



Report to Strategic Planning Committee

Application Number:	15/00314/AOP
Proposal:	Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.
Site Location:	Land South of The A421 West of Far Bletchley North of the East West Rail Link and East of Whaddon Road, Newton Longville.
Applicant:	SWMK Consortium
Case Officer:	Helen Fadipe
Ward(s) affected:	Gt Brickhill
Parish-Town Council:	Newton Longville
Date valid application received:	30.01.2015
Statutory determination date:	22.05.2015
Recommendation	

The recommendation is that permission be deferred and delegated to the Director of Planning and Environment for **APPROVAL** subject to the satisfactory completion of a legal agreement to secure: 1) financial contributions towards provision of education (primary and secondary); 2) on or off site sport and leisure provision; 3) off site farmland bird mitigation; 4) on-site provision of affordable housing, 5) financial contribution for hospital facilities; 6) provision of community facility; 7) onsite provision of primary school facilities and land for a secondary school; 8) provision of a health centre (GP surgery) (and/or financial contributions thereto); 9) provision and maintenance of public open space and recreation and play areas; 10) on-and off-site highways contributions/ works/road infrastructure works, travel plans, sustainable transport measures (and/or financial contributions thereto); 11) SUDS maintenance; and 12) phasing plan and subject to conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 This application was previously heard at the Strategic Development Management Committee of the former Aylesbury Vale District Council on 7 June 2017 when it was resolved that permission be deferred and delegated for APPROVAL subject to the completion of a legal agreement to secure financial contributions towards and/or

onsite provision of education facilities, off-site sport and leisure provision, on-site provision of affordable housing, public open space and play areas, on- and off-site highways works, travel plan and sustainable transport measures (and/or financial contributions thereto) and subject to conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused.

- 1.2 Following the resolution, an update report was presented to Members of the Strategic Development Management Committee of the former Aylesbury Vale District Council on 24th April 2019. The report set out the latest position on the S106 relating to the health contributions requested from Milton Keynes Council (MKC) and to provide updates in respect of the NPPF and policy position.
- 1.3 The updated Committee report set out that the Council were satisfied that sufficient justification had now been provided to secure the contribution towards secondary health care at MKUH. The report also set out that the changes in circumstances since the application was considered by Committee could not justifiably alter the conclusion that the proposals constitute a sustainable and acceptable development. In this instance it was considered that the planning balance exercise was not affected by the change in circumstances to arrive at a different conclusion and recommendation to that which the committee previously considered and resolved to agree. That resolution was agreed by Members at the meeting. This updated the resolution (previously taken on 7th September 2017) to include the additional S106 matter and subject to appropriate conditions.
- 1.4 Work has been progressed on the S106 legal agreement and since the resolutions taken on application 15/00314/AOP as set out above, the applicants have submitted a package of updated documents and associated plans proposing amendments to the scheme. These updates have sought to address changes in regulation, policy and guidance since the original application was submitted in 2015. The revisions do not alter the application site area itself but amount to amendments to the proposed development parameters within the site and to the proposed mitigation package.
- 1.5 The supporting documentation submitted with the amendments advises that the changes have arisen for the following reasons:
 - The alignment of the oil pipeline crossing the application site was not identified correctly in the original planning application drawings, and as a result needs to be amended to show the correct alignment. The oil pipeline was and continues to be, located within an area identified as a green infrastructure corridor in the Proposed Development;
 - The standards required for climate change mitigation have been enhanced since the Planning Application was submitted. As a result, larger surface water attenuation ponds need to be included which has required changes in the size and disposition of the proposed development parcels;
 - The housing needs of older people is identified as a specific issue in the adopted Vale of Aylesbury Local Plan and this type of housing is supported

by policy H6b on those sites identified as suitable in the Housing and Economic Land Availability Assessment. The application site is identified as a suitable housing site and is a draft housing allocation. As a result, the applicant has decided that an element of elderly persons' accommodation (within use class C3) should be included in the proposed development within the total quantum of housing.

- 1.6 The updates include a revised Environmental Statement reflecting requirements of the 2017 Regulations and it addresses the up-to-date policy and regulatory framework. Further Transport Response Notes (TRN) were submitted in response to the Council's queries and comments on the May 2020 Transport Assessment.
- 1.7 The additional documents submitted have been the subject of further public consultation. Further representations have been received and in this context, it is considered appropriate for the application to be returned to committee for determination and to provide an up to date position, including the evolving policy framework.
- 1.8 A parallel application was submitted to Milton Keynes Council for "Outline planning application for physical improvements to the Bottledump roundabouts and a new access onto the A421 (priority left in only) to accommodate the development of land in Aylesbury Vale District reference 15/00314/AOP (for Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure - EIA development).
- 1.9 The application was considered at a number of committee meetings and finally referred back to the DCC meeting on 7th November 2019, with a recommendation that permission is granted subject to conditions. However, DCC resolved to refuse permission specifically on highway matters (and not to the principle of the proposed development). The refusal reason is:
"That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK."
- 1.10 An appeal was lodged against the refusal of application 15/00619/FUL by Milton Keynes Council (MKC). Buckinghamshire Council (BC) presented their case as a Rule 6 party at the Public Inquiry (PI). The inquiry was originally to open on the 13th October 2020 and programmed to sit for 6 days. In light of the additional highway information submitted the Inquiry was postponed to mid-February and was eventually held mid-

May 2021. BC presented as expert witnesses in respect of highway and development management. The appeal was dismissed on the 26th July 2021.

- 1.11 This application seeks outline permission (with all matters reserved) except for access for a mixed-use sustainable urban extension including up to 1855 mixed tenure dwellings, employment and other uses as set out in detail in the description below.
- 1.12 The proposal site is located to the south west of Milton Keynes, immediately to the west of Far Bletchley. It is contained by the boundary of Buckinghamshire Council, but physically relates to the urban area of Milton Keynes, completing its western flank. The site is an allocated site within the adopted VALP, namely D-NLV001 Land south of the A421 and east of Whaddon Road.
- 1.13 The application is considered to comply with the requirements of its site allocation policy D-NLV001. The development is required to incorporate upgrade improvement to vehicular and pedestrian facilities to the land especially to Buckingham Road Access, Whaddon Road Access and A421. The site makes a significant contribution to the delivery of housing ; the supply of affordable housing. There would also be economic benefits in terms of the creation of jobs associated with the B1 commercial units proposed as well as the other commercial elements and further jobs created from the construction of the development.
- 1.14 It is considered that the resultant development would meet open space requirement, drainage, parking, net enhancement in biodiversity and be designed to ensure an acceptable impact on the residential amenities of both existing and future residents .
- 1.15 Negotiations have enabled the scheme to be amended such that BC are satisfied that the development will achieve safe and suitable access and will not result in a severe individual or cumulative network impact and is acceptable, in this regard, subject to relevant conditions and completion of a S106 Agreement to secure the highway works, construction management and financial contributions.
- 1.16 The site has been the subject of detailed examination in public during the VALP process. The Landscape Character Assessment carried out as part of the evidence for the preparation of VALP shows that the site has moderate impact on the Landscape. It is acknowledged that the site is currently a large greenfield site and that localised harm would result from the residential development of it in landscape terms and from the users of the public footpath network. The Environmental Impact assessment and revisions to the proposed development, including specific on-site mitigations will minimise the harm thereby ensuring that the development is sensitive to the site context.
- 1.17 It is considered that the proposals complies with VALP and the NPPF. The resultant development will be designed to meet VALP requirement for trees and hedgerows, open spaces, parking and access, promoting sustainable transport relating to cycling, walking and public transport, public rights of way, drainage, meeting the challenge of

climate change, and conserving and enhancing the natural environment, archaeology, well-designed places and design, healthy and safe communities, contamination, air quality, and residential amenities.

- 1.18 This assessment identifies that various s106 planning obligations would need to be secured to make the schemes acceptable and mitigate its impact in accordance with adopted VALP policies and the NPPF if the council was minded to approve the application. These obligations are set out in section 5 below.
- 1.19 Under Part D section 4.4 of the constitution, the Strategic Sites Committee have responsibility for wider strategic development; sites which have a significant impact beyond the specific local area; and sites fundamental to the implementation of an adopted Local Plan. This will include amongst other criteria large scale major development comprising housing (approx. 400 dwellings or more). The application is for up to 1,855 dwellings, the site forms part of the strategic delivery of sites as set out in the adopted VALP policy D2. It is therefore considered that this application would fall within the terms of reference to be considered by the Strategic Sites Committee as a strategic site which forms part of the overall strategy fundamental to the implementation of the adopted VALP. Under section 2.5 of the constitution officers consider the exercise of delegated powers is not appropriate in this instance given the change in policy framework and other material considerations since it was previously considered and that it would be appropriate for the application to be returned to committee for determination.

