

CALDECOTE FARM

NEWPORT PAGNELL · MILTON KEYNES

SUPPORTING DOCUMENT

PLANNING STATEMENT

JULY 2021

PLANNING STATEMENT

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PLANNING STATEMENT

EXECUTIVE SUMMARY

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This outline planning application is submitted on behalf of Newlands Developments and proposes employment development on land at Caldecote Farm, east of the M1 and adjacent to Willen Road, Newport Pagnell.

The application seeks Outline planning permission for a commercial development (Use Class B8), in line with the following description of development:

Outline application for the development of storage and distribution (Use Class B8) floorspace, with ancillary offices and associated infrastructure, including access, parking, servicing and landscaping.

The scheme proposes landscaping around the perimeter of the site. Off-site highway improvements are proposed, including improved pedestrian linkages and modifications to the Marsh End Roundabout.

Milton Keynes benefits from locational advantages which make it extremely attractive to logistics operators. The application site is well located to suit and serve a wide range of logistics requirements. Market demand for large scale buildings has continued to grow over recent years and throughout the last 18 months occupational demand for good quality and well-located distribution facilities has remained strong. The COVID-19 Pandemic has accelerated pre-existing trends around e-commerce growth, such that a decade's worth of growth occurred in only a matter of months. Since beginning to promote the site the applicant has received a number of enquires.

The application site lies within an area identified as a Strategic Urban Extension in the recently adopted Plan:MK. The Council's aspirations for the site allocation are set out through Policy SD12 'Milton Keynes East Strategic Urban Extension' (MKESUE). The Policy outlines proposals for a comprehensive new residential and employment development, to meet the long term needs of Milton Keynes.

Policy SD12 is supplemented by the Strategic Urban Extension Supplementary Planning Document which provides the guiding principles and framework for the allocated site.

Policy SD12 establishes a series of nine points which set out the Council's ambitions for the delivery of the site allocation. This planning application accords with all of these points. The Policy identifies that the allocation site should be delivered through a 'masterplanned' approach. A masterplan is submitted in support of this planning application and the applicant has worked collaboratively with Bloor Homes who are delivering development on the adjacent parcel of land.

However, the application site is separated from the rest of the allocated area of land by Willen Road. In this regard it forms its own discrete parcel, which can be delivered now without impacting on the delivery of the remainder of the site allocation.

The highways works proposed through this application will not only mitigate the impacts of the proposed development and deliver improvements for the wider area, but they will also help to resolve existing issues. In addition, the scheme will deliver some of the important highway works necessary for the delivery of the wider site allocation.

A planning application was submitted by a different applicant (SEGRO (Newport Pagnell) Limited) in respect of the site in 2018 ('the 2018 Application'), which was supported by a named occupier, but due to delays in the application process the occupier went elsewhere and the application was withdrawn.

SEGRO (Newport Pagnell) Limited made a further planning application in 2019 ('the 2019 Application'). This application was refused at Committee in June 2020, for five specific reasons: (1) Principle – the Council was concerned that infrastructure funding for the wider allocation had not yet been secured. (2) Highways – the Council was concerned that permitting the application could prejudice forthcoming highway infrastructure improvements associated with the wider allocation. (3) Residential Amenity – the Council was concerned that the nature of the development could have a detrimental impact on residential amenity and could be overbearing in nature. (4) Planning Obligations – the Council had not established their Tariff Framework Agreement for seeking equitable contributions by developers across the site allocation. (5) Landscape and Character Area – the Council was concerned that sufficient depth for landscaping and screening the development had not been provided.

These matters have been addressed through this new application which includes a reduced overall floorspace and increased landscaping to the perimeter of the site. The Council has now secured the necessary infrastructure funding and a draft Tariff Framework Agreement has been prepared. In addition, the applicant has worked collaboratively with Bloor Homes regarding the delivery of their residential development on the adjacent parcel of land within the site allocation. The Bloor proposals include a set-back buffer to respond to this context.

The market continues to be buoyant. Indeed, the COVID-19 pandemic has increased the need for logistics floorspace underpinned principally by increased growth in e-commerce. The form of development proposed through this application would help to narrow the supply-demand gap at this location.

This outline planning application presents the opportunity to bring forward part of the employment element of the MKESUE, to meet the existing and immediate demand for floorspace. It also enables the early delivery of important infrastructure, which will benefit the wider allocation, as this is brought forward.

The scheme is carefully designed to ensure it does not prejudice the delivery of the remainder of the MKESUE. It will sit within the landscape as a stand-alone employment facility, but with excellent connectivity to the surrounding area. It is envisaged that the form, type and scale of development will complement the uses being brought forward on the remainder of the site allocation.

The benefit of bringing this part of the allocation forward now is that the proposed new employment units will help to screen motorway noise from any new housing development on nearby land, providing immediate mitigation to forthcoming proposals from the outset of delivery within the wider allocation area.

The application proposes a sustainable form of development, which is sensitive to the site's setting. The development would be constructed from high quality materials; it will be supported by extensive landscaping; it will include sustainable drainage features; and benefits from good accessibility to a choice of transport modes. The scheme has been designed to complement Milton Keynes Council's ambitions for growth and prosperity.

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1.0 INTRODUCTION

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1.1 This Planning Statement is submitted in support of an Outline planning application for commercial development on land east of the M1, Willen Road, Newport Pagnell.

1.2 The description of development is:

Outline application for the development of storage and distribution (Use Class B8) floorspace, with ancillary offices and associated infrastructure, including access, parking, servicing and landscaping.

1.3 This application seeks to strike the appropriate balance between the need to provide new employment development and the need to protect and, where possible, enhance the existing environment.

1.4 The application site is situated within an area allocated in Milton Keynes Council's Plan:MK as a Strategic Urban Extension, which is identified to help deliver for the long term housing and employment needs of Milton Keynes.

1.5 The application seeks to deliver a high quality development, providing employment opportunities for people living within Milton Keynes and Newport Pagnell, as well as for any new residents of the strategic allocation as this is brought forward.

1.6 This Planning Statement explains how this is achieved; describes the site and its surrounding context; provides the relevant planning history for the site; sets out the application proposals in detail; identifies relevant planning policy and guidelines; and goes on to appraise the suitability of the proposals having regard to these policies.

1.7 Under the Environmental Impact Assessment Regulations the site is considered EIA development and therefore the application is accompanied by an Environmental Statement.

1.8 The purpose of this Planning Statement is to provide the Local Planning Authority and interested parties with the information necessary to appraise the application proposals against the wide range of established policies and guidance.

1.9 This Planning Statement is structured as follows:

Section 2

Provides a detailed background of the relevant planning history for the site.

Section 3

Describes the site and surrounding area, providing a detailed description of the surrounding context, the existing site conditions and the opportunities and constraints presented by these.

Section 4

Describes the application proposals in detail.

Section 5

Identifies the relevant planning policy guidance.

Section 6

Sets out a detailed appraisal of the application with regard to the relevant policies and guidance. It considers the application in terms of the sustainability and suitability of the proposals, with specific regard to the reasons for refusal for the previous application and also having regard to the conclusions of the Environmental Statement.

Section 7

Draws together our conclusions.

- 1.10 The application is supported by a number of other reports and statements, these are:
- Application plans and drawings
 - Market Report
 - Design and Access Statement
 - Sustainability Strategy
 - Statement of Community Consultation
 - A full Environmental Statement

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PLANNING STATEMENT

2.0 BACKGROUND

2.0 BACKGROUND

2.1 PLANNING HISTORY AND PRE-APPLICATION ADVICE

- 2.1.1 The 2019 Application (reference: 19/02402/FUL) was made by a different Applicant (SEGRO (Newport Pagnell) Limited) in September 2019. No technical concerns were raised from consultees and the proposed highway strategy was agreed with both Highways England and the Highways Authority who provided responses of 'no objection' to the application.
- 2.1.2 However, in the week leading up to Planning Committee in June 2020, a consultee response was received from the Council's Landscape Officer highlighting concerns around residential amenity and landscape character. The Council also separately raised concerns that the funding for the wider site allocation had not been fully secured and that the Tariff Framework Agreement was not in place. To that end, the proposals were deemed to be 'premature'.
- 2.1.3 As a result of these matters, the application was refused at the 18th June Planning Committee for the following reasons: (1) Principle – the Council was concerned that infrastructure funding for the wider allocation had not yet been secured. (2) Highways – the Council was concerned that permitting the application could prejudice forthcoming highway infrastructure improvements associated with the wider allocation. (3) Residential Amenity – the Council was concerned that the nature of the development could have a detrimental impact on residential amenity and could be overbearing in nature. (4) Planning Obligations – the Council had not established their Tariff Framework Agreement for seeking equitable contributions by developers across the site allocation. (5) Landscape and Character Area – the Council was concerned that sufficient depth for landscaping and screening the development had not been provided.
- 2.1.4 Since the refusal of the 2019 Application, the current applicant's team has continued to liaise with the Council regarding the site, discussing the various technical matters, including planning principles; the reasons for refusal; and progress with the rest of the MKESUE.
- 2.1.5 In addition, the applicant has positively engaged with Bloor Homes, as developers of the land directly adjacent to the application site, with regard to their proposals. These constructive discussions have enabled a collective understanding and joined-up response to the emerging proposals for both development schemes, including the boundary treatments at the interface of the two developments at Willen Road.
- 2.1.6 In direct response to the Council's concerns the proposed landscape buffer zone within the application site has been increased. Further, the Bloor Homes application also includes a landscaped buffer zone, with the proposed dwellings set back within their site.
- 2.1.7 The work undertaken since the refusal of the 2019 Application has helped to inform the proposals submitted in this application.

2.2 RELEVANT HISTORICAL APPLICATIONS

- 2.2.1 The 2018 Application was a 'hybrid' planning application, which was submitted by SEGRO (Newport Pagnell) Limited in July 2018 (ref: 18/01719/FUL) following positive dialogue with Milton Keynes Council's planning officers.
- 2.2.2 The application proposed a storage and distribution unit for a named operator along with an enterprise park comprising small B1b, B1c and B2 units.
- 2.2.3 No technical concerns were raised from consultees and again the proposed strategy was agreed with both Highways England and the Highways Authority who provided responses of 'no objection' to the application. Notwithstanding, feedback was received from the Council that the timing of the application did not align with the timescales of adopting their Local Plan: Plan:MK (which was still progressing through the consultation and Examination stage at this time).

- 2.2.4 As a result of this feedback, SEGRO (Newport Pagnell) Limited decided that the application should be withdrawn to allow further discussions to take place, in advance of preparing a new planning application for the site. This was the 2019 Application.
- 2.2.5 Whilst there is no other recent planning history relevant to the redevelopment of the Caldecote Farm site, the site has been subject to a number of other applications which are of note, these are:
- Application ref: 03/00422/min – Construction of site access, extraction of sand and gravel, restoration to agriculture using imported inert fill and in situ overburden and soils. Permission granted: 9th July 2003.
 - Application ref: 06/00106/min – Modification of Condition 5 of planning permission 03/00422/min to change the extraction of sand and gravel and in filling phases. Permission granted: 22nd May 2006.
 - Application ref: 06/01096/min – Recycling of aggregates. Permission granted 22nd December 2006

2.3 PLAN:MK SITE ALLOCATION

- 2.3.1 As described elsewhere in this Planning Statement, the application site is situated within a wider area allocated for development in the recently adopted Plan:MK. Full details of the site allocation and associated policy are set out in Section 5 of this Statement. The recent history of the site, leading to its allocation is set out through the following paragraphs.

Minerals Local Plan

- 2.3.2 The Minerals Local Plan (2006) identified the Caldecote Farm site (both the application site and land on the opposite side of Willen Road) as a sand and gravel extraction site with planning permission.
- 2.3.3 In 2017, a replacement Minerals Local Plan for Milton Keynes was adopted to replace the 2006 Plan. Referring to land to the east of Willen Road (opposite the application site), the Caldecote Farm site was identified as one of four sites with planning permission for sand and gravel extraction.

