



The Civic Society for Milton Keynes

**SOUTH CALDECOTTE
DEVELOPMENT FRAMEWORK
SUPPLEMENTARY PLANNING
DOCUMENT**

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

June 2019

INTRODUCTION

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

This is an important site at a key gateway to Milton Keynes and which will increase in prominence with the opening of the Oxford- Cambridge Railway line and construction of the Expressway. It will form the first impression of Milton Keynes to those who enter the city from the south and it is therefore important that the buildings on it reflect the high qualities that we seek for buildings in Milton Keynes.

That said, we are concerned that this SPD is premature for three particular reasons:

1. Lack of context. The site needs to be planned in conjunction with South-East Milton Keynes so that the proper linkages between the two areas can be accommodated - both above ground (roads and redways) and below ground (underpasses, sewers and services). At the very least there should be provision for a redway and footpaths to pass underneath Brickhill Street but it is also important to understand the way that the road network in SEMK will work and how, and where, it will meet Brickhill Street. Without this work there is a danger of abortive expenditure and the risk that development in South Caldecotte could prejudice the wider plans for SEMK.
2. Lack of information about the railway bridge. It is clear that the level crossing will have to be replaced with a bridge (sooner rather than later) but we are concerned that there is a lack of information about this - particularly an absence of details of the vertical alignment of the bridge and whether it can accommodate the 85kph design speed for the MK Grid Roads (Milton Keynes Planning Manual p41).
3. Lack of a Landscape Visual Impact Assessment (LVIA). The document requires the applicant to undertake an LVIA, which the design of the buildings should then respect. This begs the question as to how this will be achieved - will the Council issue a revised version of the SPD for public consultation once the LVIA has been received? This seems to be illogical and not the best use of resources and we consider that the LVIA should be undertaken first, and the draft SPD amended and then reissued for consultation.

There is much use of the words "grid road" within the document (eg 3.5.5, 3.5.6) without a proper definition of what "grid road" actually means. We understand from Plan:MK that, in this context it could relate to a 70m wide corridor (which refers back to the dimension in the Milton Keynes Planning Manual) but the latter also refers to a design speed of 85kph (p41) which does not appear in Plan:MK. This creates uncertainty and ambiguity - on which side of Brickhill Street is the dualling reservation, for example? If it is to be on the east, is it compromised by the high-pressure gas main? There should therefore be a clear plan showing the developable edge of the site.

SPECIFIC COMMENTS

1.6.5

Full details must be provided about the current impact of the closed level crossing gates eg a table comprising precise closure times and northbound and southbound queue lengths and how this will be impacted by the proposed development if the level crossing remains in place. The use of

"total" figures in this context does not reflect the proper impact that the closure of the level crossing gates is causing.

1.6.7

The need for the bridge crossing the railway line is not a "long term solution" but one that must be implemented prior to the commencement of work in South Caldecotte or, at the least, before the units on the site are occupied.

More information is needed about the design of the proposed bridge and, in particular, its vertical section and whether the gradients on the bridge together with the forward visibility will impact upon road speeds (Council officers have indicated to us, on an informal basis, that there could be a 30mph speed limit which, if correct, is unacceptable for a road that is described as being a "grid road").

We also need to understand how the bridge will be constructed and the length of time that it will take. Will it be necessary, for example, to close Brickhill Street for the duration of the work and, if so, how this will impact upon local residents and businesses as well as the wider local area?

Information from our members confirms that MKDC had reserved a strip of land in Tilbrook for a suitable bridge and which, unfortunately, has been sold by MKC to Red Bull. Given that this is apparently the most logical and efficient alignment for the bridge (and has the additional benefit of enabling it to be built whilst the level crossing remains open), we would ask whether the Council can explore the matter further with Red Bull to see if it is possible to accommodate their needs whilst building the bridge on the most sensible alignment ie the one reserved by MKDC.

2.6

This statement about the Priority Habitat is unclear when read against Para 3.4.5: Para 2.6 suggests that it is a "fairly poor quality example of lowland meadow habitat type" whereas Para 3.4.5 suggests that it should be preserved and restored.

We are concerned that Para 2.6 gives an argument to the developer to remove the habitat whereas it should be a requirement to protect it and pass it to a body such as The Parks Trust that has the appropriate experience in grassland restoration.

The fact that a habitat may be a "poor example" is not an accurate judgment upon its long-term potential for restoration and its restoration would accord with the clear and emphatic advice provided by Natural England in its response to the previous consultation. The concept of "re-creating" this kind of habitat by translocation elsewhere is not supported by any objective evidence that this could achieve the necessary outcome. This site exhibits characteristics comparable to some of those of the Oxley Mead SSSI and, if managed properly, could be an important ecological asset for occupants of the development as well as the general public.

We suggest alternative wording for Para 2.6 as follows: "Recent National Vegetation Classification (NVC) grassland surveys have identified that the grassland type has characteristics of MG5, MG6 and OV23c communities. The applicant should make proposals for retaining this lowland meadow Priority Habitat and for transfer of it with an appropriate endowment to a local body with capability and experience at grassland restoration and grazing management, a task for which The Parks Trust is well suited. This grassland could provide an attractive feature for those working on this site'

2.8 (Existing Road Hierarchy....)

