



The Civic Society for Milton Keynes

**SOUTH CALDECOTTE
DEVELOPMENT FRAMEWORK
SUPPLEMENTARY PLANNING
DOCUMENT**

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

April 2018

INTRODUCTION

Milton Keynes Forum welcomes the opportunity to comment on the consultation draft of the South Caldecotte Development Framework Supplementary Planning Document.

The Council will be aware, from our submission about Plan:MK (which is contained in the Appendix to this response) that we object to this site for employment development, unless it were to be rail related.

That said, and with the possibility that our objections will not be supported, we are concerned about certain aspects of the Brief, which we have set out below.

SUMMARY OF MAIN COMMENTS

The South Caldecotte site is of considerable importance because of its visibility from a wide area and will be a significant visual feature at a main entry point to the 'city'. It will either demonstrate the distinctive character of Milton Keynes or become a disappointing 'anywhere' kind of development. It is particularly important because it is one of the few sites within the 'city' that can readily be viewed from above.

The South Caldecotte Development Framework SPD provides the opportunity to ensure that this site is developed to a genuinely imaginative standard of design and layout that makes it a distinctive and memorable introduction to Milton Keynes for those travelling from west, south, or east and those viewing it from nearby heights.

Our main concerns relate to:

1. Use of the site for warehousing and other industrial and commercial uses.
2. The relationship between the site and the proposed upgrading of the adjacent section of Brickhill Street to grid-road standards.
3. The need to provide for a bridge to replace the existing level crossing over the Bletchley to Bedford railway line and what land take this may require in relation to the South Caldecotte site.
4. The proposed location of a junction between Brickhill Street and the proposed spine road into the site.

5. The need to protect a small woodland of oak trees within the site.
6. The apparent confusion between provision of SUDS and the provision of public open space and a new footpath.
7. Whether the proposed public open space along the noisiest side of the site is in the most appropriate location for such a use and how best to achieve genuine and useable linear parkland connecting Caldecotte Lake southwards and towards Eaton Leys.
8. Views into the site from surrounding areas.
9. How to achieve the necessary quality of design of the proposed industrial and commercial buildings.
10. The lack of provision for enhanced use of Bow Brickhill station on the Bletchley to Bedford railway line and the likely need for enlarged station facilities.
11. The lack of provision for the potential use of Bow Brickhill station area as the hub of a park-and-ride system for rail and bus.
12. Potential need for additional land-take for future enhancement of the road junction between the A5, A4146, Brickhill Street and Watling Street.
13. The lack of clarity about what account should be taken of the area of Lowland Meadow Priority Habitat within the proposed 'Gateway Character Area' part of the site.
14. The need to forewarn developers of the likely need for access to the site for employees arriving by cycle and on foot from housing areas such as Bletchley, Fenny Stratford and Water Eaton, for which provision will be needed beyond the boundaries of the site.

SPECIFIC COMMENTS

SECTION 1: INTRODUCTION

Policy SD16

Part of the text has been corrupted so that the number for item 5 of the principles is missing and the text reads "... as part of a Sustainable Drainage System across the Brickhill railway station ..." etc. This makes no sense. Some text is missing.

SECTION 2: THE SITE AND ITS CONTEXT

2.3.1

There is an inconsistency here and elsewhere in the document. At this point and elsewhere the railway is called "the Marston Vale railway line"; elsewhere it is described as "the Bedford to Bletchley railway". It would assist clarity if a single title were used, to avoid confusion. We suggest using 'Bedford to Bletchley Railway' because 'The Marston Vale Railway' is more of a marketing description. Mentions of 'East-West Rail' are appropriate when they refer to plans to enhance this route and service.

2.3.4

It is not at all clear what the following text means "*Edge conditions are important to evaluate, as they form the interface with the existing context. Depending on their nature, they can inform a certain development or open space response.*" This needs to be stated with more clarity.

Figure 2.2 Edge Conditions

Brickhill Street should also be shown as a future noise generator as it is a City Road and elsewhere in the text there is explanation that this section is to be upgraded to grid-road standards. Already it generates noise: in future it can be expected to be noisier and this needs to be taken into account when designing the South Caldecotte development.

2.3 Surrounding Area and Edge Conditions

"Immediately to the north is the Marston Vale Line."