2.0 Description of Proposed Development

- 2.1 The application site is located to the south west of Milton Keynes, immediately to the west of Far Bletchley. It is contained by the boundary of Buckinghamshire Council, but physically relates to the urban area of Milton Keynes, completing its western flank.
- 2.2 The site is bordered to the north by the industrial area of Snelshall West and to the east by the established residential area of Far Bletchley. The western boundary and southern boundaries predominantly comprise agricultural farmland, with Newton Longville located to the south of the site.
- 2.3 The application site covers an area of approximately 145 hectares. The site is defined by the A421 (Standing Way) to the north, Whaddon Road which links the Bottledump roundabout in the north west corner of the site to Newton Longville, to the west and the disused railway line to the south which now forms part of the East West Rail proposals. The eastern boundary is defined by the existing residential neighbourhood of Far Bletchley.
- 2.4 Two existing recreational routes fall within the physical limits of the site. Weasel Lane runs along an elevated physical ridge running north-east. Milton Keynes Boundary Walk also runs through the eastern part of the south in a north-south direction. Three sections of public footpaths are also within the site. One footpath traverses the South

West section of the site, linking Newton Longville to Weasel Lane, itself a public right of way and part of the long distance National Cycle Route (Sustrans no. 51). The other two sections of footpath converge in the north-east corner of the site, connecting to the wider rural area and Thrift and Broadway Woods.

- 2.5 The topography of the site is undulating and characterised by a ridge running across the central length of the site from east to west aligning with Weasel Lane. The predominant topographic features are therefore shallow ridges and valleys sloping away from this focal ridge line, which run broadly on a south west alignment.
- 2.6 The site naturally divides into two areas along Weasel Lane Ridge: the north/northwest with its undulating land falling northwards towards the A421; and the south/southeast which gradually falls toward the south eastern corner of the site. Mature trees are mostly confined to boundary hedgerows, mostly in the north of the site including Weasel Lane. The dominant species on site are Ash and English Oak.
- 2.7 The application (as amended) seeks outline permission (with all matters reserved) except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide;
- up to 1,795 mixed tenure dwellings;
 - 60 extra care housing units (class C3);
 - employment area;
 - neighbourhood centre including retail and community uses;
 - primary school;
 - secondary school,
 - grid road reserve;
 - multi-functional green space;
 - sustainable drainage system; and
 - associated access, drainage and public transport infrastructure.
- 2.8 The application is accompanied by an illustrative masterplan and parameter plans which shows how the development could be achieved on the site.
- 2.9 The application is accompanied by the following:
- Documents**
- a) Planning Statement & Appendices
 - b) Design & Access Statement
 - c) Sustainability Strategy
 - d) Flood Risk Assessment
 - e) Retail Assessment
 - f) Employment Assessment
 - g) Statement of Community Involvement
 - h) Transport Assessment & Appendices & Framework Travel Plan
 - i) Arboricultural Impact Assessment

- j) Energy Strategy
- k) S106 draft Heads of Terms
- l) Construction Environmental Management Plan
- m) Environmental Statement & Appendices
- n) Environmental Statement Non-Technical Summary

Drawings

- o) Development Framework Plan
- p) Parameter Plan
- q) Open Space Plan
- r) Illustrative MP in Context
- s) Application Site Boundary
- t) Residential Density
- u) Public Transport
- v) Constraints Plan
- w) Phasing
- x) Ground Remodelling
- y) Building Heights
- z) Illustrative Landscape Plan

2.10 Additional documentation was submitted in August 2016 which made the following revisions;

- Revisions to the proposed site access arrangements:
 - Improvements to the Bottledump Roundabout, including an equestrian crossing and links to Redway routes to the north of the A421 and within the site;
 - Revision of the proposed junction with the A421 from a 'left in and left out' arrangement to a 'left in' only arrangement and consequent amendments to the disposition of land uses immediately adjacent to the junction;
 - Revision of the proposed traffic light controlled junction with Buckingham Road to a roundabout junction;
- The incorporation of 1.69 Ha of green space (ecological corridor and land effected by archaeological constraints) situated between the proposed satellite secondary school and housing at Far Bletchley within the boundary of the school site;
- Changes to the Whaddon Road corridor to provide for a widening of the landscape corridor along the western boundary of the scheme, removal of the proposed bunding, a general increase in the extent of planting and accommodation of the Milton Keynes Boundary Walk to the internal edge of the landscape corridor;

- Changes to the corridor adjacent to the southern boundary with the relocation of the woodland planting to the northern edge of the proposed SUDs features and changes to the overall design concept for the development parcels in the south east quadrant of the site which incorporates new east-west 'ribbons' of green infrastructure;
- An increase in the number of LEAP (now 9No), the sizes of LEAP and NEAP increased to meet RoSPA guidance and their disposition across the site to maximise coverage in reflection of Fields in Trust guidance;
- Identification of a parcel of land (0.2 Ha) to the rear of the proposed neighbourhood centre to be used either for employment purposes (B1) or to accommodate a 6GP practice (D1) developed over two floors with associated car parking.
- reduced the development parameters directly south of the SAM in order to retain a larger area of Ridge and Furrow and which was accompanied by an update from CgMS archaeology.

2.11 The ES was reviewed following the changes made with implications to the ES chapters considered and a formal addendum to the Environmental Statement and non technical summary received in August 2016. The submission explained the reasoning for preparing revised chapters or for not doing so, the addendum ES includes updated ecological assessment and chapters on the following topic areas

- Chapter 9 – Landscape and Visual
- Chapter 10- Traffic and Transport
- Chapter 11 – Air Quality
- Chapter 12 – Noise and Vibration

2.12 In response to the amendments the supporting drawings were amended to reflect the changes sought and a formal round of publicity was undertaken on the amendments submitted. A supplementary Addendum Design and Access Statement document 2016 was provided.

2.13 Following submission of the updated Travel Assessment (TA) prepared by Mouchel, the Consortium engaged with the Council and MKC as local highway authorities (LHA) and their appointed technical advisers to consider the updated TA and highways objections by third parties, including an independent review of the TA commissioned jointly by West Bletchley Town Council and Newton Longville Parish Council. In light of this engagement, further technical work has been undertaken and submitted to the respective LPA; in particular to address criticism of the modelling of the Whaddon Road and Buckingham Road junction arrangements. In consequence, to mitigate identified capacity issues at the proposed junctions, revised junction arrangement for Whaddon Road Junction and Buckingham Road Junction were submitted.

2.14 In June 2020, the following documents were submitted

- Amended Development Framework Parameter Plan (Drawing No. CSN4857/100 Rev K) showing proposed distribution of uses across the site. The proposed distribution of uses includes:
 - New highway access points at two locations on the A421 comprising an 'at grade' roundabout located on Buckingham Road that would cater for all traffic movements and a left turn 'access only' slip further west along Standing Way;
 - A new 'Ghosted Right Turn' access that would cater for all traffic movements off Whaddon Road to the south east of Bottledump roundabout.

- Revised transport assessment (TA) to update the transport evidence base associated with the planning applications prepared in January 2015 (subsequently updated in August 2016). The revision is as a result of the scoping and methodology which was agreed by all parties following meetings held with BC and MKC in December 2019 through to April 2020 .

- An updated ES to address the proposed amendments that have been made to application 15/00314/AOP and to reflect changes in regulation, policy and guidance. The updates address changes to relevant, adopted and emerging development plan documents and policies since the application was submitted. These include Milton Keynes Plan which was adopted in 2019, and Vale of Aylesbury Local Plan (VALP) adopted September 2021.

2.15 The updated ES supersedes the ES prepared in January 2015 and its Addendum in August 2016. There are three environmental topics that were not assessed in the original ES but are included in the updated ES to meet the requirements of the EIA Regulations 2017, which are as follows: human health, climate change and disaster management. Furthermore, the updated ES has reconsidered alternative sites and alternative site layouts as required by the EIA Regulations 2017.

2.16 Full publicity and re-consultation have been undertaken following the receipt of the amended plans and supporting documentation. Site and press publicity was undertaken for a 30 day period in July 2020. Full technical reconsultation was also undertaken together with formal consultations with MKC and the Parish Councils of Newton Longville, Whaddon and Mursley.

2.17 In October 2020, the suite of drawings submitted in June 2020 were updated, to correct a drafting error which incorrectly illustrated the alignment of the 'left in' access from the A421 Standing Way. The consequential minor amendment was to the disposition of the attenuation feature, housing development parcel and the alignment of the primary route corrido immediately adjacent to the access. In addition, Addendum to Chapter 7 of the Ecology of the Environmental Statement was updated. The addendum confirmed the ecological survey work conducted between April and August 2020. The addendum supports the assessments made of the likely significant

effects of the proposed development in terms of Ecology and Nature Conservation within Chapter 7 of the updated ES. A Technical note was submitted in response to a request for information relating to SuDs; and in addition, a response note was submitted to address comments from the Council's ecologist (19th August 2020) and the BBOWT (27th July 2020).

- 2.18 Further to ongoing discussions in respect of highway matters, the application package was subsequently updated. These updates were submitted both for the appeal scheme, and as further supporting documentation for planning application 15/00314/AOP.
- 2.19 These technical updates are pertinent to BC's formal consideration of the application revision package that was submitted in summer 2020. The submitted updates include:
- TRN2 submitted on 18th December 2020. This was prepared to respond to comments from Buckinghamshire Council as LHA on TRN1 and relates primarily to the Buckinghamshire road network.
 - A Stage 1 Road Safety Audit & Designer's response was submitted on 15th January 2021 and considers the proposed mitigation work at junctions on the Buckinghamshire road network.
 - On 29th January 2021 TRN3 was submitted, along with a Stage 1 Road Safety Audit and Designer's Response (Junctions in Milton Keynes) and an Addendum to the Environmental Statement dealing with Traffic & Transport, Noise and Air Quality. TRN3 applies the methodology of TRN2 to the Milton Keynes highway network. The Addendum ES has been prepared to assess the application scheme in light of the additional work that has been undertaken.
 - An ES Addendum updating Chapters 10-12 inclusive (Traffic & Transport, Noise and Air Quality) of the Environmental Statement (June 2020).
- 2.20 Site and press publicity were undertaken for a further 30 day period in October 2020 and March 2021 together with a full technical consultation.