Core Strategy (2013)

- 2.3.4 The adopted Core Strategy (2013) proposed the expansion of the edges of the main urban area of Milton Keynes. No allocations were proposed on or around land South or Newport Pagnell to the east of the M1 motorway. This followed a similar approach to expansion as set out in the previous Local Plan (2001–2011), which was adopted in 2005.

Plan:MK Strategic Development Directions Consultation (January – April 2016)

- 2.3.5 The 2016 Strategic Development Directions Consultation outlined a series of options for strategic growth in and around the City. Land East of the M1 Motorway was identified as Option 2 and originated from a series of 'Vision Workshops' where participants envisaged a substantial settlement mirroring the character of Milton Keynes.

Submission Version of Plan:MK (October 2017)

- 2.3.6 The site was initially allocated in the Draft Plan:MK in March 2017, where Policy DS2 envisaged a mixed residential and employment strategic allocation.
- 2.3.7 The Caldecote Farm site was then identified in the Submission Version of Plan:MK as a strategic site allocation, under Policy SD14, which identified the site for "new residential and employment development to meet the long-term needs of Milton Keynes". This overarching objective for the site allocation has been carried forward in the adopted Plan:MK through Policy SD12.

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3.0 THE SITE AND SURROUNDING AREA

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- 3.1 The application site is roughly triangular in shape and extends to approximately 19.3 Hectares. It is located directly to the south of Newport Pagnell and to the east of Milton Keynes.
- 3.2 To the north the site borders the A422 (Monks Way) dual carriageway, which extends across to the M1, which forms the site's south-western boundary. To the east the site boundary is formed by the single carriageway Willen Road, which similarly extends to the M1, forming the site's triangular shape.
- 3.3 This Site Context Plan below shows the site's position in context:

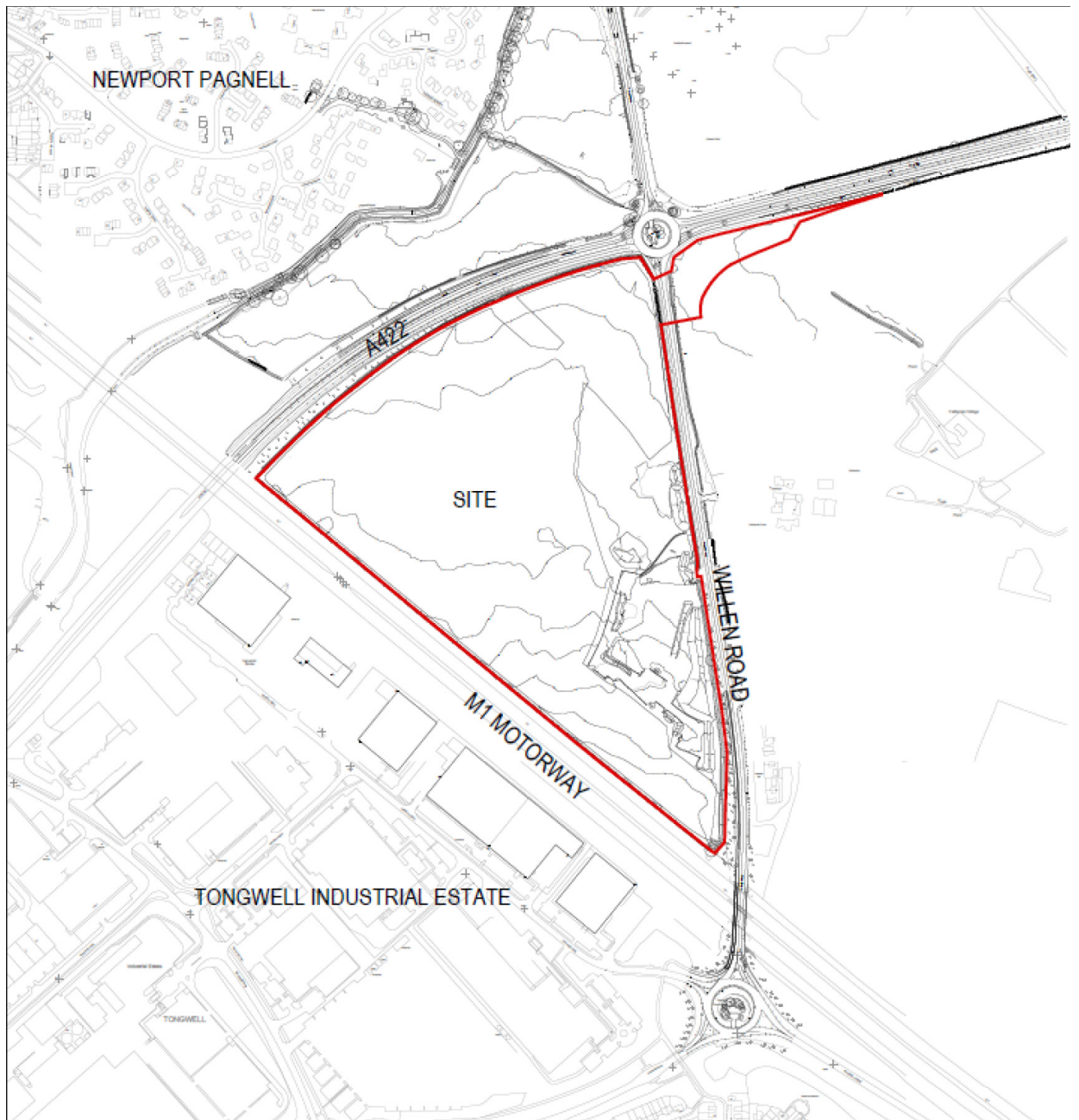
Caldecote Farm, East of M1: Site Context Plan



- 3.4 The site's topography is relatively flat, having been restored back to agricultural use from its former use for sand and gravel extraction. Given this former use, the site is devoid of any features of landscape or ecological importance.
- 3.5 The site is enclosed by a high hedge with a gap part way along Willen Road which provides vehicular access to the site. There remains small deposits of sand and gravel within the site boundary and adjacent to the site access.
- 3.6 There is an access which serves a small cluster of dwellings (known as Glenfield) on the opposite side of Willen Road. This access track also serves the more remote dwellings known as Moat Cottage and Caldecote Cottage. Adjacent to Glenfield is an access to a sand and gravel extraction quarry. Further along Willen Road, closer to the southern corner of the application site, is a traveller site with six pitches.

3.7 The Site Location Plan below shows the site:

Site Location Plan



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4.0 THE PROPOSAL

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4.1 DETAILED DESCRIPTION OF DEVELOPMENT PROPOSALS

4.1.1 This application seeks outline planning permission for the development of up to 78,429 sqm of storage and distribution (Class B8) floorspace with ancillary offices on land at Caldecote Farm, adjacent to Willen Road.

4.1.2 The description of development is:

Outline application for the development of storage and distribution (Use Class B8) floorspace, with ancillary offices and associated infrastructure, including access, parking, servicing and landscaping.

4.1.3 The application is made in outline and therefore the detailed design of the units and final layout of the scheme remain unknown at this stage.

4.1.4 However, as is the nature of outline planning applications, the documentation submitted in support of this application establishes the principle of what could be delivered on the site.

4.1.5 The proposals deliver several key elements, including:

- Formation of new vehicular access from Willen Road to serve the site as a whole.
- Ground modelling work, including the creation of development plateaus, earth bunding alongside the M1 motorway and landscaped areas to provide visual and acoustic screening.
- Provision of surface water attenuation features.
- Improvements to the Marsh End roundabout to improve traffic flow and ease congestion (with associated highway surface water drainage).

4.1.6 The Parameters Plan for the site is contained overleaf. It identifies the proportion of the site which can accommodate built development, alongside the proportion of the site which must be set aside for landscaping and green infrastructure provision.

4.1.7 The developable area of the site would house the building units together with all service yards, HGV parking and staff parking, which would include disabled parking bays, motorcycle parking and bike shelters. This area of the site would also contain the individual plot landscaping which is in addition to the wider green infrastructure being provided as part of the proposals.

Landscape Parameters Plan



4.2 INFRASTRUCTURE

- 4.2.1 Although the application is made in outline, the application proposes a package of on and off-site infrastructure improvements to mitigate any potential impact of the development. These are proposed in response to Milton Keynes Council's pre-application feedback and are discussed in detail in the supporting Transport Assessment and through Chapter 12 of the Environmental Statement.
- 4.2.2 The highways works proposed through this application will not only mitigate the impacts of the development and deliver improvements for the wider area, but they also help to resolve existing issues. In addition, the works proposed through this application will deliver some of the important highway works necessary for the delivery of the remainder of the MKESUE.
- 4.2.3 A summary of the proposed improvements package is below:
- Comprehensive mitigation package to deliver improvements to the function and capacity of the Marsh End roundabout, including enlargement and signalisation.
 - New signal controlled junction to serve the site.
 - Upgrading to Willen Road.
 - New bus stops on Willen Road adjacent to the site access, including raised kerbs, shelters with seating and real-time information display screens.
 - A Redway (pedestrian/cycleway) along Willen Road to connect to existing routes towards Newport Pagnell and the existing H4 Redway Super Route at the Tongwell Roundabout to the south
 - New traffic signal controlled Toucan crossings at the site access, across Willen Road and at the Marsh End roundabout on the A422 (east)
 - On-site, secure, covered cycle parking close to building entrances
 - New pedestrian and cycleways on each side of the new site access
 - On site surface water drainage ponds to sustainably control the rate of surface water discharge
 - Off-site surface water attenuation feature adjacent to the south eastern edge of the Marsh End roundabout to mitigate against the impact of additional hard surfacing as part of the Marsh End highway improvement works.

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5.0 PLANNING POLICY

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5.1 NATIONAL PLANNING POLICY FRAMEWORK

- 5.1.1 National planning policy is set by the National Planning Policy Framework (NPPF). The NPPF seeks to promote sustainable development, in order to meet the development needs of the Country. The ‘presumption in favour of sustainable development’ lies at the heart of the NPPF, to ensure that sustainable development is positively pursued.
- 5.1.2 The NPPF states that there are three dimensions to sustainable development:
- An economic role, ensuring sufficient land of the right type is available, in the right place, at the right time, to support growth;
 - a social role, supporting strong, vibrant and healthy communities, through ensuring that a sufficient number and range of homes are provided to meet the needs of present and future generations; and
 - an environmental role, to enhance the natural environment.
- 5.1.3 For decision-taking paragraph 11 explains that the presumption in favour of sustainable development means approving proposals without delay, which accord with the Development Plan.
- 5.1.4 Section 3 of the NPPF deals with plan-making. At paragraph 20 it identifies that strategic policies should “set out and overall strategy for the pattern, scale and quality of development” including making provision for, inter alia, employment and commercial development. Paragraph 22 goes on to state that:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure.”*
- 5.1.5 Section 4 sets out national requirements for decision-making. Paragraph 38 directs that Local Planning Authorities should approach decision making on development proposals in a positive and creative way and that decision makers at every level should seek to approve applications for sustainable development where possible.
- 5.1.6 Paragraphs 39 to 46 discuss pre-application engagement and front loading. They identify that *“early engagement has a significant potential to improve the efficiency and effectiveness of the planning application system for all parties.”*
- 5.1.7 With regard to determining planning applications, paragraph 47 identifies that planning law *“requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”*
- 5.1.8 Planning conditions and obligations are also dealt with through Section 4. Paragraph 55 identifies that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions and obligations, stating that obligations should only be used where it is not possible to address unacceptable impacts through planning conditions.
- 5.1.9 Paragraph 56 explains 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.”* The paragraph also identifies that agreeing conditions early in the process is beneficial to all involved and can speed up decision making. In addition, planning conditions *“that are required to be discharged before development commences should be avoided, unless there is a clear justification.”*
- 5.1.10 Section 6 deals with building a strong, competitive economy. Paragraph 81 advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adopt. Furthermore, it advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
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- 5.1.11 Paragraph 82 requires planning policies to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”
- 5.1.12 Paragraph 83 advises that planning policies and decisions should recognise and address the specific locational requirements of different sectors. It goes on to say that this includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 5.1.13 Section 8 deals with policies to promote healthy communities. It recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It encourages the creation of healthy, inclusive and safe places which:
- a) Promote social interaction, including allowing for easy pedestrian and cycle connections;
 - b) are safe and accessible; and
 - c) enable and support healthy lifestyles, again, including through encouraging walking and cycling.
- 5.1.14 In this context, paragraph 100 identifies that planning policies and decisions should take opportunities to provide better facilities, for example, by adding links to existing rights of way.
- 5.1.15 Section 9 of the NPPF identifies policies to promote sustainable transport. The Government recognises that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Paragraph 104 states that transport issues should be considered from the earliest stages of plan-making and development proposals so that:
- “the potential impact of the development on transport networks can be addressed;*
- opportunities from existing and proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- opportunities to promote walking, cycling and public transport use are identified and pursued;*
- the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*
- 5.1.16 Paragraph 111 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.1.17 Paragraph 113 advises that all developments that will generate significant amounts of movement should be required to provide a travel plan and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 5.1.18 Achieving well-designed places is dealt with through Section 12 of the NPPF. It states that high quality buildings and places are fundamental to what the planning and development process should achieve. It seeks to ensure that developments:
- “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- are visually attractive as a result of good architecture, layout and appropriate landscaping;*
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

establish or maintain strong sense of place, using the arrangement of street spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

optimise the potential of the site to accommodate and sustain as appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