We suggest, to avoid confusion and for consistency, that this should be described as Bedford to Bletchley Railway.

2.4 Topography, Views and Drainage

Mention should be added of the deep and substantial ditch that runs along the northern edge of the site and along some of its western edge. Does this continue westward under the A5?

"Wider views into the site are seen from the Brickhills, with Milton Keynes and Bletchley in the background." We suggest that the views from the A5 heading northwards towards the site will be of particular importance and this should be mentioned.

2.5 Landscape Character

2.5.4

"... encourage appropriate management of all drainage ditches to improve wildlife value, by improving water quality and establishing grass verges."

There is an inherent conflict between the way in which many drainage ditches are managed for flood prevention and their wildlife value, and as part of public open space. MK Forum has drawn attention to this in its comments on Plan:MK. Recent Internal Drainage Board comprehensive dredging of ditch sides and removal of vegetation at Brooklands Meadow linear parkland illustrates this, as it has rapidly reduced an attractive feature with useful wildlife habitats to a bare and un-vegetated ditch with piles of bare clay soil on either side.

We therefore propose additional wording such as: *'The design of the landscape, drainage and flood prevention measures should be planned to avoid the need for harsh dredging and excessive clearance of vegetation. It should enable attractive areas of landscape to be managed for public access and for watercourses to be designed and managed as naturalistic streams of ongoing benefit to a wide range of wildlife.'*

2.6 Habitat and Vegetation

"There are two small groups of trees within the site." This is not correct as there is a third and more substantial woodland immediately north of Crossroads Farm buildings, which should be referred to.

2.8 Heritage

As the line of a Roman road has been predicted as crossing the site, it would be helpful to mark the indicative line of this on Figure 2.8. Should this be considered as a design feature?

2.9 Utilities

There is a line of concrete marker posts along the northern edge of the site indicating the alignment of a gas pipe, which has not been mentioned. This route should be added to Figure 2.9.

2.10 Opportunities and Constraints

Edge Conditions

"The A5 and Marston Vale Railway are noise generators."

We suggest that this should be described as Bedford to Bletchley Railway. Brickhill Street will become more noisy as its use increases and it is upgraded to grid-road standards. This should also be mentioned.

Topography, Views and Drainage

"Wider views into the site are seen from the Brickhills."

Mention should also be made of views from the A5 as it heads down the hill from the south towards the site.

Figure 2.10 Opportunities and Constraints

The existing woodland immediately north of Crossroads Farm buildings should be shown on Figure 2.10.

SECTION 3: DEVELOPMENT FRAMEWORK

3.2 The Vision

We welcome the statement that *"Transport facilities will promote the most sustainable forms of movement such as walking and cycling ..."* but this has not been carried through to the concluding sentence which says *"Connections will be made to the rest of Milton Keynes' grid road and transport network"*. This makes no mention of the most effective way of doing this which would be through the Redway network. We suggest that the final sentence should say *'Connections will be made to the rest of Milton Keynes' transport networks including Redways, footpaths and the grid road network'*.

We also suggest that this should be not only about connecting to existing Redways but extension of them through the site and beyond to facilitate movement from areas west, south and east of the site.

3.4 Landscape and Open Space Strategy

The text has an error which reads *"... as part of a Sustainable Drainage System across the Brickhill railway station ..."*. Some words appear to be missing.

Landscape

3.4.1

We suggest a change of wording to read: 'A Landscape and Visual Impact Assessment (LVIA) should be undertaken to influence the impact of the development on the landscape ...' rather than only "... *to assess the impact* ...".

We consider it to be a serious omission not to include measures to protect, retain and enhance the clump of around 20 mature oak trees towards the north of the site as a feature of the site (These could well live for at least a hundred more years) and to retain some trees, hedgerows and vegetation alongside watercourses. We also consider that the site should be designed in ways that retain some, if not all, of the woodland immediately north of Crossroads Farm buildings.