We suggest that it should be made clear that, until the construction of a bridge to replace the level crossing, all HGVs leaving the site should be prohibited from turning left upon leaving the site.

3.3.2

Does the reference to "small business units" include the B1 Use Class ie will pure B1 units be permitted?

3.4.1

The proposed Landscape Visual Impact Assessment (LVIA) should encompass the visual impacts of proposed development on the Ouzel Valley Linear Park, and in particular on Caldecotte Lake. The Lake provides a visually tranquil landscape at least as important as the surrounding countryside. As MK Council's landscape assessment of the wider areas of the borough specifically excluded assessment of parklands within the 'city', it is deficient in valuing the visual importance of areas such as Caldecotte Lake. High warehouse buildings dominating the views south across Caldecotte Lake would devalue this popular area of parkland, unless large-scale landscape measures within the South Caldecotte site address this issue.

We suggest that the first sentence of the text of 3.4.1 should be followed by this additional sentence: "The LVIA should include assessment of the visual impact of the proposed development on views out of Caldecotte Lake parklands. This could well suggest a landscape feature of structural planting parallel to the Bedford to Bletchley Railway at the northern edge of the proposed development".

Please note however that, as per the Introduction (Point 3) we believe that the LVIA should be undertaken before the SPD is finalised.

We appreciate why the term "landscape belt" has been replaced, but consider "landscape buffer" to be an equally inappropriate way of describing a significant and creative landscape feature. Buffers are usually designed to absorb damage, so have negative connotations. We suggest a more neutral term such as "landscape structure" or "landscape feature".

It is a popular myth that landscape provides significant "noise mitigation" but this is not endorsed by acoustics experts. The evidence seems to be that landscape can affect subjective perceptions of noise transmission to a limited extent, although the use of acoustic barriers and bunds makes clear that only solid structures are capable of significant mitigation of noise transmission. We suggest deletion of the reference to landscape providing noise mitigation.

3.4.2

The text currently says: "Where the loss of hedgerows or trees is unavoidable and can be justified, compensatory planting should be provided elsewhere within the site in line with the mitigation hierarchy". It should be made explicit that the copse of mature oak trees at the north side of the site, which are probably a century or more old, cannot be compensated for in landscape terms by planting new oaks elsewhere on the site, so these existing trees should be retained. Such trees provide aspects of biodiversity that could not be replicated in new planting. Similarly, ancient hedgerows have biodiversity value that would not be replicated for very many decades by a replacement hedge.

We suggest the text at 3.4.2 should be amended to indicate those landscape and biodiversity features that should be retained, as their removal is avoidable.

3.4.7

The "Net gains for biodiversity" policy can readily be supported by provision on buildings for those bird species that rely entirely on nest-spaces on buildings. Swifts, in particular, are in serious decline and we suggest that the text should be amended to say: "Swifts are in serious decline and require nest-sites at roof-level on buildings which could readily be provided on warehousing and office buildings, when included within the design. There is excellent guidance on design and provision of groups of swift nest-sites for this colonial species on the Swift Conservation website".

3.4.8

Whilst such a link may serve a purpose as a wildlife corridor we do not consider it suitable as a "pedestrian leisure route" given its proximity to the A5. There should be a strong leisure route link through the middle of the area to link with the underpass under the railway.

3.4.10

The link **should** be transferred to the Parks Trust. If this does not occur then it should be clear that the open space is dedicated to the public in perpetuity.

We suggest the following wording: "The completed green link open space should be transferred to The Parks Trust on completion – together with the necessary capital endowment to enable investments that will fund future maintenance and management costs in perpetuity without recourse to any further funding from owners or tenants of the planned buildings, or from a local authority. Alternatively, if not transferred to the Parks Trust, then the space should be transferred to another body with comparable, proven landscape and open space management capabilities that can achieve this on the same funding basis with local accountability as well as providing permanent access to the general public at no cost and in perpetuity".

Figure 3.1

There is no indication on the plan of the type of junction into the site. Is it to be a roundabout?

3.5.5

Given the magnitude of the development we do not understand why the developer is responsible for upgrading part only of Brickhill Street to grid road standard, given that (presumably) traffic will be entering the site from the north and leaving in the same direction.

3.5.10

It should be made clear that footpath/redway connections into the SEMK Strategic Urban Extension are to be via underpasses and not at grade crossings and constructed at the developer's expense. Amend wording of second sentence to read ".....Urban Extension via underpass(es) to be constructed by the developer".

3.5.11

Amend wording of first sentence to read "..grid road corridor on the western side of the road at the developer's expense".

3.6.8

Add wording at the end "...and the adjoining roads bounding the site".

3.6.10

See earlier comment in Introduction about timing of undertaking the LVIA.

Figure 3.5

The term "Landscape Buffer" needs to be more fully described in terms of width and types of materials including a specification for the mature heights of trees to be used.

3.7.2

We suggest the following be added at the end of the paragraph: "Benefits for biodiversity and visual landscape quality, together with public safety, will be best achieved by gradual and gentle gradients rather than steep sides to pond edges".

4.2.3

See earlier comment on 3.4.10