- 5.1.19 Paragraph 132 states that design quality should be considered throughout the evolution and assessment of proposals, advocating taking account of the views of the community.
- 5.1.20 Policies for meeting the challenge of climate change, flooding and coastal change are set out in Section 14. With regard to climate change, paragraph 154 states that new development should be planned in ways that avoid increased vulnerability to the range of impacts arising from climate change and which can help to reduce greenhouse gas emissions, such as through location, orientation and design.
- 5.1.21 Paragraph 157 advises that in determining planning applications, Local Planning Authorities should expect new development to, inter alia, “take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”
- 5.1.22 Flood risk is dealt with through paragraphs 159 to 169 of the NPPF. Policy seeks to steer developments, where possible, to locations which are not at risk from flooding and to ensure that development does not result in an increased risk of flooding elsewhere.
- 5.1.23 Section 15 deals with conserving and enhancing the natural environment. It states that planning policies and decisions “should contribute to and enhance the natural environment”. This can be achieved by minimising impacts on, and providing net gains for, biodiversity.
- 5.1.24 With regard to ground conditions and pollution, paragraph 183 requires that planning decisions ensure that a site is suitable for its proposed use, taking into account ground conditions and any risks arising from land instability and contamination.
- 5.1.25 Paragraph 185 identifies that planning policies and decisions should also ensure that development is appropriate for its location with regard to pollution, considering the likely effects (including cumulative effects) on health, living conditions and the natural environment.
- 5.1.26 Paragraph 186 seeks to ensure that decisions sustain and contribute towards compliance with values or national objectives for pollutants, taking account of air quality management area and clean air zones. It also seeks to ensure that opportunities to improve air quality or mitigate impacts are identified.

5.2 NATIONAL PLANNING PRACTICE GUIDANCE

- 5.2.1 The National Planning Practice Guidance (NPPG) is an online based Government guidance platform. Following a period of public consultation, it was launched in March 2014. It replaces and consolidates 7,000 pages of previous planning guidance on a range of topics including flood risk, heritage and design. The NPPG provides supplementary and supporting context for the NPPF and should therefore be read in conjunction with the NPPF.
- 5.2.2 The NPPG also provides general procedural guidance on matters including the use of planning conditions and obligations as well as on planning appeals. The document provides guidance on issues of prejudice and prematurity alongside providing detailed technical guidance for both authorities and applicants on the production of planning studies, such as housing and economic land availability assessments.

5.3 LOCAL PLANNING POLICY

5.3.1 Local planning policy is set by Milton Keynes Council's Plan:MK. The Plan was adopted in March 2019 and covers the Plan period of 2016 – 2031. Plan:MK sets out the vision and objectives for Milton Keynes over the Plan period. The strategic objectives include:

"To allocate and manage the development of employment land and pursue a vigorous economic development strategy so that the business sector and local economy are supported, existing firms can expand, new firms are attracted, the level of working skills among the local population is enhanced and the area's resident population can find employment locally."

5.3.2 The sustainable development strategy identifies that the Council will provide land for a minimum of 30,900 new homes and forecasts around 28,000 to 32,000 additional new jobs.

5.3.3 Chapter 3 sets out the Council's Sustainable Development Strategy which reflects the NPPF's 'presumption in favour of sustainable development'. Paragraph 3.6 states that the Council will:

"seek to ensure that all development takes full account of, and strikes the balance between, economic, social and environmental factors, with the relative weight to be given to these elements being dependent on the specific circumstances of a development scheme/local plan and the local area allowing flexibility to respond to local circumstances"

5.3.4 Further, paragraph 3.7 states that the Council is committed to achieving sustainable development and "will give favourable consideration to proposals" which, inter alia, will contribute to delivering a strong, flexible and sustainable economy. Plan:MK will "need to take advantage of economic opportunities, and meet the needs of existing and future residents, business and visitors, whilst protecting and enhancing the natural and historic environment and addressing the issues of climate change."

5.3.5 Chapter 4 sets out Milton Keynes' development strategy. Policy DS1 sets out the Settlement Hierarchy for Milton Keynes. The highest tier in the hierarchy is Milton Keynes City, which includes 'New Strategic Growth Areas', incorporating 'Land East of the M1' in this group. Newport Pagnell is identified in the second tier as a Key Settlement.

5.3.6 Paragraphs 4.26 to 4.28 discuss the context of the Strategic Urban Extension at land east of the M1, stating:

"Plan:MK allocates land to the east of the M1 motorway, south of Newport Pagnell, for a mixed residential and employment strategic urban extension to meet the long term needs of Milton Keynes. The development of this site is dependent on the necessary strategic infrastructure, required to make the site deliverable before 2031, being funded and delivered up-front.

If the necessary infrastructure can be funded and delivered prior to 2031, then the development will be allowed to proceed within the plan period...."

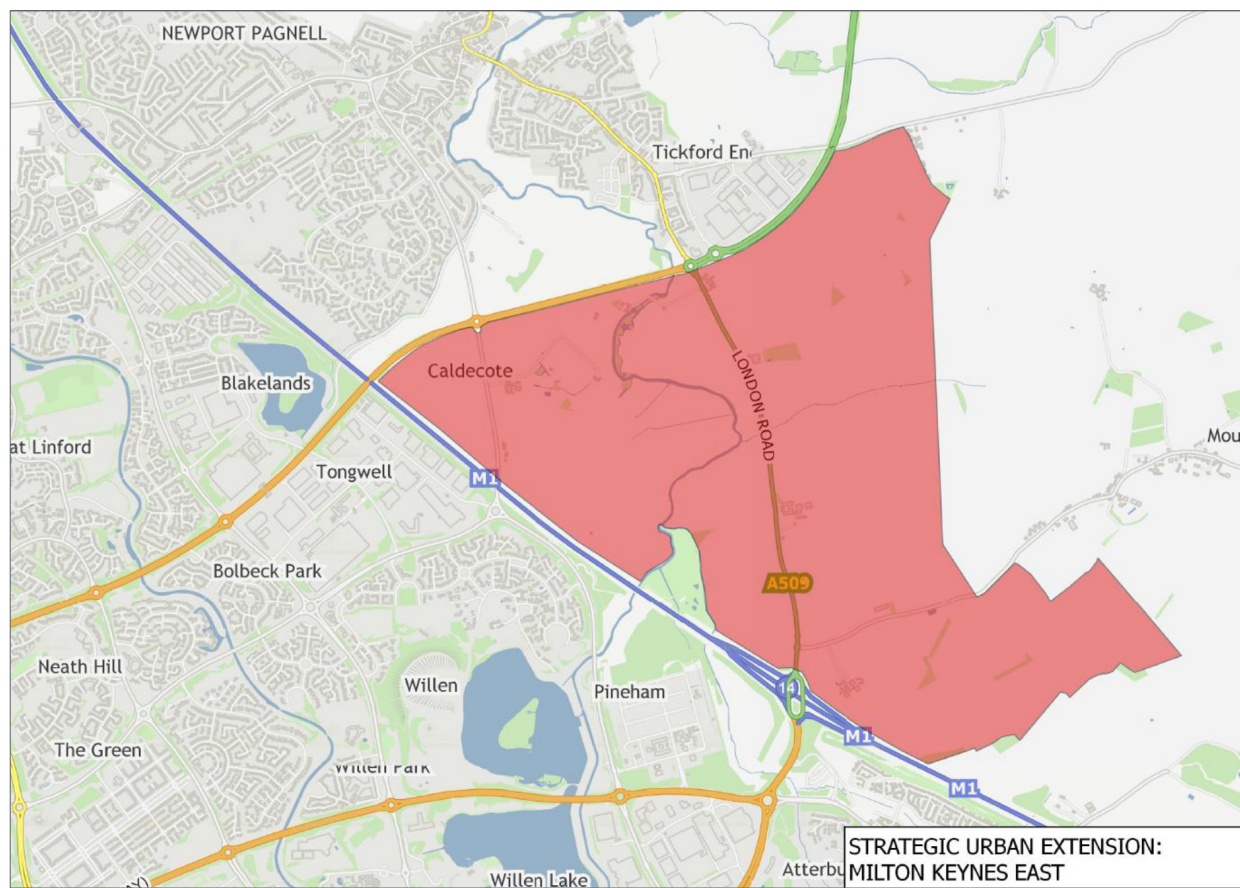
5.3.7 The Plan continues, stating that there may be further potential for growth in this direction beyond that envisaged in the allocation, but that this would require cross-boundary co-operation and further improvements to connectivity: these will be considerations for the review of Plan:MK, which is defined through Policy DS0 and will take place no later than December 2022.

5.3.8 With regard to future employment provision in the Borough, paragraph 4.41 of Plan:MK highlights that Milton Keynes has "a superb geographical location halfway between London and Birmingham and Oxford and Cambridge". Further, "It is well connected to the rest of the country by the West Coast Main Line and A5, which pass through the city and the M1 motorway to the east of the city. East-west links will improve in the future with the extension of east-west rail services; a new national expressway between Cambridge Milton Keynes and Oxford; and improvements to the A421."

5.3.9 The Plan also identifies that the Borough is one of the fastest growing in the UK, with a large, diverse and dynamic local economy. It identifies that Milton Keynes has performed better than many other parts of the UK because it is dominated by the private sector, with the Borough having around four private sector jobs for every one public sector job. Additionally, "At £10.5 billion in 2015, the local economy is bigger than that of Northampton and Luton and approaching that of some of England's major cities such as Leicester and Nottingham."