3.0 Relevant Planning History

- 3.1 10/00891/AOP - Site for mixed-use development of up to 5,311 dwellings, 7.4 hectares of employment (Classes B1a-c & B2, utilities & renewable energy infrastructure (sui generis), a relocated recycling centre & a new household recycling centre (sui generis); a neighbourhood centre comprising: a reserve site for a railway station (sui generis); a supermarket (Class A1), mix of A1, A2, A3, A4, A5, B1a & B1b uses, up to 274 dwellings, utilities & renewable energy infrastructure (sui generis), a Thames Valley Police one stop facility (sui generis) & Community Facilities (Classes D1 & D2); two local centres & a small mixed use centre comprising: A1, A2, A3, A4, A5, B1a, B1b, D1 & D2 uses, an emergency/ambulance call point (sui generis), utilities & renewable energy infrastructure (sui generis), up to 90 dwellings & a veterinary practice (sui generis); sites for four primary schools & one secondary school; ground remodelling; multi-functional green infrastructure including new landscaping with formal & informal

sporting areas, allotments, woodland & a wildlife area, foul & surface water drainage networks; associated highway infrastructure & public transport infrastructure (including a reserve site for Park & Ride) & associated car parking. – Application withdrawn.

- 3.2 13/60019/SO - Environment Impact Assessment Scoping Request for a proposed development – Scoping Request is Acceptable

4.0 Representations

4.1 Newton Longville Parish Council, Whaddon Parish Council, Mursely Parish Council, West Bletchley Council and Drayton Parslow Parish Council have objected (see Appendix C), and a total of 587 letters of representation have been received. Of these responses 582 raised objections, 4 letters raise comments that neither support nor object and 1 letter raised comments in support of the proposal. Whilst these objections have been more clearly set out in Appendix D (General Representation), the key concerns are:

- Highways capacity and road condition
- Parking
- Density
- Inadequate and dangerous access
- Lack of pedestrian access
- Impact on social infrastructure – for example police resources, shopping centre, schools, hospitals
- Settlement identity of Newton Longville
- Loss of access to historic footpaths
- Noise, light and air pollution
- Visual impact on neighbouring village of Newton Longville
- Out of character within the rural setting
- Flood risk
- Disruption of and loss of habitat for wildlife including endangered species
- Impact on the conservation area
- Impact on light and privacy
- Loss of valuable agricultural land
- Prematurity
- Not in keeping with rural context of Newton Longville and the wider area
- Cost impact on Milton Keynes Council taxpayers
- District council boundary should be moved to include site area within MKC.
- No need for the volume of housing
- Requirement for duty to co-operate not met
- Lack of regard to future potential of Oxford v. Cambridge Expressway proposals.
- Insufficient traffic surveys and assessment.
- Proposed local centre should be accessible
- Greater emphasis should be given to the employment provision on site.

- It is a logical development area and will increase access to secondary school and provide better local amenities

5.0 Policy Considerations and Evaluation

Vale Aylesbury Local Plan (VALP) adopted 15 September 2021

The National Planning Policy Framework (2021)

National Planning Policy Guidance

Aylesbury Transport Strategy (January 2017)

Buckingham Transport Strategy (January 2017)

Local Industrial Strategy (2019)

Open Space – good practise guide for the provision of public open space.

Aylesbury Vale Strategic Landscape Visual Capacity (2017)

Policy Background

- 5.1 The South East Plan (SEP), published in 2009 identified Aylesbury Vale as a major growth area, Aylesbury as a ‘regional hub’ and required the Vale to expand by 26,890 dwellings from 2006-2026. The majority of those dwellings were indicated to be at Aylesbury, with lower numbers being accommodated in Rest of District and in the north east of Aylesbury Vale.
- 5.2 The Milton Keynes and South Midlands Sub-Regional Strategy identified land to the south west, between the A421 and the railway line as a growth location. The South East Plan (SEP) was adopted in 2009 which identified a Strategic Development Area at South West Milton Keynes (SWMK), known as the SWMK SDA Area. Policy MKAV1 included a requirement 5,390 dwellings as an urban extension to the south west of Milton Keynes. This proposal covered a larger site area than that currently proposed by this planning application. The levels and distribution of housing provision in Policy MKAV1 of the SEP were proposed to deliver the spatial vision for Milton Keynes and Aylesbury Vale set out in Policies MKAV2 and MKAV3. These policies clarified the housing provision split between the local authority areas in advance of Policy MKV2 which related to the spatial framework for Milton Keynes growth area. Policy MKV3 proposed the spatial framework for Aylesbury Growth Area.
- 5.3 The draft Aylesbury Vale Core Strategy (2009) sought to carry forward all relevant information and policies from the SEP and in the proposed submission core Strategy. The strategic objectives proposed a distribution of growth across the district and policy CS1 identified the provision of 5,390 dwellings in the north east of Aylesbury Vale close to Milton Keynes as part of the Core Strategy.
- 5.4 The Government revoked the South East Plan in July 2010 at which time AVDC withdrew the Core Strategy. Whilst these plans are no longer in place the background policy position is considered material to the planning application.

Milton Keynes policy position

- 5.5 There are a number of policies of note in the Milton Keynes Council Plan:MK 2016 - 2031 (adopted March 2019) Policies DS1 Settlement Hierarchy, DS2 Housing Strategy, SD1 Place- Making Principles for Development, SD9 General Principles for Strategic Urban Extensions, SD11 South East Milton Keynes Strategic Urban Extension , HN1 Housing Mix and Density, HN2 Affordable Housing, CT1 Sustainable Transport Network, CT2 Movement and Access, CT3 Walking and Cycling, CT5 Public Transport, CT8 Grid Road Network, CT10 Parking Provision, L4 Public Open Space Provision in New Estates, ER10 Assessing Edge Of Centre And Out Of Centre Proposals, FR1 Managing Flood Risk, FR2 Sustainable Drainage systems (SuDs) and Integrated Floor Risk Management, FR3 Protecting and Enhancing Watercourses, EH5 Health Facilities, EH6 Delivery of Health Facilities in New Development, EH7 Promoting Healthy Communities, HE1 Heritage and Development, DS6 Linear Park , NE1 Protection of Sites, NE2 Protected Species and Priority Species and Habitats, NE3 Biodiversity and Geological Enhancement, NE4 Green Infrastructure, NE6 Environmental Pollution, NE5 Conserving and Enhancing Landscape Character and INF1 Delivering Infrastructure.
- 5.6 Policy SD15 of the MK Plan sets out that when and if development comes forward for an area on the edge of Milton Keynes which is wholly or partly within the administrative boundary of a neighbouring authority this Council will put forward the following principles of development during the joint working on planning, design and implementation:
1. The local authorities will work jointly, and with infrastructure and services providers, to achieve a coordinated and well designed development.
 2. A sustainable, safe and high quality urban extension should be created which is well integrated with, and accessible from, the existing city. Its structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, redways and the linear parks and strategic, integrated flood management.
 3. A strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation) should be taken.
 4. The design of development should respect its context as well as the character of the adjoining areas of the city.
 5. Linear parks should be extended into the development where possible to provide recreational, walking and cycling links within the development area and to the city's extensive green infrastructure and redway network.
 6. Technical work to be undertaken to fully assess the traffic impacts of the development on the road network within the city and nearby town and district centres and adjoining rural areas, and to identify necessary improvements to public transport and to the road network, including parking.
 7. A route for the future construction of a strategic link road(s) and/or rail link should be protected where necessary.
 8. New social and commercial facilities and services should be provided, and existing facilities improved where possible, to meet the day to day needs of new and existing residents.

9. The opportunity for new 'Park and Ride' sites for the city should be fully explored and where possible provided and efficiently and effectively linked to the city road system.
 10. The local authorities and their partner organisations should produce an agreement on appropriate mechanisms to secure developer contributions towards improvement and provision of infrastructure to support the development, including facilities in the city that will be used by residents of the development area
- 5.7 Paragraph 24 of the National Planning Policy Framework (NPPF) states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly where strategic issues are involved. It is expected by the Government that joint working on areas of common interest should be undertaken. The application site is wholly located within the administrative boundary of Buckinghamshire Council, but the principal access points to the A421 fall within the administrative boundary of Milton Keynes Council (MKC). The planning application has been submitted to both the legacy AVDC and MKC to enable both authorities determine the elements of the proposed development that fall within their respective administrative areas.
- 5.8 In order to co-ordinate and plan for the cross -boundary implications of the proposed development a Memorandum of Understanding has been drawn up with Milton Keynes Council. Since the applications were submitted in July 2015 (when the application was submitted), there has been ongoing dialogue and work with Milton Keynes Council on the proposal. A number of topic based meetings have taken place at regular intervals looking at key issues such as highways, education, design and layout and S.106 matters engaging with key consultees, stakeholders and the applicants. It is considered that the requirement to work cooperatively with adjoining authorities as specified in the NPPF has been met in this instance

Principle and Location of Development

S1 Sustainable development for Aylesbury Vale S2 Spatial strategy for growth, S3 Settlement hierarchy and cohesive development, D2 Delivering site allocations in the rest of the Aylesbury Area), D-NLV001 Land South of the A421 and east of Whaddon Road, BE2 Design of new development.

