

# PLANNING STATEMENT MILTON KEYNES EAST MARCH 2021



# **Milton Keynes East Planning Statement**

**Hybrid Planning Application**

St James Group Limited

March 2021

**LICHFIELDS**

12491/04/MS/MT  
18962130v6



# Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
	The Applicant	1
	Accompanying Documents	2
	Report Structure	3
<b>2.0</b>	<b>Application Site and Surrounding Area</b>	<b>4</b>
	Milton Keynes East Allocation	4
	Application Site and Boundary	5
<b>3.0</b>	<b>Background</b>	<b>8</b>
	Context for Milton Keynes' Growth	8
	Planning History	11
	Consultation	11
<b>4.0</b>	<b>Proposed Development</b>	<b>13</b>
	Proposed in Outline – Milton Keynes East	14
	Proposed in Detailed – Strategic Highways Infrastructure	19
	Construction	22
<b>5.0</b>	<b>Planning Policy Context</b>	<b>25</b>
	Statutory Development Plan	25
	Other Policy Considerations	26
	Overview of Key Policy and Material Considerations	27
<b>6.0</b>	<b>Development Assessment</b>	<b>28</b>
	1. Principle of Development	28
	2. Community Infrastructure	29
	3. Employment and Housing Provision	34
	4. Design	37
	5. Heritage	41
	6. Landscape and Visual Impacts	44
	7. Habitats and Biodiversity	45
	8. Open Space, Play Space, and Sports Provision	49
	9. Transport, Active Travel and Parking	51
	10. Energy, Sustainability, and Climate Change	56

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11. Minerals Safeguarding	58
12. Water and Drainage	59
13. Other Environmental Considerations	61
14. The Benefits and Overall Planning Balance	65
Planning balance	69
<b>7.0 Planning Obligations and Conditions</b>	<b>71</b>
Planning Obligations	71
Conditions	72
<b>8.0 Summary and Conclusions</b>	<b>74</b>

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## Figures

Figure 2.1 Strategic Allocations in Milton Keynes Borough	4
Figure 2.2 MKE Development Site	6
Figure 3.1 Oxford-Cambridge Arc	8
Figure 4.1 Illustrative Location of Outline and Detail Elements of Scheme	13
Figure 4.2 MKE Illustrative Masterplan	19
Figure 4.3 MKE Highways Works in Detail	21
Figure 4.4 Illustration of location of building clusters to be demolished	23
Figure 6.1 Agricultural Land Classification	64

## Tables

Table 4.1 Amounts and Locations of Proposed Built Uses Within Application	15
Table 6.1 Proposed Education Facilities	31
Table 6.2 Proposed Community Facilities	33
Table 6.3 Maximum Jobs Generation by Area (Full Time Equivalent)	35
Table 6.4 Proposed Open Space	50

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## Appendices

- Appendix 1 Full Planning History
- Appendix 2 Planning Policy Matrix
- Appendix 3 Housing Statement
- Appendix 4 Retail Impact Assessment





## 1.0 Introduction

1.1 This Planning Statement (hereafter referred to as ‘Statement’) has been prepared by Lichfields on behalf of St James Group Limited (‘St James’) in relation to the submission of a hybrid planning application for the majority of development allocated as part of the Milton Keynes East (‘MKE’) strategic urban extension. The application site is located to the east of Milton Keynes, east of the M1 and south-east of Newport Pagnell.

1.2 The application proposes the development of around 4,000 up to a maximum of 4,600 new homes and 403,650 sqm of employment floorspace, with associated transport infrastructure, community infrastructure, green and blue infrastructure, and other associated uses. Details are submitted for elements of strategic highway infrastructure that will support the urban extension. Outline permission (with all matters reserved) is sought for all other uses such as housing, employment, open space and community uses. The application encompasses the majority, but not all, of the MKE growth allocation contained within the Council’s adopted Local Plan, Plan:MK (2019).

1.3 The full description of development proposed is as follows:

*“Hybrid planning application encompassing:*

- (i) outline element (with all matters reserved) for a large-scale mixed-use urban extension (creating a new community) comprising: residential development; employment including business, general industry and storage/distribution uses; a secondary school and primary schools; a community hub containing a range of commercial and community uses; a new linear park along the River Ouzel corridor; open space and linked amenities; new redways, access roads and associated highways improvements; associated infrastructure works; demolition of existing structures and*
- (ii) detailed element for strategic highway and multi-modal transport infrastructure, including: new road and redway extensions; a new bridge over the M1 motorway; a new bridge over the River Ouzel; works to the Tongwell Street corridor between Tongwell roundabout and Pineham roundabout including new bridge over the River Ouzel; alignment alterations to A509 and Newport Road; and associated utilities, earthworks and drainage works”.*

1.4 The purpose of this Planning Statement is to explain the application and assess the proposal against the Statutory Development Plan and other material considerations.

## The Applicant

1.5 The applicant is St James Group Limited which is part of the Berkeley Group of companies. Berkeley Group is a renowned developer which builds homes and neighbourhoods across London, Birmingham and the South of England. It is made of six autonomous companies of which St James is one. The Berkeley Group has an exceptional track record of delivering high quality housing and mixed-use schemes. This ranges from award-winning regeneration schemes in London – such as Woodberry Down and Kidbrooke – to outstanding new neighbourhoods at Hartland Village in Fleet and Southwater near Horsham. Berkeley Group won the ‘What House?’ Gold Award for Best Large Housebuilder in November 2020.

1.6 St James itself was established in 1996, originally as a joint venture with Thames Water. Over the past 20 years, the company has established a reputation as a design-conscious developer creating attractive developments whose design not only creates desirable places to live, but also

has a positive impact on the environment. St James' commitment to the quality and design of the buildings is matched by a commitment to making a vital contribution to the landscape, to the communities the company helps create, and to the environment as a whole. Sustainability is vital to the way St James operates. St James and the wider Berkeley Group has the vision, expertise and strategic resources to deliver a distinct and thriving new community at MKE.

## Accompanying Documents

- 1.7 The scope of the application has been discussed during the pre-application process with Milton Keynes Council ('MKC'), including via a Planning Performance Agreement and related regular meetings over the course of approximately 12 months.
- 1.8 A suite of plans and documents accompany the application which provide information relevant to determining the application. An accompanying Cover Letter to the submission provides a full directory of supporting documents, reflecting the required information for planning applications set out within the Milton Keynes Local Validation List (version 1.5, published May 2020). Key documents that should be read in conjunction with this Statement include:
- 1 Application forms (including relevant certificates and notices);
  - 2 Application Drawings, including detailed design drawings for the strategic highways elements and associated works (including general arrangement plans, long sections, drainage drawings etc.) and parameter plans for the outline elements;
  - 3 Design and Access Statement ('DAS'), prepared by JTP and incorporating a Green Infrastructure strategy and open space assessment;
  - 4 Environmental Statement ('ES') (set out below);
  - 5 Housing Statement, prepared by Lichfields (appended to this Planning Statement – see Appendix 3);
  - 6 Retail Statement, prepared by Lichfields (appended to this Planning Statement – see Appendix 4);
  - 7 Statement of Community Involvement ('SCI'), prepared by Lichfields and St James;
  - 8 S106 Heads of Terms, prepared by Lichfields;
  - 9 Health Impact Assessment, prepared by Lichfields;
  - 10 Biodiversity Impact Assessment Metric, prepared by Hankinson Duckett Associates;
  - 11 Sustainability Statement, prepared by Hodkinson;
  - 12 Outline Energy Assessment, prepared by Hodkinson;
  - 13 Overheating Mitigation Strategy, prepared by WSP;
  - 14 Utilities Services Statement, prepared by WSP;

## Environmental Statement

- 1.9 This application is accompanied by an Environmental Statement ('ES'), prepared by Lichfields, WSP, Fabrik, RPS, Hankinson Duckett Associates, Hodkinson and St James.
- 1.10 A Scoping Report prepared pursuant to Regulation 15 of the Town and Country Planning (EIA) Regulations 2017<sup>1</sup> as amended by the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018<sup>2</sup> (together 'the 2017 EIA

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<sup>1</sup> Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (published 16 May 2017)

<sup>2</sup> Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 (published 1 October 2018)

Regulations’) was submitted to the Council on 5 October 2020. An EIA Scoping Opinion provided by the Council dated 30 November 2020 (ref. 20/02) has informed the ES. The ES is comprehensive and provides all the information specified under the Regulations that is reasonably required to assess the likely environmental effects of the development.

1.11 The likely environmental effects of the following topics have been assessed:

- Transport (Chapter D);
- Landscape and Views (Chapter E);
- Ecology (Chapter F);
- Air Quality (Chapter G);
- Noise (Chapter H);
- Ground Condition & Soils (Chapter I);
- Historic Built Environment (Chapter J);
- Archaeology (Chapter K);
- Water Environment & Drainage (Chapter L);
- Socio-Economics (Chapter M);
- Climate Change & Resilience (Chapter N); and
- Waste (Chapter O).

1.12 The ES is divided into three volumes as follows:

- 1 Volume 1 – Main Technical Assessments
- 2 Volume 2 – Technical Appendices; and
- 3 Volume 3 – Non-Technical Summary.

1.13 Many of the technical reports that are referred to in this planning statement form appendices as part of the ES.

## Report Structure

1.14 This Statement provides:

- **Section 2.0** describes the application site and surrounding area;
- **Section 3.0** sets out the background to the application including the planning history and consultation;
- **Section 4.0** describes the proposed development;
- **Section 5.0** sets out the planning policy context;
- **Section 6.0** fully details an assessment of the proposed development against relevant policy and guidance;
- **Section 7.0** sets out a commentary on likely necessary planning obligations and planning conditions;
- **Section 8.0** provides a summary and conclusions.

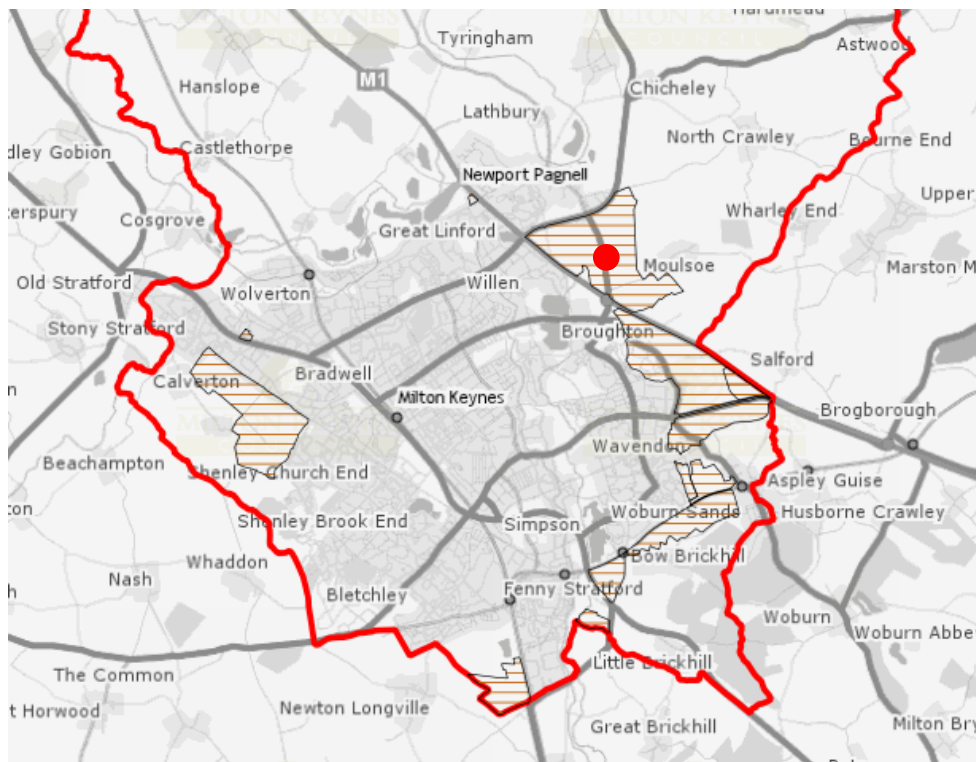
1.15 The appendices include a full planning history, a precis of relevant planning policy, the housing statement and the retail impact assessment.

## 2.0 Application Site and Surrounding Area

### Milton Keynes East Allocation

2.1 Milton Keynes East (MKE) is a strategic urban extension to Milton Keynes allocated for growth within the Council’s Local Plan, Plan:MK (2019), to contribute towards meeting the housing and employment needs of Milton Keynes. Its location within Milton Keynes Borough, on the eastern flank and south-east of Newport Pagnell, is shown in Figure 2.1. This is an extract from Plan:MK which also shows the other expansion areas to Milton Keynes currently allocated and/or under construction.

Figure 2.1 Strategic Allocations in Milton Keynes Borough



Source: Plan:MK (2019) (MKE shown by red dot)

2.2 The allocation area is strategically well located for development. It is immediately north-east of Junction 14 of the M1; one of the two main motorway junctions serving Milton Keynes. It is c.3.5 kilometres north-east of Central Milton Keynes, with good potential to enhance direct walking, cycling and highway links to the city centre. The allocation area is bounded by road infrastructure (principally the M1) and open countryside.

2.3 The majority of the allocation area is in agricultural use but there is an existing ‘Holiday Inn’ hotel on London Road, an office furniture warehouse on Newport Road, a travellers site on Willen Road and several small groups of dwellings and buildings. An area of land to the east of Willen Road and south of Caldecote Farm is also currently used as a sand and gravel extraction site.

2.4 The River Ouzel is a major existing feature of the MKE allocation area running south-north. Similarly, the A509 runs south to north linking with Milton Keynes at Junction 14 of the M1 and with the A422 to the north near Interchange Park on the edge of Newport Pagnell. The site is generally low-lying and gently slopes up, west-to-east from the River Ouzel towards Moulsoe.

## Surrounding area

- 2.5 The MKE allocation area is on the urban edge of Milton Keynes on the eastern side of the M1 motorway. To the south-west of the M1, is the existing built-up area of Milton Keynes (specifically, Tongwell, Willen, Pineham and Broughton) characterised variously by low rise housing estates and employment uses. At Pineham is the existing Anglian Water Cotton Valley Waste Sewage Works.
- 2.6 Newport Pagnell is to the north including Interchange Park business estate. Newport Pagnell is a town similarly separated from Milton Keynes by the M1 and includes a range of services along a popular high street. To the east of MKE there is a rural farmland character set between a series of villages located within a predominantly low lying open agricultural landscape. The village of Moulsoe is immediately to the east and includes the Grade I listed Church of St Mary. Beyond Moulsoe (c.4.5km east of the site) is Cranfield, where there is a large cluster of knowledge intensive business activity, including Cranfield Airfield with associated aerospace businesses, Cranfield University and the Cranfield Technology Park.

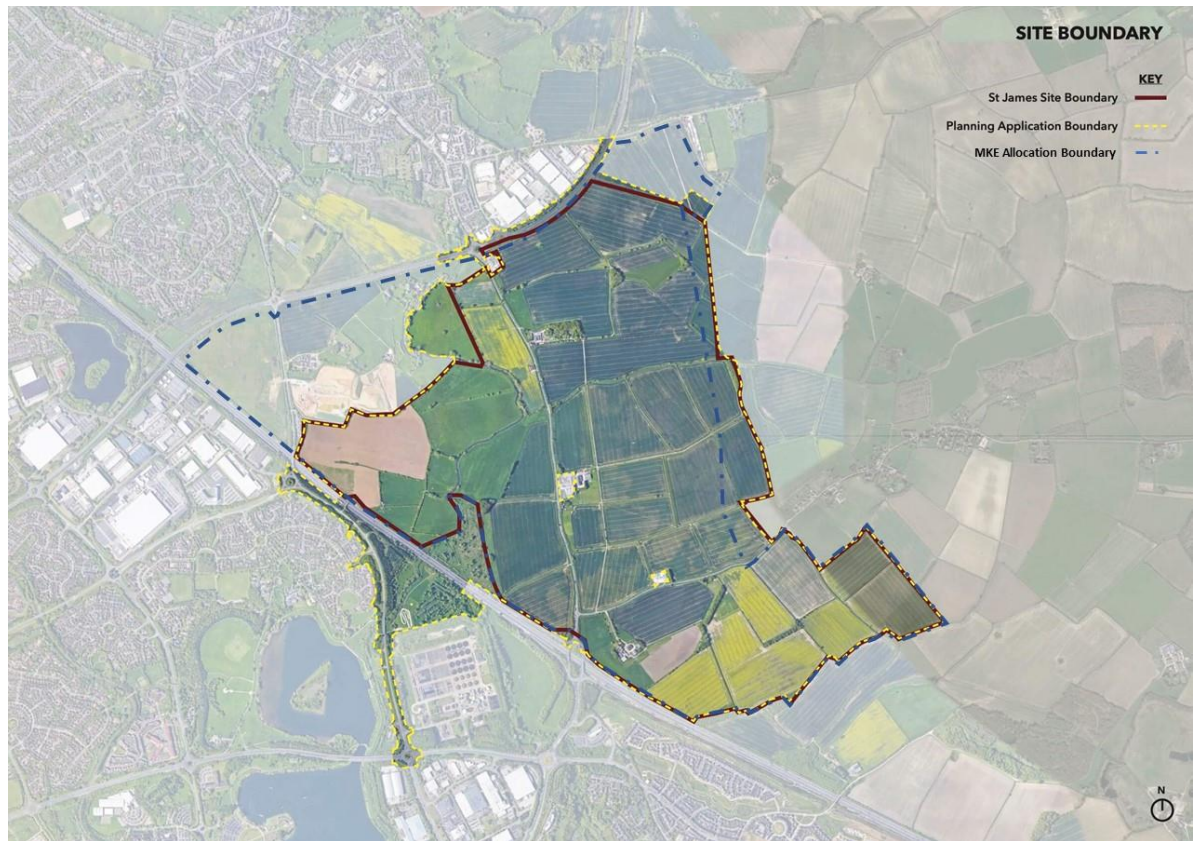
## Land ownerships within the allocation area

- 2.7 There are several landowners across the MKE allocation. St James controls c. 80% of the MKE allocation land. The other principal landownerships within the allocation area are:
- **Bloor Homes** (c. 42ha) who are proposing a housing development on their parcel of land East of Willen Road;
  - **Newlands** (c. 18ha) who are proposing a warehousing development on their parcel of land West of Willen Road; and
  - **Milton Keynes Council** own parcels of land adjacent to the River Ouzel and further parcel of land (c. 16ha) at the northern edge of the allocation which will accommodate housing development.
- 2.8 Separate applications will be submitted by these landowners for development on their sites; albeit development on these parcels will be served by much of the infrastructure for which planning permission is being sought as part of this application. The landowners have worked collaboratively to bring about a coherent and sustainable development. As part of this, a collaboration agreement is being brought forward to ensure the site allocations comes forward in a holistic, coordinated and comprehensive manner, and in accordance with planning policy.

## Application Site and Boundary

- 2.9 The site to which this planning application relates comprises the majority of land that forms the MKE allocation area. In all, the application site comprises 437.46 hectares as shown on the site Location Plan accompanying the application (Drawing No. 01312\_S\_100 rev. P1) and illustrated in Figure 2.2 below. The application site does not include the existing Holiday Inn hotel along London Road nor the existing office furniture warehouse on Newport Road.

Figure 2.2 MKE Development Site



Notes: St James Ownership (red line), Application Boundary (yellow dashed line) and MKE Allocation Boundary (blue dashed line)

Source: St James and Plan:MK – n.b. this plan is for illustration only

2.10 The main part of the site comprises St James’ land holdings within the MKE allocation area. But there are several areas where the application site extends beyond the boundary of the allocation, as follows:

- 1 The site includes the Tongwell Street corridor between Tongwell Roundabout and Pineham Roundabout and part of the M1 motorway; this is land required to provide highway improvements in the Grid Road corridor and a new bridge over the M1 into the MKE allocation site;
- 2 The site includes a part of the A509 corridor adjacent to Newport Pagnell (Interchange Park) to deliver new highway works and tie-in new roads to the A509;
- 3 The site includes land north and south of the M1 within the River Ouzel corridor owned by the Milton Keynes Parks Trust; this is to enable provision of enhancements and wider connections as part of a new linear park through the site and connecting south to Willen Lake;
- 4 At the eastern edge, the boundary of the site to the north of Newport Road has been extended eastwards by between c.60m and c.250m compared to the allocation boundary; this land is also controlled by St James and is included within the application area for several reasons:
  - a The allocation boundary along this edge was a relatively arbitrary line which did not reflect the landscape on the ground, and which cut across, rather than follow, several field boundaries and existing hedgerows. By moving the boundary eastwards, it better

reflects this landscape pattern and severs fewer fields allowing existing field boundaries to form the natural extents of the site;

- b Related to the above, the MKC-owned parcel to the north was added to the Milton Keynes East allocation at a relatively late stage within the Local Plan process. As illustrated above, it included some land that did extend further east, but at that point there was no corresponding consideration as to whether that would logically have any impact on how that new boundary at the north-eastern edge tied into the extents of MKE;
- c It provides further land within which to better align the proposed new Grid Road (and associated accesses, including to the MKC owned parcel to the north) and to provide some significant landscaping and open space uses along the edge of MKE, including a new wood near Moulsoe helping to screen the development and provide significant amenity value;
- d Very limited net developable land (e.g. for housing) would be included within this area, which would be used predominantly for infrastructure such as the Grid Road corridor. The actual development of homes and employment would be almost entirely kept to the original allocation area, continuing to adhere to the principles set out within Milton Keynes East Development Framework SPD (2020);
- e Represents a very small area given the size of the overall MKE site and presents no greater sensitivity in its proposals for those areas other than the eastern boundary which adhered to the allocation line.

2.11 Whilst in the above areas the application boundary is different to the allocation boundary, it is considered *de minimis* in the context of the scale of the application and is also considered to be necessary to deliver a better designed development, which is more sensitive to its context. These areas where the site extends beyond the allocation boundary have been discussed with Milton Keynes Council during pre-application meetings and the applicant considers the proposed approach aligns with the overall vision for the MKE allocation, enhancing the scheme proposed.



### 3.0 Background

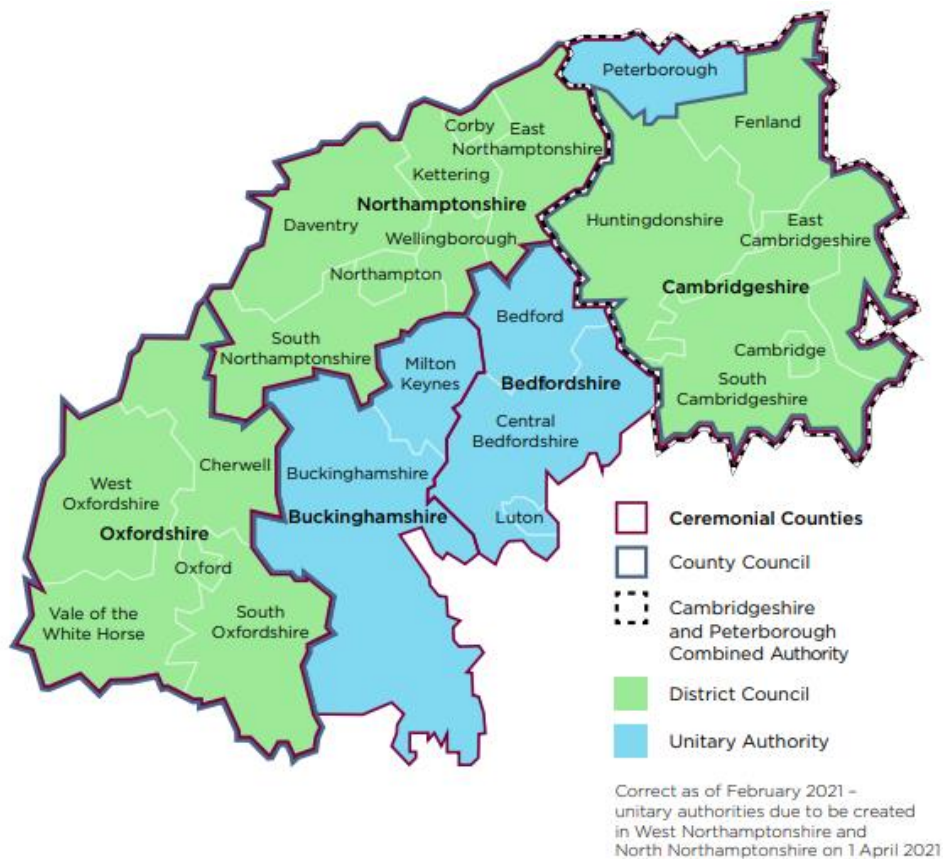
#### Context for Milton Keynes' Growth

3.1 Milton Keynes' Local Plan – Plan:MK – was adopted in 2019. It sets out the vision and framework for the future development of Milton Keynes Borough, addressing issues such as housing, the economy, infrastructure, the environment, adapting to climate change and securing good design. It sets out to meet the development needs of the Borough to the end of the plan-period to 2031 but also sets the foundations for achieving the longer term aims for the city as set out by the 'MK Future 2050' commission and national growth aims as part of the 'Oxford-Cambridge Arc'.

#### The Oxford-Cambridge Arc

3.2 The Oxford-Cambridge Arc (formerly called the 'Cambridge-Milton Keynes-Oxford' Arc) is the strategic belt spanning from Oxford in the west to Cambridge in the east. The arc is defined by the National Infrastructure Commission ("NIC") as stretching: *“around 130 miles from Cambridgeshire, via Bedford and the south east midlands, to Oxfordshire. It forms a broad arc around the north and west of London’s green belt...”*

Figure 3.1 Oxford-Cambridge Arc



Source: 'Planning for sustainable growth in the Oxford-Cambridge Arc' (Feb 2021), HM Government

3.3 The Arc area is characterised by universities, science parks and research and technology zones which are all world leading. Together it currently contributes £111 billion of annual Gross Value

Added to the UK economy per year<sup>3</sup>. The aim of the arc is to support economic growth within the area via the development of new supporting infrastructure and housing, improving productivity, affordability and connectivity. One of its areas of focus is placemaking.

- 3.4 Milton Keynes East sits at the heart of the Arc and is strategically well located. It is geographically close to what will become a key east-west artery formed by East-West Rail and the parallel road links of the A422 and A421. It is also on the key north-south artery of the M1 linking the northern and southern extents of the central part of the arc (i.e. Daventry/Northampton to the north and Luton to the south). The Government recently set out its ambitions to develop a Spatial Framework for the Arc to promote an integrated approach to planning and investment, with a target for implementation shortly after Autumn 2022.