-
- 5.3.10 Paragraph 4.43 identifies that around half of the Borough's jobs are in employment within the 'B' Use Class for planning, which includes offices, factories and warehouses.
- 5.3.11 Policy DS3 (Employment Development Strategy) sets out the Council's aspiration to grow and develop the Milton Keynes economy. The Policy cites Milton Keynes' relationship between London and Birmingham and how it is part of the knowledge-intensive cluster being developed in the Cambridge – Milton Keynes – Oxford corridor. Policy DS3 encourages training and skills development, seeks to attract new businesses and encourages existing businesses to grow.
- 5.3.12 Chapter 5 deals with the Strategic Site Allocations. The introduction to the Chapter (paragraph 5.1) explains that the Chapter provides specific policies to guide strategic development which will help to deliver the Development Strategy, as set out in Chapter 4. There are also policies to guide the ongoing development of the western and eastern expansion areas.
- 5.3.13 Policy SD1 (Place-making Principles for Development) defines a series of principles that need to be adhered to as part of new development, which includes new strategic urban extensions. These principles include measures to promote good health; connectivity; integration; high quality design and architecture (design, scale, materials and layout, including consideration of the principles which shaped the original city, such as redways and integrated flood management); energy reduction; sustainable water management; provision of social and commercial facilities; public transport; landscaping and green infrastructure; public realm; accessibility; improvements to the road network and sustainable travel; and support for park and ride facilities.
- 5.3.14 Policy SD9 (General Principles for Strategic Urban Extensions (SUEs)) requires that proposals for SUEs and the documents produced in line with Policy SD10 (Delivery of Strategic Urban Extensions) to guide their development, should be prepared in accordance with the principles set out in the Policy. Policy SD9 will also be applied to any planning applications for unallocated strategic development sites.
- 5.3.15 The process for the delivery of SUEs is set out through Policy SD10, which states:
- A) "To ensure that Strategic Urban Extensions are brought forward in a strategic and comprehensive manner, planning permission will only be granted for land within Strategic Urban Extensions, following the approval by the Council of a comprehensive development framework, incorporating any necessary design codes, or phasing of development and infrastructure delivery, including green infrastructure delivery, for the Strategic Urban Extension as a whole.*
- B) Development frameworks will be produced by the Council in conjunction with and with the support of the developer(s). Development frameworks will also be prepared in partnership with landowners, adjoining local planning authorities, parish or town councils, infrastructure providers, regional and local agencies and services, statutory consultees, the Parks Trust and other stakeholders. Development frameworks will be prepared in consultation with the local community. The Council will adopt development frameworks as supplementary planning documents to guide future planning applications."*
- 5.3.16 The application site lies within a wider site area which is allocated for development through Policy SD12 (Milton Keynes East Strategic Urban Extension). Policy SD12 allocates the SUE for "a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes".
- 5.3.17 The Site Allocation Plan, overleaf, identifies the extent of the SUE:
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Site Allocation Plan: Milton Keynes East, Strategic Urban Extension



5.3.18 The supporting text for the Policy states that the allocation site is envisaged to provide a SUE after 2031 (the end of the Plan:MK Plan period). However, the reason for this is centred on the need for further infrastructure funding to be in place, the bid for which has been made to Government by Milton Keynes Council. The supporting text confirms that if the bid is successful, then development of the site will be allowed to come forward prior to 2031 and this is confirmed through the Policy wording, which states:

“Development can commence once the necessary strategic infrastructure required to make the site deliverable is funded and is being delivered. In that circumstance, the development of the site will be allowed to proceed within the plan period as an additional source of housing and employment land supply.”

5.3.19 Policy SD12 reiterates the requirements of Policies SD9 and SD10 for a comprehensive development framework to be prepared for the delivery of the allocation, with the supporting text identifying that the Council will support a masterplanned approach.

5.3.20 The Policy itself states that the development framework and subsequent applications will establish the quantum and form of development in more detail and lists the criteria which proposed development of the site will be expected to meet, as follows:

1. “Delivery of around 5,000 new homes, including at least 1,475 homes within the plan period, providing a range of sizes, types and tenures, including affordable housing, in accordance with other policies in the Plan.
2. Around 105 hectares of land for a mix of employment uses, complementing the role and function of CMK.
3. Associated infrastructure including primary and secondary education, community facilities, health, retail and local services and a hotel. The development should comprise at least one district centre and/or local centre(s), of scale commensurate to the needs of the new community and that would not adversely affect the viability of Newport Pagnell district centre, with a co-location of key facilities.

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/M11 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.
7. 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.
8. The creation of a linear park through the site that broadly correlates with the River Ouzel floodplain and existing green infrastructure assets of value within and adjacent to it.
9. Be informed by appropriate surveys of archaeology, built heritage and ecology with appropriate mitigation of impact as consistent with other policies of the Plan and the NPPF. An archaeological field study, including Geophysical Survey, where appropriate following desk-based assessment, will be required to identify potential below ground archaeology. Where feasible, the Council will expect below ground archaeology to be kept in situ in preference to removal."

- 5.3.21 Transport and connectivity are dealt with through Chapter 8. Policies CT1 (Sustainable Transport Network) and CT2 (Movement and Access) seek to promote sustainable patterns of development, reduce the need to travel and reduce dependence on the private car. Policies CT3 (Walking and Cycling) and CT4 (Crossover on Redways) supports development that enables access to various services, including employment, by walking and cycling and that protects and enhances redways.
- 5.3.22 Policy CT5 (Public Transport) requires that developments meet the needs of public transport operators, whilst Policy CT6 (Low Emission Vehicles) seeks to maximise the use of sustainable transport in developments, including providing electric charging points.
- 5.3.23 Policy CT7 has regard to freight and states that the Council will work with stakeholders to maximise the potential benefits of the East West Rail link and the Oxford to Cambridge Expressway.
- 5.3.24 Policy CT9 deals with Digital Communications and advises that the Council wishes to see all new developments served by digital communication services providing at least superfast broadband speeds, but ideally using fibre technology. It also seeks other forms of digital infrastructure such as facilities to support mobile phones, broadband and Wi-Fi.
- 5.3.25 Parking Provision is considered through Policy CT10. The Policy requires that parking areas are well designed and that employment developments provide electric vehicle charging points.
- 5.3.26 Chapter 9 (Education and Health) identifies the Council's ambitions with regarding to increasing access to education and promoting health through the Plan period. Policy EH7 specifically deals with 'Promoting Healthy Communities'. It states that the Council is committed to reducing health inequalities and increasing life expectancy within the Borough. It advises that development proposals should be designed to achieve this by, inter alia:

"Creating and enhancing cycling and walking networks and their environments, such as maintaining and extending the redway network into new developments, as well as supporting the connectivity between local centres and attractions."

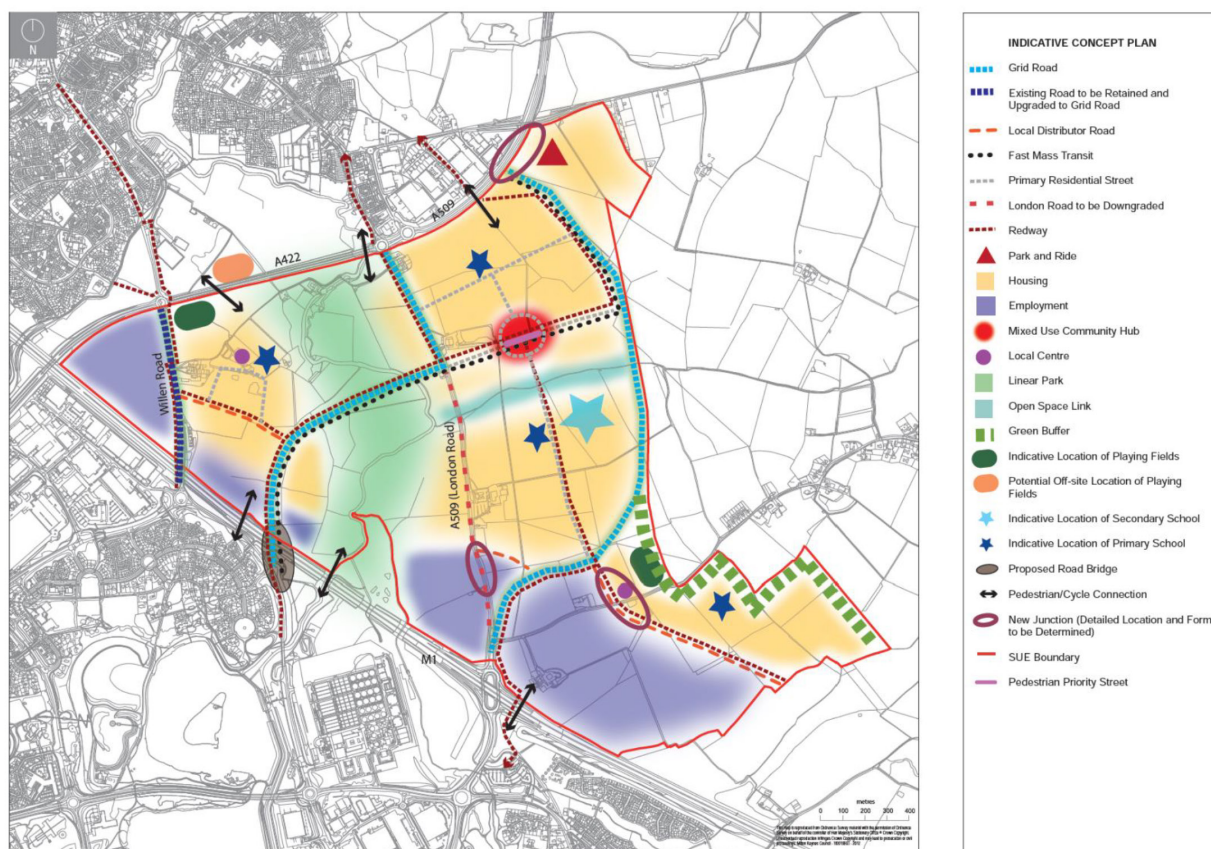
- 5.3.27 Infrastructure delivery is dealt with through Chapter 10. With regard to infrastructure and planning obligations, the Chapter reflects the requirements of the NPPF, noting at paragraph 10.4 that planning obligations should meet three tests: they should be necessary to make the development acceptable in planning terms; they need to be directly related to the development; and they should be fairly and reasonably related to the scale and kind of development.
- 5.3.28 In this context, Policy INF1 (Delivering Infrastructure) sets the criteria for infrastructure delivery. The Policy states:
- “A. New development that generates 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 that development is either:*
- 1. Already in place; or*
 - 2. There is a reliable mechanism in place to ensure that infrastructure, facilities and resources will be delivered in the most appropriate places and at the earliest opportunity, to the required minimum high standards demanded by this Council and its partners. This might include improvements for highways schemes such as bus and rail provisions and enhancement for walking and cycling facilities, or the provision of improved and better connected green infrastructure, local health, shopping and recreational facilities.*
- B. The Council will prepare a new Planning Obligations Supplementary Planning Document to cover infrastructure and service requirements, including site-specific infrastructure to be delivered through Section 106 agreements. Where a developer delivers early infrastructure in advance of, or prior to development, then the ‘abnormal’ costs of this infrastructure provision will be credited against future planning obligations for the site.
- C. Where appropriate, the Council will permit developers to provide the necessary infrastructure and facilities themselves as part of the development proposals, rather than by making financial contributions, provided that these included funded proposals for long term management and maintenance.
- D. If applicable, the Council will give consideration to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or over a period of time to ensure that the provision of infrastructure is delivered in a timely manner and to meet the Council’s expectations. Therefore, conditions or a planning obligation may be used to secure this phasing arrangement. All infrastructure provision should ensure that it is provided to meet the needs of future growth and take into account external growth of the site.
- E. In the case of a number of developments in close proximity, the Council will seek voluntary agreements from developers to contribute towards the costs of jointly required infrastructure, therefore improving the accessibility of the development, reducing the need for statutory S106 contributions and enhancing the attractiveness of the development to potential buyers.
- F. The above policy should be read in conjunction with Policy SD10 which outlines the Council’s requirements for providing infrastructure provision for strategic urban extensions.”
- 5.3.29 Chapter 11 has regard to managing and reducing flood risk. Policy FR1 (Managing Flood Risk) requires that all new developments incorporate a surface water drainage system, to demonstrate that capacity is available to accommodate the proposed development. The Policy states that Plan:MK will seek to steer all new development towards areas with the lowest probability of flooding, reflecting the NPPF’s sequential test approach. Where appropriate, developments will be required to provide a Flood Risk Assessment to support the proposals, this includes all sites within Flood Zones 2 and 3 and all sites of above 1 hectare located in Flood Zone 1.
- 5.3.30 Policy FR2 (Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management) identifies that Plan:MK advocates the continuation of a strategic, integrated approach to managing flood risk, seeking to ensure that the management of surface water is planned at the largest appropriate scale for new developments and is incorporated into the site at the earliest opportunity. The Policy sets out the Council’s expectations in this regard, including the need to design in an allowance for climate change. It also highlights the opportunity which SUDS present to maximise environmental, biodiversity, social and amenity value of developments.