- 5.9 The site falls within the Parish of Newton Longville. The Council's Settlement Hierarchy Assessment (September 2017) identifies Newton Longville as one of Aylesbury Vale area medium villages.
- 5.10 The site is allocated for development in VALP, policy D2, it is one of two strategic sites considered at the issues and options stages of the local plan. The Housing and Economic Land Availability Assessment (HELAA) v4 (January 2017) confirmed that the two strategic allocations known as Salden Chase (NLV001) and Shenley Park (WHA001) were both suitable or part suitable for housing and/or economic development. The application site, VALP Policy D-NLV001 Salden Chase, Whaddon Road comprises agricultural land and the VALP anticipates delivery of the following:

- At least 1,855 dwellings
- employment area (2.07 ha)
- A neighbourhood centre on 0.67ha including retail (A1/A2/A3/A4/A5)
- Community (D1/D2)
- A primary and secondary school
- Grid road reserve
- Sustainable and strategic flood mitigation and urban drainage scheme linked to multi-functional Green Infrastructure
- Access and public transport infrastructure
- A high-quality walking, cycling and public transport links to and from Newton Longville, Bletchley.
- Enhancement of the existing bus service or provision of a new service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station will be required.
- A number of improvements to the surfacing of the local footpaths
- Adequate green links to Tattenhoe Park

5.11 In respect of the location of the site and transport sustainability, the site is located on the edge of Milton Keynes, and whilst it is within Newton Longville Parish, the site is actually approximately 0.5km distant from the built up area of the settlement of Newton Longville (to the south-east) and is more directly associated with the built form of Milton Keynes.

5.12 The nearest bus stops to the application site that are served by a regular bus service are on Chepstow Drive in Far Bletchley to the east of the site. These existing bus stops on Chepstow Drive are currently on Route 28 which provides on Monday to Saturday an hourly service operates between Central Milton Keynes and Bletchley Bus Station.

5.13 The nearest bus stops to the application site that provide a more frequent level of service are around 800 metres walking distance from the site boundary on Whaddon Way. These stops are currently on Route 4 which provides a 10 minute service during peak weekday hours and a 20 minute service throughout the rest of the day.

5.14 Bletchley Railway Station is approximately 4km driving distance from the application site to the east and therefore is accessible both by cycle and car. The station has parking spaces and there is also sheltered parking for cycles. The station, is located on the West Coast Main Line, providing connections to Milton Keynes Central and Birmingham New Street to the north, and Watford and Euston to the south. The station also provides links to local stations, including Leighton Buzzard. Southern Trains operates an hourly service which terminates at South Croydon.

5.15 Milton Keynes Central is approximately 7km driving distance from the site and is therefore accessible by both cycle and car. Cyclists can also use the network of Redways to access the station. The train operators serving Milton Keynes Central are London Midland, Southern trains and Virgin Trains.

- 5.16 These services and facilities are within 5km of the site, a distance where cycling can be considered a meaningful alternative to the private car. The application site is well connected on a local, sub-regional and regional scale. The A421/H8 Standing Way runs in a north easterly direction towards the A5 providing connections to the Bletchley, Emerson Valley and Furzton areas. A roundabout at the junction of H8 Standing Way and V6 Grafton Street allows access to Redmoor Roundabout which interchanges with the A5. To the east of the A5, A421 Standing Way provides access through to Junction 13 on the M1 Motorway and also north into Bedford.
- 5.17 To the west, the A421 provides links to Buckingham and the A43. The A421 runs west from Bottle Dump Roundabout in the north-west corner of the application site and providing links to the surrounding villages. The A421 continues west and meets the A413 to the east of Buckingham, some 12.5km west of the site.
- 5.18 National Cycle Route 51 (Sustrans) runs south-west through the site, along Weasel Lane from Buckingham Road, crossing Whaddon Road before re-joining the road network, east of Lower Salden Farm. Weasel Lane is a restricted byway, and the site can link with a number of public right of ways in the vicinity. The Milton Keynes cycle network, the Redway system, connects to the site, and a route can be followed towards the City Centre and Central Milton Keynes Railway Station.
- 5.19 Furthermore, there is good access to employment and leisure opportunities in Milton Keynes and the proposal also includes employment provision creating further opportunities.
- 5.20 Drawing this all together, the site is in a sustainable location for economic and housing growth which is capable of accommodating a level and form of development, which would result in a comprehensively and holistically planned urban extension. The proposals would provide major opportunities and enhancements to support sustainable growth at a strategic level, given the quantum of employment and housing proposed. It is therefore considered that the site would constitute sustainable development in locational terms, in accordance with adopted VALP policies S1, S2, S3, D2, D-NLV001, BE2 and the NPPF.

Employment issues

S1 Sustainable Development for Aylesbury Vale, D2 Delivering site allocations in the rest of the Aylesbury Area, D-NLV001 Land South of the A421 and east of Whaddon Road, D6 Provision of employment land, E5 Development Outside Town Centres.

- 5.21 The NPPF paragraph 81 states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt 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. Policy D6 of the adopted VALP recognises that continuing provision of

land and premises suitable for employment uses is needed, of a type and scale appropriate to the characteristics of the local area.

- 5.22 In recognition of the importance of sustainable development, the application proposes a sustainable mix of uses on site and job creation. The proposed employment element comprises of 2.07 hectares and this will be developed for B1 purposes, most probably offices. The offices will be developed at the gateway to the scheme, fronting the A421, and next door to the neighbourhood centre and would be closely related to the employment uses located opposite the application site within MKC. This would provide high quality employment space in a phased development as well as a local centre and up to 1855 new homes.
- 5.23 The application is accompanied by a Planning statement, retail and employment reports which considers that the site proposes a balanced and diverse employment offer creating a land use blend which is compliant with the requirements of the NPPF.
- 5.24 The neighbourhood centre will provide a range of community infrastructure and facilities to ensure the delivery of a sustainable mixed-use development of sufficient critical mass and diversity to meet the requirements and expectations of the new community and generate new employment opportunities.
- 5.25 The Updated Employment Assessment (May 2020) advises that based on a plot ratio of 0.45 the provision of 2.07ha of employment land would generate 9,315 sq. m of floor space (gross external area (GEA)). 80% of this would represent usable floor space of 7,452 sq. m.
- 5.26 The submission is clear to explain that this site is deliverable and will provide a range of local employment opportunities for people with differing skills and work experience.
- 5.27 The proposed development would also include small scale retail/ community uses within the neighbourhood centre to provide a further element of local employment. 0.67Ha of land is allocated for a neighbourhood centre which will comprise a mixed-use space for local retail and other services to include retail (A1), financial and professional services (A2), a family public house (A4), takeaways (A5) and community and recreation uses (DI and D2). Retail provision on the site would be modest and limited to only providing convenience needs for the residents of the new development, ensuring no impact upon existing services and facilities in the area in line with NPPF advice.
- 5.28 The ES also sets out that in economic terms the development will create in excess of 150 construction jobs on site, the majority for the duration of the development of the project. It is also estimated that once fully constructed, the new development will create approximately 1,880 new permanent jobs, 621 fte arising from the proposed employment land and 1,261 fte from the neighbourhood centre, schools and supporting on site community facilities / services, depending on the exact types of businesses that occupy the new units. It is also predicted that the completed

development will generate a figure of £48,230,000 arising as support for the local economy, this being a reflection of gross median household incomes derived from the Council's monitoring data. The ES provides an estimate of New Homes Bonus arising from the scheme of £8,000,000. The Retail Assessment (updated May 2020) concludes that the turnover of the proposed Neighbourhood centre will be £5,174,943 whilst the development will generate a total expenditure of £29,481,550 comprising £8,946,920 of convenience goods and £20,531,630 of comparison goods expenditure to the local economy by 2031.

- 5.29 The NPPF seeks to promote competitive town centre environments and seeks to support their viability and vitality. The NPPF states at paragraph 90 that local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (default of 2,500sqm). Policy E5 of the adopted VALP (main modification) sets out the sequential test to be followed for proposals that do not comprise small scale rural development and are not within defined town centres.
- 5.30 A Retail Assessment (updated May 2020) accompanies the application and concludes that the scheme is capable of being supported by the expenditure of the new residential population and that the impact the convenience element of the proposal would have on other local shops would be imperceptible and their turnover will increase. The turnover of the larger stores will increase also. As such, the retail provision is considered appropriate to serve as a neighbourhood centre for the development. The retail element of the proposal meets local need without adversely impacting on the existing centres. Limits to the retail floor area can be secured by condition to ensure that this element would not undermine the vitality of the town centre.
- 5.31 Therefore, not only will the development provide additional employment land and the direct creation of jobs which weighs in its favour, it is acknowledged that the construction of the development in itself would contribute to the economy of the area and so too would the resultant population growth in supporting local businesses, facilities and services with increases in expenditure estimated in the ES as well as the new services the development includes. It is therefore considered that the proposal would give rise to a number of economic benefits in accordance with policies S1, D2, D-NLV001, D6, E5 of the adopted VALP and the NPPF.

Housing: Quantum, Affordable Housing and Housing Mix

D2 Delivering site allocations in the rest of the Aylesbury Area, D-NLV001 Land South of the A421 and east of Whaddon Road, H1 Affordable Housing , H6a Housing Mix , and H6c Accessibility.