### **MK Futures 2050**

- 3.5 The MK Futures 2050 Commission was set up in September 2015 tasked with helping to create a long-term vision for the way MK should grow and prosper over the coming decades. It published its 'Making a Great City Greater' report in July 2016 setting out some the key challenges, economic drivers and an inclusive growth agenda for Milton Keynes to 2050. In order to achieve the 2050 vision for the city six 'Big Projects' were identified:

- 1 **Growth and Strategy.** MK as a hub to realise the Arc's full economic potential as a single knowledge-intensive cluster as envisaged by HM Treasury.
- 2 **MK:University.** Provide lifelong learning opportunities at a new university to promote research, teaching and practices on solutions to the problems facing fast-growing cities.
- 3 **Learning 2050.** Ensure that the city provides, and is known for providing, world-class education for all its young people and its local workforce.
- 4 **Smart, Shared and Sustainable Mobility.** Everyone who lives, works, studies or does business in the city can move freely and on-demand by harnessing the flexibility of the city's grid roads and redways.
- 5 **Renaissance: CMK.** (Re)create an even stronger city centre fit for the 21st century.
- 6 **The Creative and Cultured City.** Harness the energy and motivation of the city's most important asset – its people.

- 3.6 Following these recommendations, Milton Keynes Council published and adopted its 'Milton Keynes Strategy for 2050' in December 2020. This strategy offers seven big ambitions which together act as a promise to those living in the city and those who wish to make Milton Keynes their future home. These are:

- 1 Strengthen those qualities that make Milton Keynes **special**
- 2 Make Milton Keynes a **leading green city** – by global standards
- 3 Ensure everyone has their own **decent home** to rent or buy
- 4 Build safe communities that support **health and wellbeing**
- 5 **Provide jobs for everyone** by supporting our businesses, and attracting new ones
- 6 Offer better opportunities for everyone **to learn** and develop their skills
- 7 Make it **easier for everyone to travel** on foot, by bike and with better public transport.

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<sup>3</sup> Paragraph 1.1, The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners (2019) (M.6)

- 3.7 To achieve these ambitions, the commission aims to plan positively for growth. This is to plan for not only the homes that are needed but also the supporting infrastructure and services required to support new development.
- 3.8 The growth at Milton Keynes East is indicated as an integral part of the spatial strategy to deliver this (Figure 8 of the MK Strategy to 2050) and the proposals at MKE have been guided by helping Milton Keynes to realise these ambitions.

### Context for Milton Keynes East

- 3.9 Milton Keynes East is an allocated site within the adopted Statutory Development Plan for Milton Keynes. It is identified for development within Plan:MK and therefore the principle of development on the site has already been established.
- 3.10 MKE was identified as a potential location for growth from the very start of Plan:MK's preparation. In 2014, a topic paper was published by MKC as part of the initial consultation on the then emerging 'Plan:MK'. 'The Way Forward Strategy Topic Paper' (September 2014) identified MKE as a 'potential site within the MKC boundary' for development (figure 1). The allocation of MKE was taken forward in the draft plan and found sound as part of Plan:MK which was adopted in 2019.
- 3.11 Since the adoption of Plan:MK (2019), MKC has adopted an 'MKE Development Framework' for the MKE allocation which was adopted as a Supplementary Planning Document ("SPD") in March 2020. It provides guiding principles for the layout and design of future development and is a material consideration for future planning applications. In preparing the Framework, MKC established the MKE Local Stakeholder Group to enable the local community representatives to inform the preparation of the development Framework. The Local Stakeholder Group ran from July 2018 to March 2019 and influenced the fundamental principles established in the Development Framework. The SPD sets out that the MKE allocation has the potential to deliver around 5,000 dwellings, along with 105ha of strategic employment land for logistics and knowledge-based manufacturing.
- 3.12 Overall, MKE has been consulted upon as an expansion area for the city for over six years. It is a site that strategically well located adjacent to the M1 motorway and can deliver a significant quantum of housing on the edge of Milton Keynes. However, while the M1 is an asset in terms of strategic highways connectivity to the site it also had been a constraint given it physically separates the site from the main built up area of the city. The development of MKE is therefore reliant on the funding and provision of new infrastructure; principally anew connection across the motorway to improve connectivity to Milton Keynes.

### Housing Infrastructure Fund

- 3.13 MKC – in partnership with St James – has successfully secured from Central Government £94.6 million of infrastructure funding to bring forward the Milton Keynes East development. This follows a joint bidding process by the Council and St James to the Housing Infrastructure Fund ("HIF"); a Government capital grant programme which aimed to unlock new homes by helping fund necessary infrastructure in areas of greatest housing need.
- 3.14 This money, announced in March 2020, is ringfenced to part-fund some of the infrastructure required to enable the delivery of MKE, including funding for:
- 1 Parts of the proposed highway improvements which are part of the detail of this application, including:

- a A new road bridge over the M1 corridor primarily to provide good connectivity between MKE and the existing urban area of Milton Keynes and relieve J14 of local traffic not accessing the motorway;
  - b Dualling of the A509 and Tongwell Street; and
  - c New on-site dual carriageway links forming an extension to the Grid Road network;
- 2 A new Health Care facility to alleviate existing GP constraints and serve the new community early in the development; and
  - 3 A three-form entry primary school to alleviate pupil capacity constraints and serve the new development.

3.15 The allocation of this funding to the MKE development comes with several conditions including the need for utilising all the HIF funding within certain timescales. The need to meet these deadlines has been the primary driver for both the timeline and nature of the planning submission, with a requirement to submit it by 31<sup>st</sup> March 2021. This is to demonstrate to the Government that sufficient progress has been made towards spending all the funding by the HIF long-stop date of March 2024. This is the reason why the main highways works (funded by HIF) are sought in the detailed element, as it will enable the early commencement of infrastructure delivery and access to HIF funding in line with conditions. The HIF funding is therefore contingent upon and necessarily interlinked with this planning application and its role enabling the delivery of infrastructure-led growth in Milton Keynes.

## Planning History

3.16 The full planning history for the application site, as identified on MKC's online planning portal is set out at Appendix 1. Overall, there is no relevant planning history to the development of this strategic urban extension. The sites planning history mainly relates to advertisement consent applications on the road network as well as agricultural development.

## Consultation

3.17 A Statement of Community Involvement ("SCI") accompanies this application which sets out our approach to consultation. St James has undertaken an as extensive and innovative programme of consultation ahead of the application as possible given constraining factors as a result of severe restrictions in the runup to submission. The ongoing COVID-19 restrictions and the timing conditions attached to the HIF funding has meant consultation has had to be focussed but has been conducted in the context that the delivery of MKE is part of ongoing conversation with the local community given the extensive consultation already occurred as part of its allocation in Plan:MK (2019) since 2014 and more recently as part of the Development Framework SPD. This application also represents the start of the next stage of consultation on the scheme, with the housing, employment and community elements of the scheme only being submitted in outline with all matters reserved. This means that local residents and stakeholders will have the opportunity to engage with detailed design proposals ahead of each and every design code and reserve matters application in the future.

3.18 Notwithstanding the feedback given at various points has helped influence and improve the proposal, the technical assessment undertaken, and the mitigation strategies proposed as detailed in the Design and Access Statement and SCI.

3.19 Extensive pre-application engagement has been undertaken with MKC in addition to other statutory consultees, local stakeholders, and the wider community. Formal pre-application feedback from these meetings has shaped the emerging proposals and assisted in creating the proposed scheme. The proposed scheme simply translates the illustrative masterplan and

parameters set out in the Development Framework SPD (which was consulted upon between August and October 2019) into a formal planning submission which responds to key planning policy objectives; notably placemaking, the provision of housing, the provision of new infrastructure, and the provision of employment. The accompanying DAS sets out that the development follows the development principles established in the Development Framework SPD. There are some aspects of the layout/design where a slightly different approach has been taken (e.g. the precise location and distribution of uses across the site, including the location of schools and employment areas) but this is fully justified in design terms within the DAS as well as in Section 6.0 of this Statement.

3.20 Full details of the consultation undertaken are set out within the SCI, but includes a series of broadly monthly pre-application meetings with officers at MKC, direct presentations given to local councillors, parishes, the local community, local stakeholder groups and forums and the MK Development Review Forum. The public consultation involved an extensive 20-page consultation brochure that as delivered to over 26,600 residential and business addresses, a dedicated consultation website, with an online comments form, contact details and an introductory film show St James' vision and ambition for the new neighbourhood at MKE.

3.21 Given the COVID-19 restrictions and the Housing Infrastructure Funding timescale challenges, the applicants MKE consultation being run via its website (<https://miltonkeyneseast.co.uk/>) will remain open for comment until September 2021. Also, to reiterate, this application is just the beginning of the next phase of consultation. Local residents and stakeholders will still have the opportunity to engage with detailed proposals as they come forward in the future.

## 4.0 Proposed Development

- 4.1 This is a hybrid planning application seeking simultaneous outline planning permission with details being submitted for elements of the scheme. The main elements of the development which are being submitted in outline (with all matters reserved) include the housing, employment, schools, open space and the community hub. Future reserved matters applications will bring forward detailed proposals for these aspects of the scheme.
- 4.2 The elements of development submitted in detail are the key road infrastructure and supporting works that is being funded by the successful Government HIF bid. This road infrastructure not only supports this application but also the development of other parts of the MKE allocation that does not form part of this submission. These other applications are therefore reliant on permission being granted for these proposals and would have to come forward pursuant to this development. The Government infrastructure funding secured comes with conditions in terms of the timing of when it needs to be spent, and as such when construction of infrastructure needs to occur, so these aspects need to have detailed consent to expedite delivery and meet these timescales.
- 4.3 In broad terms the split between the outline and detailed elements of the planning application is illustrated in Figure 4.1.

Figure 4.1 Illustrative Location of Outline and Detail Elements of Scheme



Notes: Outline (white) and Detail (hatched with highway related drainage works shown in blue)

Source: St James / Applicant Design Team

- 4.4 However, although this illustrates the broad location of the outline vs. full elements, the outline and full element are not neatly delineated by area. There are parts where the full element and outline element will deliver sequentially different parts of the scheme in the same areas at different points (or where the construction associated with the detail element will require land that falls on development parcels associated with the outline element). For example, whilst the full element will deliver the grid road corridors, some landscaping and pedestrian/cycle overbridges in these corridors will be delivered at a later date pursuant to reserved matters on the outline element of the scheme). These are distinguished and shown via the plans for approval.
- 4.5 A full explanation of the scheme and its design principles is provided in the Design and Access Statement ('DAS'). A full set of application drawings and parameter plans (for the outline elements) provide details of the proposed development. The illustrative drawings show how the outline parameters could be implemented and demonstrate how the principles for the development build upon the adopted Development Framework SPD.
- 4.6 This section has been split into separate parts to cover the outline and detailed elements of this hybrid application.

### **Proposed in Outline – Milton Keynes East**

- 4.7 A series of parameter plans have been submitted as part of the application for approval. These plans set the development parameters within which future reserved matters applications will come forward. The parameter plans will fix the various land use, maximum quantum, maximum building heights, access and circulation routes, and areas of public open space for the outline part of this application. Future reserved matters applications will need to adhere to these parameter plans.
- 4.8 In addition, an Illustrative Masterplan has been developed to show how the parameters could be applied in practice. This is not submitted for formal approval and is for illustrative purposes only within the DAS.

### **Amount and land use of development**

- 4.9 The Land Use Parameter Plan (Drawing No. 01312\_PP\_01 rev. P1) submitted with this application define the land uses and quantum of development proposed as part of this MKE application.
- 4.10 The development applied for principally comprises:
- around 4,000 (up to a maximum of 4,600) homes including later living accommodation;
  - up to 403,650 sqm of employment floorspace;
  - three primary schools with early years provision and one secondary school;
  - a community hub with up to 10,000 sqm of commercial floorspace, including a health hub;
  - open space including a 63ha linear park along the River Ouzel, a sports field, new woodland, allotments and community orchards, play spaces.
- 4.11 The quantum of development is set out in Table 4.1 below, which identifies the maximum amounts proposed within the outline element of the planning application and its uses.

Table 4.1 Amounts and Locations of Proposed Built Uses Within Application

Use/ Component	Location(s) Within Site	Use Class & Use Type	Amount (Maximum) and/or Parameter Sought
Homes	Residential Parcels and Community Hub	Use Class C2/C3 – (includes any potential housing with care element)	Up to 4,600 homes (including houses, flats and specialist elderly accommodation with or without care).
Employment	Employment Areas: <ul style="list-style-type: none"> <li>• Zone A: West Parcel</li> <li>• Zone B: Centre Parcel</li> <li>• Zone C: East Parcel</li> </ul> Plus 3 x employment or residential parcels to west of River Ouzel.	Use Class B2/B8 Use Class E (Offices/Light Industrial)	403,650 sqm of which: <ul style="list-style-type: none"> <li>• Maximum 37,160 sqm Class E offices/light industrial (within Zone A)</li> <li>• Maximum 92,900 sqm Class B2 industrial</li> <li>• Maximum 403,650 sqm Class B8 warehousing (with ancillary offices)</li> </ul>
Schools	3 x Primary Schools: <ul style="list-style-type: none"> <li>• PS1: Community Hub</li> <li>• PS2: Central South</li> <li>• PS3: S. of Moulsoe</li> </ul> 1 x Secondary School: <ul style="list-style-type: none"> <li>• SS1: Community Hub</li> </ul>	Use Class F1	PS1: 3 Form of Entry (3.0ha site) PS2: 3 Form of Entry (3.0ha site) PS3: 2 Form of Entry (2.1ha site) SS1: Up to 10 Form of Entry (11.8ha site)
Commercial and Community	Community Hub	Commercial use within Class E/Sui Generis including: <ul style="list-style-type: none"> <li>• Shops, restaurants, cafes, services (uses in Class E) and public house, takeaway (uses in Sui Generis class)</li> <li>• Health centre</li> <li>• Early years nursery</li> <li>• Gymnasium</li> </ul>	10,000 sqm Class E/Sui Generis floorspace in the community hub of which: <ul style="list-style-type: none"> <li>• Maximum 4,000 sqm retail, broken down with maximums: <ul style="list-style-type: none"> <li>- Convenience retail: 1,500 sqm</li> <li>- Comparison retail: 2,000 sqm</li> <li>- Food &amp; beverage: 1,000 sqm</li> <li>- Other non-retail service: 1,000 sqm</li> </ul> </li> <li>• Maximum 2,000 sqm health</li> <li>• Maximum 2,000 sqm early years nursery</li> <li>• Maximum 1,000 sqm commercial gym</li> <li>• Maximum 2,000 sqm office use (within maximum parameter of 37,160 sqm offices/light industrial across entire site).</li> </ul>
		Community hall and/or community services within Use Class F1/F2	400 sqm
	South of Moulsoe Local Parade	Use Class E/Sui Generis – shops, restaurants, cafes, services (uses in Class E) and takeaway (Sui Generis)	Maximum of 500 sqm Class E/Sui Generis floorspace, within which a maximum of: <ul style="list-style-type: none"> <li>• Convenience retail: 300 sqm</li> <li>• Comparison retail: 200 sqm</li> <li>• Food &amp; beverage: 200 sqm</li> <li>• Other non-retail service: 200 sqm</li> </ul>
	Sports Pitches	Sports pavilion/clubhouse within Use Class F2	600 sqm
	Linear/District Park	Community building/ visitor centre within Use Class F2	600 sqm

4.12

As noted above, the floorspace in the application is sought to be restricted by several maximum floorspace limits which will be secured by a condition on the hybrid planning permission. These are provided to allow flexibility of uses and amounts across and within proposed development that would come forward as part of reserved matters, whilst retaining control on the overall amount of development that could occur. These maxima are required to ensure adverse impacts



do not arise and that the development amount is within that tested as part of the Environmental Impact Assessment. For some of the non-residential aspects of the scheme there are suggested requirements around the number or size of individual units within different development parcels (set out below). The applicant will discuss with the Council an appropriate way that these can be secured by condition.

### **Community Hub & local parade**

- 4.13 The Community Hub is located centrally within the MKE site and the majority of homes would be within a 15-minute walk of it. The aim of the Community Hub is to act as a local centre for shopping, health facilities, education, and other supporting uses to create a critical mass. This in turn will be able to support a future Mass Rapid Transport (MRT) system, with routes for this safeguarded – included through the community hub - and to come forward through future detailed design.
- 4.14 Most of the retail (Class E/Sui Generis) and community space (Class F2) will be located here and the hub may also support some office use (Class E) which will fall within the maximum parameters of the employment space. The hub will also provide for floorspace to provide for a new commercial gym as well as early years care. As part of the Community Hub a health centre will be delivered as part of an early phase, which will meet the local health (e.g. GP, pharmacy, dental) needs of the new neighbourhood; this element is part of the infrastructure funded by the HIF monies secured.
- 4.15 In addition to the Community Hub, a small local parade is proposed in the south east of the site. This small parade will serve this area with a small amount of retail and other uses.

### **Education**

- 4.16 Three primary schools (totalling eight forms of entry) and a secondary school (up to 10 form entry) are proposed as part of this application (in total, this equates to 3,630 school places). One of the primary schools, adjacent to the community hub, is being funded by the HIF monies secured and will be brought forward as part of a first phase. A fourth primary school will also be developed at MKE on Bloor Homes' land (i.e. not forming part of this application). Across the site, all new homes will be within a 12-minute walk of a primary school along a safe, green and direct routes.
- 4.17 The locations of the proposed primary schools and secondary school proposed are shown on the Land Use Parameter Plan (Drawing No. 01312\_PP\_01 rev. P1) and accord with the provision and school site sizes as required by the MKE Development Framework SPD (2020). It is intended that school facilities will be subject to community use agreements secured by MKC and therefore some of their facilities (e.g. sports, playing fields, halls) will be available for wider community use when not in education use (e.g. evenings/weekends).

### **New homes**

- 4.18 The masterplan is developed based on delivering 4,000 new homes. However, this application sensitivity tests the provision of up to 4,600 homes and makes allowance for this within the parameters for the development. This range provides the flexibility necessary for a development that will occur over many years and reflects the potential need to adapt the density and housing mix that will be delivered over time, particularly where it might help support and respond to the critical mass necessary along certain corridors and around certain transport nodes for any future Mass Rapid Transit scheme.
- 4.19 The number of new homes also encompasses a specific allowance for later living housing/accommodation. The overall homes proposed would comprise a mix of private,

affordable rent, social and intermediate units across the site. The proposed new homes will be provided in a mix of sizes and tenures, specified at reserved matters stage for each development parcel, but following the principles of the housing mix set out within the appended Housing Statement (Appendix 3). In total 1,240 affordable homes (31% of 4,000) will be provided.

### Employment

- 4.20 The proposals aim to create a range of new employment opportunities principally in a new employment area adjacent to Junction 14 of the M1. The application would deliver between approximately 80 to 90ha of employment land (depending on whether the proposed flexible parcels to west of the River Ouzel come forward as employment or residential) involving the delivery of up to 403,650 sqm of employment floorspace. The plans allow flexibility for a range of employment spaces to be created, suitable for medium to large format employment uses.
- 4.21 The main uses in the employment areas will be storage and distribution warehouses and potentially general industrial premises alongside any ancillary uses (Use Classes B8 and B2 respectively). There may also be office and light industrial uses within these areas (falling within Use Class E commercial, but with a suggested restriction via condition to prevent other Class E uses coming forward within this area).

### Green and blue infrastructure and open spaces

- 4.22 The MKE proposals provide for a full range of green and blue infrastructure and open space throughout the development. A new linear park along the River Ouzel is proposed that would also link through via a green lattice link along Moulsoe Stream to a new wooded area on the eastern edge of MKE. Combined this would form a district scale park totalling approximately 84ha. Other provision of open space and green infrastructure includes the provision of play areas, local parks, pocket parks, and allotments/community orchards. Much of the open space among the housing areas of the proposal is formed along a landscape lattice with a hierarchy of green and blue corridors, with integrated sustainable drainage features.
- 4.23 Regarding play space eight Local Play Areas (totalling c.3,200 sqm) and four Neighbourhood Play Areas (totalling c.12,000 sqm) are proposed to serve the residential areas. A 3.2ha sports pitch facilities is included, located centrally close to the Community Hub and residential areas. Three allotment areas are proposed, spaced across the new neighbourhood to allow for close access from nearby residential areas. The proposals also include a 2.0ha burial ground.
- 4.24 MKE will involve the planting of at least 250,000 trees. To help St James bring forward an extensive landscaping strategy, it is proposed that a new tree nursery will be created for a temporary period on one of the locations illustrated on the parameter plans. This tree nursery will supply tree saplings for the whole of the MKE development, evoking Milton Keynes Development Corporation's own tree nursery at Newlands which operated in early development of Milton Keynes. The development therefore aligns with MKCs strategic ambitions to plant one million new trees. It also aligns with Milton Keynes' first Chief Architect, the late Derek Walker whom said that his ambition was for Milton Keynes to be "*a forest city greener than the surrounding countryside*"<sup>4</sup>.
- 4.25 The layout of the green infrastructure is set out within the Green Infrastructure Parameter Plan (Drawing No. 01312\_PP\_03 rev. P1) whilst the design and access statement sets out a comprehensive landscape strategy.

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<sup>4</sup> MK Futures 2050, Milton Keynes Strategy for 2050 (Page 26).

### **Access and parking**

- 4.26 More detail regarding access to the site is formed as part of the detailed elements of the scheme set out below. However, the Movement and Access parameter plan (Drawing No. 01312\_PP\_02 rev. P1) shows the fixed proposed network of walking and cycling routes, with a comprehensive extension to Milton Keynes' redway network linking residential areas with employment zones, the community hub, open space and education facilities. The aim of these routes is to promote active travel within and across the MKE allocation area. Within the site there are several fixed internal primary roads. These will provide car and bus access throughout the site. Within these route corridors there is safeguarded space for a future Mass Rapid Transport system, which could take the form of, for example, a bus rapid transit network with physical bus priority measures.
- 4.27 A parking strategy is proposed as part of the outline scheme, including provision of electric vehicle charging points, cycle parking and shared use of car parking for some community and visitor uses. Further details on both access and parking are provided within Chapter D (Transport) of the ES and relevant appendices which includes a full parking strategy.

### **Layout, character and building heights**

- 4.28 The layout of the outline element is based upon a landscape lattice and a modern interpretation of the Milton Keynes grid. This includes two new grid road corridors with new redways, complemented by a new landscape lattice of green routes which will connect into those corridors and knit them together for the movement of both people and nature. The layout principles are set out in the DAS (Chapter 5) and the parameter plans show how these are to be fixed in the development. This includes designing the layout to be dementia friendly, with legible, distinct places which will be safe and accessible. The illustrative masterplan shows an interpretation of how the development will be built around the proposed layout which builds upon the development principles set out in the adopted Development Framework SPD (2020).

Figure 4.2 MKE Illustrative Masterplan



Source: JTP (Note: See Design and Access Statement for full size version)

4.29 The proposed residential areas within MKE are differentiated across six-character areas responding to the varied context across different parts of the Milton Keynes East site and the varied densities that will occur. Similarly, the DAS sets out how the character of the employment areas will create a very high quality, modern and well-serviced logistics hub.

4.30 The Building Heights Parameter Plan (Drawing No. 01312\_PP\_04 rev. P1) sets out the maximum building heights across the application site. In broad terms, the residential areas range from 2.5 storeys (12.5m to ridge) on the more sensitive eastern edges of the development, up to 6 storeys (26m to ridge) within the community hub area. The higher buildings heights are focused in the Community Hub to create a greater mix of uses and flats to support its vitality and vibrancy and also to create a critical mass that can support a potential future mass rapid transit public transport system. These higher building heights (i.e. six storeys) are set as maximums, and are not intended to be ubiquitous to these central areas (i.e. not all buildings will be six storeys – there will be variation up to that maximum), but are intended to be used at focal points and key gateways. Further justification for the buildings heights is set out in the DAS (Section 5.0). Similarly, at its highest the employment areas will see units with heights up to 29m, catering for modern employment space needs, whilst focusing these on the least sensitive parts of the site adjacent to the M1 motorway.

### Proposed in Detailed – Strategic Highways Infrastructure

4.31 This section provides a description of the proposed development for which full permission is sought. This is comprised of highways infrastructure and associated works which will provide the primary means of access for the Milton Keynes East urban extension. A full set of detailed plans accompany the application including

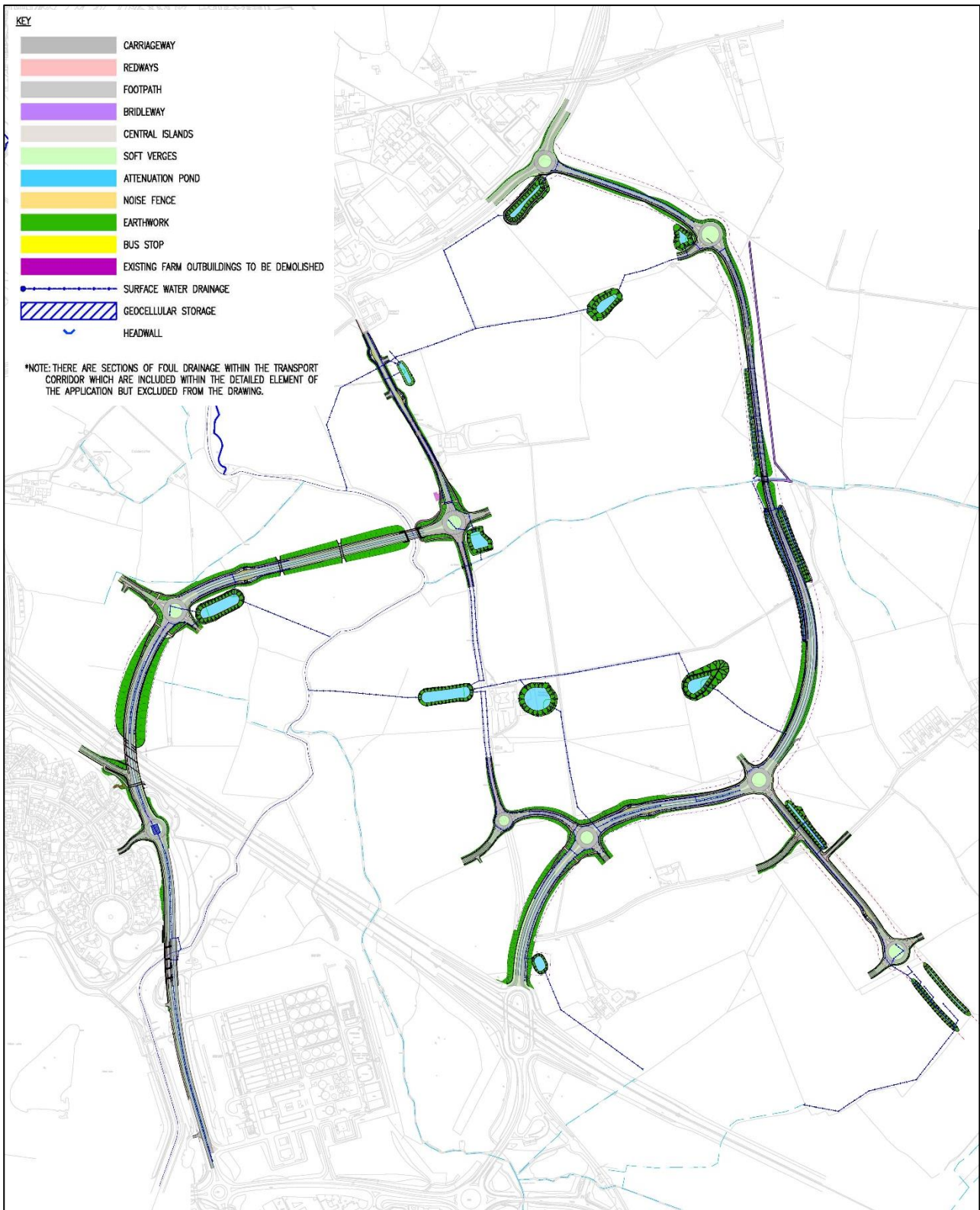
- 1 Schematic Overview for Planning;
- 2 A set of General Arrangement plans;
- 3 A set of Geometry Details of Cross Sections;
- 4 A set of long sections;
- 5 A set of indicative road cross sections with geometry details;
- 6 A set of detailed design drawings for structures; and
- 7 A set of highways drainage plans.