- 5.3.31 Environment, Biodiversity and Geodiversity is dealt with through Chapter 12. Policy NE2 (Protected Species and Priority Species and Habitats) seeks to protect statutorily protected species and their habitats, whilst Policy NE3 (Biodiversity and Geological Enhancement) aims to maintain and protect biodiversity and geological resources and, where possible, enhance biodiversity in accordance with the vision set out in the Buckinghamshire and Milton Keynes Natural Environment Partnership (NEP).
- 5.3.32 Policy NE4 (Green Infrastructure) seeks to protect and enhance the network of Green Infrastructure for its biodiversity, accessibility, health and landscape value and for the contribution it makes towards combatting climate change.
- 5.3.33 Policy NE6 (Environmental Pollution) seeks to ensure that developments do not have an unacceptable impact on human health, general amenity, biodiversity or the wider natural environment, having regard to contaminated land, air quality, noise and vibration and light pollution.
- 5.3.34 Design is dealt with through Chapter 15. Policy D1 (Designing A High Quality Place) advises that development proposals will be permitted provided that they satisfy a series of objectives/principles, including the need to respond to the site context; to locate buildings to face the street or public space; to maximise surveillance of the public realm; to provide landscaping and suitable boundary treatments; and to ensure the ease of movement by creating places which are permeable and well connected, delivering connectivity and legibility.
- 5.3.35 Policy D2 (Creating a Positive Character) requires that developments are appropriately designed in terms of layout, massing/scale, boundary treatments and landscaping, allowing for visual interest.
- 5.3.36 The design of buildings is dealt with through Policy D3, which sets out the criteria for securing high quality design in new development. The Policy aims to ensure that the appearance of buildings contributes to a positive character, with distinctive architecture and is of appropriate scale/massing.
- 5.3.37 Policy D5 (Amenity and Street Scene) reiterates the requirements for a good standard of design with regard to both the built element and open space aspects of schemes.
- 5.3.38 Chapter 16 deals with culture and community with Policy CC1 (Public Art) stating that a minimum of 0.5% of the gross cost of proposals for non-residential development of 1,000sqm or more should be subject to viability and allocated towards cultural wellbeing. This includes public art, which the Policy states can enhance the cultural offer and appearance of developments. However, the Policy does not advise as to how these contributions will be sought.
- 5.3.39 Chapter 17 sets out the Council's policies for sustainable construction and renewable energy. Policy SC1 (Sustainable Construction) states that where non-residential developments of 1,000sqm or more do not achieve a BREEAM Outstanding rating, the Council's construction requirements for dealing with materials and waste, energy and climate and water apply.

5.4 OTHER MATERIAL CONSIDERATIONS

- 5.4.1 Milton Keynes East Strategic Urban Extension Development Framework Supplementary Planning Document
- 5.4.2 In March 2020 Milton Keynes Council adopted their Development Framework Supplementary Planning Document (SPD) for the whole of the MKESUE. The SPD is designed to complement and supplement Policy SD12 of the Local Plan, through providing the guiding principles and framework.
- 5.4.3 The document provides the detail of how the Council expects the development of the MKESUE to progress and sets out their ambitions for the whole site allocation. It describes the allocation site and its context, the development principles and the framework within which all development of the MKESUE should fit, establishing land use and development delivery protocol.
- 5.4.4 The land use and development delivery are clearly identified through the document's Concept Plan, which is contained overleaf. The Concept Plan identifies Willen Road and demarcates the separate employment and housing zones within the SUE. The application site is identified as purple (for employment), on land to the west of Willen Road.

Milton Keynes East SUE SPD Concept Plan



5.4.5 The SPD sets out the Council's expected standards for the design of the development, including, for example, road widths and infrastructure delivery requirements.

5.4.6 The 'vision' expressed through the SPD is to create a bespoke masterplan-led new settlement for "the 21st Century that will be sustainable, successful and prosperous in its own right."

South East Midlands Local Industrial Strategy

5.4.7 In July 2019 the South East Midlands Local Enterprise Partnership (SEMLEP) published the South East Midlands Local Industrial Strategy. The Strategy provides a framework for the area and identifies how the SEMLEP will achieve the Government's ambitions and long-term plan to boost productivity, investment in skills, industries and infrastructure.

5.4.8 Page 7 of the Strategy identifies the SEMLEP's ambitions, which include providing "an exemplary business environment, with high-quality commercial premises and support for incubator, scale-up, innovation, trade and investment activity within the Arc."

5.4.9 With regard to infrastructure, the Strategy recognises the strategic position the SEMLEP area holds, specifically within the context of logistics development stating:

"As evidenced through the area's high popularity with logistics firms and Future of Mobility innovators, the SEMLEP area is extremely well located in order to connect with key markets in the UK and abroad."

5.4.10 Consequently, the SEMLEP will:

“work with partners to support an extensive and balanced pipeline of employment land and premises in the area, which takes account of market intelligence and strategic infrastructure.....increase promotion of the SEMLEP area to prospective investors, including through the preparation of relevant materials to encourage inward investment, and by working in partnership with local authorities, developers and commercial agents to help match prospective businesses with appropriate employment land.”

5.4.11 With regard to commercial premises, the Strategy identifies that “The lack of suitable employment premises was the third most commonly reported constraint on business growth in the SEMLEP area, with 27 per cent of businesses citing this as a constraint in 2017.”

CALDECOTE FARM

NEWPORT PAGNELL · MILTON KEYNES

SUPPORTING DOCUMENT

PLANNING STATEMENT

6.0 DESIGN PRINCIPLES

6.0 APPRAISAL OF THE APPLICATION

6.1 INTRODUCTION

6.1.1 This section of the Planning Statement appraises the application against the relevant local and national planning policies. It also brings together the key findings of the various documents submitted in support of this planning application, to reach a logical conclusion about the merits of the scheme proposed through this application.

6.2 PLAN:MK POLICY SD12: MILTON KEYNES EAST STRATEGIC URBAN EXTENSION

6.2.1 Alongside its general planning policies, Plan:MK also includes specific policies for the proposed Strategic Urban Extensions (SUEs). Policy SD12 is one such policy which relates specifically to the MKESUE, within which the application site is located.

6.2.2 This sub-section of the Planning Statement deals with Policy SD12 in detail, setting out how the proposals subject to this application accord with the Policy and the ambitions of Milton Keynes Council for the delivery of the SUE.

6.2.3 The MKESUE seeks to deliver the long-term residential and employment needs of Milton Keynes beyond the Plan period (which extends to 2031). However, the supporting text for Policy SD12 notes that an infrastructure funding bid has been made to Government which, if successful, would enable the delivery of the allocation prior to 2031. Whilst the policy discusses the infrastructure funding required, it does not identify what the funding is proposed to pay for and therefore specifically how it relates to the delivery of the site.

6.2.4 Notwithstanding, Milton Keynes Council is working to deliver a Tariff Framework Agreement to cover the whole of the MKESUE. The applicant has engaged positively with the Council and other developers in this regard.

6.2.5 Demonstrably, the Council considers that the site allocation could be delivered, for the benefit of Milton Keynes, earlier than 2031. However, when the policy was adopted, uncertainty regarding funding was the reason that the site was not proposed to be delivered before this date. The necessary funding has now been secured.

6.2.6 The infrastructure proposed to be delivered through this scheme would mitigate the impact of the development, as well as delivering sustainable transport connections for the benefit of the wider area. In turn, this would reduce the overall level of infrastructure improvement work required as the wider site allocation is brought forward.

6.2.7 Indeed, the highways works will also help to resolve existing capacity issues whilst delivering some of the important highway works necessary for the delivery of the wider MKESUE.

6.2.8 In this context, the development proposed through this planning application is self-contained, i.e. it is not reliant on the external funding from the Council's Government bid and would deliver improvements which would not prejudice the wider site allocation including Bloor Homes scheme on the opposite side of Willen Road. Indeed, the proposed highway works have been discussed in detail with Bloor Homes to ensure that they meet their requirements for access as part of a co-ordinated approach.

6.2.9 Berkeley St James have submitted a planning application for the largest element of the SUE (ref: 21/00999/OUTEIS), which is currently with the Council pending determination. The Transport Assessment submitted with the Berkeley application identifies that the cumulative impacts of the SUE would require some improvement works to Marsh End Roundabout and that their assessment of the proposals put forward in support of this application would be capable of accommodating the traffic associated with the whole MKESUE.

6.2.10 The supporting text for Policy SD12 states that the Council will support a masterplanned approach to the delivery of MKESUE. A masterplan for the application site is submitted in support of this planning application. It demonstrates that, whilst the site forms part of the MKESUE, it is self-contained and segregated from the rest of the allocation by Willen Road.

6.2.11 A context masterplan has been prepared which shows the applicant's illustrative proposals in the context of the adjacent Bloor Home illustrative proposals. The context plan demonstrates the clear set back on both sides of Willen Road, between the road and the proposed built development in each site, providing a strong green infrastructure corridor either side of Willen Road.

6.2.12 The applicant has undertaken extensive discussions with Bloor Homes to bring forward a landscape scheme which both parties are comfortable with as part of a collaborative approach. The Context Overlay Plan is contained below:

Context Overlay Plan



6.2.13 Notwithstanding, Willen Road divides the allocation site into two distinct parcels of land and this division is evident through the MKESUE Supplementary Planning Document. This shows Willen Road, complemented by green infrastructure, as a buffer between the residential development proposed to the east of the road and the employment development, which would be delivered through this application, to the west.

6.2.14 In this regard, the masterplanned approach to this application accords with this overarching objective. It demonstrates how the site could accommodate the development proposed without precluding the delivery of the wider MKESUE, due to its separation from the rest of the scheme.

6.2.15 By bringing this employment development forward now, enabling its early delivery, the scheme would deliver explicit and implicit benefits:

- Explicitly, the development would provide vital floorspace for a buoyant commercial market, meeting the existing current demand. It would also deliver highways improvements which would immediately benefit existing residents and road users, through addressing current capacity issues and providing additional infrastructure. Importantly, these improvements would also facilitate the delivery of the wider allocation.
- Implicit benefits include screening motorway noise from any new housing delivered on adjacent land. This would deliver immediate mitigation for any forthcoming proposals, from the outset of delivery on the wider allocation area.

6.2.16 Policy SD12 establishes a series of nine points which the site allocation should deliver. This application accords with all of the relevant points. How the application achieves this is set out below, taking each point in turn:

1. "Delivery of around 5,000 new homes, including at least 1,475 homes within the plan period, providing a range of sizes, types, tenures, including affordable housing, in accordance with other policies in the Plan."

This planning application is for employment development only, to the west of Willen Road. The application site area is identified within the wider allocation for employment space, as demonstrated through the SPD. The proposals submitted through this application will not prejudice or restrict the capacity of the rest of the MKESUE to deliver the housing requirement in line with the policy. As highlighted by the British Property Federation (BPF) in their report 'What Warehousing Where?' (March 2019), there is an inextricable link between housing and warehousing such that the latter provides important infrastructure for servicing modern societal needs. As such, additional housing growth generates a need for more parcel or grocery deliveries which, in turn, generates a need for more warehouse space. It is important that a balance is struck in this regard and that residential and employment uses are co-located to reduce travel distances.

2. "Around 105 hectares of land for a mix of employment uses, complementing the role and function of CMK."

The planning application enables the delivery of approximately 24% of the employment land allocated through Policy SD12, in line with the relevant policies of Plan:MK, as set out in the sub-sections below.

3. "Associated infrastructure including primary and secondary education, community facilities, health, retail and local services and a hotel. The development should comprise at least one district centre and/or local centre(s), of a scale commensurate to the needs and vitality of Newport Pagnell district centre, with a co-location of key facilities."

The application proposals include the delivery of infrastructure along Willen Road. This will be for the benefit of the wider allocation area and beyond. This application does not impact on the ability of the site allocation to deliver all other proposed infrastructure requirements.

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."