Affordable Housing Interim Position Statement (November 2019)

- 5.32 The 2021 Five Year Housing Land Supply Position Statement for the Aylesbury Vale area shows that the Council can demonstrate 5.47 years' worth of deliverable housing supply against its local housing need in this area. This calculation is derived from the new standard methodology against the local housing need and definition of deliverable sites set out in the NPPF and NPPG.
- 5.33 Quantum: This site is included in the trajectory for deliverable housing sites and calculation for the 5 years' worth of deliverable housing supply against its local housing need. The adopted VALP shows that the proposal would contribute to housing land supply within the next 5 years (delivering 300 homes in 2020-25 and 1,705 homes in 2025-2033).
- 5.34 There is no reason that the site could not be delivered within the next five-year period which would be a significant benefit. The planning statement advises that the site could deliver approximately 600 dwellings in the five year period. The SWMK Consortium comprises both developers and housebuilders, all of whom are experienced at delivering large scale mixed use developments of the type proposed in this planning application. The application site is either owned by members of the Consortium or is controlled under option. The report concludes that the initial phases of the proposed development are deliverable and could contribute to the five year housing land supply.
- 5.35 Affordable: In relation to affordable housing, VALP policy H1 requires a minimum of 25% provision. A tenure mix of 75% rented and 25% shared ownership would also be required. All of the dwellings will be required to meet the appropriate Building Regulations and this will ensure that suitably accessible housing is achieved.
- 5.36 The NPPF states that local planning authorities should set policies for meeting affordable housing needs on site and those policies should be sufficiently flexible to take account of changing market conditions over time. The applicant has confirmed through S106 discussions that 30% (557) of the dwellings are to be affordable units and any phasing will ensure that the aggregate percentage as the scheme progressed does not fall below 30%. The provision meets VALP policy requirement of at least 25% affordable housing to be provided on site. Regard is paid to MKC policy HN2 requirement for developments to secure 30% of new housing in the Borough as affordable housing. It is considered that 30% provision for affordable housing is in line with policy requirements of VALP and the NPPF. S106 discussions are ongoing between the Consortium and housing officers on securing this provision and the clustering standards, housing mix and tenure split.
- 5.37 Mix: The scheme is in outline and does not seek permission for a specific housing mix and officers will ensure at the detailed matters stage that the market housing and affordable housing on the scheme accords with the housing need prevailing in the area at that time and is reflective of the overall mix of dwellings within the development. The approach of setting out an indicative mix (at the outline stage) will ensure flexibility over the duration of the development programme and is considered to be in line with

the NPPF which seeks to create sustainable, inclusive and mixed communities and requires a mix of housing based on current and future demographic trends.

- 5.38 Policy H6c of VALP requires that all development meet and maintain high standards of accessibility so all users can use them safely and easily, 15% of the affordable units will be required to be wheelchair accessible. The accessible units will be secured in the S106 and it is being progressed on this basis.
- 5.39 As part of the housing proposed, 60 units will be extra care residential units (C3). The 60 Extra Class residential units (C3) introduced as part of the amended scheme will allow the occupation of the units by older people with some levels of care needs – consistent with retirement accommodation and or conventional sheltered housing, use class C3 (as described in VALP see Table 14 - Types of Older people accommodation). The provision of the extra care units would add to the range of accommodation provided across the development ensuring that there is a sustainable mix and balanced community. The Extra Care housing will be secured in the legal agreement, and the detailed design, scale, layout, access and landscaping will be subject to reserved matters approval.
- 5.40 Having regard to the above matters, the provision of 1, 855 houses at Salden Chase would make a significant contribution towards the supply of deliverable housing land and contribution of affordable housing on site as well as the mix of properties to be proposed and is consistent with the approach advocated by the Government in planning positively to deliver sustainable development. The proposal would also contribute to the delivery of affordable housing, older persons housing, sustainable homes that would have economic, social and environmental benefits in accordance with the adopted VALP policies D2, D-NLV001, H1, H6a, H6c and the NPPF.

Transport matters and parking

T1 Delivering the Sustainable transport vision, T3 Supporting local transport schemes, T5 Delivering transport in new development and T6 Vehicle parking, Appendix B (Parking Standards), T7 Footpaths and cycle routes, T8 Electric vehicle parking and T4 Capacity of the transport network to deliver development.

- 5.41 The NPPF at paragraph 110 seeks to encourage sustainable transport modes and to ensure safe and suitable access to new development. It will also be necessary to consider whether the proposal provides opportunities to undertake day-to-day activities and that the development would ensure that safe and suitable access to the site can be achieved for all people, and that improvements can be undertaken that effectively limit the impacts albeit that development should only be refused on transport grounds where the residual cumulative impacts are severe.
- 5.42 The promotion of sustainable transport is a core principle of the NPPF and patterns of growth should be actively managed to make the fullest possible use of public transport,

walking and cycling and to focus significant development in locations which are or can be made sustainable.

- 5.43 Local Transport Plan 4 (2016-2036): Buckinghamshire's 4th Local Transport Plan was adopted in April 2016 and sets out the Council's policies and strategies to address transport related issues and challenges over the plan period. Policy 2 relates to improvement in connectivity: and Policy 7 discusses the importance of reliable road travel.
- 5.44 Since the resolution was taken at the Committee meeting in April 2019, the applicants have submitted a package of updated documents and associated plans proposing amendments to the scheme. This included a revised Transport Assessment and Framework Travel Plan (May 2020), the scope of the revised TA was discussed and agreed between the Applicants and representatives of both Buckinghamshire Council (BC) and Milton Keynes Council (MKC) with Buckinghamshire Council providing final agreement on 20th February 2020. Two Technical Notes were further submitted ahead of submission of the revised TA for Trip Generation and Trip Distribution. The Trip Generation Note was accepted by BC on 26th March 2020 and MKC confirmed acceptance on 7th April 2020 in email sent by their representative Nigel Weeks Stirling Transport. The Trip Distribution Note was submitted for review on 26th March 2020 and MKC emailed acceptance of the methodology on 7th April 2020 by Nigel Weeks. BC raised several comments in a series of emails on review of the revised TA it was noted that some of these comments had not been addressed and were subject to further discussion. Initial Highway comments were provided on 29th July 2020 which in turn led to a further Technical Note (TRN1) submitted in September 2020. Further comments were provided on the TRN1 on 2nd October 2020 with a further Technical Note TRN2 submitted in December 2020 and TRN3 in January 2021 with further clarification letters provided by the Applicant.
- 5.45 BC Highways full comments were provided on 13th April 2021, contained in Appendix E. A further BC Highways response was provided on 27th May 2021 (Appendix F) providing comment and response to an objection received from Milton Keynes (Appendix G) .
- 5.46 A separate Application was submitted to Milton Keynes Council in March 2015 (15/00619/FUL) in relation to physical improvements to the Tattenhoe and Bottledump roundabouts and a new access onto the A421 (priority left in / left out) to accommodate the development for Aylesbury Vale District 15/00314/AOP. The application was taken to a number of MKC Development Control Committee (DCC) from 2016 to 2019, where Officers recommended that planning permission be granted and decision was deferred until November 2019 when MKC DCC resolved to refuse planning permission, against Officer recommendation, on the basis:

'That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and

Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.'

The Applicant appealed against the decision of MKC DCC to the Planning Inspectorate, with a Planning Appeal held in May 2021 in which Buckinghamshire Council attended as a Rule 6 party. The Revised TA (May 2020) and subsequent Technical Notes (1 to 3) were used for the purpose of considering the Traffic Impact of the development on the Milton Keynes network. The Planning Inspectorate provided their findings on the 26th July 2021, the overall conclusion was as follows,

Paragraph 88. For the above reasons, I have found that the appellant has demonstrated that mitigation would be able to be provided to adequately address the highway impacts, and the proposal would not have an unacceptable impact on highway safety or on the flow of traffic and congestion on the Grid Road network. The residual cumulative impacts on the road network would not be severe and there are no highways related grounds for refusing planning permission. The proposal would accord with the statutory development plan, and policies in the Framework taken as a whole, and would facilitate the delivery of substantial benefits in the public interest through the SWMK development.'

Paragraph 94. I have found that the proposal would accord with the development plan as a whole and the other material considerations that I have given above weigh in its favour. Therefore, for the reasons given, and having regard to all relevant matters raised, I conclude that the appeal should succeed.'