4.32 These plans provide the detail of what elements full planning permission is sought for. In summary, the detailed element of the application comprises:

- 1 **An Eastern Link Grid Road** - A new part dual, part single carriageway Grid Road linking Junction 14 of the M1 to a new junction of the A509 east of Interchange Park. This would follow the eastern boundary of the site and would involve new roundabouts tying into existing movement routes and access to the new development parcels. It would link to a downgraded existing A509 London Road and would involve the existing Newport Road where it adjoins the A509 being closed to through-traffic, with access to Moulsoe and beyond towards Cranfield provided by linking the existing Newport Road just west of Moulsoe in to the new grid roads via a new 'Cranfield Link' to be provided as a spur to serve the employment and residential parcels in this part of the site. The Eastern Link would involve a new single span bridge over the Moulsoe Stream.
- 2 **A Western Link Grid Road** – A new predominantly dual carriageway Grid Road linking the V11 Tongwell Street from Pineham Roundabout, to the A509/A422 at Tickford Roundabout. This would include the dualling of the existing Tongwell Street within the existing Grid Road corridor, including a new dual carriageway bridge on Tongwell Street over the River Ouzel, a new dual carriageway bridge over the M1 motorway and a new dual carriageway bridge over the River Ouzel as the proposed Grid Road passes through the Linear Park. As part of this new infrastructure a new roundabout with Carleton Gate would be provided and the remainder of Tongwell Street from the new M1 bridge to Tongwell Roundabout would be reconfigured to one-way north-westward running, with a slip road adjoining from the new carriageway just before the new M1 overbridge. The new dual carriageway bridge back across the River Ouzel through the Linear Park would tie into a new roundabout on the A509 London Road, continuing northwards as the existing single carriageway to Tickford Roundabout.

4.33 Associated with the highway infrastructure sought in detail is several new redway shared paths alongside the grid road corridors, and a series of highway drainage works, including attenuation ponds and surface water drains. There will also be a series of new underpass (subway) structures constructed to provide crossings of the Grid Roads (with several additional bridge structures forming part of the outline application) and several culvert structures will be necessary for existing watercourses. The external materials for structures will generally comprise concrete with aluminium vehicle restraint systems, to match existing Grid Road structures commonly seen throughout Milton Keynes (e.g. the existing Tongwell Street River Ouzel bridge). The detailed elements are illustrated in Figure 4.3.

Figure 4.3 MKE Highways Works in Detail – Illustrative Plan



Source: WSP (See High Resolution Version within DAS)

4-34

The road will be constructed with an asphalt carriageway, over a granular sub-base, except for where they pass over a bridge structure. Kerbs will be constructed along the roadway and where

applicable a safety barrier is to be provided within the central reserve of some dual carriageway sections and within the adjacent verge on bridge structures. This soft verge will be provided between the edge of the carriageway and, where provided, adjacent redways, with the latter also be constructed with asphalt surfacing. Most of the new Grid Road corridors and embankments will initially be soil and seeded, with structural landscaping and planting to be delivered later pursuant to the outline permission and when adjacent development parcels are delivered.

- 4-35 In general, the new Grid Roads will be lit, with indicative lighting details set out on the cross section, but a detailed lighting strategy to be agreed as part of further detailed design work to be agreed at a later date. New signage will also come forward at new roundabouts and along the grid road corridors, as well as changes to off-site signage to recognise the introduction of the new road infrastructure, and as agreed with MKC a full signage strategy will be set out for MKC's agreement at a later date.
- 4-36 Noise barriers / bunds will be provided alongside the new roads to mitigate any noise impacts to adjacent residential parcels albeit these will largely be delivered later pursuant to the outline permission and when adjacent development parcels are delivered. The exception to this is along Tongwell Street where the noise barrier forms part of the detailed application.
- 4-37 The construction of the highway infrastructure may involve temporary closures of some roads, and overnight working on the M1 motorway. Earthworks needed to create embankments and levels for the road infrastructure is also included within the proposed detailed scheme.

## Construction

### Phasing

- 4-38 Milton Keynes East is a large development that will build-out over many years with a construction period of around 26-years. The proposed development will therefore be brought forward in phases. An illustrative phasing schedule has been adopted for the purposes of testing the development's delivery. Broadly it would see the construction of development between 2022 and 2048 split into phases as follows:
- **Initial Infrastructure Phase** – This relates to the delivery of the detailed elements of the scheme, primarily the provision of road infrastructure including a new bridge over the M1 motorway, new Grid Road infrastructure and works to the A509. There will be some overlap with this with the initial phase 1 of development;
  - **Phase 1** – As part of the HIF funding, the first main phase of built development will deliver the key parts of the community hub (including the HIF funded health hub and first primary school), and adjacent residential parcels. It is also likely that the Bloor and Newlands parcels of the wider MKE allocation will come forward in parallel. Some employment uses north of the Newport Road will also be developed.
  - **Phase 2** – The second phase will focus on the development of parcels south of the community hub as well as a secondary school and additional employment uses within the employment zone; and
  - **Phase 3** – The remaining residential parcels will be developed and the third primary school. These parcels include those adjacent to the M1 west of the River Ouzel, and those south of Moulsoe.
- 4-39 At this stage, the detailed phasing and delivery of individual parcels, open space, employment land is left open such to provide flexibility. This will be determined at the detailed design stage and is subject to later Reserved Matters applications.

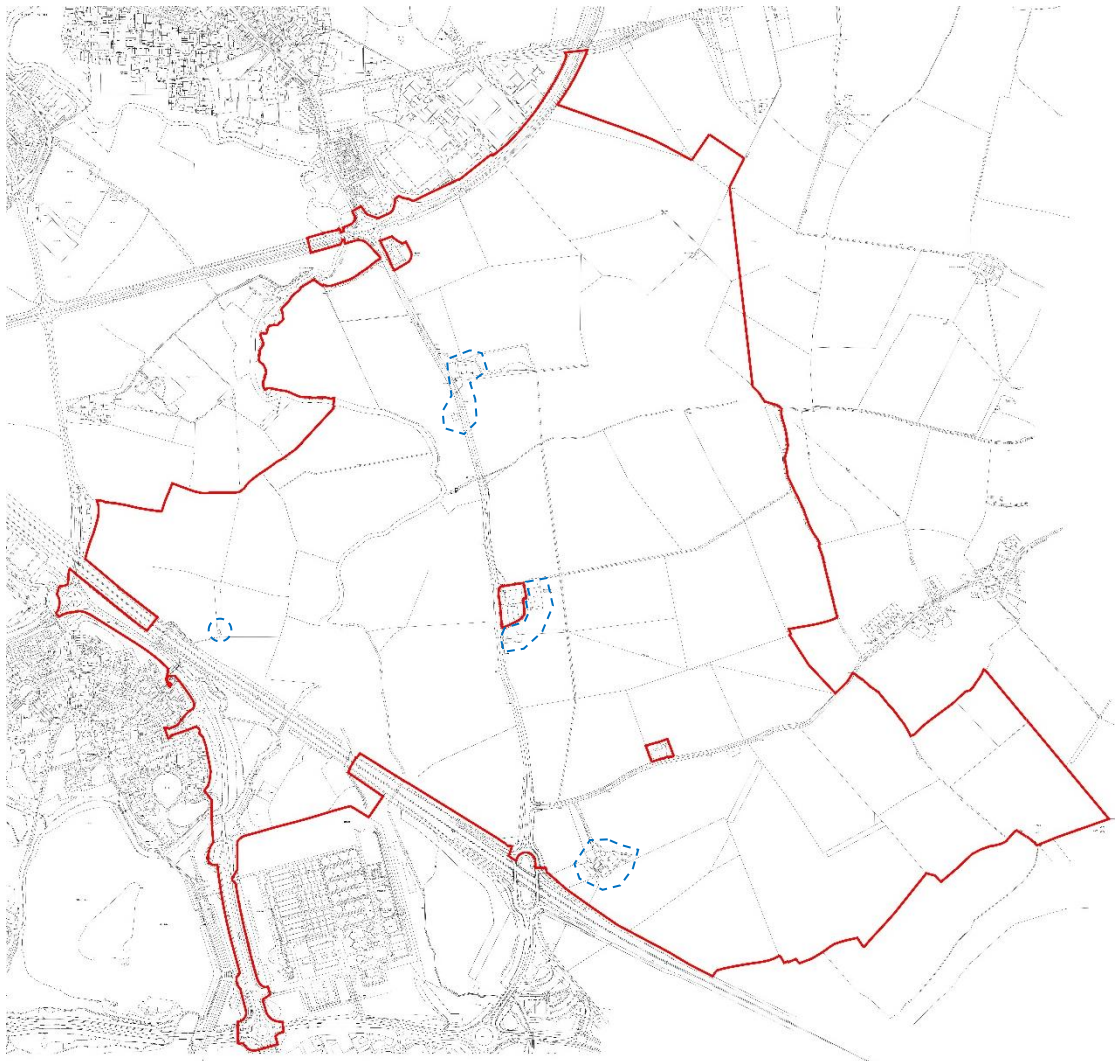
## Demolition of existing structures

4.40 All existing buildings on the site will be demolished. This includes:

- All existing buildings at Hermitage Farm, Newport Road comprising the farmhouse and various farm buildings, outbuilding, barns and grain stores.
- All existing buildings at Moulsoe Farm, London Road (behind/around Holiday Inn hotel which is outside the site and retained) comprising the farmhouse and various farm sheds, barns and outbuildings.
- All existing buildings at 27/29 London Road including the farmhouses, adjacent farm sheds as well as the farm shed on the opposite side (west side) of the A509 London Road (this farm shed needing to be removed to allow delivery of the detailed highway elements).
- The barn structure/shed near to the existing farm track bridge over the M1.

4.41 These are all shown and visible on the OS base contained on the site location plan (O1312\_S\_100 Rev.P1) and illustrated in Figure 4.4 below.

Figure 4.4 Illustration of location of building clusters to be demolished (blue dashed areas)



Source: St James / Applicant Design Team



4.42 In addition to the above buildings, as part of the highway infrastructure work, there will be removal and breaking up of some existing structures, including where alterations to road alignments are occurring. This will also include the removal and filling in of the pedestrian underpass on Tongwell Street near to Carteret Close.

### **Stopping up of highway and/or traffic regulation orders**

4.43 In order to deliver the strategic highway improvements, it is necessary to rearrange the existing highway network in several places which will require either the 'stopping-up' of existing public highway removing its status as a highway, road or footpath, or alternatively a 'traffic regulation order' (TRO) which retains its highway status but restricts or prohibits its use (e.g. closes it to vehicular traffic).

4.44 The applicant intends to apply under Section 247 of the Town and Country Planning Act 1990, as amended, for the stopping up of any required highway in order to deliver the new highway infrastructure. In accordance with the legislation, this application will be made to be enacted pursuant to the receipt of planning permission for the proposed development (the application itself may be brought forward in parallel).

4.45 During construction it is proposed that the following will need to be permanently stopped-up:

- 1 A section of the A509 London Road between the proposed Eastern Perimeter Road (Link 101) and the new roundabout on the A509 serving a new employment parcel.
- 2 A section of Newport Road between the proposed Eastern Perimeter Road (Link 101) and a new Cranfield Link road (Link 110).

4.46 We understand the land to be stopped-up is controlled by MKC as highway land. The stopping-up is required to enable the construction of the new link road.

4.47 There are also proposed to be several locations where diversions of Pedestrian Rights of Way (PROWs) are proposed to occur. These, along with the above proposals to stop-up the highway are show on in Diagram 2.1 of the 'PRoW Strategy Note' (ES Volume 2, Appendix D1, Appendix A-10, ref. TTN10).

## 5.0 Planning Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 This section details the policy context for the application, describing the Development Plan policies relevant to the consideration of the scheme, as well as providing an account of the prevailing policy guidance in the National Planning Policy Framework (NPPF 2019) and other documents that represent appropriate material considerations.

5.3 Appendix 2 also sets out a planning policy matrix assigning different policies and guidance documents to different topic themes.

### Statutory Development Plan

5.4 The statutory development plan relevant for this proposal principally comprises 'Plan:MK' the Local Plan for Milton Keynes adopted in 2019, the Milton Keynes Waste DPD adopted in 2008 and the Milton Keynes Minerals Local Plan adopted in 2017.

#### Plan:MK (2019)

5.5 The wider area known as MKE is allocated in Plan:MK for around 5,000 homes in totality (Policy SD12). Policy SD12 sets out that MKE will form a strategic urban extension to the city of Milton Keynes that will provide a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes. It notes that the development can commence once the necessary strategic infrastructure – required to make the site deliverable – is funded and is being delivered.

5.6 In accordance with Paragraph 48 of the NPPF, the decision-maker may also give weight to relevant policies in emerging plans according to the stage of preparation, number of outstanding objections and consistency with the NPPF. MKC is currently preparing a review of Plan:MK. However, this is at a very early stage and is not considered to be materially relevant to the consideration of this application.

5.7 The site is also allocated within:

- 1 Development Boundary;
- 2 Strategic Site Allocations;
- 3 Employment (Existing and Proposed);
- 4 Linear Parks;
- 5 Local Wildlife Sites;
- 6 Minerals Primary Focus Area;
- 7 Open Countryside;
- 8 Transport Corridor; and
- 9 Wildlife Corridor.

5.8 The site is also partly located in areas at risk of flooding (Zone 2 and 3).

### **MK Minerals Local Plan (2017)**

- 5.9 The Milton Keynes Minerals Local Plan identifies that the area of the MKE allocation between Willen Road and the A509 (i.e. the River Ouzel Valley) is within a mineral safeguarding area for sand and gravel extraction. Policy 18 of the plan sets out how that safeguarding will apply.

### **Milton Keynes East Development Framework SPD (2020)**

- 5.10 The adopted MKE Development Framework SPD (2020) provides more detailed guidance specific to the development of the MKE strategic urban extension. It sets out the guiding development principles and a development framework for the delivery of the MKE allocation. This includes an indicative concept plan (Figure 3.1). This framework SPD is not part of the statutory development plan but is a material consideration for the determination of this application.

### **Other Policy Considerations**

- 5.11 In addition to the Statutory Development Plan and emerging policy, the following documents are considered relevant and material in determining this application:

#### **National planning policy and guidance**

- National Planning Policy Framework ‘NPPF’ (CLG, February 2019);
- National Planning Policy Framework and National Model Design Code: consultation proposals (January 2021) (Emerging Policy)
- Planning Practice Guidance (‘PPG’) (CLG; 2014, 2017-2020); and
- Nationally Described Standards (March 2015).

#### **Other guidance**

- Planning Obligations for Education Facilities SPG (2004);
- Milton Keynes Drainage Strategy SPG (2004);
- Planning Obligations SPD for Leisure, Recreation and Sports Facilities (2005);
- Social Infrastructure Planning Obligations SPD (2005);
- Milton Keynes Urban Development Area Tariff SPD (2007);
- Sustainable Construction SPD (2007);
- New Residential Development Design Guide (2012);
- Milton Keynes Landscape Character Assessment (2016);
- Parking Standards SPD (2016);
- MKE Strategic Urban Extension Development Framework SPD (2020);
- Affordable Housing SPD (2020);
- Planning Obligations SPD (2021);
- Draft Health Impact Assessment SPD (Emerging – consultation concluded September 2020)
- Draft Biodiversity SPD (Emerging – consultation concluded November 2020); and
- Draft Sustainable Construction SPD (Emerging – consultation concluded in January 2021).

### **Other policy documents**

- MK Futures Commission 2050 – Making a Great City Greater (2016)
- MK Futures Commission 2050 – Milton Keynes Strategy for 2050 (2020)
- HM Government – The Oxford-Cambridge Arc: government ambition and joint declaration between government and local partners (2019)
- HM Government – Planning for sustainable growth in the Oxford-Cambridge Arc: spatial framework (2021)

### **Overview of Key Policy and Material Considerations**

- 5.12 A detailed summary of relevant planning policy is provided below. The prevailing policies across the various documents establish several policy themes that assist in the consideration of the proposed development.
- 5.13 Considerations such as employment generation, economic growth and sustainability, community infrastructure, and heritage, for example, all contribute to the policy context for the proposal.
- 5.14 These themes have been grouped together in structuring the next section, which assesses the planning application against the Development Plan and other material considerations.

## 6.0 Development Assessment

6.1 This section assesses the proposed development against the relevant planning policy summarised in the previous section and described in more detail at Appendix 3. The main policy themes arising are considered to comprise the following:

- 1 Principle of Development
- 2 Community Infrastructure
- 3 Employment and Housing Provision
- 4 Design
- 5 Heritage
- 6 Landscape and Visual Impacts
- 7 Habitats and Biodiversity
- 8 Open Space, Play Space and Sports Facilities
- 9 Transport, Active Travel, and Parking
- 10 Energy, Sustainability, and Climate Change
- 11 Minerals Safeguarding
- 12 Water and Drainage
- 13 Other Environmental Considerations
  - a Noise, Vibration and Air Quality
  - b Land Conditions
  - c Agricultural Land
  - d Waste and Recycling
  - e Communications
- 14 The Benefits and Overall Planning Balance

6.2 For the purposes of this assessment, the proposed development is assessed primarily against both the adopted Plan:MK (2019) and MKE Development Framework SPD (2020).

6.3 Where relevant, the assessment on the above has been split to cover the outline and detailed elements of the proposed development in order to appropriately assess the development proposal.

### 1. Principle of Development

6.4 The NPPF establishes a presumption in favour of sustainable development and seeks opportunities to deliver net gains across each of the three sustainable development objectives (Paras 8 and 11). It also sets out the Government's commitment to significantly boost the supply of homes (Para 59), which can sometimes be best achieved through the planning for large development (Para 72), and states significant weight should be placed on the need to support economic growth and productivity (Para 80).

6.5 Plan:MK (2019) allocates land across the borough in order to deliver a minimum of 26,500 net additional dwellings within the plan period. As per Policy DS2 (Housing Strategy) new housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes.

Policy DS2 then sets out 13 ways in which this housing delivery will be met including development at MKE:

*“Land East of the M1: a mixed residential and employment strategic site to the east of the M1, south of Newport Pagnell, is allocated as a strategic urban extension to meet the long-term needs of Milton Keynes. Development of this site can commence once the necessary strategic infrastructure required to make the site deliverable, including required connections to the existing urban area of Milton Keynes, is funded and is being delivered” (Point 12)*

6.6 Policy SD12 (Milton Keynes East Strategic Urban Extension) then specifically states:

*“Land is allocated at Milton Keynes East – as shown on the Key Diagram and Policies Map – for a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes.”*

6.7 Since the adoption of Plan:MK (2019) the Council has also adopted a Development Framework SPD (2020) that provides additional detail as to what form and type of development is expected at MKE.

6.8 Based on the above planning policy, it is evident that the MKE urban extension is as an intrinsic part of the Borough’s strategy for growth. The relevant strategic infrastructure has now been funded following a successful Government HIF bid and this infrastructure forms the detailed part of this application. The principle of development for the application site is therefore established, is supported by the relevant policies of both Plan:MK (2019) and the NPPF (2019), and this application enables the realisation of development at MKE.

6.9 Its noted however that the application site includes land not within the MKE allocation. This is fully detailed earlier in this statement (Para 2.10). Whilst in some areas the application boundary is different to the allocation boundary, it is considered *de minimis* in the context of the scale of the application, and within that area the proposals include new road corridors and green infrastructure uses (e.g. a new wooded area); the net developable area is predominantly within the existing allocated part of the site. This extension is also considered to be necessary to deliver a better designed development, enable the delivery of key infrastructure required and enable a development which is more sensitive to its context. The principle of development of this land is therefore justified and in accordance with the overall aims of delivering a comprehensive urban extension at MKE.

6.10 As the site is allocated within the Statutory Development Plan for the mixed housing and employment uses proposed within Plan:MK Policy SD12, the proposals accord with policy when taken as a whole and should be granted in line with the plan unless specific material considerations are of such a weight that planning permission should not be granted. As set out in remainder of this section, we do not consider there are any such other considerations.

## **2. Community Infrastructure**

6.11 Policy INF1 (Delivering Infrastructure) of Plan:MK (2019) requires new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of the development is either already in place or there is a reliable mechanism in place to deliver such infrastructure in appropriate locations. Policy SD12 (C3) also expects the delivery of associated infrastructure including primary and secondary education, community facilities, and health facilities at MKE. The Development Framework SPD (2020) sets out the broad location and general amount of such infrastructure (particularly in respect of education needs) for these uses.

## Retail and leisure

- 6.12 Policy SD12 (C3) expects the delivery of at least one district centre and/or local centre(s) of a scale commensurate to the needs of the community and that would not adversely affect Newport Pagnell. Policy ER14 (New Local Centres) further affirms the need to provide new local centres in new residential developments of over 500 dwellings. It also notes that all new dwellings should be within a 500m walking distance of a local centre. Plan:MK (2019) establishes the principle of retail and leisure development at MKE. However, there remains a requirement in policy for this to be “right sized” commensurate to the needs of the community and not to adversely impact Newport Pagnell; the MKE Development Framework SPD confirms that a retail impact assessment should be undertaken for proposals including more than 350 sqm of retail at MKE. Given MKE is a site for which main town centre uses are allocated it is not subject to the Sequential Test in accordance with Policy ER10 (Assessing Edge of Centre and Out of Centre Proposals).
- 6.13 The parameters for retail and leisure uses are set out in Table 4.1 but essentially comprise up to 4,000 sqm of retail floorspace and a commercial gym within the Community Hub and a single local centre neighbourhood parade up to 500 sqm retail. Most retail and leisure uses will be concentrated within the Community Hub. This hub is also the location of both a primary and secondary school and will act as a key public transport hub (including a potential Mass Rapid Transit system). Furthermore, housing development will be denser around the hub. These will all complement the retail and leisure provision to create a concentration of uses and critical mass around the hub. A local centre is also proposed in the south east of the site. These locations are broadly aligned with the ‘Indicative Concept Plan’ in the adopted Development Framework SPD (2020) (Figure 3.1).
- 6.14 The proposed mix of retail could support a food store of at least 1,500 sqm suitable for main and top-up shopping trips, complemented by a range of small format retail, service and food/drink units. As necessary, we anticipate retail units would be limited in use (e.g. to a sub-use within Class E commercial, given that use class encompasses a much wider range of commercial uses including employment) and might also be limited in size (e.g. to ensure smaller format units for other retail units beyond the food store). This could be done by way of condition.
- 6.15 A Retail Statement is appended to this Planning Statement (Appendix 4). This demonstrates the proposals are of a scale commensurate to the needs of the new community and that – even on the worst-case scenario – the development would not adversely affect the viability and vitality of Newport Pagnell district centre nor Central Milton Keynes. It finds that the resident and expenditure growth from Milton Keynes East will support the scale of the retail proposed, whilst also creating a net positive impact for nearby centres i.e. new expenditure from the new homes exceeds any trade diversion to the Community Hub. The proposed amount of retail and leisure floorspace therefore accords with Policy SD12; it is “right-sized” for a new community of the scale of MKE.
- 6.16 To ensure there are no temporary impacts on nearby centres by the delivery of retail development proposed at MKE outpacing the commensurate growth of homes on the site, on a precautionary basis, St James would welcome a planning condition limiting the amount of retail floorspace that can be occupied within the Community Hub, linked to phased housing delivery.

## Community uses and social infrastructure

### Education

- 6.17 With regards to new education facilities, Policy EH1 (Provision of New Schools – Planning Considerations) generally supports the provision of new facilities. There are five policy criteria

for new schools to meet including the need to provide safe access, safe drop off, and avoid conflict with adjoining uses. Policy EH2 (Provision of New School – Site Size and Location) sets out that MKC does not normally support primary schools of smaller than 2 FE (2.1ha minimum site size) and secondary schools of 5FE (7.34ha minimum site size). Finally, Policy CC5 (Childcare Facilities) generally supports the provision of nursery and similar facilities that are consistent with detailed policy guidance in Appendix E to Plan:MK (2019).

- 6.18 As part of the proposed development, three primary schools with early years provision and a secondary school are proposed. Table 6.1 sets out the key detail regarding each school including the relevant indicative trigger points for when each school will need to be delivered; St James would make the school parcels available to MKC in advance of that point. The design and delivery of the schools will be progressed by MKC via future submissions. The locations of the new schools are shown on the Parameter Plan (Drawing No. 03132\_PP\_01 rev. P1) which broadly align with the locations shown in the adopted Development Framework SPD (2020) (see also page 83 in the DAS).