As set out through the sub-sections below, this application delivers improvements to Willen Road and Marsh End Roundabout, including the delivery of additional bus stops; the continuation (extension) of a Redway, providing a new link from Tongwell Roundabout to Newport Pagnell; and on-site provision for a future fast mass-transit system. The proposals delivered through this application will mitigate the impacts of the development; improve the existing situation, through helping to resolve existing capacity issues; and deliver some of the necessary infrastructure for the wider site allocation.

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."

Land within the application site is safeguarded for the delivery of a fast mass-transit system.

6. "A network of segregated, and where appropriate, grade separated, new and enhanced footpaths, cycleways and bridleways (including redways) to connect existing routes beyond the site, including provision of appropriate pedestrian and cyclist crossings of the A422 and suitable and attractive crossings of the M1 as appropriate."

As described in detail through this Planning Statement and the Transport Assessment submitted in support of this application, the proposals include the delivery of a new extension to the Redway which currently terminates at Tongwell Roundabout. The proposal takes the route from the roundabout, along Willen Road, and connects to Newport Pagnell, providing appropriate crossing points at the A422.

7. "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."

A Concept Landscape Masterplan and Landscape Parameters Plan are submitted in support of this application. The Concept Landscape Masterplan presents the landscape proposals for the site. Where possible, existing planting within the site is retained, especially to the perimeter, where existing wildlife corridors are maintained. The extent of the perimeter landscaping buffer is set (and therefore safeguarded) through the Parameters Plan. Existing planting on the site will be supplemented with additional planting which will have ecological and biodiversity habitat benefits alongside helping to visually screen the development by filtering views from the surrounding area.

8. "The creation of linear park through the site that broadly correlates with the River Ouzel floodplain and existing green infrastructure assets of value within and adjacent to it."

This planning application does not impede the delivery of a linear park and is separated from the River Ouzel by Willen Road.

9. "Be informed by appropriate surveys of archaeology, built heritage and ecology with appropriate mitigation of impact as consistent with other policies of the Plan and the NPPF. An archaeological field study, including a Geophysical Survey, where appropriate following desk-based assessment, will be 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."

The application is supported by a detailed Geotechnical and Geo-environmental Ground Conditions Report which is appended to the Geology and Groundwater Chapter of the Environmental Statement (Chapter 7). This site has previously been mined for sand and gravel; as such, an archaeological assessment has not been prepared for inclusion in this planning application.

- 6.2.17 In the above overall context, it is clear that this application accords with Policy SD12 in its entirety. There is no reason not to enable the application site to be brought forward now.

6.3 MILTON KEYNES EAST STRATEGIC URBAN EXTENSION DEVELOPMENT FRAMEWORK SUPPLEMENTARY PLANNING DOCUMENT

- 6.3.1 In March 2020 Milton Keynes Council adopted their Development Framework Supplementary Planning Document (SPD) which relates to the whole of MKESUE and this outline planning application accords with its principles and objectives.

- 6.3.2 A key objective of the SPD is that the whole of the MKESUE is brought forward in a strategic and comprehensive manner. As described elsewhere, the application site is a discrete parcel of land which is separated from the other developer's parcels by Willen Road.

- 6.3.3 Notwithstanding, the proposals have been discussed in detail with Bloor Homes, who are bringing forward the adjacent housing land. The access proposals help to enable Bloor Homes to bring forward their site and the landscaping proposals provide a sufficient buffer between the built element of the scheme and Bloor's site. Furthermore, they are complemented by a similar buffer on the eastern side of Willen Road that will be delivered by Bloor.

- 6.3.4 The proposals accord with the 'Development Principles' set out at Section 3.3 of the SPD. Specifically, on the 'economic role', the application proposals absolutely address the principle of "maximising its prime location with high accessibility to the strategic road network". The scheme will deliver much-needed logistics space in a prime location in line with the requirements of NPPF Paragraph 83. Indeed, the Site exhibits all the hallmarks of a good logistics site as described in Paragraph 31 of the Housing and Economic Needs Assessment section of the NPPG: namely a significant amount of land to accommodate large units; good access to the strategic highway network; sufficient power capacity and access to appropriately skilled local labour. This is confirmed on Page 4 of the specialist Market report submitted as part of the outline application.
- 6.3.5 The SPD requires that development considers the relationship with potential future development and this is achieved in the application proposals through the perimeter landscape buffer provided around the entire site, but specifically the enlarged buffer along Willen Road compared with the 2019 Application. As described elsewhere, the proposals have been coordinated with Bloor Homes who will also provide a buffer within their site along the eastern edge of Willen Road.
- 6.3.6 With regard to the 'Movement Framework' set out at Section 4.3 of the SPD, the proposals accord with the principle of retaining and upgrading Willen Road, whilst also safeguarding land for the provision of the 'fast mass transit system' and delivering a new redway from Tongwell to Newport Pagnell.
- 6.3.7 Land use is covered at Section 4.4 of the SPD and the proposals accord with the identified schedule of land uses, providing a logistics development in a prime location for this use on land designated for such employment uses.
- 6.3.8 A landscape buffer surrounds the site, which has been increased along the width of Willen Road in order to ensure that there are no unacceptable adverse impacts.
- 6.3.9 Phasing for the SUE is discussed at Section 5.1 of the SPD. The applicant has worked proactively with the Council, engaging on the Tariff Framework Agreement, whilst also working collaboratively with Bloor Homes on bringing the application proposals forward.

6.4 NATIONAL AND LOCAL POLICIES – SUSTAINABLE DEVELOPMENT

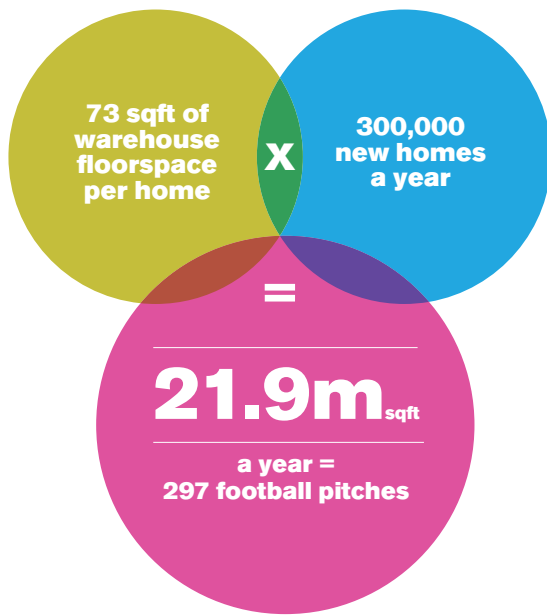
- 6.4.1 The NPPF is clear, sustainable development should be pursued in a positive way, which is why the 'presumption in favour of sustainable development' lies at the heart of national policy. Sustainable development comprises three roles, which form overarching objectives. The economic objective seeks to ensure that land of the right type, in the right location is available at the right time to support growth.

An Economic Objective

- 6.4.2 In line with the NPPF's ambitions, Milton Keynes Council's aspiration, as set out in Plan:MK, is to encourage the growth of Milton Keynes' diverse and dynamic economy. This ambition is established through the Council's strategic objective to "pursue a vigorous economic development strategy" and it is formalised through Policy DS3, which sets the Council's employment development strategy. Policy DS3 seeks to attract new business and encourage and enable existing businesses to grow.
- 6.4.3 The application proposes a high quality, sustainable form of development, complementing the longer-term growth aspirations for the Milton Keynes East site allocation, within which the application site sits.
- 6.4.4 The site is well located in relation to the strategic road network and is positioned on the fringe of Milton Keynes, an important strategic location for housing and employment growth. It is easily accessible for local people currently living in the area who choose to work at the site and, in time, will also provide job opportunities for new residents moving into the new developments being delivered by Berkley and Bloor Homes.
- 6.4.5 Accessibility is a key requirement for logistics companies. In this context the NPPF calls for planning policies and decisions to recognise and address the specific locational requirements of storage and distribution uses. Plan:MK highlights that Milton Keynes has "a superb geographical location halfway between London and Birmingham and Oxford and Cambridge", as well as being extremely well connected to the rest of the country through, for example, the West Coast Main Line railway and the M1 Motorway.

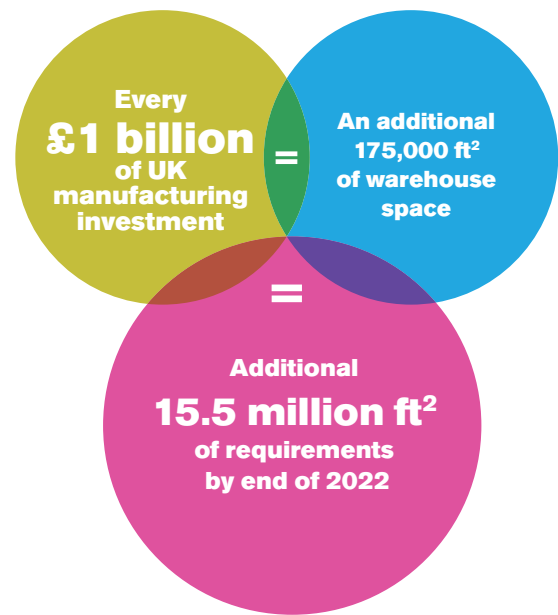
- 6.4.6 The application proposals would bolster Milton Keynes' supply of B8 floorspace. In the above locational context, it is no surprise that, as Plan:MK identifies, around half of the Borough's jobs are in the 'B' Use Classes, which demonstrates the crucial role that this form of development plays locally in delivering employment opportunities. In this regard, the application proposals fully accord with Policy DS3 by offering additional floorspace in a vibrant and growing sector of the economy, into which expanding businesses could relocate or new businesses could move, bringing additional employment opportunities to the area. It also fully accords with the NPPF.
- 6.4.7 A Market Report is submitted in support of this outline application which concludes that the site is well located to suit and serve a wide range of logistics requirements. Market demand for large scale logistics buildings has continued to grow over recent years. Since the Site was first promoted a number of enquires have been received. The 2018 Application was supported by a named occupier who eventually withdrew their interest in the site due to their immediate need for space. Indeed, the accompanying Market Report identifies that since the site was initially promoted several potential occupiers have either gone elsewhere or have reviewed their options due to the lack of progress in the planning process. These occupiers include:
- 4PX who have taken 335,000 sq ft in Leicester
 - BSH who have taken 850,000 sq ft in Corby
 - Wayfair who have taken 1,000,000 sq ft in Lutterworth
 - Europa who are in discussion on another site outside of Milton Keynes for 500,000 sq ft
 - Makita (the occupier identified in the 2018 application) who are unable to find a site of 350,000 sq ft in Milton Keynes and are reviewing their options
 - West Coast who have taken 340,000 sq ft in Andover
- 6.4.8 As evidenced, in part by the above, the lack of suitable sites for large-scale logistics in Milton Keynes (i.e. sites of a suitable size, location and quality) has meant that a number of occupiers who might otherwise have secured accommodation in Milton Keynes have had to locate elsewhere, resulting in a loss of jobs and investment.
- 6.4.9 The need for investment in job creating activities could not be clearer as we emerge from the COVID-19 Pandemic. Logistics is highly resilient, which has been exhibited through the previous recession and through the Pandemic.
- 6.4.10 Throughout the last 18 months, occupational demand for good quality and well-located distribution facilities has remained strong, principally being driven by the industry's response to changing consumer shopping patterns and the increased demand for new and expanding e-commerce and discount retailing platforms, as well as a resilience in UK manufacturing.
- 6.4.11 The COVID-19 Pandemic has accelerated pre-existing trends around e-commerce growth, such that a decade's worth of growth occurred in only a matter of months. ONS figures for November 2020 show that online retail sales grew by 74.4% year-on-year and these new consumer behaviours are unlikely to be reversed.
- 6.4.12 As a consequence, there was a record take up of 50.1 million sqft in 2020. 12.7 million sqft ahead of the previous record set in 2016.
- 6.4.13 Take up in 2021 is expected to exceed this record. Indeed, the Savill's 'Big Shed Briefing' from July 2021 identifies that the positive sentiment for growth in the occupational market continues to feed into the logistics investment market, identifying investment values for the first half of 2021 have reached £3.8 billion, which is:
- 6.4.14 "a 239% increase on H1 2020 and already exceeds the five-year annual average investment volume, which stands at £3.7bn per year.
- 6.4.15 Despite this significant demand, the wider region is severely undersupplied resulting in a supply-demand imbalance. Therefore, allocated sites in extremely attractive locations, such as Milton Keynes, need to be brought forward to assist with economic recovery and create jobs.