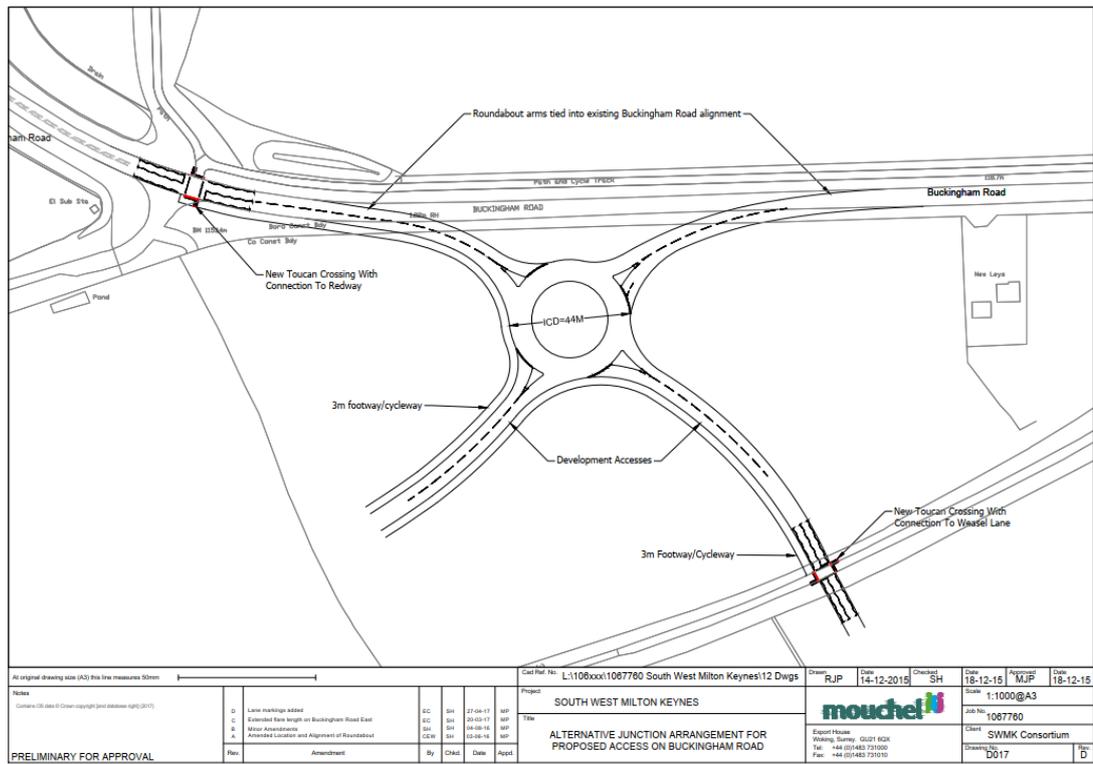
- 5.47 The Inspector's decision is a material consideration in determining this application. The full Planning Inspector Planning Decision Report is contained in Appendix H.

Vehicular Access

- 5.48 Access into the site is a matter for consideration in this application and as submitted, there are three points of access proposed from the development onto the local highway network at the following locations: Whaddon Road, Buckingham Road and A421 Standing Way.
- 5.49 The access onto Whaddon Road falls within the jurisdiction of Buckinghamshire highway authority whilst the A421 Standing way access point joins the highway network controlled by Milton Keynes Council. The Buckingham Road access joins the existing public highway controlled by Milton Keynes Council but the majority of the new layout is located within Buckinghamshire.
- 5.50 Three access points were selected to distribute traffic onto the local highway network and provide route choice options for new residents of the proposed development. The internal road layout, to be considered at the reserved matters stage, would however need to be designed to discourage through trips (rat running through the development). This will need to be addressed, using principles from Manual for Streets, as part of any future reserved matters application.

Buckingham Road Access

- 5.51 The original Transport Assessment proposed a signalised gyratory arrangement. Both Milton Keynes Council and at the time Buckinghamshire County Council raised concerns regarding introducing traffic signals in this area as well as the complex arrangement, which could be confusing for drivers.
- 5.52 In response to these concerns a new four arm roundabout junction has been proposed, encompassing two new site roads. The existing Redway on the northern side of Buckingham Road is to remain and a 3m shared footway is proposed on the southern arms of the junction into the site. Toucan crossings are proposed on the western arm between the new roundabout and Tattenhoe Roundabout and where the new road crosses Weasel Lane, providing safe crossing facilities to the wider pedestrian and cycle network.
- 5.53 During the planning application determination period, and subsequent to agreement of the layout with Buckinghamshire Council and Milton Keynes Council, revisions were undertaken at the request of Buckinghamshire Council to provide minor lane marking improvements. These revisions were shown on Drawing 0017D and it is this revision that Buckinghamshire Council recommend being taken forward.
- 5.54 The Buckingham Road access junction has been modelled using industry standard software Junctions 9 (ARCADY), as set out in TRN2.
- 5.55 The assessment of this proposed junction shows that the junction operates within capacity in both the AM and PM peaks in the 2033 Do something 1 and 2033 Do Something 3 scenerios, in particular the current free flowing sections of Buckingham Road are predicted to have at maximum 11 seconds of delay. Furthermore, the design of the junction does not impede the ability of either Council to deliver the Grid Road if required in the future. Whilst the modelling demonstrates that there is junction capacity available in its current form to accommodate changes to the network, additional land will be secured by S106 Agreement, as part of the Grid Road reserve, to ensure that amendments to this junction can be carried out in the future.



5.56 An independent Stage 1 Road Safety Audit has been undertaken and Buckinghamshire Council is satisfied that the problems identified can be resolved during detailed design consideration at the reserved matters stage. The current design as shown in the May 2020 TA shows wide single lane entry on Buckingham Road East. Further revisions were undertaken at the request of Buckinghamshire Council to provide minor lane marking improvements, as shown on Drawing 0017D. This version would be required to be taken forward to detailed design.

5.57 At the May Planning Inquiry this junction was discussed in detail. In his Appeal Decision report, the Planning Inspector stated:

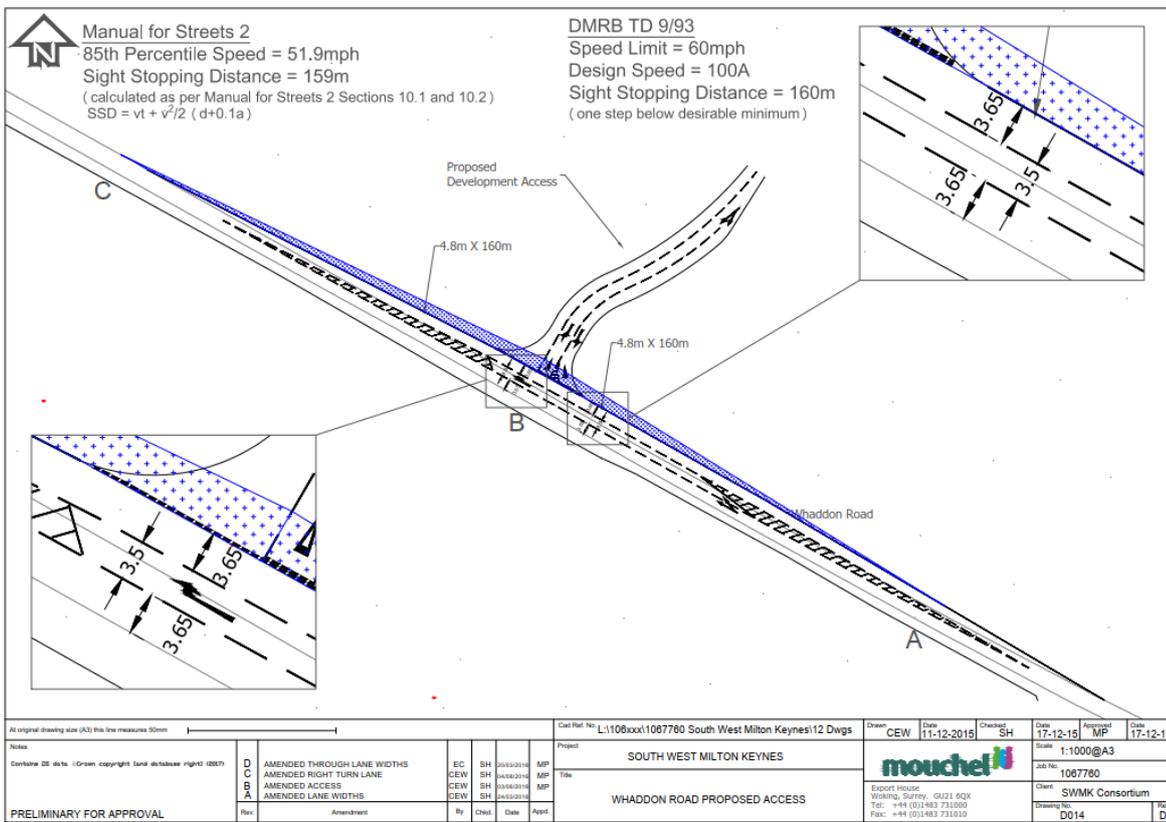
'41. I conclude on this junction that it has been designed in sufficient detail to demonstrate that it would be safe, or would be able to be made safe with minor amendments that might be recommended by a Stage 2 RSA, particularly with regard to the provision of adequate visibility, its entry widths and pedestrian and cycle crossings.'

Whaddon Road Access

5.58 The proposed access at Whaddon Road is a ghosted right turn priority junction. Speed surveys were completed on Whaddon Road in June 2015 and the design of the junction ensures that appropriate visibility in both the horizontal and vertical planes can be achieved based on requirements set out in Manual for Streets 2 and DMRB.

5.59 An independent Stage 1 Road Safety Audit was carried out on the Whaddon Road access and the design has been amended to address the problems raised, including the extension and provision of a longer flare length (within the site) to accommodate peak hour demand for vehicles leaving the site.

5.60 The Stage 1 Road Safety Audit did raise concerns regarding the conspicuity of the junction to approaching road users. Whilst the Applicant has demonstrated that the required visibility splays can be achieved, both in the horizontal and vertical planes, the Highway Authority is of the view that further design features are necessary including but not limited to, signs, lines and coloured surfacing. A review of the collision record along Whaddon Road has shown that the majority occur within the hours of darkness, as such the provision of lighting on approach and at the junction should be considered. Furthermore, a speed limit reduction on Whaddon Road should be investigated, given the recorded 85th percentile speeds and the change in character that would result from the development. A potential implementation plan would need to be developed for a reduced speed limit if deemed necessary. The Highway Authority is content that these can be secured by way of a condition.