Table 6.1 Proposed Education Facilities

School	Location	Forms of Entry (FE)	Site Area	Trigger Point
Primary School 1	Adjacent to Community Hub	3FE	3.0 ha	0 homes
Primary School 2	Central South	3FE	3.0 ha	c. 1,900 homes
Primary School 3	South of Moulsoe	2FE	2.1 ha	c. 4,000 homes
Secondary School	Adjacent to Community Hub	Up to 10FE	11.8 ha	c. 900 homes

Source: St James Group Limited

- 6.19 The illustrative masterplan contained within the DAS demonstrates how the detailed design of future schools can ensure compliance with the five criteria for new facilities as set out in Policy EH1:
- 1 Deliver safe access by public transport, cycle and walking as well as by car:** All homes are within a 12-minute walk of a primary school and the secondary school proposed is centrally located and will be within a 15-minute walk for the majority of homes. The schools will be accessible via the proposed network of segregated pedestrian routes and redways. These will provide a safe and attractive option for walking and cycling to school.
  - 2 Provide a safe drop-off and pick-up provision, which reflects a school's need and travel requirements:** The DAS illustrative masterplan shows how the school sites could accommodate such requirements; but these will be subject to detail design at a later date.
  - 3 Provide outdoor facilities for sport and recreation, which meet the pupils needs of the school:** All schools are of sufficient size to provide outdoor facilities for sport and recreation to meet their needs.
  - 4 Avoid conflict with adjoining uses:** All schools are located to avoid conflict with adjoining uses. Detailed landscaping and design proposals as part of future reserved matters submission will demonstrate how nearby uses will avoid conflict with the schools.
  - 5 To facilitate the adaptability of a school's design to allow for expansion or contraction and separation off, for differing uses:** It has been agreed with MKC that all future operators will be required to make their facilities available to the wider public as part of the Council's tendering process.
- 6.20 The size of the education facilities proposed at MKE has been agreed via the pre-application process. Anticipated child yields for the development have been based on an indicative mix for a 4,000 home and 4,600 home St James scheme and the Council's 'Pupil Product Ratio Study'



(2017). These child yields are detailed in the Socio-Economic Chapter of the ES (Chapter M). On the basis of these child yields, this MKE proposal provides sufficient places to meet its own needs, the wider needs of the MKE allocation (noting that a fourth primary school will be delivered by a separate landowner at MKE), and potentially the needs of those outside of MKE.

- 6.21 All primary schools will also include nursery provision. Additional floorspace for a further nursery is included in the Community Hub (2,000 sqm gross) which is considered the best location for a separate nursery taking account of the detailed Appendix E guidance for the provision of nurseries.
- 6.22 The levels of education provision and type of facilities proposed is justified, would meet local education needs and accords with local policy.

### Health facilities

- 6.23 Policy EH5 (Health Facilities) generally supports proposals for new health facilities where they will meet an identified need. Residential developments will also only be supported by the Council where they provide or improve essential facilities required to serve the scale of development. Policy SD12 expects the provisions of health facilities as part of the MKE development. This is to support the needs of the new community which will grow within the urban extension.
- 6.24 The proposed Community Hub will include a Health Hub of up to 2,000 sqm (Use Class E). Based on national population to practitioner ratio's, the proposed development across the whole of the MKE allocation (i.e. up to 5,750 units) will give rise to a need for circa eight GPs and seven dental practitioners<sup>5</sup>. As a comparison, a recent new health centre as part of the Western Expansion Area was 2,400 sqm which included a retail unit<sup>6</sup>. The size of the proposed health facility therefore gives flexibility against this example in terms of meeting the necessary health infrastructure needs of the new community. The health hub benefits from infrastructure funding via HIF, and therefore will be delivered early in the development. Overall, the health provision meets the need generated from the development itself and the wider MKE urban extension.
- 6.25 Furthermore, Policy EH6 (Delivery of Health Facilities in New Development) requires all Use Class C2 and C3 developments of more than 50 dwellings to prepare a Health Impact Assessment ('HIA'). An HIA has been submitted as part of the application documents that considers the health impacts of the proposed development in both the construction and operational phases in accordance with the draft HIA SPD (2020) and other guidance for the preparation of HIAs.

### Community facilities

- 6.26 Policy CC4 (New Community Facilities) supports the development of community facilities subject to several policy tests. This includes ensuring that new developments include provision for such facilities proportionate to the scale of development proposed, but also enables use by residents across Milton Keynes. Regarding the location of these facilities, Policy CC2 (Location of Community Facilities) states that planning permission will be granted for community facilities where they are within or adjacent to district/local centres. Facilities for sports and outdoor leisure should also be within or adjacent to parks with suitable public transport links and sufficient parking; these facilities must also be designed to be adaptable for multiple use.
- 6.27 This MKE proposal includes a variety of community facilities that are proportionate to the needs of the future community. Table 6.2 below details the types of community space proposed as part

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<sup>5</sup> 1 GP per 1,800 patients, and 1 Dental Practitioner per 2,000 patients.

<sup>6</sup> Planning ref. 18/01168/FULR3

of the development, their broad location, and the size parameters. The design of each facility – including parking arrangements, landscaping, and details of relevant design measures to protect local amenity – will be determined via future reserved matters submissions.

Table 6.2 Proposed Community Facilities

Community Spaces	Location	Size
Community Hall/Civic Space	Community Hub	Up to 400 sqm
Sports Pavilion/ Clubhouse	Sports Pitches north west of Community Hub	Up to 600 sqm
Linear Park Visitor Centre	Linear Park west of Community Hub	Up to 600 sqm
Community Use of School Facilities	As per Table 6.1 – All schools can include an element of community use.	n/a

Source: St James Group Limited

- 6.28 The range of facilities are such that they would provide different flexible community spaces which could comprise community halls or a function rooms, a small library, indoor space for sports/recreation or a fitness class. This would ensure the needs generated from the development itself would be met and the facilities could provide a wider benefit for residents of other parts of Milton Keynes.

### Burial grounds

- 6.29 Policy CC6 (Burial and Memorial Grounds) details that the Council will support burial and memorial ground uses provided that they are, inter alia, accessible, include surface water drainage to ensure there is no threat to groundwater quality, and would not have an adverse impact on the surrounding landscape. Policy SD12 does not include a specific requirement for burial space (albeit it does fall under the term ‘Community facilities’ – paragraph 16.32 of Plan:MK (2019)). However, the adopted Development Framework SPD (2020) sets out a specific need to provide 2ha of burial space as part of the MKE development to meet future needs. The Indicative Concept Plan in the Development Framework SPD (2020) (Figure 3.1) does not indicate a space for a burial ground.
- 6.30 The proposed development includes 2.0 ha of land for burial space or remembrance gardens. This provision therefore satisfies the Development Framework SPD (2020) requirement and supports the development in demonstrating it provides sufficient ‘community facilities’ as per Policy SD12 (C3) in Plan:MK (2019).
- 6.31 The proposed location of the burial grounds or remembrance gardens is shown on the Parameter Plans in the south east of the site. This location within the MKE allocation area is accessible and fits in with the wider greenspace and landscape strategy. Details of the surface water drainage specific to the burial ground or remembrance gardens and a land management and maintenance programme (requirements as set out in Policy CC6) will be detailed in future reserved matters submissions.

### Highways infrastructure

- 6.32 Policy SD12 requires necessary strategic infrastructure to be funded and be being delivered before the development of homes and employment can commence. It also expects MKE to provide a comprehensive network of transport infrastructure including improved highways connections, grid road connections, and principally a new bridge connection over the M1 Motorway.

- 6.33 The detailed aspect of this application proposes the various highway works required to unlock the comprehensive new residential and employment development. These are in part funded by a successful bid by the Council (in conjunction with St James) to the Governments Housing Infrastructure Fund announced in March 2020. The highways work sought detailed permission principally comprise of:
- **Eastern Link – Grid Road:** New dual carriageway Grid Road including stopping-up of part of A509 and Newport Road, new linking arrangements, four new roundabouts); and
  - **Western Link – Grid Road:** New dual carriageway grid road including a new single carriageway overbridge over the M1 motorway and roundabouts.
- 6.34 The development of these strategic highways infrastructure is in line with relevant local planning policy and allows the wider MKE allocation to come forward in line with Policy SD12.

### 3. Employment and Housing Provision

#### Employment uses

- 6.35 Policy ER1 (Employment Sites Within the Borough of Milton Keynes) sets out that planning applications for employment uses will be granted on sites listed Table 6.1 of Plan:MK (2019). Table 6.1 identifies that MKE has capacity for 105ha of the former B1, B2, and B8 use classes. Furthermore, Policy SD12 expects the MKE to delivery of around 105ha of employment land to provide for a mix of employment uses completing the role and function of central Milton Keynes.
- 6.36 This development proposal includes approximately 80ha of land for dedicated employment uses plus a further c.10ha of land identified for either employment or residential land. The employment uses are principally to be developed in the south west of the site adjacent to the M1; however, there is scope to include small scale office uses within the community hub The location of the employment land is in broad alignment with Development Framework SPD (2020) Indicative Concept Plan (Figure 3.1), acting as a barrier between the M1 and housing development. The Land Use Parameter Plan (Drawing No. 01312\_PP\_02 rev. P1) also provides flexibly to bring forward employment in the site's western area, providing a further buffer the M1, as envisaged by the Development Framework SPD. The total employment floorspace to be created as part of this development proposal is 403,650 sqm as set out in Table 4.1.
- 6.37 Another landowner at MKE, Newlands, is to deliver c.25ha of employment land. This will be subject to a separate planning application. Through the combination of Newlands and St James's development, MKE will deliver at least 105ha of employment land consistent with Policy ER1 (Table 6.1) and Policy SD12. Overall, the development of employment land as part of the proposed development is in line with relevant policy and the SPD.

#### Jobs generated

- 6.38 Given the amount and type of uses proposed as part of this development it will make a significant contribution to job growth. This is both from community infrastructure and retail uses such as the retail provision in the Community Hub as well as new jobs at schools and the health hub. In addition, the employment uses proposed will generate a significant number of jobs. It is estimated that around **5,900 total jobs** (either part time or full time) would be supported at MKE in a range of workplaces.
- 6.39 Table 6.3 below details the maximum number of gross jobs (Full Time Equivalent) that could be generated by area across the proposed development: c.6,600 FTE jobs. The proposed development will therefore make a significant contribution job growth in the borough which is

supported by both local and national planning policy. The total figure in Table 6.3 is the maximum number of jobs that might be generated by the proposed development assuming the least amount of B8 Use Class floorspace is developed and the most amount of B2 Use Class and Offices/Light Industrial uses are developed within the parameters. This is because B8 Warehouse uses generate less jobs for a given floorspace than both B2 and Offices/Light Industrial. It is still estimated that around 5,400 FTE (5,900 total) jobs would be supported by the scheme if a different mix with more warehousing jobs were applied.

Table 6.3 Maximum Jobs Generation by Area (Full Time Equivalent)

Use	Community Hub (FTE)	Local Parade (FTE)	Employment Zone (FTE)	Other Areas (FTE)	Total Jobs (FTE)
Schools (Primary & Secondary)	150	~	~	50	200
Health Hub	62	~	~	~	62
Early Years Nursery	11	~	~	~	11
Gym	11	~	~	~	11
Shops and non-retail services (including food store)	146	19	~	~	165
Restaurant/Café/Public House/Takeaway	51	7	~	~	58
Elderly Living Care Home	160	~	~	~	160
Offices	143	~	~	~	143
Employment uses	~	~	5,796	~	5,796
<b>Total Jobs (FTE)</b>	<b>734</b>	<b>26</b>	<b>5,796</b>	<b>50</b>	<b>6,606</b>

Source: Lichfields Analysis (ES, Chapter M), FTE = Full Time Equivalent

- 6.40 A full assessment of the net jobs generated by the development, including construction employment, induced employment (i.e. that within supply chains), and potential economic output is contained in the Socio-Economic Chapter of the ES (Chapter M). This demonstrates that the proposals would have a provide significant positive economic benefits to the Borough.

## Housing

- 6.41 Plan:MK (2019) recognises the need to deliver at least 26,500 net additional dwellings in the Borough. Housing growth is directed by Policy DS2 (Housing Strategy) which includes the development of three urban extensions, one of which is MKE.
- 6.42 The proposed development could provide 4,000 up to a maximum of 4,600 new homes (including elderly living) making a significant contribution towards meeting local housing need. Overall, the whole of the MKE allocation could support around 5,000 homes; potentially up to 5,750 (+15%) when accounting for development by other landowners. The range of housing types and tenures proposed as part of this application will help to develop a mixed and sustainable new community. Based on applying an average of 2.4 persons per home, this MKE proposal will likely generate a population of between 9,600 and 11,040 persons.
- 6.43 Policy SD12 (C1) expects the delivery of ‘around’ 5,000 new homes across the whole of the MKE allocation. Therefore, providing between 4,000 to 4,600 homes on approximately 80% of the allocation area is considered to be in line with the policy requirement. The NPPF (Para 122) sets out that planning decision should support development that makes efficient use of land, and the opportunity to increase densities to achieve 4,600 homes whilst also supporting delivery of a future Mass Rapid Transit system, would accord with those principles.

6.44 Policy SD12 (C1) also expects that at least 1,475 homes are completed within the plan-period. Based on an anticipated delivery schedule including development across the wider MKE allocation it is currently expected that approximately 1,550 units will be delivered within the plan-period from the MKE urban extension. MKE underpins the Council's ability to meet its housing targets in the Plan:MK period, making unplanned and speculative development less likely.

6.45 A separate Housing Statement is appended to this Planning Statement (Appendix 3). The Housing Statement sets out a proposed broad housing mix, the tenure split, and other housing related design requirements (i.e. accessible homes, adaptable homes, self-build, and homes to be built by innovative construction methods) summarised as follows:

- 1 **Affordable Housing Provision** - Policy HN2 (Affordable Housing) requires that proposals for housing of more than 11 units should provide for 31% total affordable homes in the identified tenure split. The Affordable Housing SPD (2020) provides further detail and guidance in relation to the need and delivery of affordable housing.

St James proposes to provide at 1,240 affordable homes (31% of 4,000) split by 20% affordable rent, 5% social rent, and 6% shared ownership: according with Policy HN2. The location of affordable housing would be detailed at reserved matters stage but, in line with policy, affordable housing would be designed to be tenure blind and 'pepper potted' avoiding large affordable housing clusters.

- 2 **Density** - Policy HN1 (Housing Mix and Density) of Plan:MK (2019) encourages higher densities of development in locations with good accessibility to facilities and that are well accommodated by public transport. Table 7.1 of Plan:MK (2019) also sets out the objectively assessed need for homes in the Borough by type: setting out a need for only 7.26% of homes to be flats (i.e. higher density development). The Affordable Housing SPD (2020) also indicates a need for only 8.23% of this tenure to be flats. In contrast, Table 4.3 of the adopted Development Framework (2020) sets out density ranges from approximately 100 dwellings per hectare ('dph') in the central areas falling to between 40-60 dph, 25-40 dph, and 10-30 dph for different character areas. To achieve these densities requires the provision of a higher proportion of flats. Both Policy HN1 and the Affordable Housing SPD (2020) are flexible in how the overall split between flats and housing is applied.

To achieve a minimum of 4,000 units will require more significant level of flats and some urban houses across all tenures to achieve the desired density as per the Development Framework than the broad mix of homes/flats as assessed for Milton Keynes Borough in Table 7.1 of Plan:MK. The DAS and Building Height Parameter Plan (Drawing No. 01312\_PP\_04 rev. P1) sets out the approach to density, with the areas of higher density closest to the Community Hub where there will be a concentration of services and public transport. The exact split of flats/houses will be determined via reserved matters submissions on a parcel by parcel basis, but the principle is considered appropriate in the context Policy HN1 and the wider aims of the NPPF (i.e. supporting the efficient use of land), Plan:MK (2019), and the Development Framework.

- 3 **Later living** - The proposals include provision for later living accommodation, which may be in the form older persons accommodation either with or without an element of care. Policy SD12 makes no specific requirement for extra care/after living to be delivered at MKE but does require a range of housing types and tenures in accordance with other policies in the plan. The Development Framework (2020) states that in accordance with Policy HN3 (Supported and Specialist Housing) in Plan:MK (2019) the development of supported specialist housing is expected at MKE. Policy HN3 of Plan:MK (2019) specifically supports the development of supported and specialised units (including C2 use)

on residential development proposals to help meet the needs of older people. The level of such development should be commensurate to the scale and nature of the proposals.

As part of the overall quantum of housing to be delivered, some will be ‘extra care’ units or other types of supported living accommodation. These types of housing serve the dual purpose of potentially freeing up underutilised family housing and allow people, as they grow older, to live within a more appropriate environment to meet their needs. A specific location, close to schools, the community hub and green spaces is proposed for a later living community, which pilot MKC’s guidance on “Dementia Friendly Neighbourhoods”. The provision of such supported and specialised units is in accordance with both the Development Framework (2020) and Policy HN3. The exact number of units will be based on local demand and approved via future reserved matters submissions, but the principles of the above approach has been discussed with MKC’s housing department during pre-application liaison.

- 4 **Housing mix** - Based on the above and taking account of Table 7.1 associated with Policy HN1 and other relevant policy and guidance, MKE will provide a range of housing types and sizes, albeit this will necessarily need to be flexible (especially in respect of the market element) to be able to respond to demand over the 25+ year build period which extends well beyond the horizon of Plan:MK and MKC’s existing housing needs evidence. The need for flexibility on the market element can mean it will be able to respond to changing customer choice, changing trends (e.g. working from home), and future transport improvements at MKE.

- 5 **Design and residential quality** - Policy HN4 (Amenity, Accessibility and Adaptability of Homes) sets out requirements for the size and standards of new residential proposals. Given the housing elements of the scheme are in the outline part of the application, the precise detail will come forward through reserved matters submissions. However, St James are exploring opportunities to delivering exceptional design and meeting relevant standards in Policy HN4 as set out in the Housing Statement.

Furthermore, Policy D4 (Innovative Design and Construction) encourages that in proposals of over 50 units 10% of new dwellings should incorporate innovative design features and modern methods of construction such as modular / off-site construction. St James (and the Berkeley Group they are a part of) has an advanced manufacturing facility in Northfleet, Kent specialising in producing volumetric modular housing to Berkeley’s usual high-quality standards. Drawing on this market leading expertise, St James are exploring opportunities to use Berkeley Modular to deliver an element of the new homes at MKE.

- 6 **Self-build** - Policy HN5 (Self-Build and Custom Housebuilding) requires provision of 1ha of serviced land for self and custom-build housing plots in strategic growth areas allocated within Plan:MK (2019). The residential parameters sought in outline are flexible such that self-build could be incorporated within the application site. However, it is principally considered that the MKE allocation as a whole would meet this policy requirement, with the opportunities to deliver this on many different parts of the allocation, including potentially beyond this application site.

6.46 Overall, it is considered that the proposals will deliver a range and mix of new housing that will meet housing need and demand and will accord with the relevant housing related provisions of the Local Plan.

## 4. Design

6.47 The NPPF (2019) makes it clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is central to

achieving sustainable development, creating better places in which to live and work and helps make development acceptable to communities (Para 124). Paragraph 127 sets out criteria for development proposals, ensuring that they:

- Function well and add to the overall quality of the area over the lifetime of the development;
- Are visually attractive;
- Are sympathetic to the surrounding built environment and landscape setting;
- Establish a strong sense of place;
- Optimise the potential of the site; and
- Create safe, inclusive and accessible places.

- 6.48 The NPPF's emphasis on good design is also reflected in Plan:MK (2019). Policy D1 (Designing a High-Quality Place) sets out nine objectives/principles to achieve high quality places in new development. This includes considerations such as ensuring proposals respond to its surrounding context, landscaping, and legibility. Policy D2 (Creating a Positive Character) seeks to ensure developments create and contribute to positive built character. The policy sets out considerations of how this can be achieved; for example, by way of the layout, massing/scale, landscaping and appearance of buildings. Policy D3 (Design of Buildings) also sets out nine design objectives and principles for developments (not all of which are relevant to this proposal) to achieve. This includes considerations relating to the form and massing of building, the materials used for construction, and the appearance of buildings to create positive character areas in larger developments. Finally, Policy D5 (Amenity and Street Scene) sets out a framework for ensuring a good standard of amenity (for example, considering levels of daylight and sunlight as well as privacy) in new developments, as well as setting expectations for parking and service/refuse areas.
- 6.49 In respect of the MKE development specifically, Policy SD12 in Plan:MK (2019) sets out key principles for the development. This includes principles that affect the layout of the development such as in respect of the creation of a new linear park, the provision of a new network of active travel routes, and the implementation of a strategic green infrastructure. Section 4.0 of the Development Framework (2020) sets out the Council's design framework for the layout, design, and character of a future MKE urban extension. The Development Framework (2020) includes a Development Framework Plan as well as more detailed indicative design proposals for the layout and function of the Community Hub, road cross sections, and indicative Character Typologies for housing areas across the site (see Table 4.3 in the framework). Finally, the Development Framework (2020) requires that Design Codes be submitted for each phase to be approved by MKC. These will be prepared in partnership with MKC, local stakeholders, and service providers.
- 6.50 The submitted DAS (prepared by JTP) fully details the design evolution process, from identification of the key site opportunities to a finalised illustrative masterplan layout. This illustrative masterplan shows one interpretation of how the Parameter Plans could be realised. The Parameter Plans and illustrative masterplan design builds upon the vision of the Development Framework and aims to create and foster a new thriving community.
- 6.51 The below summarises the vision, layout, and proposed character areas for this development as detailed in the DAS. The majority of the proposed development is within the outline part of the application with all matters reserved. Therefore, the design of the proposals will – in the main – be for future consideration as part of reserved matters submissions. However, from the below it is clear that the Parameters Plans can be translated into a distinct and exemplar new neighbourhood in accordance with all design policies.

## Vision for MKE

6.52 The vision for MKE is set out in the DAS as set out below:

*“... MKE will be a thriving community where people want to live and spend time; a sustainable place that is fit and flexible for the 21st century.*

*It will be a place that actively supports health and wellbeing, connects people and nature, encourages community spirit and a strong sense of belonging, building on the qualities that make Milton Keynes a special and unique place already.” (Page 4)*

6.53 Furthermore, as set out in the DAS there are five key design principles for the development:

- 1 **Creating a distinct place, connected to Milton Keynes:** a new neighbourhood of a sufficient scale to be a place in its own right, that does not compete with existing communities and with strong connections to Milton Keynes;
- 2 **Evolving the grid:** adapting the MK grid for the 21st century with green grid roads and redways, weaving a landscape lattice within the grid square along existing rivers, streams and hedgerows to form a natural masterplan framework;
- 3 **Placemaking for health and wellbeing:** a sustainable, walkable neighbourhood with access to nature and diverse landscapes forming part of everyday life.
- 4 **Enhancing the natural environment:** protecting and enriching existing distinct natural features to create a place that wildlife and people can live harmoniously; and
- 5 **Looking to the future:** sustainable and innovative solutions at every stage, tackling climate change and adopting a dynamic placemaking approach that can respond to changing future trends.

## Layout principles

6.54 The Parameter Plans – which relate to the outline element of the scheme and are for approval as part of this application – detail the site wide layout. Chapter 5 of the DAS shows the evolution of the Development Framework SPD (2020) illustrative masterplan into the Parameter Plans and illustrative masterplan (as shown in the DAS). The proposed layout has evolved but broadly accords with that set out in the Development Framework. It also achieves the overall SPD objectives for the new development. The Land Use Parameter Plan (Drawing No. 01312\_PP\_01 rev. P1) shows the proposed main layout of the new development. The layout of individual land use areas will be for future consideration as part of Reserved Matters submissions, but the illustrative masterplan demonstrates how these parameters could be translated into a well-designed place.

6.55 The DAS sets out the key layout principles that have influenced the proposed layout, identifying these as:

- **The River Ouzel Linear Park**, providing a new south-north riverside park
- **Existing landscape assets**, protecting and connecting the existing network of hedgerows and trees
- **A landscape lattice**, providing green corridors for easy walking and cycling access;
- **Forming connections**, providing active travel to the community hub and a safeguarded Mass Rapid Transit route through the site;
- **The community hub**, providing a focal point at the heart of a new community: within a 15-minute walk for the majority of homes; and



- **A collage of uses**, with new neighbourhoods and mini hubs of different uses and character forming a place with its own identity

6.56 Alongside this, consideration of the key constraints and necessary mitigation measures has also acutely informed the layout principles, for example with the employment land located so as to provide a buffer between the residential and community uses with the M1 motorway.

6.57 Overall, the layout of the development proposed incorporates key features for the site as set out in Policy SD12 and the Development Framework (as fully explained in the DAS). It will enable ease of movement through a permeable site and will be able to incorporate a variety of layouts, uses, street types, building sizes, forms, and landscapes; responding to the principles of high-quality places as per Policy D1.

### Building heights and character areas

6.58 Across the proposed development there will be a range of building heights defined by character areas that respond to differing land uses and objectives for MKE. The Development Framework SPD (2020) set out five different character areas for housing development (ranging from 100dph in central areas to 10-30dph on the rural edge). Figure 4.6 of the Development Framework also set out the broad locations for where these and other land use character typologies could be accommodated.

6.59 The Building Heights Parameter Plan (Drawing No. 01312\_PP\_04 rev.P1) shows how these design principles have been applied, with these heights corresponding to six different character areas within the DAS (Chapter 7). As with the general layout of scheme, these building heights and character areas accord with the principle established in the Development Framework SPD (2020).

6.60 In broad terms, the residential areas range from 2.5 storeys (12.5m to ridge) on the more sensitive eastern edges of the development, up to 6 storeys (26m to ridge) within the community hub area. Similarly, at its highest the employment areas will see units with heights up to 29m. The below sets out a summary of the key principles for the proposed heights:

- **Intensity of the Community Hub:** The approach to building heights has focused intensity around and within the Community Hub. This is to ensure there is a mass of homes and people around this area to support its vitality.
- **Employment hub:** Building heights in the employment hub allow for a range of business operators, including high tech, efficient and flexible workspaces, in an area that is generally less sensitive given its location adjacent to the M1. Heights in the northern employment parcel are lower so as to provide a better transition to residential neighbourhoods.
- **Sensitivity to heritage assets and views:** Building heights are lower along the more sensitive eastern boundary of the site. This is due to ground levels and more sensitive views across the site from Moulsoe and surrounding areas. Lower building heights combined with appropriate landscape buffers/planting will soften this edge. Consideration in respect of building heights has also been given in respect of heritage assets.