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- 6.4.16 Recent research has shown that areas with large concentrations of storage and distribution uses are staging the fastest economic recovery with the strongest growth in job opportunities. Accordingly, former Prime Minister Gordon Brown has recently called for the Government to focus on logistics as a key sector and the benefits of the sector. This has also been recognised in two recent Secretary of State decisions from the North West (Harworth's Wingates scheme and Tritax Symmetry Limited's Wigan scheme) where the socio-economic benefits carry 'substantial weight'.
- 6.4.17 In the Tritax Symmetry decision the Secretary of State attributed 'significant weight' to the locational benefits of the scheme for logistics. The Market Report submitted as part of this application highlights the application site is centrally located and has all the attributes necessary of a key distribution hub. The report concludes that the "supply of large-scale logistics properties and land capable of accommodating them is limited and unable to meet the growing demand in the short-medium term.....the site is well positioned to meet the growing demand for large-scale logistics properties."
- 6.4.18 Significant weight should be given to the 'need' for logistics floorspace, the ability of the site to accommodate this type of development and the economic benefits of the proposal in terms of job creation and investment, which has been made ever-more important as a result of the pandemic.
- 6.4.19 The market continues to be buoyant and the form of development proposed through this application would help to meet this existing demand. The need to identify sites capable of accommodating large units in suitable locations is something that has been emphasised in the National Infrastructure Commission's (NIC's) 'Better Delivery: The Challenge for Freight' (April 2019) and the British Property Federation's (BPF's) 'What Warehousing Where?' and recent 'Employment Land Manifesto' (July 2021). Indeed, logistics is a facilitator and should be viewed as essential infrastructure. It enables growth in other sectors and developing sites such as this will be essential if the ambitions of the CaMkOx Arc are to be realised as shown in the graphic overleaf.



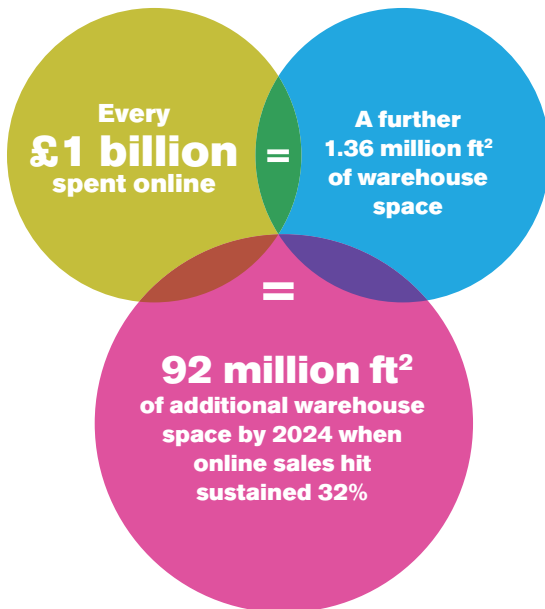
Source:

Turley(2021) Playing to our industrial strengths;



Source:

Savills (2020) 'Forecasting Warehouse Demand'



Source:

Knight Frank (2020)



Source:

CoStar News (2020)

Delivering Sustainable Development

- 6.4.20 Whilst proximity to transport routes, such as the M1, is a key asset for the site, access to employees is also a significant benefit. The proximity to Milton Keynes means that the delivery of the development will enable an extension to the nearby Redway, which currently terminates at the Tongwell roundabout (south of the site).
- 6.4.21 The extension would be delivered as part of the development, ensuring that the site is accessible to employees via sustainable means of transport, but it will also provide a link between Tongwell roundabout and Newport Pagnell, along Willen Road and across the A422 with new crossing facilities (also proposed as part of the scheme).
- 6.4.22 To ensure that the new links and access routes can be used safely by pedestrians and cyclists, the development will also deliver signal controlled crossings on Willen Road, as well as a Toucan crossing on the site's access arm at the Marsh End Roundabout.
- 6.4.23 Furthermore, new bus stops will be provided along Willen Road, both north and south bound, connecting the site to the wider area through sustainable public transport links.
- 6.4.24 Electric car charging points will also be provided in the car parks, providing further sustainable travel options for employees at, and visitors to, the site.
- 6.4.24 In addition, capacity has specifically been designed into the site for the provision of an extension of the Council's proposed Fast Mass Transit System. A corridor is provided along the eastern edge of the site, adjacent to Willen Road to accommodate this, should the extension take place in the future.
- 6.4.26 The application is supported by a Transport Assessment and Framework Travel Plan (appended to Chapter 12 of the Environmental Statement), which are, in turn, accompanied by detailed access and highway works plans. In combination, these documents set out the above proposals in detail and demonstrate how the development scheme directly responds to and accords with national policies for sustainable travel as well as Milton Keynes Council's specific objectives, as set out through policies CT1, CT2, CT3, CT4, CT5 and CT6.
- 6.4.27 The above proposals for the delivery of local connectivity improvements and the provision of infrastructure to mitigate the impacts of the development also fully accord with Policy INF1 (Delivering Infrastructure).
- 6.4.28 The drainage strategy submitted in support of this application identifies that SuDs will be used to manage drainage within the site. The proposed strategy fully accords with national policy and Policy FR2.
- 6.4.29 Having specific regard to the sustainability of the units' design and construction, the planning application is supported by a Sustainability Statement which sets the principles and objectives for the site. The Sustainability Statement further demonstrates the sustainability credentials of the site and accords with the Council's overall objectives in this regard.
- 6.4.30 In terms of the site's general suitability to accommodate development, the suitability and the sustainability of the location are demonstrated through the allocation of the application site (and wider area) in Plan:MK.

6.5 DESIGN PRINCIPLES

- 6.5.1 The scheme has been carefully designed having regard to the consultation with the Council, the previous reasons for refusal (discussed in detail below) and the site constraints, as well as market requirements. The application documents demonstrate how the scheme incorporates sustainable drainage and biodiversity enhancement proposals and how any potential adverse impacts can be carefully managed and mitigated.
- 6.5.2 In direct response to landscape comments received in respect of the 2019 Application, the retained planting along the Willen Road boundary is increased, with the Strategic Landscape Parameters Plan establishing a clearly defined landscape buffer between the built form of the site and Willen Road. The applicant has worked closely with Bloor Homes in a coordinated approach to the Willen Road corridor.
- 6.5.3 Whilst ensuring that amenity is retained for users of Willen Road and new residents in the proposed housing on the eastern side of Willen Road, the increased landscaping will also have concomitant habitat and biodiversity benefits.

-
- 6.5.4 In this regard, the site provides the opportunity to deliver net gains in biodiversity, in line with Government ambitions and as set out in the NPPF and in the supporting text to Plan:MK's Policies NE3.
- 6.5.5 Furthermore, an Ecological Appraisal, a Landscape and a Visual Appraisal and a Concept Landscape Masterplan are submitted in support of the application which demonstrate how the proposal accords with Policies NE3 and NE4, through the retention, and delivery, of supplementary green infrastructure within the site.
- 6.5.6 In a direct response to the comments the previous Applicant received to the (withdrawn) 2018 application, the site access has been relocated so that it does not directly face the access to residential properties on the opposite side of Willen Road. This is a key aspect of the revised design (compared to the 2018 scheme) and seeks to ensure that any potential conflicts of movement for those using the opposing access are minimised.
- 6.5.7 Specifically with regard to the site access arrangements, the proposals have been designed having regard to the adjacent land allocated for housing development. The access and Willen Road upgrading proposals have been prepared in coordination, and agreed, with Bloor Homes (who are preparing the adjacent application for the housing on the eastern side of Willen Road). The designs not only deliver the access for the application site but also facilitate the access for the Bloor Homes scheme. In this regard they fully accord with the requirements of Policy SD12 of Plan:MK; they do not prejudice the potential development on the rest of the scheme, indeed they actively facilitate it.
- 6.5.8 The proposals have also evolved to take account of the requirements set out in Plan:MK's Policy SD1 (Place-making Principles for Development), which requires developments to have consideration for the principles which shaped the original city. The application directly responds to this Policy through the proposed extension of Milton Keynes' Redway, an integral part of Milton Keynes' infrastructure from the city's conception. As set out above, with regard to sustainable development, the proposals also address matters relating to sustainable travel, including public transport, and overall accessibility.
- 6.5.9 Whilst the application is submitted in outline, the parameters are established (see the Landscape Parameters Plan) and an Illustrative Masterplan is provided, which demonstrates one way in which the scheme could be delivered. The final layout of the scheme will need to respect the established parameters, which are designed to enable the site to accommodate the size of units required by the market within an easily navigable layout between individual plots with adequate turning and manoeuvring space. The design also enables appropriate landscaping to be provided to supplement existing planting and deliver biodiversity opportunities.
- 6.5.10 As described in the 'Sustainable Development' sub-section above, the site is well connected and will deliver additional connectivity to surrounding areas. The buildings will be well designed and, in line with the parameters, they will be set back away from Willen Road, to protect amenity of adjacent uses.
- 6.5.11 In this overall context, the proposals accord with policies D1 and D2 relating to designing high quality places and creating a positive character, as well as the objectives of Section 12 of the NPPF for achieving well-designed places.
- 6.5.12 Policy SD9 sets out the general principles for Strategic Urban Extensions and requires various documents to be submitted as part of application proposals relating to both design and environmental matters. This application provides all of the necessary documents. The Policy also notes obligations which should be attached to any planning permission, to seek to ensure the principles are adhered to. Should the Council be minded to grant planning permission, the developer intends to enter into a Section 106 Agreement containing the necessary obligations, in line with the Tariff Framework Agreement approach. In this context, the proposals accord with Policy SD9.

6.6 ADDRESSING THE PREVIOUS REASONS FOR REFUSAL

6.6.1 The overall appraisal of the application demonstrates how the proposed development scheme accords with the local and national policy of relevance. However, the previous 2019 Application was refused for five specific reasons. This sub-section identifies how the current application addresses these reasons for refusal.

6.6.2 How the application addresses each item is set out below, taking each in turn:

1. Principle

The application site forms part of the Milton Keynes East Strategic Urban Extension, which is allocated for the long-term needs of Milton Keynes. Plan:MK Policy SD12 requires that the allocation can only come forwards once the funding for strategic infrastructure required to make the site deliverable has been secured and once this infrastructure is being delivered. The funding for this strategic infrastructure has not yet been secured and there is no planning application or permission in place for the delivery of the strategic infrastructure. The requirements of Policy SD12 have therefore not been met, and the site effectively remains in Open Countryside under Policy DS5, until the allocation is able to be brought forward. The proposal is therefore contrary to policies SD12 and DS5 of Plan:MK (2019) and the Milton Keynes East Development Framework SPD (2020).

The funding for the strategic infrastructure has now been secured. Berkeley Group, who are delivering the largest element of the MKESUE, have submitted their planning application, which is currently being determined by the Council (expected in the autumn). The Berkeley scheme delivers the majority of the strategic infrastructure required for the allocation as a whole. However, importantly, this application does not prejudice Berkeley's ability to deliver their scheme and, in fact, Berkeley's proposals assume that the highways improvements for the application site will come forward, as previously proposed.

2. Highways

Highway improvement works have been proposed as part of this application which do not meet the requirements of the Milton Keynes East Development Framework SPD (paragraph 4.3.7) and could prejudice forthcoming highway infrastructure and improvements proposed strategically as part of the wider allocation, as required by Policy SD12 of Plan:MK and the Milton Keynes East Development Framework SPD, such as a bridge or underpass crossing of H3 Monks Way (A422) and the improvements required to Willen Road to upgrade it to a 'grid road'. In addition, it is considered that the applicants have not fully considered the cumulative impact of this development with the rest of the Milton Keynes East Strategic Urban Extension, on the existing highway network. This means that the highway improvements proposed have not been fully considered in light of the future amount of traffic that will use these junctions, the result of which is likely to be excessive street on the highway network with impacts on accessibility, movement and highway safety. The proposal is therefore contrary to Policies SD12 and CT2 of Plan:MK.

