with the current building). As with the redway referred to above (11) it seems to imply that the brief has only been considered in two dimensions.
13. We have the following particular comments upon the draft Development Brief:
 - a. 1.1 There is nothing within the introduction that describes Saxon Court eg floor area, plans etc. This is vital given that some options allow for the building to be retained.
 - b. 1.1.1: Surely it is wrong to call this a "development opportunity" given that one of the options is to retain the building. We would suggest wording along the following lines: "This Development Brief provides a framework for development of land adjoining Saxon Court along with the potential redevelopment/retention of Saxon Court itself".
 - c. 1.1.1: The Vision Statement does, of course, also accurately describe the current situation.
 - d. 1.3.4: The Renaissance CMK section of the Futures 2050 report does not talk about eradicating existing successful buildings and places. It very much supports the CMK Business Neighbourhood Plan eg "build from (not set aside) the CMK Alliance Plan". It is wrong to quote this as a justification for removing the existing building.
 - e. 1.3.6: The Statement about according with current Planning Policy is incorrect - the development of G11 land is not current policy. There should also be reference to Policy CS19 (Core Strategy) and HE1 (Plan:MK) given our comment in 8 above, and which relate to the protection of modern heritage assets.
 - f. 2.2: See comments above about the NPPF. There should be reference to the appropriate paragraphs eg 17, 128 and 129 relating to heritage assets.
 - g. 2.3.2: We would comment that the Council is making much use in general of the phrase "Better By Design", which comes from the opening

- pages of the Futures 2050 Commission report. If this belief is genuinely held then the Council needs to find ways of keeping our best buildings (such as Saxon Court) and not promoting their demolition.
- h. 2.4.1: This is incorrect given that the Brief clearly considers options that do not maintain the existing building lines.
 - i. 3.1 et seq: It is not clear whether "The Site" refers to the whole of Block D4.1 or the piece of vacant land at the rear: 3.2.7 refers to Saxon Court forming the northern boundary of the site but para 3.3.1 states that "the site comprises Blocklet D4.1".
 - j. 3.2.1: It is Fishermead, and not Oldbrook, that lies to the south of Saxon Court.
 - k. 3.3.2: it is completely wrong to state that "*The building thus lacks any presence and does not serve to mark this key gateway and corner in CMK*". The building responds perfectly to the "Key View" arrows shown on Figure 5.
 - l. 3.4.4: a) S1.2 refers to 2 development sites, not 3: b) This statement is fallacious because paras 3.4.2 and 3.4.3 patently do not indicate such a stance - the same could be equally applied to the existing building - which is equally accessible and marks a gateway to CMK.
 - m. 3.4.9: What does "respect" mean in this context? Building heights and positions of setbacks need to be defined so that the potential impact of any new development is clear. Development to the east is two storey, not three, other than on the boulevard and South Row.
 - n. 4.3.3: Why is it anticipated or required that there should be no new public realm? A considerable amount of public realm will be lost if options 3a and 3b are pursued: there is no reason why replacement space should not be offered eg upon the porte cochère route or by way of a public square at the heart of the development eg The Hub. The current proposals seem to encourage a large building mass to which there will be no public access, which is completely unacceptable - placemaking is not just about the look of buildings, it is how they are used, particularly by the public: public access is an essential part of successful placemaking. At the very least the brief should incorporate a convenient twenty four hour access for pedestrians and cyclists through the site from north to south
 - o. 4.4.7: This needs further clarification. The purpose of the colonnade is to provide weather protection for pedestrians moving around CMK. This cannot be removed if the use is residential. It is no different to the situation in many places where dwellings front directly onto street edges eg Stony Stratford.
 - p. 4.6.2: The existing context along South Eighth Street is two storey - see comment m. above.

- q. 4.9.3: This is to include cycle parking.
- r. 5.3.5: "Expected" should be replaced by "required".
- s. Appendix A: Development of the site would seem to be severely constrained by existing services. The Brief should contain full information about such services, whether or not they can be diverted and any associated costs. This is vitally important because if, for example, services cannot be diverted economically then it will impact upon built form eg it may necessitate an easement with 24 hour access which could then form a pedestrian route. On the face of it, for example, the 11kv substation would seem to be a severe constraint by itself. Knowledge of diversion costs and constraints is good practice anyway because it enables the Council fully to understand the costs involved in each option which then, in turn, impact upon the eventual sale value.
- t. There should be a proper 1:500 plan of the site showing all of the information relating to the site as an integral part of the brief - A4 drawings of the type contained in the consultation document are completely inadequate. It is apparent that the site boundaries shown do not match the adopted highway (see especially the steps down to the areas on the west and east of Saxon Court).