6.61 Overall, the range of heights proposed will support a variety of building sizes, forms and uses across the site. The heights proposed area therefore appropriate to the proposed uses, setting, and objectives for the MKE development. The proposals therefore support the aims of Policy D3 (A4) and the development principles set out in the Development Framework SPD (2020). These heights will be translated into relevant phases Design Codes to be approved by MKC ahead of each reserved matters submission.

## Design and placemaking

6.62 The design of buildings and the public realm is a matter for future reserved matters. However, the DAS goes into detail as to how the Parameter Plans could be interpreted and delivered. The below summarises some of the key design features that can be incorporated into a well-designed future development:

- **High quality and distinct character areas:** Chapter 7 of the DAS shows how different character areas can be incorporated across MKE with a range of densities, building typologies, and scale. The illustrative designs in the DAS show high quality buildings that contribute to creating a positive, strong, and distinct character for the new community across a range of typologies;
- **Dementia friendly neighbourhood:** The future neighbourhood will adopt dementia friendly design principles. Creating an environment that is accessible, legible, comfortable, and distinctive can support those with dementia to navigate and feel at ease. Embedding these principles in the design from the outset will support people to live in safety and comfort into their old age within MKE;
- **Healthy placemaking:** The illustrative masterplan shows a design that promotes access to open and natural spaces. The neighbourhood is also highly permeable via safe and segregated redways and green corridors that support active travel modes. The DAS provides further detail as to how the design accords with healthy placemaking principles (Page 107);
- **Street hierarchy:** The illustrative masterplan shows how a network of streets can be incorporated into different individual plots. Indicative design proposals (shown as section plans) in Section 6 of the DAS are presented to demonstrate how a hierarchy of roads could support footpaths, planting, cycleways and road traffic. Sections are also presented for primary and secondary streets that are designed to slow traffic and prioritises pedestrian/cycle movements while also capitalising on opportunities for street planting; and
- **Employment:** The vision is for the employment hub to be a high quality, well designed, and modern logistics hub that can meet the needs of a range of occupiers. Particular attention is given to the setting for the buildings within the employment hub; for example, protecting and enhancing the stream through the parcel. The design and materials will be chosen to achieve a coherent and consistent appearance that reduces the scale and massing of future buildings. Finally, the design will consider how the amenity of neighbouring development is protected.

6.63 While the detailed design is a matter for future consideration, the DAS (including an Illustrative Masterplan) show how a high quality and well-designed development can come forward within the set parameters for the development to be approved as part of the outline element. MKE has the potential to be a neighbourhood that promotes healthy lifestyles, that promotes engagement with nature, and that allows a mix of uses combine to create a truly distinctive new community. The future submission of Design Codes – prepared with local stakeholders – will be agreed with MKC to ensure a well-designed development is realised.

## 5. Heritage

6.64 Legislation relating to the protection of the historic environment is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires local planning authorities to have special regard to the desirability of preserving the special interest of listed buildings, conservation areas and their settings.

6.65 Plan:MK Policy HE1 (Heritage and Development) sets out that proposals will be supported where they sustain, and where possible, enhance the significance of heritage assets which are

recognised of being of historic, archaeological, architectural, artistic, landscape or townscape significance. It requires objective heritage assessments to accompany development proposals, indicating, in line with NPPF paras 194-196, that proposals resulting in:

- substantial harm to or total loss of significance of a designated heritage asset will only be permitted in exceptional or wholly exceptional circumstances in line with national policy;
- “less than substantial” harm to a designated heritage asset will only be permitted where the harm is demonstrably outweighed by public benefits of the scheme; and
- harm to the significance of non-designated heritage assets will be resisted unless the need for, and benefits of, development outweigh the harm.

6.66 The MKE Development Framework SPD also requires that masterplanning should protect the integrity and characteristics of Moulsoe village and be respectful of the character of other adjoining areas such as Newport Pagnell. It also indicates it will be necessary to identify archaeological constraints by field evaluation prior to submission of any application.

6.67 This planning application is supported by a built heritage assessment (ES Chapter J: Historic Built Environment and associated appendices); an archaeological assessment (ES Chapter K: Archaeology and associated appendices); and a Landscape and Views assessment (ES Chapter E: Landscape and Views and associated appendices). These are summarised in turn below.

6.68 For the below (and when reading the relevant ES Chapter and its appendices), it should be noted that in assessing the ‘significance’ of an asset in respect of heritage planning and assessing ‘significance’ of an impact for the ES have different meanings. For example, an asset may be significant in heritage terms, but the impact of a development to it in ES terms might not be significant.

### **Built Heritage**

6.69 The application site itself contains no built heritage assets, but does envelop one Grade II listed building, Moulsoe Buildings Farmhouse (part of the Holiday Inn hotel, which is inset from the application boundary, falling outside of the site). There are also further heritage assets near to the site, most notably the Grade I listed Church of St Mary in Moulsoe to which there are related Grade II listed buildings such as one of the churchyard monuments and The Rectory. Within Moulsoe there are also four Grade II listed cottages along the northern side of Newport Road, and two Grade II listed buildings at Tickford Park and Tickford Park Farm. There are also distant views to the site from the Grade II registered park and garden at Campbell Park. Non-designated heritage assets close to the site include Moulsoe Glebe Farm barn, Moulsoe School and Cotton Valley Sewage Treatment Works.

6.70 The built heritage assessment identifies that Moulsoe Buildings Farmhouse is already altered from its historic context, now being experienced alongside later buildings and a car park as part of the hotel use. It is screened from the road frontage by tree planting, but noise from traffic is still experienced. Whilst the development of the wider fields surrounding the asset would alter its setting, the downgrading of London Road, with new pedestrian access, would result in some degree of offsetting benefit, whilst the removal of nearby barns, good design and layout at reserved matters stage and an appropriate landscaping strategy around the hotel complex could further mitigate impacts. In this context the assessment concludes less than substantial heritage harm at a moderate level would occur.

6.71 For the heritage assets around Moulsoe the assessment identifies that the main impact arising from development would be the creation of built form within mid-to-long range views from those assets, in place of the current agricultural fields. A comprehensive landscaping strategy on the eastern edge of the development, including Moulsoe New Wood and using a landscaped

school field buffer as part of the siting of the primary school to the south of Moulsoe, would assist in screening views. The assessment concludes that there would be varying degrees of impact to the heritage assets in Moulsoe, but that all would be “*less than substantial*” harm of a combined broadly moderate scale. The same “*less than substantial*” harm is concluded in respect of long-distance views from Campbell Park Registered Park and Garden, albeit of a low degree. Whilst Cotton Valley Sewage Works is adjacent the application site south of the M1, this part of the application site would fall within the linear park and therefore, it is concluded that none of the nearby non-designated heritage assets, including the Sewage Works, would experience harm.

- 6.72 The heritage assessment concludes that there would be overall “*less than substantial*” heritage harm from the scheme. As per the NPPF and Plan:MK (2019) Policy HE1 this falls to weighed and balanced against the public benefits of the scheme. The level of less than substantial harm is considered moderate and needs to be balanced against the substantial “*public benefits*” arising from the development of MKE, including in terms of delivering the employment and housing growth on this allocated site and the social, economic and environmental benefits that it would bring, as explained in this Planning Statement. It is considered that the level of harm is significantly outweighed by the identified public benefits (see section 14 below).

### Archaeology

- 6.73 The NPPF (2019) requires that where a development site includes or has the potential to include heritage assets with archaeological interest, developers should submit an appropriate desk-based assessment and where necessary a field evaluation. Plan:MK (2019) Policy SD12 sets out for the MKE site that “*an archaeological field study, including a Geophysical Survey, where appropriate following desk-based assessment, will required to identify potential below ground archaeology. Where feasible, the Council will expect below ground archaeology to be kept in situ in preference to its removal.*”
- 6.74 The site has no nationally designated archaeological assets. However, the archaeological assessment informed by desk-based assessment, geophysical survey, fieldwalking, watching briefs on geotechnical investigation and some limited trial trending undertaken in February/March 2021, highlights several areas of potential archaeological interest, most notably a possible early Medieval period fortification towards the centre of the site on the eastern bank of River Ouzel between the river and the A509 London Road.
- 6.75 Overall, the assessment concludes that any below ground archaeological assets which may be present would most likely be of local to regional significance, and therefore able to be addressed and any impacts mitigated via normal programmes of archaeological investigation, monitoring and reporting throughout construction.
- 6.76 The only potential exception to this is the potential early Medieval fortification. The precise extent and sensitivity of this is not known but will be subject to further archaeological investigation; if its identification is correct – that it is an early Medieval fortification – then it may potentially merit preservation in-situ (depending on how significant it is) or alternatively may be able to be developed with any appropriate mitigation. To reflect this within the masterplan and parameter plans for the outline development, this area is shown as capable of either being developed for housing, used for playing fields or retained as open space (with any archaeology retained in-situ), subject to further detailed archaeological investigation and agreement with Milton Keynes Council (and any statutory bodies) on an appropriate mitigation strategy. This pragmatic approach is considered to be suitable so as to retain flexibility in how the masterplan comes forward and enable the informed consideration of the feasibility of different options, in accordance with Policy CD12 requirements on below ground archaeology.

## 6. Landscape and Visual Impacts

- 6.77 The NPPF (2019) states that in achieving well-designed places, developments should be sympathetic to their surrounding landscaping setting (Para 127c). It also states that planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia) protecting and enhancing valued landscapes (170a).
- 6.78 Plan:MK (2019) sets out policies in relation to landscaping and enhancing landscape character; principally Policy NE5 (Conserving and Enhancing Landscape Character). It requires development acceptable in principle within the open countryside (such as at MKE) to be undertaken in a manner that respects the particular character of the surrounding landscape. Furthermore, developments must demonstrate aspects of landscape character have been conserved and where positive enhanced. Developments should take into account the finding of the Milton Keynes Landscape Character Assessment (2016). Other relevant policies include:
- Policy NE4 (Green Infrastructure): The policy sets out criteria in respect of new green infrastructure which is relevant to landscape and visual impact;
  - Policy L4 (Public Open Space Provision in New Estates): The policy requires that new housing development: *‘...provide new or contribute to improved open space and recreation facilities in accordance with the Council’s adopted standards...and policies in this Plan which support the delivery of a linked network of multi-functional, resilient, sustainable green infrastructure...’*
  - Policy D2 (Designing a High Quality Place): The policy sets out a series of design objectives/principles a requirement for development proposals to, *‘...respond appropriately to the site and surrounding context...’*
- 6.79 In addition, Policy SD12 specifically requires MKE to implement a *“strategic green infrastructure framework and network of green spaces to meet strategic and local requirements that follows the guidance in the Council’s Landscape Character Assessment and Green Infrastructure Strategy to ensure ecological connectivity, protect the identity and character of nearby settlements and mitigate any significant impacts on the landscape in accordance with Policy NE5.”*
- 6.80 Finally, the Development Framework SPD (2020) sets out a proposed landscape strategy (Section 4.2). It requires existing features and topography provide the starting point for creating a distinctive character for the new development. It also required a future landscape strategy to structure the development around existing natural features, such as hedges, watercourses and ponds, within the site. In respect of edge treatment, the framework requires the development to take account of the Milton Keynes Landscape Character Assessment. Also, a Landscape Visual Impact Assessments (‘LVIAs’) should be undertaken to assess the impact of the development on the landscape and to identify appropriate mitigation measures.
- 6.81 The submitted Green Infrastructure Parameter Plan (Drawing No. 01312\_PP\_03 rev.P1) details the proposed strategy and layout of green infrastructure throughout the site. The DAS and its illustrative masterplan demonstrate how these parameters could be interpreted and implemented to create well-designed landscaped areas that conserve and enhance local landscape; minimising visual impact. The application is also supported by a ‘Landscape and Views’ Chapter in the ES (Chapter E). The chapter is supported by various appendices including an LVIA (Appendix E1 to E4) based on the Parameter Plans submitted. Against Plan:MK (2019) policies it concludes the following:
- 1 **Landscape strategy and mitigation:** The development will extend the character of Milton Keynes into the Site. New landscape features will include the extension of the Ouzel Valley linear park through the Site and the creation of Moulsoe Community Woodland on

the Site's north-eastern edge. The majority of boundary planting including the Community Wood will be planted at the beginning of the construction phases to ensure its early establishment. This planting will help screen and soften views of development particularly in views from Moulsoe and the wider countryside.

- 2 **Landscape effects:** The most significant landscape effects will happen during the construction phase during which feature loss would occur, earthworks would be carried out across the Site and building of new homes and associated infrastructure would commence. The proposals will affect and alter views from nearby viewpoints, including those surrounding Moulsoe, as well as affect the landscape setting site features and local character. However, upon establishment and once planting is mature impacts will be moderated. New Parkland within the Ouzel Valley Floor, planting throughout the scheme and the introduction of a variety of new segregated pedestrian and cycle routes across the site will all result in positive effects.
- 3 **Visual effects:** The most significant visual effects would also happen during the construction stage when internal footpaths and roads are diverted, and new planting is establishing. However, as new planting matures and establishes these effects will become moderated. The Site would be seen beyond the mature landscape belt created through the introduction of Moulsoe New Wood and the wide belt of planting associated with the edge road. The scheme would also benefit from the creation of new views and vistas along streets, green corridors and from within public open space.

6.82 The assessment concludes that the allocated site is generally well contained from the wider landscape by virtue of the low valley landform and inward facing slopes. Where the scheme extends into the wider landscape the effects upon local receptors will be reduced through design by minimising storey heights and introduction of open space land uses on the development edge. Overtime and as Moulsoe New Wood and early planting associated with the edge road mature the effects will reduce further. Positive benefits of the scheme include:

- A significant increase in hedgerow and tree planting across the Site including the community woodland and orchard;
- The creation of the Ouzel linear park, green corridors, and neighbourhood parks;
- new areas of open space will include play areas, ball courts and sports pitches;
- SuDS features that will extend through the public open space areas providing a visual and physical link to the Ouzell; and
- New features across the Site will provide both wildlife and amenity benefits.

6.83 On this basis, while there is inevitably a landscape and visual impact of the development, it is an allocated site and the landscape and visual assessment concludes that once the development is established it will conserve and enhance the landscape character. Overall, it has therefore been demonstrated as far as is practical that it meets required local and site-specific landscape and visual impact requirements. Specific requirements will be dealt with further under subsequent reserved matters applications.

## 7. Habitats and Biodiversity

### Ecology and biodiversity net gain

6.84 The NPPF states that development should contribute to and enhance the natural and local environment (Para 170), protecting and enhancing valued landscapes and sites of biodiversity value and minimising impacts on and providing net gains for biodiversity.

6.85 Plan:MK (2019) Policy NE1 (Protection of Sites) sets out policy protections to internationally important sites (e.g. RAMSAR, SACs and SPAs) and sets out that development proposals which would likely cause harm to national sites (e.g. National Nature Reserves, Sites of Special Scientific Interest or irreplaceable habitats such as Ancient Woodland or Veteran Trees) will not be permitted unless certain criteria are met. Policy NE1 also seeks to avoid harm to sites of countywide or local importance. Policy NE2 (Protected Species and Priority Species and Habitats) seeks to protect species and habitats of interest and ensure there are not negative impacts upon them, whilst Policy NE3 (Biodiversity and Geological Enhancement) requires development proposals to protect biodiversity and wherever possible result in a measurable net gain for biodiversity. Policy NE4 (Green Infrastructure) requires the Green Infrastructure within development proposals to contribute towards maintaining and improving ecological networks.

6.86 There are no statutory nature conservation designations on or adjacent to the site, but there are three Milton Keynes Wildlife Corridor designations (equivalent to Local Wildlife Sites) within the site: the M1 motorway, the River Ouzel and the Broughton Brook. There is no Ancient Woodland on the site, but there are ten areas of Ancient Woodland within 2km of the site. However, there are several mature trees across the site that support veteran features; and on a precautionary basis these 40 trees and two woodland groups are identified as potentially veteran trees (see below section). The design of the scheme has sought to avoid and minimise ecological effects whilst maximise the potential for ecological enhancement a part of the development – from retaining the wildlife corridors, retaining where possible existing hedgerows, tree lines and areas of woodland, retaining habitats on site and designing in nature to development. For the detailed highways element this has included providing mammal tunnels and ledges as part of key structures to maintain connectivity, particularly along the wildlife corridors.

6.87 Chapter F (Ecology) and relevant appendices provide an ecological assessment of the development. Against the above Plan:MK policies it concludes the following:

- 1 There would be no adverse impacts on nationally important sites whilst the scheme would ensure the protection and enhancement of the Milton Keynes Wildlife Corridors, in accordance with Policy NE1;
- 2 The overall proposed development would not result in a negative impact upon protected species and their habitats, whilst the design framework for the outline component of the application provides a clearly deliverable opportunity to create new habitats and enhance the existing habitat features, in accordance with Policy NE2;
- 3 The proposals would lead to at least net biodiversity gain of 10% with current assessment showing a 14.5% net gain in accordance with Policy NE3; and
- 4 The development parameters would secure a strong green infrastructure strategy for the site and scheme, according with Policy NE4.

6.88 Notwithstanding, we address the impacts of the development on ancient woodland (in respect of air quality) and the loss of veteran trees below.

### **Ancient woodland**

6.89 An assessment of air quality (as set out in Chapter G of the ES – Air Quality; see Section 5) finds that the development proposals have the potential to increase nitrogen deposition (as a result of increased traffic on local roads) in nearby ancient woodland both during construction and once the development is completed. In summary, all nearby woodland areas are expected to experience nitrogen deposition levels in exceedance of the lower critical load, none are predicted to experience more than a 1% change in nitrogen deposition relative to the lower critical load as a result of the proposed development. In addition, none of the points register an increase in

nitrogen deposition great enough to break the indicative threshold at which a change in the species-richness of the vegetation at these sites may occur.

- 6.90 Based on this assessment, a separate assessment of the ecological impact is set out in Chapter F (Ecology) of the ES. This concludes that any adverse effects from increased nitrogen deposition to nearby ancient woodland as a result of the proposed development are highly unlikely. Furthermore, it highlights that actual deposition is likely to be lower than that modelled given several factors including improvements to vehicular engines, the Travel Plan reducing overall traffic, and policy/legislation leading to reduced vehicular nitrogen emissions.
- 6.91 Given these findings, the development will not result in negative impacts on Ancient Woodland; thus, according with Policy NE1 and NE2.

### Potential veteran trees

- 6.92 In general, the design of the proposed scheme has sought to adopt a landscape-led approach, seeking to retain existing trees and hedgerows as landscape features to be incorporated into the design of the development (see DAS section 6.0). An arboricultural survey and arboricultural impact assessment has been undertaken and is included (ES Volume 2, Appendix C6). This report identifies the trees and hedgerow features which will be retained, and which will be lost for the detailed element and indicatively for the outline element. Overall, the delivery MKE will include a significant tree planting programme, providing at least 250,000 new trees, whether as part of new tree-lined streets, as landscape buffers, as a new wood near Moulsoe or as part of local parks and open spaces.
- 6.93 Notwithstanding, the proposals may involve the unavoidable loss or deterioration of a small number of trees which present potential veteran features. Plan:MK (2019) Policy NE1 part B sets out that development proposals which would likely cause harm to irreplaceable habitats (which includes veteran trees) will not be permitted unless there is: no suitable alternative; there are imperative reasons of overriding public interest; all reasonable possibilities for mitigation have been put in place; and compensatory provision is secured. The NPPF (2019) states that development that results in the loss of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists (Para 175c). Footnote 58 sets out examples of what a ‘wholly exceptional reason’ might be:

*“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

However, there is currently no agreed guidance on what constitutes a veteran tree in planning terms and as such the applicant has approached this very cautiously by identifying those trees that potentially present veteran features and considering the policy in that context. This is not to say that such trees are veteran, and we will work with MKC to consider those that present such features before jointly arriving at a conclusion.

- 6.94 Across the site several potential veteran trees/clusters are identified; the vast majority with the potential to be retained as part of the proposed development. As part of the detailed application for highways infrastructure five trees which may present veteran features are proposed to be removed with four of these five being considered for whether they might be relocated (extracted and re-planted where feasible, potentially leading to their deterioration). These are shown on the Tree Retention and Removal Plan (Appendix D of Tree Survey Report and Arboricultural Impact Assessment) and relate to the provision of the new strategic highway infrastructure. In addition, there is the potential for further trees which present veteran features to be affected as part of the wider outline element of the development. However, until detailed design comes



forward it is not definitively known what the impact upon these trees may be and these will be considered as part of future reserved matters submissions; if confirmed to be veteran they may well be able to be retained or relocated if feasible.

6.95 Throughout the design of the highway infrastructure, opportunities to retain these trees were sought, but their loss was concluded unavoidable due to a combination of the following reasons:

- 1 The general road layout for the Grid Roads needing to conform to certain layout principles in order to achieve the desired effect of funnelling traffic away from Junction 14 of the M1 (e.g. creating journey times and access routes that encourage use of the new bridge);
- 2 The necessary locations in terms of vertical and horizontal alignments in order to successfully provide new junctions to serve the allocation site; and
- 3 The required precise routing of the Grid Roads which need to tie into the existing road network at specified points (e.g. Tongwell Street and the new M1 overbridge) and also accord to Design Manual for Roads and Bridges (BMRB) standards which dictates the geometry of aspects of the road layout (e.g. minimum curve arcs, visibility etc.)

6.96 These strategic highway works are necessary to deliver MKE and address the highway impacts of the strategic urban extension (as per Policy SP12). They are being funded by Government's Housing Infrastructure Fund which provides grants to unlock new housing development in the areas of greatest demand. In this context it is considered – if the trees are concluded to be veteran – that the scheme accords with NPPF footnote 58 and is an infrastructure project where the following public benefits would clearly outweigh the loss and/or deterioration of these potentially veteran trees:

- 1 The delivery of the overall MKE sustainable urban extension allocation including around 5,000 homes, 105ha of employment land, four primary schools, a secondary school, and community facilities. This will provide affordable homes and workspaces and help to deliver improved opportunities and wellbeing for people in Milton Keynes.
- 2 The scheme incorporates significant amounts of green open space, enhancing nature and acting as a suitable compensation strategy, which will lead to an overall net benefit for habitats and biodiversity including:
  - a a net biodiversity gain of at least 10% with the current assessment showing a 14.5% net gain (see Biodiversity Impact Assessment Metric, prepared by Hankinson Duckett Associates)
  - b the planting of more than 250,000 trees across MKE;
- 3 The development will support Milton Keynes growth as a key city within the Ox-Cam Arc helping to support economic growth. The number of jobs supported during construction is on average 338 direct jobs per annum (as well as an average of 486 supply jobs per annum) and while operational it would support in excess of c.5,900 jobs whilst the scheme would contribute £448.40m p.a. in Gross Value Added to the Milton Keynes economy;
- 4 If the scheme is not realised and the allocation could not come forward, the above benefits would be lost to Milton Keynes and it would also mean the £94.6m Government funding would not be able to be used by MKC as it is tied to MKE;

6.97 This set of public benefits, as well as the full weight of public benefits identified throughout the planning application, in our view clearly outweigh the loss or deterioration of a limited number of trees identified, whether defined as veteran or not. On this basis, it is concluded there would be wholly exceptional reasons for the loss of the trees as part of this development if they are concluded to be veteran. For further consideration of the planning balance see Section 14 below.

## 8. Open Space, Play Space, and Sports Provision

- 6.98 The MKE allocation (Policy SD12) requires provision a network of green spaces to meet strategic and local requirements and specifically the creation of linear park through the site that broadly correlates the River Ouzel floodplain. Policy NE4 (Green Infrastructure) sets out requirements for Green Infrastructure whilst Policy L4 (Public Open Space Provision in New Estates) sets out the requirements for provision of public open space provision in new estates. The standards for the provision required the Plan:MK (2019) are set out Appendix C which identifies policy requirements in terms of the amount and distribution of different types of open space, from District/Linear parks at the larger scale, to local pocket parks and local play areas at the smaller, local, scale.
- 6.99 The proposals deliver a green infrastructure strategy that will lead to comprehensive and significant network of green spaces providing enhanced opportunities for play, recreation, biodiversity, health, wellbeing and water management. A new linear park along the River Ouzel will provide a varied open space linking Willen Lake in the south through to Newport Pagnell in the north, combining with the east-west Moulsoe Stream Park and Moulsoe New Wood to create a new district park for Milton Keynes East, with visitor centre community building and parking. This is complemented with a lattice of smaller green corridors through the new neighbourhoods, with smaller areas of local and pocket parks, amenity open space and network of play spaces, designed to ensure everyone has access to a variety of green spaces on their doorstep.
- 6.100 This strategy informs the Green Infrastructure Parameter Plan (Drawing Np. 01312\_PP\_03 rev. P1) which outlines where and the proposed distribution of open space. The principles for how this would be implemented is contained within the DAS at Chapter 6.
- 6.101 A combined summary schedule of open space and green infrastructure areas proposed as part of the development is provided in Table 6.4 below, which compares these against the policy requirements from the adopted Statutory Development Plan. Relevant plans showing the coverage of open space typology catchment areas is included within the DAS at Chapter 6, illustrating how the policy catchments are met, and how the network of open spaces reflects that set out within the DAS.