Areas of Wildlife Interest

3.4.6

The consultation draft offers no recommendations of how the area of Lowland Meadow Priority Habitat should be addressed in the design of the site. It could, of course, be retained as open space and wildlife habitat, managed for hay and light aftermath grazing. If it formed a core open area around which some of the buildings were placed, these could provide some shielding from the noise of the A5 and provide an attractive area for those working within the site; as well as linking to the corridor of SUDS and any paths along the west side of the site. This should be discussed with The Parks Trust to assess the feasibility of managing this area in that way.

Given the nature of the proposed development and the limitations on scope for ecological improvement, it will be necessary to find ways of using buildings themselves to make provision for ecological enhancement. One way of doing this would be to design buildings that make provision for nesting Swifts beneath roofs and on walls. Swifts are a declining species - present elsewhere in Milton Keynes and known to feed over Caldecotte Lake - that relies on buildings for nesting sites. These can be provided by installing Swift 'nest bricks' or nest-boxes on buildings (specifically designed for Swifts) and the provision of playback equipment to play Swift calls to attract use of these nest sites.

Green Link

3.4.7

This development area should be seen as an attractive place to work. Open space should be seen as a positive attribute to those who work on the site, as a place to

stroll and sit whilst taking a break. It should also provide for those who are more energetic and who may, for example, choose to go for a run during their rest periods. The open space should therefore be seen as an integral part of both the site and the Milton Keynes park network; it should not, therefore, be placed in strips along the site boundaries. As a general principle the site edge boundaries should be treated the same as landscaped grid road boundaries and not as linear parkland. Although the western edge of the site is an appropriate area for surface water attenuation, and may provide some of the ecological resource that is needed, it has limitations as an area for recreation and public open space as it is an area subjected to high and ongoing noise. The idea that this could serve as a *"noise ... buffer"* perpetuates a common myth: neither grassland nor trees offer substantial sound attenuation.

Although a path through the western edge could provide a practical means of movement by cycle or on foot it would not create a pleasurable area of linear parkland for leisure use, other than as a landscaped area to pass through that provides connections between Caldecotte Lake and the wider countryside.

We suggest instead that the footpath link under the railway line - which should be treated as either a Leisure Path or a Redway - should run directly through the site. There should also be a potential provision for a link, via an underpass, to the land east of Brickhill Street to link up with the Redway running south from Tilbrook. Consideration should also be given to additional provision of a horse-riding path from Caldecotte Lake southwards through the site, subject to discussion of this with horse-riding interests and The Parks Trust. This would contribute to extension of the existing network of horse-riding paths and bridle-paths throughout Milton Keynes and enable eventual connection with routes in the Brickhills and across Eaton Leys, through Waterhall Park and past the Lakes Estate towards Newton Leys.

If wet and dry ponds for drainage are created here, any provision for public access should be additional to, distinct from, though possibly alongside these, even if the flood management areas are designed in ways that make them attractive visual features. *"Multi-functional landscaped areas"* are something of a planning myth, although flood-prevention, ecology and recreation can sometimes be provided for successfully alongside each other.

A *"landscape belt"* suggests just a line of trees. Preferable would be tree-planting in informal groups of differing widths and with a range of native species to create far more interesting and varied landscape.

3.4.9

We welcome the proposed text about transfer of the open space to The Parks Trust with a necessary endowment, but suggest that the sentence should conclude with “... *to cover necessary endowment to cover future maintenance and management costs*”. Looking after and ensuring good use of open space requires much more than just maintenance, it requires visits by rangers, communication with users, and oversight to identify necessary improvements, to ensure good use of the site.

3.5 Movement Framework

3.5.2

We have a general concern about the connectivity between this site and the rest of Milton Keynes, particularly because many potential employees will live nearby in Bletchley, Fenny Stratford and Water Eaton. The Brief should therefore include a requirement for appropriate Redway and footpath links to these surrounding areas. We welcome the proposed emphasis on improving accessibility, particularly for walking, cycling and public transport. We also welcome the proposals to extend the Redways into and through the site and to connect them to the A5 roundabout and beyond, particularly to enable cycling and walking access from new housing at Eaton Leys. We are concerned that the weak link in the chain is surface level pedestrian and cycle crossing at the A5 roundabout, which is a far from satisfactory way of crossing this busy road. We consider that the planning of the proposed upgrade of the A5 roundabout should include consideration of providing underpasses for pedestrians and cyclists.