- 5.61 The Whaddon Road access junction has been modelled using industry standard software Junctions 9 (PICADY), as set out in TRN2. The results of the assessment show that the junction operates within capacity in both the AM and PM peaks for all the modelled scenarios with minimal queuing and delay expected, significant spare capacity is present to cater for possible increases in flow.
- 5.62 The results of the modelling work and sensitivity testing undertaken by the Applicants have adequately demonstrated that with an element of traffic reassignment the two site access junctions in combination have sufficient capacity to accommodate the vehicle trips generated by the proposed development. As such, the Highway Authority is of the view that subject to detailed design, 'safe and suitable access' can be achieved in accordance with the requirements of the NPPF.

A421 Standing Way

- 5.63 The design of the access from A421 Standing Way is in the form of a left in only junction. This junction falls within Milton Keynes Council's jurisdiction and was considered separately by their planning committee, whose refusal of permission was successfully appealed against by the Applicant including items raised in reference to this junction. It should however be noted that Buckinghamshire Council does not have any objections in principle to the proposed access arrangement, noting that the junction has been designed in accordance with relevant design standards. Buckinghamshire Council did raise concern over how the access will interact with the Old Buckingham Road alignment, which is used by pedestrian and cyclists, and potentially the same user groups from the development will also make use of the route. It was considered that measures would be needed to ensure safe crossing movements for non-motorised users with potential high vehicle speeds (relative) on exiting the bend of the new access and restricted intervisibility.
- 5.64 In TRN1 the applicant provided an arrangement to manage the potential interaction with Old Buckingham Road, replicated below. The arrangement would enable pedestrians and cyclists to divert further into the Site and to cross the proposed road access safely. Whilst this design provides a less direct route, it does in principle provide a safer crossing location with lower vehicle speeds. The set-back crossing also reduces the potential environmental impact of tree removal to ensure adequate intervisibility for an in-line crossing, the design of which would be finalised as part of reserved matters.

Off Site Impact Assessment:

Assessment methodology

- 5.67 It was agreed at the scoping stage with both Buckinghamshire Council and Milton Keynes Council that the development proposals would be tested within a static spreadsheet-based transport model. The alternative approach would to have been the use of one of the strategic transport models for the area. Buckinghamshire Council raised some concern over the use of updated Milton Keynes Multi-modal Model (MKMMM). On review of the model documentation at the time there were several potential issues that could impact the use of the model to provide a single, unified, assessment methodology
- 5.68 In addition to the MKMMM the Buckinghamshire Countrywide Strategic Model was also considered, but like MKMMM this would not cover all the network within MKC that would need to be modelled. As such a manual spreadsheet-based approach assessment was requested to ensure a consistent process was applied across the study area. It is acknowledged that the use of a manual spreadsheet-based approach is unable to account for the benefits of any dynamic reassignment that would arise in a congested urban network such as found in Milton Keynes. However, the methodology assumes that traffic volumes at a junction would continue to increase even when queues and delay predicted by the model would likely result in drivers seeking alternative routes as they would unlikely to be willing to accept a certain level of queueing and delay. Nor does the methodology consider potential modal choice which may occur on a congested network. As such BC highways consider the manual-spreadsheet based methodology provides a robust 'worst case' assessment of the development impacts on the junctions assessed with impact determined when comparing the future year scenarios of with or without development traffic
- 5.69 A series of traffic surveys were commissioned in February 2020, including Automatic Traffic Counts (ATCs), junction turning counts, and queue length surveys. The ATC data covered a two-week period, and the turning counts and queue length surveys were carried out over three consecutive mid-week for the 18 junctions included in the assessment. The scope and location of the surveys were agreed with then Buckinghamshire County Council and Milton Keynes Council prior to being commissioned and the Highway Authority is satisfied that surveys have been carried out in accordance with best practice and the 2020 base data is robust.
- 5.70 Some concern was raised over the validity of the surveys in February 2020 as is not a usual neutral month for data collection purposes. The average two-way flow from the permanent counter on A421 Standing Way was reviewed for the period from 0800 - 0900 by month for 2017 to 2019 period and this was compared to an average neutral month across the period. The result of which when comparing the peak hours was the AM peak varied by 32 vehicles less than the average for the neutral month whilst the PM peak showed there to be 89 vehicles less than the average for the neutral month.

This indicates that traffic through the month of February is comparable to neutral months.

- 5.71 Milton Keynes Council have raised an objection to the Proposed Development on Highway matters. One element of which relates to the use of the assessment methodology employed (having been previously agreed) in that if redistribution is relied upon then a wider area network needs to be modelled. Buckingham highways confirm that the assessment of the impact on assessed network has not relied on any re-routing with all flows sustained on the A421, Buckingham Road and other roads that form the assessed network.
- 5.72 It is BC highways opinion that the methodology used provides a robust interrogation of the junctions under review and is likely to represent a worst-case scenario. It is accepted that this may result in some movements to adjacent roads and that the mitigation proposals along the A421 have the potential to attract greater use, drawing traffic away from currently congested roads, in addition to taking some movements away from the A421 to others following improvements to the local network. The most likely outcome is that this would balance across the surrounding network and that overall changes in route flow would be very limited. As such, a wider network model is not considered a requirement and the development of a suitable micro-simulation model, or localised update of the MKMMM, to be unnecessary and at this stage in the application to be disproportionate.
- 5.73 The view of BC Highways was accepted by the Planning Inspector and is detailed in the Planning Appeal Decision report:

Paragraph 23. The appellant has taken the results of the Updated TA and sought to mitigate the impacts through junction improvements. I accept the position of the appellant and BC that some redistribution of traffic is likely, but the appellant does not appear to me to have relied upon this in determining the mitigation and reaching its conclusions as to the acceptability of the traffic impacts of the SWMK development. As such, I am satisfied that it is not necessary to attempt to model any redistribution effects over the wider area, especially as the amount of extra work that would be required to provide anything that would be accurate enough to assess would be disproportionate in time and expense.'

Milton Keynes Junctions:

- 5.74 It is acknowledged that the majority of traffic generated by the development will occur on roads within Milton Keynes. For assessing the impact within Milton Keynes, a static spreadsheet-based transport model was adopted as discussed above. Buckinghamshire Highway Authority has performed a full review of the junctions and network which fall under the remit of Milton Keynes Council as Highway Authority. This was undertaken to determine the wider impact of the development and that where necessary suitable mitigation is proposed to ensure the development will not have significant impact on the wider highway network. It is acknowledged that this is

somewhat unusual, in that performing a full review outside of the Buckinghamshire boundary but was considered necessary to process the Application.

- 5.75 The first substantive response to the Buckinghamshire Application from Milton Keynes Council highways was received on 13th April 2021 (with a holding letter dated 12th February 2021 detailing initial objection). The latter letter provided greater details on the reasons for objecting. Previous to this no communication was received in terms of the application in reference to highways, as such it was determined that a full review be performed of the Milton Keynes network in late 2020 so a decision could be made on the impact of the wider network, taking into consideration that a provisional Committee date had been set for early 2021.
- 5.76 Milton Keynes Council commissioned Stirling Maynard, an independent transport consultant, to assess the highway and transport impacts of the proposed development on the Milton Keynes network. Their comments received on 13th April 2021 indicated their objection to the development on highways grounds. The Buckinghamshire Highway Authority's response to the Milton Keynes objection can be seen in Appendix F which identifies numerous items / issues which Buckinghamshire highways consider to have been satisfactory resolved, or details where Buckinghamshire highways are in disagreement with Milton Keynes and state our reasoning and justification for the non-severe impact determination on the network.
- 5.77 The junction assessments and proposed mitigation schemes have been reviewed by Buckinghamshire Highway Authority and a full detailed position for each junction is set out in the full highway comments attached as Appendix E. The junctions in Milton Keynes have undergone further review and analysis based on the consultation response from Milton Keynes highways and this is attached at Appendix G. The outcome of which is that the mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout, whilst noting that some arms may perform worse. However, when considering each junction as a whole across both peak period's improvements can be observed and the impact in terms of highway safety and congestion impact is not considered to be severe in the context of paragraph 111 of the NPPF.
- 5.78 All the junctions in Milton Keynes were discussed in detail at the May Planning Appeal and within the associated Appeal documentation. In the Planning Appeal Decision Report the Planning Inspector came to the following conclusion in terms of the overall effects of the Mitigation within Milton Keynes:

Paragraph 76. The modelling has shown that there would be increased congestion on some arms of some of the junctions by 2033, with the forecast traffic growth. However, this would be expected in an urban area and, when all parts of the junctions are considered across the AM and PM peaks, the modelling shows that with the mitigation there would be an improvement in 2033 compared to the 'Do-Nothing' scenario. With regard to an assessment of the overall effect on the network, I accept that the MKMMM Reference case is based on out of date data, but it does not indicate that

there would be any significant problems due to congestion on the Grid Road network as a result of the identified additional development in Plan:MK, including the SWMK development.’ xx

Paragraph 77. For the reasons given above, I have found that the proposed mitigation is deliverable and would not result in any unacceptable impact on highway safety. I conclude that the appellant has demonstrated that the residual cumulative impact during peak travel periods with the SWMK development fully occupied in 2033 on a worst-case basis would not be severe. The mitigation would address the impact of the SWMK development and assist with accommodating the predicted wider growth in traffic. This view is also supported by the BC highways expert that provided evidence to the Inquiry.’