Table 6.4 Proposed Open Space

Open Space Typology	Policy Requirement <sup>1</sup>	Site/Application Provision	Provision Commentary
District Park & River Ouzel Linear Park	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> Minimum 20ha</p> <p><b>Catchment:</b> 1,200m</p> <p>A linked network of multi-functional open space, including a visitor attraction.</p>	<p>River Ouzel District &amp; Linear Park – 84ha total.</p> <p>Improvements to existing linear park south of M1.</p> <p>All housing parcels within 1,200m catchment.</p>	<p>A new District Park comprising the linear park, Moulsoe Stream Park and Moulsoe New Wood, with a destination play space, wetlands and a visitor centre space. This will link north and south to an extended River Ouzel linear park connecting Willen to Newport Pagnell.</p>
Local Parks	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> Minimum 1-2ha per park.</p> <p><b>Catchment:</b> 600m</p>	<p>4 Local Parks: 4ha (1ha per park)</p> <p>All housing parcels within 600m catchment.</p>	<p>Multi-functional spaces providing amenity and play. Bloor to also provide Local Park serving MKE to complement.</p>
Pocket Parks	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> Up to 1ha per park.</p> <p><b>Catchment:</b> 300-400m</p>	<p>12 Pocket Parks: 4.32ha (ave. 0.36ha per park)</p> <p>All housing parcels within max 400m catchment.</p>	<p>Distributed spaces provided an open space focal point for neighbourhood blocks. Bloor to also provide Pocket Parks serving MKE to complement.</p>
Amenity Open Space	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> Up to 1,000 sqm.</p> <p><b>Catchment:</b> 400m</p>	<p>Various sizes within the development parcels to be determined as part of the Reserve Matters Applications.</p>	<p>Smaller amenity open space within the development parcels will create interest, relief and incidental spaces.</p>
Local Play Areas (LPAs)	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> 0.04ha activity area with 20m buffer zone to homes.</p> <p><b>Catchment:</b> 300m</p>	<p>8 LPAs: 400 sqm minimum each (i.e. 3,200 sqm across the site).</p> <p>Vast majority of housing parcels within 300m catchment.</p>	<p>Bloor to also provide LPAs. Reserve Matters will be able to comply with offsets to homes. A very small residential area in the north of the site would be no more than 50m beyond the 300m catchment for two LPAs; exceptionally minimal in the context of the scale of MKE.</p>
Neighbourhood Play Areas (NPAs)	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> 0.3ha activity area with 30-40m buffer zone to homes</p> <p><b>Catchment:</b> 600m</p>	<p>4 NPAs: 3,000 sqm minimum each (i.e. 12,000 sqm across the site).</p> <p>All housing parcels within 600m catchment</p>	<p>Larger play areas to include multi-use games area and wheeled sports. Bloor to also provide NPA serving MKE to complement.</p>
Playing Fields and Outdoor Sports Facilities	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Size:</b> 5.7ha (0.52 ha per 1,000 people<sup>2</sup>, excluding school playing fields where not publicly accessible)</p> <p><u>MKE Development Framework SPD</u></p> <p><b>Size:</b> 2 x 3.2ha sites across MKE (1 in this part)</p>	<p>3.2ha sports playing field with pavilion in line the SPD requirement. In addition, school outdoor sports facilities will help to serve local people, with element of public use secured via Community Use Agreements.</p>	<p>Bloor to also provide c.3.2ha sports field north of north of A422 (adjacent existing Newport Pagnell Town pitches) which will be of use to wider MKE population. Combined they will meet playing fields/outdoor sports requirements for the MKE allocation.</p>
Allotments and Community Growing Areas	<p><u>Plan:MK (Appendix C)</u></p> <p><b>Catchment:</b> 700 to 1,000m</p> <p><u>MKE Development Framework SPD</u></p> <p><b>Size:</b> 2 x 0.6-0.8ha across MKE (1 in this part)</p>	<p>3 Allotments: 1.7ha and a community orchard at Moulsoe New Wood.</p>	<p>Provision is above standard in SPD to ensure all housing parcels within max 1,000m catchment and to address any wider deficit in provision. Bloor to also provide on allotment serving MKE to complement.</p>

Notes: <sup>1</sup> The masterplan has been developed in conjunction with Bloor Homes' whose part of the overall MKE allocation will also make open space provision contributing towards jointly meeting standards across the whole allocation. For catchments, higher order/larger size open space categories can contribute to meeting lower order/smaller size category needs (e.g. a district park within 400m of a home would also perform the role of an amenity open space for that home) in line with Plan:MK policy

<sup>2</sup> Based on maximum housing delivery of 4,600 homes and 2.4 average household size for this application.

- 6.102 This schedule demonstrates that the proposals at Milton Keynes East will exceed relevant minimum standards set out in Plan:MK, predominantly due to the generous District Park proposed to make the best use of the River Ouzel corridor and associated features across the site. Chapter 9 of the DAS also sets out some information on the proposed long term management arrangements for the green infrastructure, and St James is in discussions with the Milton Keynes Parks Trust (who already own the area of the site south of the M1 and the area identified for an enhanced Pineham Nature Reserve) about the role they may take on managing aspects of the strategic green infrastructure proposed.

## 9. Transport, Active Travel and Parking

- 6.103 The NPPF promotes sustainable transportation and developments must provide appropriate opportunities to promote sustainable transport modes which are safe and suitable for all users.
- 6.104 Plan:MK (2019) sets out the Council’s aim to create a sustainable transport network in the city. Part of this is encouraging individuals to reduce their car dependency and choose to use more sustainable and lower carbon modes of transport; for example, by bus, rail, walking and cycling. Policy CT1 (Sustainable Transport Network) sets out several ways in which the Council will achieve this by promoting transport choice, ensuring the good integration between modes, and promoting healthy lifestyles. Furthermore, Policy CT2 (Movement and Access) provides more detailed guidance in respect of individual development proposals and how they should both minimise the need to travel and promote opportunities for sustainable transport modes. Development proposals are expected to (inter alia) mitigate against impacts to local or strategic highways networks, to provide appropriate parking, and offer the maximum flexibility in the choice of travel modes.
- 6.105 In addition, Policy SD12 sets out a number of specific transport and active travel requirements for MKE specifically as set out below:
- “4. The phased introduction of a comprehensive network of transport infrastructure in line with the Local Investment Plan, to include grid road connections to H4/V11 to the west and improved highway connections to Newport Pagnell and Central Milton Keynes (CMK), including new and/or enhanced vehicular crossings of the M1, involving highway works on and off-site.*
- 5. A corridor of land safeguarded for a fast mass-transit system, and associated infrastructure, enabling connectivity to CMK and other key destinations. The width of the corridor should be sufficient to enable a range of possible transit solutions to come forward whilst also ensuring the efficient use of land for achieving the scale of development proposed within this policy.*
- 6. A network of segregated, and where appropriate grade-separated, new and enhanced footpaths, cycleways and bridleways (including redways) to connect to existing routes beyond the site, including provision of appropriate pedestrian and cyclist crossings of the A422 and suitable safe and attractive crossings of the M1 as appropriate.”*
- 6.106 The Development Framework SPD (2020) shows an interpretation as to how these new transport networks can be incorporated into the site, as per its Development Framework ‘Movement Framework’ plan (Figure 4.2a).
- 6.107 The application submission includes as well as a Transport Assessment (ES Volume 2, Appendix D1), Travel Plan (ES Volume 2, Appendix D2 and D3), and Construction Logistics Plan (ES Volume 2, Appendix D5) – supported by a strategy. Consideration of the transport network proposed, and the impacts of the Proposed Development is considered below.

## Site access and internal movement

- 6.108 The detailed element of the Proposed Development includes highways infrastructure that enables the site to come forward (as per Policy SD12). The new strategic infrastructure enabling the delivery of the MKE development includes:
- A new dual carriageway crossing of the M1, providing a direct connection between the existing A509 London Road and the existing grid road of Tongwell Street, which itself is proposed to be dualled down to Pineham Roundabout. This will cater for motorists wishing to travel into and out of CMK without the need to use or cross M1 Junction 14 (J14).
  - A new alternative to the existing London Road, which connects M1 J14 with the A509 in the site's NE corner. This link is referred to as the Eastern Perimeter Road, which will serve traffic wishing to access M1 J14, serve the employment areas on the site and provide the initial section of a potential future new link through to Cranfield. A new link to Newport Road to provide access to Moulsoe will be created from this Cranfield Link.
  - A new link is to be provided between Willen Road and the new M1 bridge link, with this to be partially delivered by St James and partially by Bloor whose development this link will run through.
- 6.109 These new highways infrastructure will provide the principal vehicular access to the site, with the routes also forming new Grid Road corridors with pedestrian and cycle access to the site. The River Ouzel corridor and linear park will provide a principle pedestrian and cycle access to the site including across the M1 linking to the wider redway network. Internal access arrangements are matters reserved for later determination. Notwithstanding, the Access and Movement Parameter Plan (ref. 01312\_PP\_02 rev.P1) sets out the approach to providing access across the site (showing both the detailed and outline elements). This includes the illustrative location of redways, footpaths and cycle routes, crossings, Public Rights of Way, and new bus stops.
- 6.110 The detailed proposals, parameters, and the illustrative arrangements shown on the masterplan, demonstrate how the proposals can provide a legible and permeable road and pedestrian/cyclist network to serve the new settlement, whilst promoting sustainable means of transport. This broadly accords with the requirements of Policy SD12 (c4 and c6).

## Sustainable transport

- 6.111 The NPPF is clear that the planning system should promote sustainable transportation. This includes promoting walking, cycling, and public transport (Para 102c). It also states that there should be an appropriate mix of uses across an area within larger scale sites to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (Para 104a).
- 6.112 Plan:MK (2019) also sets out a strong emphasis on delivering sustainable transport solutions, minimising the need to travel, while also encouraging active travel modes. Policy CT3 (Walking and Cycling) sets out that the Council will support developments that enable people to enable people to access employment, essential services and community facilities by walking and cycling. This includes the conidiation of the layout of development, the incorporation of measures to minimise vehicle speed, and create well lit, convenient, and attractive walking and cycling connections within developments. Furthermore, Policy CT5 (Public Transport) requires that developments be designed to meet the needs of public transport operators and users. This includes consideration of road layouts, distance to bus stops, and access to public transport points.

6.113 The Development Framework SPD (2020) also seeks to prioritise active travel modes. It requires walking and cycling to be prioritised and promoted throughout the site with the provision of a comprehensive network of footpaths & cycleways, extending the Milton Keynes redway network into the site, and ensuring good connectivity to adjoining communities of Moulsoe, Willen and Newport Pagnell. The SPD also requires the urban extensions design to accommodate an accessible, frequent and high-quality public transport connections at key hubs within the site, including being future proofed to accommodate and integrate with potential mass rapid transit as part of a wider system for Milton Keynes.

### **Walking and cycling**

6.114 The masterplan has been designed with a focus on providing future users of the development with an inter-connected network of active travel infrastructure to make walking, cycling, and the use of micro-mobility modes the most attractive way of travelling to, from and across the Site. The design of the proposed development includes provision for the expansion of the redway network into the urban extension. This includes linking homes and employment areas to the Community Hub – which is within a 15-minute walk of the majority of homes – as well as the new schools via redways or segregated paths. The proposed parameters incorporate a range of uses across the site that are located to and connected via a segregated, safe, and convenient network to promote cycling and walking.

6.115 Overall, it is clear that the MKE proposals promote walking and cycling as the primary method of transport based on the proposed layout, parameters, and illustrative design. It has therefore been demonstrated that as far as is possible (given many aspects of the detailed design will be for future consideration as part of reserved matters) for the proposed development to meet required local and site-specific policy requirements in respect of active travel.

### **Public transport and rapid mass transit**

6.116 The MKE development proposes the integration of public transport proposals, including:

- Providing high bus frequency connections to most popular destinations such as Milton Keynes Central and Newport Pagnell together with providing new routes or extending existing routes to cater for main external trips in both directions;
- Providing internal demand responsive travel services (i.e. buses/ride sharing proposals) to flexibly support travel between internal residential, leisure and employment zones and connecting with the high frequency bus services for destinations further afield;
- Maximising benefits from bus services already serving MKE to widen destination choices nearby such as Moulsoe and further afield such as Bedford. This in particular will incorporate the provision of convenient stopping arrangements for Route X5 and a minor rerouting of Cranfield services; and
- Creating a multi-modal Transport Interchange for the MKE site, which will include public transport. The multimodal hub will be located within the Community Hub and create a focus point for transport modes at the heart of the site, underpinned by strong walking and cycling connections from all the areas of the development – thus reducing the need to use private transport.

6.117 Bus stops will also be placed in strategic locations with the aim of maximising the public transport coverage so that all residents are within 400m of a bus stop, without compromising attractive journey times. The proposals therefore accord with Policy CT5(3).

6.118 MKC also proposes a long-term 2050 vision for the city, part of which looks to develop a movement network that works for everyone, so that there are efficient, cost-effective and

reliable alternatives to using the private car. A key element in the delivery of the Council's Mobility Strategy is to optimise mass transit access in new development areas. The development of MKE is therefore closely aligned with the future provision of a fast Mass Rapid Transit (MRT) system linking the urban extension with central Milton Keynes.

- 6.119 MKE is located on the indicative alignment of MRT Line 6. The development proposals are therefore well placed to build upon this vision, and discussions have been undertaken with MKC regarding the potential for a MRT system to pass through the site and be integrated in to the development, to provide fast, efficient and frequent sustainable movement within Milton Keynes and Milton Keynes East. To ensure a future MRT can be developed, the Proposed Development has safeguarded land and corridor widths where appropriate, such as the new M1 Bridge to enables a lane in either direction to be reallocated to MRT in the future should this be deemed appropriate. Therefore, the development accords with Policy SD12(c5).
- 6.120 Overall, it is clear that the MKE proposals will be able to implement a sustainable transport network that promotes transport choice, ensuring the good integration between modes, and promoting healthy lifestyles. It has been demonstrated that as far as is possible (given many aspects of the detailed design will be for future consideration as part of reserved matters) for the proposed development to meet required local and site-specific policy requirements in respect of sustainable public transportation. Specific requirements will be dealt with under subsequent reserved matters applications and considered against prevailing policy and guidance.

### Impact on Highways

- 6.121 The NPPF (2019) states that developments proposals need to consider and address the potential impacts of the development on transport networks (Paragraph 102a). Policy CT1 (Sustainable Transport Network) affirms that new developments must manage congestion and provide for consistent journey times. Policy CT2 (Movement and Access) also states that developments must not result in inappropriate traffic generation or compromise highway safety. Finally, in respect of freight Policy CT7 (Freight) states that the Council will work with partners to ensure fast and efficient movement of freight. This includes ensuring development does not prejudice the implementation of national infrastructure projects (including East West rail). Furthermore, developments that require junction improvements need to produce travel assessments to assess the traffic impact of freight to and from the site.
- 6.122 The Transport Assessment (ES Volume 2, Appendix D1), sets out the impacts of the proposed development. In summary, the TA concludes the following:
- 1 Forecasted construction traffic along the different highway routes is not significant in comparison with existing flows and will not be detrimental to the public highway surrounding the site. An Outline Construction Logistics Plan has been prepared, which will be subsumed into and subsequent CEMP, which will be used to manage construction traffic and reduce the impacts of construction traffic on the highway network;
  - 2 The strategic infrastructure within the site is sufficient to enable the scale of development envisaged at the MKE allocation to come forward (i.e. this St James development as well as other MKE development); it would be able to accommodate traffic flows. However, there would need to be further transport interventions to reduce the overall traffic generated by the Proposed Development and/or address the impact of increased traffic that would occur beyond the site. As part of this the TA identifies:
    - a A walking and cycling strategy and a public transport strategy seeking to focus movement on active travel and public transport, reducing traffic from the site. This will be supported by Residential Travel Plans and Workplace Travel Plans;

- b Highway junction improvement works necessary to support delivery of MKE at the following locations within existing grid road corridors:
  - i Minor improvements at Blakelands Roundabout;
  - ii Minor physical changes to Willen Road;
  - iii Improvements to exits and/or potential signalisations at Pagoda Roundabout, Woolstone Roundabout, Marsh End Roundabout, Fox Milne Roundabout and Pineham Roundabout.

6.123 The design and layout of MKE seeks to promote sustainable travel choices to reduce the proportion of private car trips. Targets and measures to increase walking, cycling and public transport trips are proposed on the basis that a remedial strategy would be put in place if targets are not met. As a result, none of the effects considered above would be significant after implementing the mitigation measures.

6.124 Overall, the Transport Assessment (ES Volume 2, Appendix D1) concludes and confirms that the scale of traffic generated by the proposal is appropriate for the function and standard of the roads serving the area. It has been demonstrated that the objectives and aims of local and national policy can be met by the Proposed Development and, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed Development.

6.125 In conclusion, in accordance with the NPPF (2019) it has been demonstrated that the residual cumulative impacts of the Proposed Development would not have a 'severe' impact in terms of transport matters. The impacts have been assessed and after implementation of mitigation none would be significant.

### **Vehicle and cycle parking**

6.126 Policy CT10 (Parking Provision) in Plan:MK (2019) expects development proposals to meet a set of parking requirements. This includes meeting the Council's full parking standards, providing well designed parking areas (in terms of safety, circulation, appearance, and access by pedestrians/cyclists), and the provision of electric vehicle charging. Further to Policy CT10, the Council has also adopted a 'Parking Standards' SPD (2016). The SPD sets out vehicle and cycle parking standards based on different uses and zones within the city.

6.127 Policy CT6 (Low Emission Vehicles) sets out additional policy requirements in respect of electric vehicle charging. The policy (CT6e) requiring new developments to provide charging points at a rate of 1 point per dwelling at each dwelling. The policy also supports the provision of rapid and fast charging points throughout the city; including in local centres and car parks (CT6d).

6.128 Parking provision in MKE for residential, employment, and community uses will be considered as part of reserved matters submissions. Initially, it is likely that earlier phases will be designed in accordance with current standards. The Transport Assessment (ES Volume 2, Appendix D1), prepared by WSP, concludes that given the distinct character areas and densities across the site, it is appropriate to apply a varied standard across the housing areas of the development according to its character, with (as per ES Volume 2, Appendix D1, Appendix A-8, ref. TTN8):

- The Community Hub and Central Area applying parking standards in accordance with Zone 2
- Primary Street, Riverside and General Area housing applying parking standards in accordance with Zone 3 (potentially reducing to Zone 2 in Primary and Riverside areas where higher densities and higher public transport accessibility is achieved); and
- Rural edge area applying parking standards in accordance with Zone 4.



- 6.129 In addition, it is proposed that:
- Disabled parking will be incorporated in accordance with the Inclusive Mobility (Department for Transport, 2005) minimums: 5% of provision for employment uses and 6% of all other non-residential use classes should be suitable for blue badge holders (or in accordance with future standards); and
  - Car club spaces can also be considered and support the provide an alternative and support lower levels of parking.
- 6.130 Subsequent phases of MKE will be monitored through each reserved matter submission to ensure that the parking provided is adequate in accordance with prevailing guidance, but to levels that do not promote car use over sustainable options. This may enable the opportunity to review the above Zones if and where car use is lower than envisaged, for example if MRT comes forward.
- 6.131 The design and layout of the parking areas is for future consideration in reserved matters. However, the DAS provides illustrative examples of home parking typologies based on different densities, plot types (Chapter 8). These designs seek to provide an appropriate amount of parking in convenient locations that are overlooked by dwellings. The front gardens aim to soften the appearance of parked cars on the streetscape, thus creating a softer street scene.
- 6.132 The provision of electric vehicle charging is also a matter for future reserved matters submissions. As detailed in the Transport Assessment (ES Volume 2, Appendix D1) the development would likely seek to accommodate existing parking standards (see Table 5.4 in the TA) as a minimum. St James however is exploring opportunities to improve on these minimum standards delivering flexibility and electric vehicle charging provision to its new residents. This includes looking to deliver 100% active chargers for houses, and 100% passive provision for apartments. This will be reviewed as each phase comes forward.
- 6.133 Finally, the provision of sufficient cycle parking within the development will be key to achieving sustainable transport aims. The Transport Assessment (ES Volume 2, Appendix D1) sets out the minimum cycle parking standards for MKE (Table 5.5 in the Transport Assessment) as per the Parking Standards SPD (2016). Similar to vehicular parking, MKE will, as a minimum, provide cycle parking in line with adopted standards. However, it is likely that future reserved matters submissions will provide above the minimums, especially at key areas, such as interchange points and the community hub.
- 6.134 Overall, it has been demonstrated as far as is practical for outline elements that it is possible for the proposed development to meet required local and site-specific vehicle, electric vehicle, and cycling parking standards. Specific requirements will be dealt with under subsequent reserved matters applications and considered against prevailing policy and guidance.

## **10. Energy, Sustainability, and Climate Change**

- 6.135 The NPPF (2019) highlights planning's role in supporting a transition to a low carbon future in a changing climate (Para 148). It sets out that new development avoids increased vulnerability to a range of impacts from climate change and that can reduce overall greenhouse gas emissions (Para 150). This includes increasing the supply of renewable energy as part of new developments as well as design considerations in relation to the building layout and orientation to minimise energy consumption.
- 6.136 Plan:MK (2019) similarly places a strong emphasis on responding to climate change through the built environment. This is both as part of transport considerations (i.e. minimising the need to travel and encouraging sustainable travel modes – both of which have already been considered above) but also through sustainable construction and renewable energy generation. In

particular, Policy SC1 (Sustainable Construction) sets out detailed requirements relating to sustainable construction, materials and waste, energy and climate, and water use. Policy SC2 (Community Energy Networks And Large Scale Renewable Energy Schemes) also supports – subject to criteria – community energy networks in new large-scale developments.

6.137 The Development Framework SPD (2020) also sets out some development principles in relation to sustainability (Section 4.6). For example, the framework expects future proposals to demonstrate how they meet the requirements of Policy SC1 and demonstrate how the proposals have considered integration of community energy networks in accordance with Policy SC2.

6.138 Hodkinson has prepared an Outline Energy Statement, a Sustainability Statement, and an Overheating Mitigation Strategy for the outline scheme (all submitted as part of the planning submission not the ES). These are supported by the ‘Climate Change & Resilience’ chapter in the ES (Chapter N). The statements and the ES Chapter illustrate how the proposed development can be designed to comply with national and local policies related to sustainability, energy use and efficiency, water use and carbon dioxide (CO<sub>2</sub>) emissions. The statements are intended to be high-level strategy documents and detailed options, particularly at the building design level, are intended to be refined and presented as part of each reserved matters application. WSP have also prepared Chapter O (Waste) to the ES which considers matters such as the waste hierarchy which is relevant to the sustainability of the site. The findings of Chapter O (Waste) are considered further below in the ‘Other Environmental Considerations’ section of this assessment.

6.139 In particular, the statements demonstrate compliance to the following requirements of Policy SC1 and SC2:

- 1 Policy SC1 (C) requires the reuse and recycle of materials that arise through demolition. There is limited demolition proposed as part of this scheme, but demolition waste will be managed as per the principles set out in Section 9 of the Sustainability Statement as part of the ‘circular economy’ considerations. The earthworks strategy has also been designed such that the site will be ‘balanced’ not requiring substantive import or export of fill material to or from the site;
- 2 The Sustainability Statement (Section 10) details commitments to prioritise materials that have low embodied energy – from manufacture, transportation and operational stages, through to eventual demolition and disposal. Berkeley Group itself has committed to reducing the carbon impact of the materials and services it uses by 40% between 2019 and 2030. This accords with Policy SC1 (D);
- 3 Policy SC1 (E) encourages the incorporation of green roofs/walls where technically feasible. As per the Sustainability Statement and in accordance with the Berkeley Group Sustainability Standards green roofs will be provided within the development. These will be shown as part of future reserved matters submissions;
- 4 Policy SC1 (F) requires consideration of the Lifecycle of buildings including how materials can be recycled at the end of their lifetime. The Sustainability Statement (Section 9.0) sets out design principles relating to the ‘circular economy’ to manage, reduce, and enable the recycling of building materials used;
- 5 Policy SC1 (G) seeks to foster greater levels of recycling of domestic and commercial waste. Section 8 of the Sustainability Statement sets out the space to be provided in both residential and commercial developments to provision for waste and recycling. For example, in residential homes (in accordance with the Berkeley Group’s Sustainability Standards) space for 30 litres of waste will be provided within 1- and 2-bedroom homes as well as 5 litres of space for food waste;

- 6 Residential development will achieve and exceed the 19% carbon reduction over Part L (2013) as required by Policy SC1 (K1). From 2022, the residential development will need to meet the Interim Part L standard; a 31% reduction in carbon emissions over current Part L. From 2025 residential development will then need to meet the Future Homes Standard for a 75-80% reduction in carbon over current Part L.

In order to achieve the Future Homes Standards, a fabric first approach will be adopted to ensure compliance. Ultimately approaches could include mechanical ventilation, improved construction detailing for thermal bridging, and a focus on passive design (i.e. glazing orientations and external shading). This therefore follows the Energy Hierarchy approach as per Policy SC2 (H). There is also the potential to include solar panels to further reduce carbon emissions for residential development whilst any residual carbon emissions which cannot be feasibly mitigated against requirements within Policy or set standards will be offset via the MKE tariff (see Section 7);

- 7 In respect of SC1(K2), the above already achieves the required reduction in carbon emissions from Part L 2013 (i.e. the Future Homes Standard 2025 is 80% below Part L 2013);
- 8 All commercial non-residential floorspace will target achieving a 'Very Good' rating as a minimum. Full BREEAM pre-assessments will provided alongside relevant reserved matters submissions;
- 9 The Overheating Mitigation Strategy report that sets out a number of proposed design principles. For example, there will be use of the early-stage Good Homes Alliance overheating risk tool to identify key risk factors and constraints that can restrict the use of natural ventilation. The report in total demonstrates that compliance with Policy SC1 (4-6) can be achieved.
- 10 All residential development will target a minimum water efficiency standard of 105 litres/person/day. This is below the target of 110 litres/person/day in Policy SC1 (L);
- 11 It is envisaged that all homes will be fitted with air source heat pumps for the provision of heating and hot water requirements. This would be instead of a heat network which are promoted by Policy SC2. However, the Outline Energy Statement justifies why this approach is preferable;

6.140 In addition to the above, there are a range of other energy and sustainability measures that will be explored throughout the build-period. For example, there is potential for a wind turbine to be installed within the site (away from residential uses) or the potential to collect biogas from sewage works.

6.141 Overall, it has been demonstrated as far as is practical at outline application stage that it is possible for the proposed development to meet required local and site-specific sustainability requirements both during construction and operation. Specific requirements will be dealt with under subsequent reserved matters applications. Measures are included to mitigate and adapt to the impacts of climate change to ensure compliance with local policy.

## 11. Minerals Safeguarding

6.142 The River Ouzel valley between Willen Road and the A509 is within a minerals safeguarding designation. Policy 18 of the adopted Milton Keynes Minerals Local Plan sets out that planning permission will not normally be granted for non-mineral development that would lead to the unnecessary sterilisation of deposits in such areas unless one of the following criteria is met: the mineral is not of economic value or feasible to extract; the development is temporary and would

not sterilise future extraction; extraction is not practicable with a reasonable timescale; there is an overriding need for the development; or the development is exempt.

- 6.143 It is not proposed at this stage to substantively work the mineral deposits as part of this planning application or extract deposits as part of a commercial operation. As part of the normal construction of the infrastructure, earthworks will occur and any material excavated as part of that will be recycled into the construction of the scheme (either to make levels or for construction processes requiring sand and gravel if such deposits arise). Due to the conditions attached to the HIF funding secured, and the necessity and timescales for delivering infrastructure and then the housing to follow, it is considered neither practicable nor feasible to extract any sand or gravel deposits before implementation. The main initial construction occurring within the safeguarding area is the construction of the Western Link Road, including M1 overbridge, which has to comply with short delivery timescales in accordance with the funding agreement. The delivery of this link would also then further sever the potentially workable areas within the safeguarding zone west of the River Ouzel. Therefore, it is considered the scheme falls into at least one of the exclusion criteria detailed within Policy 18.
- 6.144 It should be noted that immediately north-west of the St James application site, and still within the MKE allocation, sand and gravel extraction has already been occurring, such that overall, the MKE allocation site has been contributing towards minerals production prior to development.