More is needed to achieve this objective, because large areas of housing within range of the site are in Fenny Stratford, Water Eaton and Bletchley, but there is no direct westward Redway connection. We suggest that the proposed Transport Assessment should consider all possibilities to rectify this. One possibility would be for the footpath between the south end of Caldecotte Lake and the Canal near Fenny Lock to be substantially upgraded to provide a surfaced Redway, with associated enhancement of the surrounding landscape, but there may be other alternatives.

3.5.4 and 3.5.5

We welcome the Council’s intention to upgrade the whole length of Brickhill Street south of the railway line to grid road standard (does this mean single or dual carriageway?) and for the developer to carry this out from the A5 junction as far north as a new junction with the proposed spine road into the development site. This raises three issues:

- 1) No mention is made of the necessity of constructing a bridge over the railway to replace the level crossing.
- 2) The radius of the corner on Brickhill Street half way between the railway and the A5 is unsuitable for a road of grid-road standard.
- 3) We suggest that the proposed location for the spine-road junction is in the wrong place.

From the aspect of safety, Network Rail's policy has been to replace level-crossings by grade-separated crossings. Even in present circumstances the existing level crossing sometimes causes considerable road traffic delays (a recent incident of an eight minute delay and a 200m vehicle back-up for example) which is entirely inappropriate on a main route such as Brickhill Street. The proposed development will introduce yet more traffic. The planned development of East-West Rail will increase train movements, which is the main purpose of that major investment. All of this necessitates a bridge to carry the grid-road and Redway and horse-riding path over the railway. Even if this is not constructed before the development of South Caldecotte, the alignment and land-take for the bridge and approach slopes need to be allowed for. It seems likely that some land from the South Caldecotte site (and Caldecotte Site C) will be required for this, so consideration for this is required now. This is made more complex because the eastbound and westbound railway platforms are offset either side of the level crossing. As mentioned at 3.4.7 above, there will also be a question of the need for a Redway underpass to enable cyclists and pedestrians to cross Brickhill Street safely to reach the development site from the Bow Brickhill direction, and for access to the footpath running east of Brickhill Street towards Bow Brickhill church and Aspley Heath.

It would seem far more appropriate for the new junction for the spine road through the South Caldecotte site to be placed approximately half way between the railway and the A5, which would place it at the existing corner on this length of Brickhill Street. This would make simpler the task of designing the enhancement of Brickhill Street to grid-road standards, but would require a revised layout of the indicative route for the spine-road.

There is a further issue. We anticipate that Bow Brickhill rail station would be of increased importance when East-West Rail services are in operation. We suggest that there should be thorough consultation with East-West Rail and Network Rail about this, to ensure that provision is made for any increased land required to upgrade the station. A related point is that some car-parking could well be needed by the station. In fact, this area could provide an important location for a

park-and-ride scheme for both bus and rail, which would require a significant additional area of land. Unless this is considered now, development will prevent this ever being achieved.

3.6 Design

The design of the site to an appropriate standard is of considerable importance because of its prominence.

3.6.6

In general terms we welcome the proposal that *“Development should have a contemporary character reflecting Milton Keynes’ reputation as a forward-thinking modern city”* though we think the issue is primarily of good quality design rather than off-the-peg solutions.

3.6.10

We agree that an LVIA should be used to inform decisions about building heights. We also suggest that careful consideration should be given to the view of roofscapes as some important views of this development will be from the Brickhills and the A5 approaching from the south. This may suggest some creative solutions to the use of form, colour and materials for roofs and copings. There may even be scope for public art designs related to the buildings. There should also be thorough consideration of how best to provide trees and other structure landscape throughout the site to enhance how the whole area looks from areas beyond.

3.7 Sustainability

Surface Water Drainage and Flooding

It seems likely that the site will require a substantial pond as well as permeable paving, filter strips and possibly swales. It may benefit from a series of ponds stepping down the gradient. We consider that many ponds provided as SUDS schemes are too tightly defined and have excessively steep sides which makes them less attractive and more of a safety hazard. We suggest that a pond or ponds for this site should have shallow edges which will also make them more suitable for a range of wetland as well as water birds, and for marginal vegetation. The advice of The Parks Trust and ecologists should be sought to determine the most appropriate form and edge gradients,

There may be opportunities on office buildings for living roofs, either ‘intensive’ or ‘extensive’, either of which could be made beneficial for wildlife, while also improving the thermal properties and energy efficiency of a building. We recognise that many warehouse and factory buildings have relatively lightweight

roofs, unsuitable to take the weight of a living roof, although these may be able to incorporate rain harvesting systems, which would contribute towards higher BREEAM standards.