The highway proposals have been developed in collaboration with Bloor Homes, who are delivering the adjacent parcel of the application. They include the upgrade to Willen Road, providing a new redway link between Tongwell and Newport Pagnell and provide space for fast mass-transit system proposals, should these be brought forward in the future.

The highways proposals have been updated to reflect the current scheme. However, the fundamentals of what is proposed remains the same as the previous application.

Berkeley have considered the highways proposals through their cumulative impact assessment work, specifically considering the proposed improvements to Marsh End Roundabout. Their conclusions show that some upgrade to the roundabout will be required, due to the delivery of the MKESUE, and that the proposals being brought forward through this application would be capable of accommodating the traffic associated with the whole of the allocation.

This planning application considers the cumulative impacts associated with the wider MKESUE and concur with the assertions of the Berkeley review, that the proposed improvement works to Marsh End Roundabout will be sufficient to accommodate the traffic associated with not just the application site, but also the wider MKESUE. Importantly, the previous Applicant's scheme was considered acceptable by Highways England and by Milton Keynes Council Highways, as Local Highway Authority.

3. Residential Amenity

There are existing dwellings to the east of the application site at risk of a significant detrimental impact on residential amenity as a result of visual impact and overbearing nature of the development. The height and position of the proposed building, the lack of landscaping and the lack of set-back between the buildings and Willen Road will contribute to an unacceptable impact on the residential amenity of the existing residents. In the absence of supporting information to show otherwise, it is considered that the proposal is therefore contrary to Policy D5 (A.5.) and Policy D3, in Plan:MK (2019).

The context for the existing residents to the east of Willen Road is changing irrevocably, due to the delivery of the wider MKESUE, which will provide significant new housing and a local centre around the existing dwellings.

In this overarching context, the application proposals form part of the wider MKESUE delivery and, whilst they will inevitably introduce change, this change will not occur in isolation and its context should be taken into account.

Notwithstanding, the application proposals have been devised in collaboration with Bloor Homes and the development proposals have been amended from the previous application to address the amenity concerns.

The maximum building floorspace of the scheme has been reduced from the scheme that was the subject of the 2019 Application. The Illustrative Masterplan shows a smaller Unit 1 to provide for the increased area for strategic landscaping. The landscape buffer has been increased along the width of Willen Road, providing an opportunity for a more substantial planted buffer to filter views of the buildings.

Bloor Homes are providing a similar buffer within their site on the eastern side of Willen Road, to provide further separation and space for landscaping between new housing and employment. The approach, in terms of both distance and landscape treatment, is similar to that which has been provided on the Berkeley proposals which have been submitted with their application. A letter confirming that Bloor Homes are happy with Newlands Development's proposal is contained in Appendix A.

4. Planning Obligations

In the absence of the necessary planning obligations being secured by a S106 agreement, the applicant has failed to demonstrate that the proposed development would not lead to a burden on or have an adverse impact on existing local infrastructure. The location of the site as part of the Milton Keynes East Strategic Urban Expansion requires the establishment of a Tariff Framework Agreement to ensure equitable contributions by developers across the site, and in the absence of this Framework the necessary contributions cannot be agreed. The proposal is therefore contrary to Policy SD12 and INF1 of Plan:MK (2019), and the aims of the National Planning Policy Framework (NPPF).

Following the securing of the infrastructure funding for the site allocation, the Tariff Framework Agreement proposed by Milton Keynes Council has been progressed. Discussions are ongoing between the relevant parties in order to agree the final Framework.

As each individual application for the parcels of land within the MKESUE allocation come forward, the Section 106 will extract the relevant items from the Tariff Framework Agreement to be included within the individual site-specific Section 106 Agreements.

The applicant has actively engaged with the Council in order to progress the Tariff Framework ahead of the submission of this planning application. Ongoing positive engagement will continue to ensure that a Section 106 Agreement can be delivered should the Council permit the application.

5. Landscape and Character of the Area

Given the size and scale of the proposed buildings, the layout of the site provides insufficient space and depth for a sufficient landscape buffer to provide effective visual mitigation for the site. The set-back of the buildings from the boundary around the site do not provide sufficient depth to create high enough bunds, nor are the bunds consistent around the boundary. The set-backs are also populated with areas that cannot be planted (drainage ponds), which further reduces the amount and depth of planting, and reduces the effectiveness of the landscape buffers for visual mitigation proposed. Without effective landscaped buffers around the site, it is considered that the visual impact of the proposals has not been successfully mitigated and will have a harmful impact on the character of the area. Concerns are also raised with the accuracy and lack of recommended mitigation proposed via the Landscape Visual Impact Assessment, and therefore there is doubt as to whether this document can be relied upon to fully assess the impact on the character of the area from both close to the site and from a distance. The proposal is therefore contrary to Policies NE6, D1, D2 and D3 of Plan:MK (2019).

As noted above, the overall floorspace for this planning application has been reduced from the previous 2019 application scheme. This has enabled a greater set-back from the site boundary and increased landscaping along the Willen Road corridor.

This needs to be balanced, however, against the commercial considerations associated with an employment site of this nature as described in the accompanying Market Report. Both the NPPF and NPPG require local authorities to consider Market trends and these indicate that units within the B8 sector are getting larger. This is due to growth in 'e-tailing' where flexibility within warehouses is an important factor. A Report by Turley entitled 'Playing to Our Industrial Strengths' (May 2021) advises that buildings must be able to cope with demand volatility so a warehouse that offers scope for expansion and contraction will be best placed to meet market requirements. Operators are increasingly attracted to warehouses that are of a sufficient height to allow for internal stacking and installation of automated machinery. The parameters plan enables market-facing units to be delivered in line with the recognised industry standards that include adequate eaves height of 18 metres, equating to a ridge height of 21 metres as confirmed in the Market Report.

The resultant effect of reducing the scale of the building and bolstering the boundary vegetation will be a reduction in the perceived visual impact of the scheme. The increased landscaping width provides additional capacity for landscape planting, which will also enable views of the site to be assimilated into the surroundings more effectively.

A new Landscape and Visual Appraisal has been prepared for this application, which considers potential views from a range of receptor points, demonstrating that the scheme is acceptable in landscape and visual terms.

CALDECOTE FARM

NEWPORT PAGNELL · MILTON KEYNES

SUPPORTING DOCUMENT

PLANNING STATEMENT

7.0 CONCLUSION

7.0 CONCLUSION

- 7.1 This Planning Statement supports an application for outline planning permission submitted on behalf of Newlands Developments for a new commercial development on land at Caldecote Farm, east of the M1.
- 7.2 The application site forms part of the Milton Keynes East Strategic Urban Extension (MKESUE) allocation. Whilst within MKESUE, the site is a self-contained, distinct parcel of land, separated from the remainder of the allocation by Willen Road.
- 7.3 The allocation of this area of land for employment uses demonstrates it is a suitable and sustainable location for growth.
- 7.4 The site allocation requires funding to be brought forward in the Plan period, which has now been secured. Subsequent to the funding being in place, a planning application has been submitted by Berkeley St James for the majority of the MKESUE allocation. The Berkeley application includes the main infrastructure elements required in order to accommodate the allocation.
- 7.5 Milton Keynes Council's Tariff Framework Agreement has also been progressed, to secure the necessary funding elements from each of the landowner parcels within the site allocation and the applicant is currently in discussions with the other MKESUE developers around the detail of this.
- 7.6 Whilst the application site is separated from the remainder of the allocation by Willen Road, the applicant has engaged proactively with the Council in discussions around the Tariff Framework Agreement, as required.
- 7.7 The highway works proposed through this application will not only mitigate the impacts of the development and deliver improvements for the wider area, but they also help to resolve existing capacity issues. In addition, the works proposed through this application will deliver some of the important strategic highway works necessary to support the wider MKESUE.
- 7.8 The Berkeley application confirms the applicant's highways consultant's conclusions that the proposed improvements to Marsh End Roundabout will accommodate the traffic associated with the whole of the MKESUE.
- 7.9 Milton Keynes benefits from locational advantages which make it extremely attractive to logistics operators. The application site is well located to suit and serve a wide range of logistics requirements. Market demand for large-scale buildings has continued to grow over recent years. Since beginning to promote the site the applicant has received a number of enquires.
- 7.10 Previous applications were submitted by a different applicant, SEGRO (Newport Pagnell) Limited, in 2018 and 2019. The 2018 Application was supported by a named occupier. However, delays in the application process (which led to its eventual withdrawal) resulted in this occupier going elsewhere, due to their immediate need for space.
- 7.11 The specialist market evidence submitted in support of this application highlights a lack of suitable sites for large-scale logistics in Milton Keynes (i.e. sites of a suitable size, location and quality). This has meant that a number of occupiers who might otherwise have secured accommodation in Milton Keynes have had to locate elsewhere, with the loss of jobs and investment. Bringing forward sites such as this for a resilient sector, such as logistics, will assist in mitigating the impacts of the COVID-19 pandemic.
- 7.12 The market continues to be buoyant and the form of development proposed through this application would help to meet this existing demand.

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- 7.13 SEGRO (Newport Pagnell) Limited's 2019 Application was refused for five specific reasons, all of which are addressed through this planning application in combination, through:
- The securing of the funding for the strategic infrastructure.
 - Progress on the Tariff Framework Agreement.
 - The reduction in the overall floorspace of the application.
 - Increased landscaping buffer around the site, specifically along Willen Road.
 - Collaborative working with Bloor Homes with regard to the submission of the application and the highways proposals incorporated within the scheme which facilitate access to Bloor Homes' site.
 - Positive engagement with the Council prior to the application submission.
- 7.14 Policy SD12 established the Council's ambitions and principles for the delivery of the site allocation, which is supplemented by the MKESUE SPD. This planning application accords with those ambitions and principles.
- 7.15 The development proposals have evolved in response to comments received in respect of the previous applications and in consultation with those bringing forward the adjacent residential development.
- 7.16 In the above context, there is no reason to prevent the development from being brought forward now; it is land of the right type, in the right place and is available now for delivery to contribute to economic recovery in a highly productive location. As such, we respectfully ask that outline planning permission be granted for this scheme.

CALDECOTE FARM

NEWPORT PAGNELL · MILTON KEYNES

SUPPORTING DOCUMENT

PLANNING STATEMENT

APPENDIX A:

LETTER FROM BLOOR HOMES

Ben Taylor
Planning Director
Newlands Developments
Lumonics House
Valley Drive
Swift Valley Industrial Estate
Rugby
Warwickshire
CV21 1TQ

29th July 2021

Dear Ben,

Land at Caldecote Farm, Newport Pagnell

I understand that you hope to submit your application shortly.

As you will know, we have been in regular dialogue with Newlands Developments as part of a collaborative approach to the planning of the MK East SUE and our respective professional team have been working closely to align our respective designs.

In view of that, I thought it would be helpful to set out our thoughts on your proposals.

You've kindly provided copies of your layout and an associated cross section on Willen Road.


The scale of the buildings proposed does not present an issue for our proposed layout and the interface at Willen Road between the two developments is considered acceptable. This is because adequate set-back distances and a sufficient landscape buffer is provided along Willen Road as highlighted on the Strategic Landscape Parameters Plan.

Moreover, we recognise the benefits of co-locating jobs and homes as part of a sustainable form of development.

As such, we support Newlands Development's proposals and do not consider them to be overbearing or do not envisage them to give rise to any unacceptable adverse residential amenity issues as a result given the separation distances between the two developments.

As always, we will stay in touch as your application progresses and will be pleased to assist if any matters arise.

Yours sincerely,



David Joseph BSc Dip TP MRTPI
Senior Planning Director