## **12. Water and Drainage**

### **Flood risk**

- 6.145 The NPPF (2019) states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but, where development is necessary, making it safe without increasing flood risk elsewhere (Chapter 14). Policy FR1 (Managing Flood Risk) in Plan:MK (2019) sets out more detailed policy requirements for all new development to manage flood risk.
- 6.146 The accompanying ES includes a 'Water Environment & Drainage' Chapter (Chapter L). This serves as the Flood Risk Assessment ('FRA') for the proposed development. A 'Sustainable Urban Drainage System Strategy' report has also been submitted. Overall, the FRA demonstrates that the development proposals can be accommodated without increasing flood risk within the locality in accordance with objectives set by Central Government and the Environment Agency. A series of mitigation measures are set out that have been incorporated into the design in relation to the principal source of flood risk. Further consideration of the scheme in relation to flood risk and drainage is set out below.

### **Sequential and exception test**

- 6.147 The proposed development represents a comprehensive urban extension to Milton Keynes. It therefore covers a wide area of c.437ha of land which includes large areas of land at risk of flooding given the River Ouzel flows through the site and has an associated floodplain. However, the majority of the site is Flood Zone 1 (i.e. the lowest risk). Policy FR1 states that Plan:MK (2019) will seek to steer all new development towards areas with the lowest probability of flooding.
- 6.148 Across the site all development areas – such as housing, the community hub, and employment uses – are located within flood risk zones where the use is appropriate to that level of flood risk (i.e. Flood Zone 1 and Flood Zone 2). The areas of the site at risk of flooding and therefore falling in Flood Zones 3a (high probability of flooding) and 3b (functional flood plain) are principally retained as open space; such as the proposed River Ouzel linear park which will be designed to

accommodate flood events (much like existing other linear parks in MK). The elements of built development proposed which are within areas at high risk of flooding (Flood Zone 3) relate to highways infrastructure including the widening of Tongwell Street introducing a new carriageway bridge over the River Ouzel and the proposed River Ouzel viaduct (Link 107) located centrally within MKE connecting into London Road. In line with Government's Planning Practice Guidance, these fall as essential infrastructure within the flood risk vulnerability classification, and are therefore not inappropriate but are subject to the 'Exceptions' and 'Sequential' tests (see Section 4.0 of the submitted Flood Risk Assessment, Appendix L1 to Chapter L of the ES Volume 2).

- 6.149 The wider development is allocated within Plan:MK (2019) and therefore is not subject to the sequential test. However, the uses within the site have been sequentially steered within the site, as set out above. Notwithstanding, the development of the highways infrastructure necessarily needs to cross the River Ouzel, associated watercourses and their associated flood plain. It is intrinsic to providing access across these features that the roads necessarily need to cross the watercourse and flood plain; as such there no sequentially preferable locations where the development could be located and perform the same function. On this basis it is considered the Sequential Test is addressed.
- 6.150 The highways infrastructure would also provide wider sustainability benefits to the community as a whole, helping to serve the MKE development and enhance transport linkages for locations beyond, such as Newport Pagnell. The highways infrastructure includes flood mitigation to ensure its safe for its lifetime and does so without increasing flood risk elsewhere; the roads throughout would be located above the 1 in 100 year +35% climate change flood event (maintaining access even in the event of a flood), whilst design mitigation has been incorporated to prevent increase risk of flooding elsewhere (for example in pier and embankment design, and the associated highways drainage strategy). On this basis, the development passes the Exception Test for development of essential infrastructure within an area at risk of flooding in accordance with national policy.

### **Drainage strategy**

- 6.151 NPPF paragraph 163 requires that developments demonstrate that (inter alia) they incorporate sustainable drainage systems. Plan:MK (2019) Policy FR1 reaffirms this requirement with all new developments expected to incorporate surface drainage systems. Policy FR2 (Sustainable Drainage Systems ('SuDS') And Integrated Flood Risk Management) also provides a set of standards for SuDS; including a requirement for SuDS to be designed as multi-purposes and that proposals must include details of achieving future management. Finally, Policy FR3 (Protecting And Enhancing Watercourses) sets out policy requirements in respect of protecting existing watercourses including required setbacks. It also states that the Council will resist proposals that would adversely affect the natural functioning of main rivers/ordinary watercourses/balancing lakes etc.
- 6.152 The accompanying 'Water Environment & Drainage' Chapter in the ES (Chapter L) considers the drainage impact of the development. This is supported by a Surface Water Drainage Strategy (ES Volume 2, Appendix L2). In respect of drainage these assessments conclude that the overall impact of the development will be negligible. This is as a result of proposed temporary mitigation during construction and the incorporation SuDS and other similar measures incorporated into both the detailed highways infrastructure (detailed element) and as part of future built development (outline element) that are designed with an allowance for climate change. Therefore, the development accords with Policies FR1 and FR2 given the implementation of a strategic site wide sustainable drainage system.

6.153 In respect of the detailed design of SuDS and other drainage measures, the application includes detailed highways drainage drawings and drainage calculations. The Surface Water Strategy (ES Volume 2, Appendix L2), concludes that these measures are sufficient to provide sustainable drainage for the highway's infrastructure. However, future reserved matters submissions will provide further detailed proposals for SuDS and other sustainable drainage measures that accord with relevant standards as per Policy FR2. For example, multi-functional SuDS can be incorporated in green spaces (such as the River Ouzel park).

6.154 In addition, the accompanying 'Water Environment & Drainage' Chapter in the ES (Chapter L) is also supported by a Water Framework Directive Assessment ('WFDa') (ES Volume 2, Appendix L3). This report considers potential impacts on existing watercourses and sets out proposed mitigation. The assessment concludes that with appropriate mitigation any impact from activities associated with the development (both during construction and once completed) any impact would be acceptable and that the overall scheme is compliant with the Water Framework Directive. Given that the development proposals incorporate required setbacks from watercourses (which form part of District/Linear parks) and the WFDa concludes no adverse impact, the proposals accord with Policy FR2(B8) and FR3.

## 13. Other Environmental Considerations

### Noise, vibration, and air quality

6.155 NPPF paragraph 180 states that planning decisions should ensure that new development is appropriate of its location considering the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as potential sensitivity of the site or the wider area to impact that could arise from the development. In doing so they should mitigate and reduce to a minimum potential adverse impact resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life.

6.156 Policy NE6 (Environmental Pollution) of Plan:MK (2019) considers the impact of air quality, noise and vibration on (inter alia) human health, general amenity, biodiversity or the wider natural environment as set out below:

- In respect of air quality, the policy requires consideration to be given to the potential impacts upon air quality arising from the development. This includes the need for an Air Quality Assessment that considers partly how air quality will be kept to an acceptable standard through avoidance and mitigation. The potential impact of proposals on odour levels needs to be considered where the Council will require an Odour Impact Assessment where necessary.
- In respect of noise and vibration impacts, the policy requires the provision of Noise and Vibration Impact Assessment where there is the potential for development to cause disturbance to people of the natural environment. There is also a requirement for setbacks, landscaping measures, and acoustic buffers to protect amenity where proposals are within 100m of or adjacent to major or heavily trafficked roads.

6.157 An assessment of the potential air quality effects of the Proposed Development has been carried out and is submitted in Chapter G (Air Quality) of the ES (as well as relevant technical appendices in Volume 2 of the ES). The assessment concludes:

- 1 During construction, the effects from the impacts of dust and PM10 will be negligible, with measures to be secured via a CEMP, such as wheel washing and damping down, to minimise impacts from construction dust.

- 2 Impacts on humans from NO<sub>2</sub> concentrations, PM<sub>10</sub> concentrations, and PM<sub>2.5</sub> concentrations are anticipated to be negligible.
- 3 There will be no significant impact in respect nitrogen deposition and the consequent impacts on Ancient Woodland (as addressed in the Habitats and Biodiversity section of this Planning Statement).
- 4 Odour impacts from routine operation of the Cotton Valley Wastewater Recycling Centre on the proposed development will not adversely affect future occupiers. In particular the masterplan design has sought to mitigate any impacts by locating homes away from the Wastewater Treatment works and using employment areas as spatial buffer.

6.158 An assessment of the potential noise and vibration effects of the Proposed Development has been carried out and is submitted in Chapter H (Noise and Vibration) of the ES (as well at relevant technical appendices in Volume 2 of the ES). The assessment identifies a total of nine locations were monitored (five unattended monitoring points and four attended monitoring points) for the existing day and night noise levels across and on the edge of the site. The assessment was taken on days between the 2<sup>nd</sup> November and 10<sup>th</sup> November 2020. In respect of noise and vibration, the assessment concludes:

- 1 During construction there will be temporary impacts from construction noise and vibration on some sensitive noise receptors such as The Holiday Inn, the Willen Road traveller's settlement, and earlier phases of development once completed. However, these will be short-lived and control on construction working hours will help mitigate and reduce these impacts.
- 2 Once development is complete, noise from road traffic can be addressed via mitigation including noise barriers and/or noise bunds along the most sensitive parts of the site, such as alongside the M1 and along the Grid Roads. These are complemented with set-backs from proposed new Grid Roads for development parcels and proposed landscape planting.

6.159 The above assessment demonstrates it is clear that no significant noise, vibration or air quality impacts will occur from the Proposed Development, which cannot be appropriately mitigated for. The proposals therefore accord with requirements of both local and national policy.

### Land conditions

6.160 NPPF paragraph 178a requires (inter alia) that planning decisions ensure sites are suitable for the proposed use taking account of ground conditions and any risks arising from land instability and contamination.

6.161 Policy NE6 of Plan:MK (2019) also considers the impacts of contaminated land and soil pollution on (inter alia) human health, general amenity, biodiversity or the wider natural environment. It requires that planning applications be accompanied by a Preliminary Contaminated Land Risk Assessment. This is to determine the likelihood of any ground, groundwater or gas contamination of the sites. Proposals that risk contributing to soil and water pollution are also required to demonstrate how this risk will be avoided or mitigation to an acceptable level.

6.162 An assessment of the potential ground condition and soil impacts of the Proposed Development has been carried out and is submitted in Chapter I (Ground Conditions & Soils) of the ES (as well at relevant technical appendices in Volume 2 of the ES). The includes a desk-based study as well as a survey from a site visit (on the 11<sup>th</sup> February 2020) which have inputted to the preparation of a Preliminary Risk Assessment (ES Volume 2, Appendix I1). In respect of ground conditions and soil, the assessment concludes:

- 1 The site has seen little development through history and has remained predominantly as agricultural land and grassland. On-site development has been limited to farms and occasional residential dwellings. The section of the M1 motorway passing through the south western extent of the site was constructed by 1959;
- 2 Following a preliminary consultation of online UXO threat hazard maps by Zetica (21/07/20), the site appears to be in an area of Low threat from unexploded ordnance;
- 3 Preliminary ground gas monitoring indicated that the risk from ground gas on the proposed development is considered to be very low;
- 4 It is assumed that that no earth will be removed from site with any surplus material to be used in the creation of noise bunds, embankments for highways and making development levels. However, any contaminated ground materials that cannot be reused will be suitably managed to prevent contaminating the wider environment of the site, prior to appropriate disposal;
- 5 There are unlikely to be any significant effects on Controlled Waters.

6.163 The above assessment demonstrates it is clear that no significant ground condition or soil impacts will occur from the Proposed Development which cannot be appropriately mitigated for. The proposals therefore accord with requirements of both local and national policy.

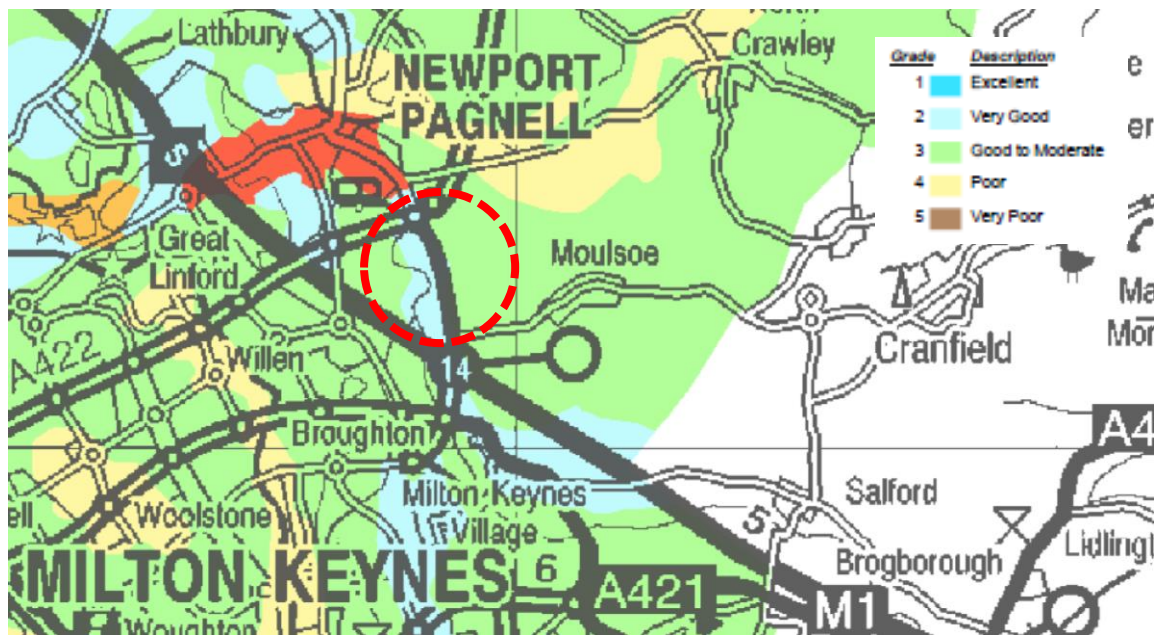
### **Agricultural land**

6.164 NPPF paragraph 170b sets out the planning decisions should recognise the economic and other benefits of best and most versatile (BMV) agricultural land (i.e. that falling within Grades 1, 2 and 3a) of the Agricultural Land Classification (ALC). Plan:MK (2019) policy NE7 (Protection Of The Best And Most Versatile Agricultural Land) reflects this and goes on to state development involving the loss of agricultural land should seek to use areas of poorer quality land, in preference to higher quality, unless other sustainability considerations suggest otherwise.

6.165 The majority of the site is within existing agricultural use, which would be lost upon development. Regional Agricultural Land Classification Maps from Natural England indicate the area is likely within a combination of Grade 2 (very good) and Grade 3 (Good to Moderate), albeit Grade 3 is not subdivided into 3a and 3b (see Figure 6.1). Detailed mapping from governments Magic mapping site is not available for the site itself, but nearby east of Willen Road (part of the MKE allocation) is confirmed as being Grade 2, whilst Broughton contained Grade 2, 3a and 3b elements; similar to the strategic mapping. For the purposes of considering agricultural land, it is assumed that the MKE site is likely to comprise at least a significant component of BMV which would be lost. In pre-application discussions with MKC, it was indicated that detailed intrusive survey on ALC was not required or proportionate given the circumstances of the site.



Figure 6.1 Agricultural Land Classification



Source: Natural England Regional ALC Maps

- 6.166 The site is allocated for development, and consideration of BMV fed into the decision to allocate the site as part of the Local Plan; including via the accompanying Sustainability Appraisal process. Whilst the loss of potential BMV land would be a disbenefit of the scheme proposed; it is considered that it is far outweighed by the economic and social benefits that would accrue from the development (as evaluated in this Planning Statement – see section 14 below) and the sustainability benefits as a whole of MKE, including the location as a natural extension to Milton Keynes, with good proximity and links to Central Milton Keynes in comparison to other expansion options, and the intrinsic sustainability of the scheme proposed. In this context, it is considered that the loss of BMV would not be a material consideration of sufficient magnitude to tilt the planning balance away from determining the application in line with the Statutory Development Plan; the harm in the overall scheme would be minimal.

### Waste and recycling

- 6.167 The NPPF (2019) sets out that to achieve sustainable development, the planning system should contribute to protecting and enhancing our environment by (inter alia) using natural resources prudently and minimising waste (Paragraph 8).
- 6.168 Locally, the Milton Keynes Waste Development Plan Document (2007-2026) was adopted in 2008. Policy WCS3 (Sustainable Design, Construction and Demolition) sets out relevant considerations for waste and recycling. It requires for example (inter alia) that developments consider ensuring that it can be served by appropriate waste collection methods to support recycling. It also requires construction methods which reduce inert landfill disposal.
- 6.169 Plan:MK (2019) also sets out relevant waste and recycling policies. Policy SC1 (Sustainable Construction) sets out various policy requirements in respect of materials and waste. The development's compliance against this policy has already been considered early under the 'Energy, Sustainability and Climate Change' of this section of the report.
- 6.170 Finally, in respect of MKE specifically the Development Framework SPD (2020) states that land should be retained for a household waste recycling centre. This should be 2ha in size with good

access to the strategic road network, with the land adjacent to the Park and Ride site specifically identified as one such location.

6.171 The application is supported by Chapter O (Waste) in the ES prepared by WSP. In addition, Hodkinson has prepared a Sustainability Statement. This also sets out details as to the waste strategy for the proposed development.

6.172 In respect of waste, the assessment concludes:

- The proposed development is not expected to result in a significant quantity of excavation waste being generated during construction, as the majority of this material would be reused on-site wherever possible;
- the proposed development will result in the generation of a considerable quantity of construction waste which will be minimised by management of supply chains, good on-site storage of materials to prevent wastage and an overarching adherence to the Waste Hierarchy. It is considered that, if the majority of the construction waste is appropriately reused on-site or reused/recycled off-site, the proposed development will result in a residual long-term effect of minor adverse significance; and
- The normal management of commercial and household waste from the proposed development would not have a significant impact on off-site waste management infrastructure in the long-term, with contributions to be made as part of planning obligations to waste management arrangements.

6.173 In respect of the required on-site recycling facility, there is the flexibility to deliver this within the wider MKE allocation.

6.174 The above assessment demonstrates it is clear that no significant waste impacts that will occur from the Proposed Development which cannot be appropriately mitigated for. The proposals therefore accord with requirements of both local and national policy.

## Communications

6.175 The development and design at MKE responds to the societal changes that have been brought about by the Covid-19 pandemic in a number of ways, from the enhanced access to open spaces on residents doorsteps for improved wellbeing, to safe and secure homes that are comfortable for people to live in. Alongside this, the pandemic has highlighted the necessity for high quality and high-speed digital communications, whether to support working from home, entrepreneurship and home learning or to support rest, relaxation and staying in contact. In this context, in accordance with Plan:MK (2019) Policy CT9 (Digital Communications), all new premises (both residential and commercial) will have access to at least superfast broadband provision (>24Mb) with future proofing for ultrafast provision (>300Mb). The precise approach, design of ducting and preferred network provider(s) will be detailed at reserved matters stage.

## 14. The Benefits and Overall Planning Balance

### Delivering social value

6.176 The proposal represents the development of a brand new, mixed-use and inclusive neighbourhood for Milton Keynes. It will transform the site to provide a place with a mix of new homes, employment and supporting retail, leisure and community uses. In doing so it will provide 4,000 up to 4,600 new homes and deliver a suite of social value benefits to Milton Keynes. These include:

- **Healthy placemaking:** from the outset, the aim has been to create a new neighbourhood that promotes active travel and incorporates natural features throughout;
- **Dementia friendly design:** incorporating dementia friendly design principles will enable a growing elderly population to live in and navigate the new neighbourhood safely;
- **New sports pitches and play areas:** the development has a full range of sports pitches and children’s play areas located across the new neighbourhood within relevant catchments. These are also all easily accessible via the extended redway network and other segregated walking/cycling routes;
- **River Ouzel Park and green infrastructure:** the development includes the creation of a new linear park. This will be a major benefit to not only the future residents of MKE but to Milton Keynes as a whole. The green infrastructure strategy will also result in a net biodiversity gain of at least 10% with current assessments showing a 14.5% net gain;
- **Reducing construction waste:** new homes and commercial uses will be constructed using innovative methods to reduce waste and carbon emissions. This includes using materials that are recycled;
- **Reducing energy consumption:** homes and commercial units will also be built to high energy efficiency standards, enabling future occupants to reduce their energy and water consumption. This will support the Council in meeting its climate change agenda;
- **Supporting sustainable transportation:** the development will help residents’ transition to electric vehicles through the provision of new active and passive charging points. It will also safeguard land for a future rapid mass transit system and can integrate the existing bus network; and
- **Training opportunities:** the delivery of the development will provide apprenticeships and training opportunities during construction. These will upskill the local population and provide social value through on-the job training.

### The planning and public benefits

6.177

In addition to the above social value benefits, there are a range of planning and public benefits that will be realised for the wider benefit of Milton Keynes, including:

- 1 Creation of a new mixed-use neighbourhood and community which supports MKC’s ambitions for growth to 2031 and beyond as a key city within the OxCam arc;
- 2 Allowing MKC to realise £94.6m of Government Infrastructure Funding associated with the MKE project to deliver new up-front infrastructure;
- 3 4,000 up to 4,600 new homes, including homes for the elderly, helping to meet Milton Keynes’ housing needs and requirements as identified in Plan:MK;
- 4 1,240 affordable homes, helping to meet acute affordable housing needs in MK;
- 5 Provision of three new primary schools and a secondary school;
- 6 The development of major new highways infrastructure, including a new bridge over the M1 improving connectivity;
- 7 New employment floorspace, including large floorplate, high quality, logistics and other flexible floorspace to enable Milton Keynes to attract inward investment in high-tech sectors and capitalise on its strategic location;
- 8 Providing a new linear park along the River Ouzel, connecting Willen Lake and Newport Pagnell via a missing green infrastructure link;

- 9 The provision of new open spaces and red routes along a lattice structure throughout the new community promoting active travel and connecting people with nature;
- 10 Supporting active travel and healthy lifestyles through a package of sustainable transport measures which reduce the need to travel by car and improve access to public transport;
- 11 New sports facilities and community buildings;
- 12 New allotments/community orchards for future residents; and
- 13 Environmental improvements, including planting of a minimum of 250,000 new trees and a biodiversity gain of at least 10%.

6.178 The headline socio-economic benefits of the proposal are outlined on the infographic below (including some of the above benefits).

# THE ECONOMIC BENEFITS OF MILTON KEYNES EAST

The proposed development at Milton Keynes East will deliver a new sustainable urban extension to the city. It will support the city meet its growth agenda, deliver a significant quantum of homes, and deliver infrastructure partly funded by Government.



## THE PROPOSAL



**4,000-4,600** New homes **1,240** Affordable homes

Other details: 88.5ha of employment land, 3 primary schools, 1 secondary school, Community Hub, Health Hub, a new District Park along the River Ouzel, and a new bridge over the M1

## CONSTRUCTION BENEFITS



**£1.15bn**  
Construction value  
(estimated total construction cost)



**£63.23m GVA**  
Economic output  
(additional average net GVA p.a.)



**338 Jobs p.a**  
Average FTE  
construction jobs p.a  
(over the 26 year build period)



**486 Jobs p.a**  
Average FTE supply  
chain jobs p.a  
(indirect/induced 'spin-off'  
jobs supported)

## OPERATIONAL AND EXPENDITURE BENEFITS



**£44.9m**  
First occupation  
expenditure  
(spending to make a house  
'feel like a home')



**5,900 Jobs**  
Total direct jobs  
(jobs from new commercial/  
community uses)



**1,356 Jobs**  
Net local supply  
chain jobs FTE  
(indirect/induced jobs  
supported)



**£155.8m**  
Gross resident  
expenditure



**1,180 Jobs**  
Town centre jobs  
supported  
(from increased expenditure in  
local area)



**£448.4m**  
Economic output  
once completed  
(additional GVA p.a.)

## LOCAL AUTHORITY REVENUE BENEFITS



**£7.7m**  
Estimated Council Tax  
revenues (total)  
(p.a.)



**£94.6m**  
Infrastructure funding unlocked  
for MKC (via Government HIF)



**£9.6m**  
Estimated business rate  
revenues (p.a.)



## Planning balance

6.179

Milton Keynes East and this proposed scheme will deliver substantial planning benefits. The myriad of positive impacts from the development are such that they significantly and demonstrably outweigh any identified harm. In addition to the social, planning and public benefits identified above the positive impacts include the following:

- 1 MKE is a rare opportunity to grow the city while upholding and evolving the design principles of Milton Keynes. It is a development that can inform a new chapter in the city's story; one of growth and thought leadership. The application itself defines an ambition for this urban extension, one that is intended to be reflective of the vision that defined the city in the 1970 Plan for MK;
- 2 The development will be defined by its green infrastructure. A new 84ha District Park, including a new riverside park alongside the River Ouzel (itself 63ha), will benefit the whole city. This will be delivered alongside a full complement of local parks, play areas, and amenity space. It will also protect 15km of existing hedgerows and include provision of tree lined streets, a community orchard and woodland planting; restoring and enriching the natural environment. The green spaces will be connected via a 13km landscape lattice with all homes within a five-minute walk of a park, green route, or village green. Across the development, at least 250,000 trees will be planted, and the development will result in at least a 10% Biodiversity gain;
- 3 The development will deliver the first new bridge over the M1 for the city in 50 years. This will enable the extension of the Milton Keynes Grid. This bridge is funded by Government and will open up new connectivity to the redway and highways network. It also includes other highways infrastructure that is commensurate to the needs of the new development;
- 4 This MKE proposal, will deliver between 4,000 to 4,600 homes. These will be homes for people of all ages, designed to be energy efficient, and their delivery will support MKC in meeting its housing needs.