SECTION 4: DELIVERY

4.2 Management and Maintenance

4.2.4

We welcome the text proposing that open space in the site should be offered to The Parks Trust on a 999-year lease with a commuted sum to cover its long-term maintenance, management and overall costs. This is consistent with MK Forum's proposals to this effect in our response to Plan:MK and the Open Space Strategy. Clarity will be needed on which body will hold the leasehold for that land, whether the Council, The Parks Trust or another owner, and on what terms. It is highly appropriate that The Parks Trust should be consulted as plans are being made for this open space.

APPENDIX

Extract of MK Forum comments on the Submission Version of Plan:MK relating to Caldecotte:

Policy SD16: We have no objection to the development of this site at the appropriate time but consider that it is illogical to consider it until the precise alignment of the Oxford-MK-Cambridge Expressway is known. We note that the policy is inconsistent with that of the "mirror site" to the east of Brickhill Street (SD13) which states "planning permission.....will not be permitted until 2019/20, once the detailed alignment of the Cambridge-Milton Keynes-Oxford Expressway is known" - there is no similar wording in SD16.

Even then, we would argue that the site's development should be more focussed upon the railway line rather than the Expressway. It has convenient access to Bow Brickhill railway station (which would imply residential use) but should also be explored for rail-based freight. Use for "standard" warehousing should be the least favoured option and, in any event, if more B2/B8 land is required during the plan period, Milton Keynes East (ie the land east of M1 J14) is better placed as it has more convenient motorway access.

In any event, we remain to be convinced that there is a need for more large scale warehousing within the Plan period and we feel that it is a poor return for the city in terms of job density given the amount of land required for such use when considered at a city scale and the other pressures upon Milton Keynes.

Fundamentally however, we do not necessarily believe that there is proven demand for warehousing space within MK that requires the allocation of this site for such a use:

- a. Policy ER1 is incorrect in that it includes Caldecotte South as "vacant land" - this is curious given that it has yet to receive planning consent and should be deleted. The amount of vacant Employment Land is therefore 134.5ha.*
- b. Table 4.4 (p24) indicates a forecast demand for Employment Land for 2016-2031 of 132ha (of which Industrial/Warehousing comprises 116ha).*
- c. On the face of it there is therefore sufficient employment land within Milton Keynes with the appropriate planning consents for the Plan period.*
- d. However, the June 2017 update of the "Milton Keynes Economic Growth and Employment Land Study" indicates a wide range in perceived demand according to whether one uses the EEFM figure of 87ha or the Experian one of 132ha. Significantly, neither predicts a shortage of land but it is pertinent to point out that each figure has an allowance for churn and windfall (35%/62% and 22%/39% respectively).*
- e. The argument is therefore, not about the quantity of land available but the quality and, in particular, sites for large warehouses, along the lines of Magna Park.*

- f. We accept that Magna Park has been successful but the reality is that half of the space let to date (c270,000 sq m) has been to one occupier (John Lewis/Waitrose). What is the reality of this happening again?*
- g. Critically the amount of jobs created over the Plan period from warehousing varies from c956 (EEFM - "distribution and logistics") to 4,500 (Experian - "land transport, storage and post").*
- h. The logistics industry is changing and the amount of automation increasing and there is therefore a logic that looks more towards the EEFM figures rather than those from Experian.*
- i. There are also competing sites outside Milton Keynes eg by M1 (Junction 13) and M1 (Junction 15) Northampton (para4.47).*

When one takes all of the above together the reality is that the need for this site for warehousing is unproven and, even if the site is developed, the amount of jobs generated could be low. It seems a poor return for the city for such a big piece of land in such a strategic location.

While we feel that the site may be too small, we accept, that it might be feasible to develop it for rail based freight distribution and we would support this given the overall paucity of such sites in the local area and the environmental benefits that would result from such a use.