It also will deliver a significant quantum of employment land supporting the provision of at least c.5,900 new jobs in a strategically important location on the M1. This employment provision – alongside other uses – will contribute significantly to the local economy. Importantly, the delivery of both these new homes and new employment uses will support the wider housing and economic growth objectives of the OxCam Arc;

- 5 While design is a matter for future consideration, the proposal sets out the parameters for an exemplar development. It would be Milton Keynes' first dementia friendly neighbourhood; incorporating design features to create a safe, distinctive, and legible environment. The illustrative masterplan shows that health placemaking can be embedded into MKE centred around a new vibrant Community Hub. This hub will be a focus for the community providing new retail, leisure, and education uses. It will be within a 15-minute walk via redways and other segregated routes of the majority of homes. This will help encourage sustainable travel patterns across the site;
- 6 This is a scheme that will meet its own community infrastructure needs and of the wider allocation as a whole. It will provide its own nursery provision, three primary schools and a secondary school. A new Government funded health hub will be delivered as well as community spaces. It is not reliant on off-site provision to meet its needs and has the space to foster a new sustainable community; and
- 7 MKE will be a climate-resilient neighbourhood. Responding to the impacts of climate change is embedded in the scheme's design from its drainage strategy, to the design of new

built development, to the encouragement of active travel and public transport across the site. MKE will ultimately deliver sustainable placemaking for the conditions of the future.

- 6.180 As part of the proposed development, it has been concluded there will be “*less than substantial harm*” to heritage assets. Given these effects, both heritage and planning legislation need to be considered in assessing the overall acceptability of the proposals. These are separate but overlapping provisions, with it being made clear through the Courts that the overall effect of the proposals on heritage matters – including effects on the setting of nearby listed building(s)– are to be considered first to arrive at an overall judgement on effects, with the conclusion then becoming part of the basis for planning consideration based on conformity with the statutory development plan and other material considerations.
- 6.181 The proposed development also involves the loss of a relatively few number of existing trees which present potential veteran features but may or may not be concluded as veteran. In accordance with Paragraph 175(c)of the NPPF, development that results in the loss of irreplaceable habitats (which includes the loss of veteran trees) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 6.182 In respect of both of these harms it is considered that the relevant tests set out are met and that within the overall planning balance, the benefits of the scheme outweigh these harms and do so comprehensively.
- 6.183 Overall, this is an allocated site which is shown above to comply with overall provision of the statutory development plan, with no significant material factors weighing against the proposal. It will deliver significant planning and social value benefits from the delivery of new homes, new employment uses, new community infrastructure and new accessible green infrastructure. The benefits arising taken together from this development clearly and demonstrably, significantly outweigh its adverse effects in the context of development on an allocated site that has secured Government funding.

## 7.0 Planning Obligations and Conditions

7.1 Government guidance on planning conditions and obligations is set out in the NPPF and the national Planning Practice Guidance.

7.2 The NPPF states that LPAs “...should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition” (para 54).

7.3 The NPPF also notes that planning conditions should be kept to a minimum and only imposed where they are “...necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects” (para 55). Guidance notes that they should be tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls. In relation to obligations, these should only be sought where these are:

- 1 Necessary to make the development acceptable in planning terms;
- 2 Directly relevant to the development; and
- 3 Fairly and reasonably related in scale and kind to the development.

7.4 In general, the applicant considers it important that sufficient flexibility should be built into conditions or obligations to take into account changes that may occur over the lifetime of the development to allow for any changes in market demand, best practice or policy/guidance, such that the development is not held-up or stalled. This is of particular importance for a scheme of MKE’s scale and phasing.

7.5 The applicant has held early discussions with MKC on planning obligations and conditions via pre-application engagement.

### Planning Obligations

7.6 The Heads of Terms for Section 106 relevant to this planning application have been submitted as a separate document to support this planning application.

7.7 Milton Keynes East will be the subject of a “Tariff” agreement. The MK Tariff seeks to set a ‘roof tax’ type mechanism for the contribution to, and funding of, wider infrastructure provision which will mitigate the impact that growth at MKE will have on the provision of wider community services. This will be set at a given amount per unit to contribute towards provision of new/improved infrastructure within Milton Keynes to include:

- 1 Strategic Infrastructure such as:
  - a Higher education (MK University/MK College, adult education)
  - b Transport (Grid Roads, major roads and public transport)
  - c Health (primary and acute care and hospital expansion)
  - d Flooding and drainage
  - e Carbon offsetting
  - f Emergency services
  - g Other including voluntary sector and inward investment.
- 2 Local Infrastructure such as:
  - a Education (early years, schools and post-16)



- b Open space and sports (playing fields, play areas, community halls, parks, swimming pools, sports halls, allotments and commuted sums for maintenance)
- 3 Social infrastructure such as:
  - a Libraries;
  - b Adult continuing education;
  - c Crematorium/burial grounds
  - d Museums and archives
  - e Waste management
  - f Public art; and
  - g Social care

7.8 The tariff agreement would be enshrined within a Section 106 agreement which would also set required affordable housing provision. A draft of the tariff agreement is already in discussion with the LPA, but would ensure that any residual impacts from the scheme can be addressed. A Section 278 agreement will be entered into for the applicant to deliver any necessary works or improvements to the existing adopted highway.

## Conditions

7.9 It is anticipated that the planning permission will be subject to numerous conditions and the applicant welcomes the opportunity to discuss these with the Council as consultee responses are received and the application progresses. The wording and structuring of the conditions should enable the development to proceed in phases over an extended period of time.

7.10 It is envisaged that, at least from the applicant's perspective, the conditions around the following will be necessary (and these have been initially discussed with MKC):

- 1 Conditions setting out approved drawings for both the detail and outline elements.
- 2 A condition setting out a timescale for implementation of the permission including a timescale for submission of a first reserved matters application and a timescale for submission of all reserved matters (a 'long-stop date' reflecting the phased nature of development). The applicant considers the long-stop date for reserve matters should be no less than 20 years from the date of permission, with then five years to implement (i.e. to approximately 2042 against an estimated overall construction period to 2048).
- 3 Conditions limiting the amount and use of the development. This is to ensure the nature of development permitted reflects that sought and tested (e.g. via the Environmental Impact Assessment) and will include residential amounts (maximum units), employment amounts and uses (maximum floorspaces), and community uses (maximum floorspaces by uses and locations within site).
- 4 A condition on retail amounts, use, unit sizes and phasing, to ensure this is limited to a form and timing of provision that would be the right size for MKE and ensure net impacts on nearby town centres from the development are positive. Initial retail impact modelling suggests this would include not occupying more than 3,000 sqm of the retail (convenience, comparison, and food and beverage) floorspace within the community hub before 800 homes are built and 4,000 sqm across the site until 1,100 homes are built.
- 5 Conditions on the detailed element requiring submission of, and MKC agreement to, plans for proposed signage and lighting.

- 6 A condition requiring submission of a Construction and Environmental Management Plan (CEMP) or equivalent setting out details of construction working to protect amenity, environmental receptors, important features, minimise emissions/dust etc. This should require a CEMP by element and phase as well as a Travel Plan and would also include requirement for related plans such as:
  - a a Construction Logistics Plan;
  - b a Site Waste Management Plan; and
  - c arrangements/details for the demolition of existing buildings.
- 7 A condition requiring a Landscape and Ecological Management Plan to set out the programme for management of newly created habitats.
- 8 A condition on archaeological mitigation, including a mechanism for agreeing with MKC how and what development can come forward on the parcel of land identified as subject to further archaeological investigation.

## 8.0 Summary and Conclusions

- 8.1 This Planning Statement has been prepared by Lichfields on behalf of St James to accompany a hybrid application for a sustainable urban extension comprising: in outline 4,000 up to 4,600 new homes, 403,650 sqm of employment space, a community hub and community use, a secondary school, three primary schools and open space; and in detail new highways giving access to the site comprising upgrades to Tongwell Street and new grid roads, including a new bridge over the M1 motorway. This proposed development and masterplan has been formed following an extensive and ongoing process of local engagement with Milton Keynes Council, local people and other interested bodies on the development of Milton Keynes East, which will continue through to further detailed reserve matters submissions.
- 8.2 Policy SD12 of the adopted Milton Keynes Local Plan, Plan:MK, identifies the site as part of a wider allocation for around 5,000 new homes and 105ha of employment at Milton Keynes East, to be brought forward subject to successful funding and delivery of strategic infrastructure. Following a bid made by Milton Keynes Council, and supported by St James, Milton Keynes East secured £94.6 million of funding from Government's Housing Infrastructure Fund to deliver up-front strategic infrastructure including highways (part of the detailed component of this application), a primary school and a health hub (part of the outline component of this application). This funding comes with certain stipulations, meaning Milton Keynes East needs to be brought forward in a timely fashion. It can do so in accordance with the Policy SD12 allocation.
- 8.3 Paragraph 38 of the NPPF sets out that Local Planning Authorities should *“approach decisions on proposed development in a positive and creative way... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”* This planning application – on an allocated site within an adopted local plan, which will significantly contribute towards improving the economic, social and environmental conditions of Milton Keynes – is a perfect example of where this principle applies.
- 8.4 Overall, it is considered that the proposal is for a sustainable new development that, when assessed against the statutory development plan, and in light of other material considerations, should be granted planning permission. The development has a wide number of substantial benefits and the proposed development positively addresses and adequately mitigates the main potential impacts of delivering the urban extension. These aspects of the proposed development include:
- 1 4,000 up to 4,600 **new homes** - including 1,240 affordable homes and homes for later living - all provided within a mix of size and types to deliver a balanced and sustainable new neighbourhood to Milton Keynes, helping to meet local housing needs;
  - 2 Delivering good **economic growth** and securing substantial economic benefits for Milton Keynes, helping to align with the Milton Keynes' long term growth ambitions with the MK 2050 strategy and Government's objectives for the Cambridge-Oxford Arc. This would include delivery of 403,650 sqm of employment floorspace and creation of around 5,900 new jobs;
  - 3 A new **sustainable** community supported by a full range of community facilities including three primary schools, a secondary school, a health centre, varied community spaces and a community hub with central square and mix of shops, restaurants and retail services;
  - 4 A **landscape lattice** of green routes and spaces, delivering a green and blue infrastructure strategy centred on a new 63ha District Park encompassing a linear park along the River Ouzel and a new east-west park along Moulsoe Stream connecting to Moulsoe New Wood

on the eastern edge (total provision of 84ha). A significant amount of the masterplan is given over to green space, including new allotments, burial spaces, play spaces, parks, sports pitches and attractive watercourses, swales and attenuation features;

- 5 Up-front delivery of **strategic infrastructure**, funded by Government following a successful joint bid by MKC and St James, to unlock Milton Keynes East. This will include new highways creating an extension to the Grid Road network and a new bridge over the M1 to alleviate impacts on Junction 14, as well as early delivery of health and school infrastructure.
- 6 Net gains on **biodiversity** enhancing nature across the site, with protection and enhancement of wildlife corridors and the planting of at least 250,000 new trees across the site. This and other public benefits will more than offset and balance out the narrow areas of habitat harm to some existing trees that will arise from the development.
- 7 Promoting **sustainable transport** choices with the masterplan creating 15-minute neighbourhoods where walking and cycling for day-to-day needs is the norm, and a mass rapid transit system – safeguarded as part of the design, with the opportunity to create an intensity of use which supports its viability – providing longer-distance onward travel.

8.5 Taken together, the principle and detail of the development is considered to accord overall with the Development Plan as well as the material considerations of the MKE Development Framework Supplementary Planning Document and national policies contained within NPPF. The site boundaries are slightly different to those arising from the site allocation, but the changes are considered *de minimis* in the context of the scheme. It is considered that limited planning harm arises from the proposed development; and in the areas where planning harm does arise - such as in respect of potential veteran trees and less than substantial heritage harm - these are narrow, specific and clearly outweighed by the wider public benefit that the scheme would generate. Overall, the planning balance is such that the substantial benefits and exceptional design of the scheme would outweigh such identified harm. We consider there are no material considerations which would support a refusal of permission and conclude that the hybrid planning permission should therefore be granted.



# Appendix 1 Full Planning History

Application Reference	Location	Application Description	Decision and Date
20/02484/EIASCO	Land To The West And East of London Road Moulsoe	EIA Scoping opinion for proposed development to the east of the M1 motorway, south of Newport Pagnell, to provide a sustainable urban extension to Milton Keynes	EIA Scoping Opinion Issued 30/11/20
20/01881/EIASCO	Land At Willen Road Willen Road Newport Pagnell Milton Keynes	EIA Scoping Opinion request made in relation to the land at Willen Road for up to 800 dwellings with associated works	EIA Scoping Opinion Issued 14/10/20
17/00355/NMA	Units 1-3 Baileys Depot Newport Road Moulsoe Newport Pagnell MK16 OHS	Non material amendment to planning permission 16/02769/FUL to reduce the height of the brick plinth on 3 of the elevations	Permitted 18/05/17
17/00259/DISCON	Units 1-3 Baileys Depot Newport Road Moulsoe Newport Pagnell MK16 OHS	Details submitted pursuant to discharge of conditions 3 (external materials) and 4 (landscape scheme) attached to planning permission 16/02769/FUL	Approved 31/05/17
16/02769/FUL	Units 1-3 Baileys Depot Newport Road Moulsoe Newport Pagnell MK16 OHS	Demolition of 468 sq. m of existing warehouse and erection of new warehouse.	Permitted 04/01/17
16/03424/EIASCR	Replacement Sewer Pipeline Willen Road Newport Pagnell	Screening opinion in respect of a proposed relining of an existing sewage pipeline between Cotton Valley Water Recycling Centre and Newport Pagnell Pumping Station	EIA not required 19/12/16
15/02799/ADV	Roundabout Sponsorship Tickford Roundabout Milton Keynes	Advertisement consent for four non illuminated signs	Permitted 29/12/15
15/02473/ADV	Renny Lodge Roundabout Renny Park Road Newport Pagnell	Advertisement consent to display three non illuminated signs	Consent granted 23/11/15
12/01871/MIN	Hermitage Farm Newport Road Moulsoe Newport Pagnell MK16 OHR	Application for variation of condition 3 of 11/00398/MIN to allow works to continue for a further 18 months	Permitted 20/11/12
12/00331/ANOT	Hermitage Farm Newport Road Moulsoe Newport Pagnell MK16 OHR	Notification of intention to erect a shed with photo voltaic panels on south facing roof	Approved 12/03/12
11/01148/FUL	Moulsoe Grain Store London Road Newport Pagnell	Installation of photovoltaic panels on south facing roof of grain store	Permitted 15/07/11

Application Reference	Location	Application Description	Decision and Date
11/00398/MIN	Hermitage Farm Newport Road Moulsoe Newport Pagnell MK16 0HR	Application for variation of condition 3 of 06/01851/MIN and condition 3 of 09/01282/FUL to allow works to continue for a further 18 months.	Permitted  25/05/11
10/02658/ANOT	Moulose Buildings London Road Newport Pagnell	Notification of the erection of a farm workshop	Approved  13/11/11
09/01282/FUL	Hermitage Farm Newport Road Moulsoe Newport Pagnell MK16 0HR	Variation of condition 3 attached to planning permission number 06/01851/MIN to extend work for further 18 months	Permitted  27/01/10
09/00511/ANOT	Tickford Fields Farm North Crawley Road Newport Pagnell Buckinghamshire MK16 9HG	Agricultural notification for erection of a corn storage barn	Approved  06/05/09
08/00302/ADV	Land Along A5130 And A4146 (Broughton), A421 (Kingston) And A509 From Rooksley To A509 Brook Furlong Milton Keynes	Advertisement consent for installation of thirty two lamppost mounted directional signs	Withdrawn  14/05/08
08/00019/ANOT	Hermitage Farm Newport Road Moulsoe Newport Pagnell Buckinghamshire MK16 0HR	Agricultural notification for the erection of a new general purpose agricultural building	Approved  07/02/08
07/00240/FUL	Moulsoe Buildings Farm London Road Moulsoe Newport Pagnell Buckinghamshire MK16 0JA	Erection of grain store	Permitted  02/05/07
06/01851/MIN	Hermitage Farm Newport Road Moulsoe Newport Pagnell Buckinghamshire MK16 0HR	Construction of a noise attenuation bund	Permitted  17/10/07
05/01263/CLUE	Pineham Motocross Track Off Tongwell Street Pineham Milton Keynes	Certificate of lawfulness for existing use of land as motocross track	Unlawful Use  12/05/06
04/02147/ADV	Renny Lodge Roundabout Renny	Four non-illuminated roundabout sponsorship signs	Consent granted



Application Reference	Location	Application Description	Decision and Date
	Park Road/A509 Newport Pagnell Buckinghamshire		25/01/05
03/00356/ANOT	Hermitage Farm Newport Road Moulsoe Newport Pagnell Buckinghamshire MK16 0HR	Notification to erect silo for grain storage	Approved  08/04/03
99/01074/MKADV	Tickford Roundabout London Road Newport Pagnell Buckinghamshire	Erection of four non-illuminated free standing signboards	Consent granted  22/09/19

## **Appendix 2 Planning Policy Matrix**



Theme	NPPF (2019)	Plan:MK (2019)	Development Framework SPD (2020)	Other Supplementary Planning Guidance & Documents
Land Use Principles	<ul style="list-style-type: none"> <li>7-14 Achieving sustainable development</li> <li>117-123 Making effective use of land</li> <li>80-82 Building a strong, competitive economy</li> </ul>	<ul style="list-style-type: none"> <li>Policy DS2 (Housing Strategy)</li> <li>Policy SD9 (General Principles for Strategic Urban Extensions)</li> <li>Policy SD10 (Delivery of Strategic Urban Extensions)</li> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy CC6 (Burial and Memorial Grounds)</li> </ul>	<ul style="list-style-type: none"> <li>Section 3.4 (Core Concept)</li> <li>Figure 3.1 (Concept Plan)</li> <li>Figure 4.4</li> <li>Section 4.4 (Land Use)</li> <li>Figure 4.7 (Indicative Development Framework Plan)</li> </ul>	<ul style="list-style-type: none"> <li>Planning Practice Guidance ('PPG') (CLG; 2014, 2017-2020)</li> </ul>
Housing	<ul style="list-style-type: none"> <li>59- 76 Delivering a sufficient supply of homes</li> <li>117-123 Making effective use of land</li> </ul>	<ul style="list-style-type: none"> <li>Policy DS2 (Housing Strategy)</li> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy HN1 (Housing Mix and Density)</li> <li>Policy HN2 (Affordable Housing)</li> <li>Policy HN4 (Amenity, Accessibility, and Adaptability)</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.4 (Land Use)</li> </ul>	<ul style="list-style-type: none"> <li>Nationally Described Standards (March 2015)</li> <li>New Residential Development Design Guide (2012)</li> <li>Affordable Housing SPD (2020)</li> </ul>
Economic Development and Activity	<ul style="list-style-type: none"> <li>80 – 82 Building a strong, competitive economy</li> </ul>	<ul style="list-style-type: none"> <li>Policy DS3 (Employment Development Strategy)</li> <li>Policy DS4 (Retail and Leisure Development Strategy)</li> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy ER1 (Employment Sites Within the Borough of Milton Keynes)</li> <li>Policy ER10 (Assessing Edge of Centre and Out of Centre Proposals)</li> <li>Policy ER14 (New Local Centres)</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.4 (Land Use)</li> </ul>	
Design	<ul style="list-style-type: none"> <li>91-95 Promoting healthy and safe communities</li> </ul>	<ul style="list-style-type: none"> <li>Policy D1 (Designing a High Quality Place)</li> <li>Policy D2 (Creating a positive character)</li> <li>Policy D3 (Design of buildings)</li> </ul>	<ul style="list-style-type: none"> <li>Figure 4.1</li> <li>Section 4.2 (Landscape and Open Space Strategy)</li> <li>Section 4.5 (Character)</li> </ul>	<ul style="list-style-type: none"> <li>New Residential Development Design Guide (2012)</li> </ul>

Theme	NPPF (2019)	Plan:MK (2019)	Development Framework SPD (2020)	Other Supplementary Planning Guidance & Documents
	<ul style="list-style-type: none"> <li>124-132 Achieving well-designed places</li> </ul>	<ul style="list-style-type: none"> <li>Policy D5 (Amenity and Street Scene)</li> <li>Policy EH7 (Promoting Healthy Communities)</li> <li>Policy CC1 (Public Art)</li> </ul>	<ul style="list-style-type: none"> <li>Table 4.3 (Indicative Character Typologies)</li> <li>Figure 4.6</li> <li>Section 6.3 (Design Codes)</li> </ul>	<ul style="list-style-type: none"> <li>National Planning Policy Framework and National Model Design Code: consultation proposals (January 2021) (Emerging Policy)</li> </ul>
Open Space and Landscape	<ul style="list-style-type: none"> <li>96-98 Open space and recreation</li> </ul>	<ul style="list-style-type: none"> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy NE4 (Green Infrastructure)</li> <li>Policy NE5 (Conserving and Enhancing Landscape Character)</li> <li>Policy L4 (Public Open Space Provision in New Estates)</li> </ul>	<ul style="list-style-type: none"> <li>Section 2.12 (Conclusions)</li> <li>Section 3.4 (Core Concept)</li> <li>Section 4.2 (Landscape and Open Space Strategy)</li> </ul>	<ul style="list-style-type: none"> <li>Planning Obligations SPD for Leisure, Recreation and Sports Facilities (2005)</li> <li>Milton Keynes Landscape Character Assessment (2016)</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>184-202 Conserving and enhancing the historic environment</li> </ul>	<ul style="list-style-type: none"> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy HE1 (Heritage and Development)</li> </ul>	<ul style="list-style-type: none"> <li>Section 2.9 (Heritage and Surrounding Built Character)</li> </ul>	
Environment, Energy, Sustainability	<ul style="list-style-type: none"> <li>148-169 Meeting the challenge of climate change, flooding and coastal change</li> <li>170-183 Conserving and enhancing the natural environment</li> </ul>	<ul style="list-style-type: none"> <li>Policy NE1 (Protection of Sites)</li> <li>Policy NE2 (Protected Species and Priority Species and Habitats)</li> <li>Policy NE3 (Biodiversity and Geological Enhancement)</li> <li>Policy NE6 (Environmental Pollution)</li> <li>Policy NE7 (Protection of the Best and Most Versatile Agricultural Land)</li> <li>Policy SC1 (Sustainable Construction)</li> <li>Policy SC2 (Community Energy Networks and Large-Scale Renewable Energy Schemes)</li> <li>Policy SC3 (Low Carbon and Renewable Energy Generation)</li> <li>Policy D4 (Innovative design and construction)</li> </ul>	<ul style="list-style-type: none"> <li>Section 2.10 (Environment)</li> <li>Section 4.6 (Sustainability)</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable Construction SPD (2007)</li> <li>Draft Biodiversity SPD (Emerging)</li> <li>Draft Sustainable Construction SPD (Emerging)</li> </ul>
Drainage and Flooding	<ul style="list-style-type: none"> <li>148-169 Meeting the challenge of climate</li> </ul>	<ul style="list-style-type: none"> <li>Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>Policy FR1 (Managing Flood Risk)</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.6 (Sustainability)</li> </ul>	<ul style="list-style-type: none"> <li>Milton Keynes Drainage Strategy SPG (2004)</li> </ul>

Theme	NPPF (2019)	Plan:MK (2019)	Development Framework SPD (2020)	Other Supplementary Planning Guidance & Documents
	change, flooding and coastal change	<ul style="list-style-type: none"> <li>• Policy FR2 (SUDS and Integrated Flood Risk Management)</li> <li>• Policy FR3 (Protecting and Enhancing Watercourse)</li> </ul>		
Transport	<ul style="list-style-type: none"> <li>• 102-111 Promoting Sustainable Transport</li> </ul>	<ul style="list-style-type: none"> <li>• Policy SD12 (Milton Keynes East Strategic Urban Extension)</li> <li>• Policy CT1 (Sustainable Transport Network)</li> <li>• Policy CT2 (Movement and Access)</li> <li>• Policy CT3 (Walking and Cycling)</li> <li>• Policy CT5 (Public Transport)</li> <li>• Policy CT6 (Low Emission Vehicles)</li> <li>• Policy CT8 (Grid Road Network)</li> <li>• Policy CT10 (Parking Provision)</li> </ul>	<ul style="list-style-type: none"> <li>• Section 3.4 (Core Concept)</li> <li>• Section 4.3 (Movement Framework)</li> <li>• Table 4.2 (Street Hierarchy)</li> <li>• Figure 4.2a</li> <li>• Figure 4.2b</li> <li>• Figure 4.3a</li> <li>• Figure 4.3b</li> <li>• Figure 4.4</li> <li>• Figure 4.5</li> </ul>	<ul style="list-style-type: none"> <li>• Parking Standards SPD (2016)</li> </ul>
Planning Obligations	<ul style="list-style-type: none"> <li>• 54-57 Planning conditions and obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Policy INF1 (Delivering Infrastructure)</li> </ul>	<ul style="list-style-type: none"> <li>• Section 5.2 (Infrastructure Delivery)</li> </ul>	<ul style="list-style-type: none"> <li>• Planning Obligations for Education Facilities SPG (2004)</li> <li>• Planning Obligations SPD for Leisure, Recreation and Sports Facilities (2005)</li> <li>• Social Infrastructure Planning Obligations SPD (2005)</li> <li>• Milton Keynes Urban Development Area Tariff SPD (2007)</li> <li>• Planning Obligations SPD (2021)</li> <li>•</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• [to add]</li> </ul>	<ul style="list-style-type: none"> <li>• Policy INF1 (Delivering Infrastructure)</li> <li>• Policy D9 (Mains and Telecommunications services)</li> <li>• Policy CT9 (Digital Communications)</li> </ul>	<ul style="list-style-type: none"> <li>• Section 2.11 (Utilities)</li> <li>• Section 4.4 (Land Use)</li> <li>• Section 4.6 (Sustainability – in respect of Telecommunications)</li> </ul>	<ul style="list-style-type: none"> <li>• Planning Obligations SPD for Leisure, Recreation and Sports Facilities (2005)</li> <li>• Social Infrastructure Planning Obligations SPD (2005)</li> </ul>

Theme	NPPF (2019)	Plan:MK (2019)	Development Framework SPD (2020)	Other Supplementary Planning Guidance & Documents
		<ul style="list-style-type: none"> <li>• Policy EH1 (Provision of New Schools – Planning Considerations)</li> <li>• Policy EH2 (Provision of New Schools – Site Size and Location)</li> <li>• Policy EH5 (Health Facilities)</li> <li>• Policy EH6 (Delivery of Health Facilities in New Development)</li> <li>• Policy CC2 (Location of Community Facilities)</li> <li>• Policy CC4 (New community facilities)</li> <li>• Policy CC5 (Childcare facilities)</li> </ul>	<ul style="list-style-type: none"> <li>• Section 5.2 (Infrastructure Delivery)</li> <li>• Section 6.5 (Indicative Programme and Milestones)</li> </ul>	

# Appendix 3 Housing Statement



Refer to separate pdf document for Housing Statement

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# Appendix 4 Retail Impact Assessment

Refer to separate pdf document for Retail Statement