Buckinghamshire Junctions:

- 5.79 The junction assessments and proposed mitigation schemes have been reviewed by Buckingham highways and a full detailed position for each junction is set out in the full highway comments attached as Appendix F. The outcome of which is that the mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout, whilst noting that some arms may perform worse. However, when considering each junction as a whole across both peak period’s improvements can be observed and the impact in terms of highway safety and congestion impact is not considered to be severe in the context of paragraph 111 of the NPPF.
- 5.80 The exception to the previous statement is the junction of Bletchley Road/Stoke Road/Drayton Road/Whaddon Road in Newton Longville. The Applicant has provided a potential mitigation scheme which would alter the form of the junction from a priority crossroads to a mini roundabout. Buckingham highways expressed some concern about the design and the positive impact of providing significant capacity benefits to the junction. This would serve to encourage non-local traffic using Stoke Road and Whaddon Road as a ‘Rat-run’ between the A4146 to the south-east and the A421 to the north-west. On this basis, the Highway Authority recommends that the junction is retained as a priority crossroads, A new raised junction table should be provided, as part of a comprehensive traffic calming scheme for Newton Longville, which is discussed further below.

Mitigation Package A421 Corridor:

- 5.81 The A421 provides a key east-west link within the Aylesbury Vale Area, connecting the M40 with the M1 via Buckingham and Milton Keynes. The majority of the A421 is single carriageway; however, the route becomes a dual carriageway after crossing the boundary with Milton Keynes. There are concerns regarding congestion on the A421 at peak times, and its function as a key east-west link. The further impact of potential developments on the A421 in Buckinghamshire is therefore of particular concern. As

part of the application the A421 has been subject to extensive modelling and testing to ensure the highway network can accommodate the proposed development.

- 5.82 Several junctions along the A421 corridor are shown to be operating over capacity in 2033 without development traffic. This is a direct result of background traffic growth. The Applicant has however demonstrated that the impact of the development on the surrounding highway network can be mitigated and therefore the cumulative residual impact of the development cannot be considered 'severe' in the context of paragraph 111 of the NPPF. Furthermore, several of the improvements proposed are likely to provide a 'nil-detriment' situation, whereby the highway network is 'no worse off' with the proposed development in a future forecast year of 2033.
- 5.83 At present the A421 is free flowing along most of its length in Buckinghamshire, with junctions managed through priority junctions or roundabouts. The Applicant has proposed signalisation of the priority junctions of the A421/ Warren Road and A421/Shucklow Hill/Little Horwood Road. Whilst the signal schemes proposed adequately resolves queuing on the minor road, it would also stop the free flow and introduce delays to the primary route.
- 5.84 In order to retain the free flowing nature of the A421 in Buckinghamshire and ensure limited delay is encountered on the route, it is prudent to commute the costs of construction of the signal schemes into the Section 106 agreement. A contribution towards corridor improvements will be agreed with the Applicant to aid in management of the A421 and the safe access and exit from its joining roads that are predicted to suffer capacity issues in future years.

Traffic through the Villages:

- 5.85 The Transport Assessment considers in detail the impact of the proposed development on the villages of Whaddon, Newton Longville, Little Horwood, Mursley and Great Horwood, in terms of capacity and road traffic safety. The Transport Assessment considers the impact on these villages, in terms of capacity, and has been assessed with reference to the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART) produced by the Institute of Environmental Assessment (1993).
- 5.86 The predicted increase in traffic flow is greatest through Newton Longville, due to the location of the development. The impact of development traffic reduces further to the north and west as traffic disperses across the wider highway network. The results of this revised assessment indicate that the increase in traffic flow through Nash, Great Horwood, and Mursley are not considered to be significant (do not exceed the 10% traffic growth for sensitive areas) and would not result in a significant impact on the local highway network
- 5.87 Newton Longville has a conservation area and should be considered against the lower GEART threshold (10%) for impact. The assessment has shown that there would be

10% or more growth through the village in peak periods for the scenarios which is considered to constitute a significant impact. The Applicant has therefore proposed a traffic calming scheme to mitigate the impact of the development, which is addressed further below and is to be secured in a S106 Agreement.

- 5.88 Little Horwood does have a conservation area and should therefore be considered 'sensitive' in nature and against the lower GEART threshold (10%) for impact, which is predicted to be 20% increase for both DS1 and D3 scenarios in the PM. However, the actual change in traffic flow in the PM peak is only six vehicles northbound and seven vehicles southbound (a total of 13 vehicles) and this is not considered to be a significant change in traffic flow and would not result in a severe impact through the village.
- 5.89 Whilst no impact is predicted for Whaddon a consultee has queried the accuracy of the traffic flows, and subsequent traffic impact modelling, which may have affected the journey time analysis on the basis that road closures were in place within north Milton Keynes impacting the potential movements through the village. A previous financial contribution of £22,000 to improve road safety and enhance the existing traffic calming was previously agreed, to mitigate against potential redistribution via Whaddon Village and improve road safety through the village. This contribution has been maintained and will be secured in a S106 Agreement.
- 5.90 Some consultees have queried the validity of the impact on local villages, including citing that the assessment does not include neighbouring developments. Buckinghamshire Council are satisfied that the impact on villages performed by the Applicant is robust and founded on 'worst' case whole development trip generation and appropriate trip distribution and includes committed developments in the area and the sensitivity test for Shenley Park and therefore is fit for purpose. Where necessary mitigation measures have been proposed to alleviate potential impacts.

Newton Longville Traffic Calming Proposals:

- 5.91 An indicative traffic calming scheme for Newton Longville has been submitted as part of the revised TA, which includes enhanced gateway features on all roads leading into the village, pinch points along Whaddon Road, raised junction tables and signing/lining. The Council is satisfied that the scheme would provide the desired effect of deterring traffic that could otherwise use the strategic road network, by slowing journey times through the village. Despite this, the Council is aware that Newton Longville Parish Council has their own aspirations for traffic calming within the village and is of the view that it would be more appropriate for a financial contribution towards the design, consultation and implementation of traffic calming be paid by the Applicant. This will allow the Council to work with the Parish Council to provide a comprehensive traffic calming scheme that meets the aspirations of the local community. As such a financial contribution is required to be secured in a S106 Agreement.

Impact on Highway Safety:

- 5.92 The agreed development trip distribution has identified additional trips on the network and the Applicant has utilised the computer programme COBALT (Cost and Benefit to Accidents – Light Touch) developed by the Department of Transport (DfT) to undertake analysis of the impact on highway safety. The assessment is based on a comparison of collisions by severity and associated costs across an identified network in ‘Without-Scheme/Development’ and ‘With-Scheme/Development’ forecasts, using details of link and junction characteristics, relevant collision rates and costs and forecast traffic volumes by link and junction.
- 5.93 As the Proposed Development will result in an increase in traffic, the impact will always show negative values. However, the extent to which a negative value is derived will be dependent upon the volume of additional traffic that the Proposed Development would generate. Traffic flows developed and agreed as part of the development trip generation and distribution process and provided in TRN2 were used to perform the analysis.
- 5.94 The analysis indicates that most links across the study area will see very small changes in ‘negative benefits’ (as they are described in COBALT), with B4304 Buckingham Road and A421 Standing Way to the east of the site showing the greatest impact of the development traffic. The COBALT analysis also predicts a change in collisions and casualties (over a 60-year period). The results predict that there will be an increase of 140 collisions with 202 casualties because of development traffic. This equates to on average to 2.4 collisions and 3.4 casualties per year. It should be noted that the analysis does not consider mitigation measures proposed as part of the development application.
- 5.95 Based on the results of the COBALT analysis Buckinghamshire Highways are satisfied that the development will not have a significant impact on highway safety and that overall, this does not represent an unacceptable impact.

***Walking, Cycling and Public Transport
Existing Conditions – Sustainable Modes of Transport***

Public Transport Provision

- 5.96 In respect of bus services, currently the nearest bus stops that are served by a regular bus service are on Chepstow Drive in Far Bletchley to the east of the Site. The existing bus stops on Chepstow Drive are currently served by Route 28 operated by Red Rose Travel. Between Monday and Saturday, an hourly service operates between Central Milton Keynes and Bletchley Bus Station. The nearest bus stops to the Site that provide a more frequent level of service are around 950 metres walking distance from the Site boundary on Whaddon Way, and 2km from the centre of the Site. These stops are currently on Route 4, operated by Arriva which provides a 20-minute frequency service from 6:47 am to 10:27pm between Milton Keynes City Centre and Bletchley from Monday to Friday. To ensure that all new dwellings are within 400m walking distance

to a bus stop, it is essential for a bus service to be provided that enters into the application site.

- 5.97 The Applicant has proposed to either enhance an existing bus service or provide a new start up service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station. The objective is to provide a high quality, fast, frequent and reliable bus service that serves the social and accessibility needs of those without access to a car. It is also expected that with the effective marketing initiatives included within the Framework Travel Plan, people who would otherwise use a private car will be encouraged to use the proposed bus service for many of their work and leisure based journeys.
- 5.98 The Applicants preferred option would be to start a completely new high frequency service between the Site, CMK, the rail station and key social infrastructure. The target would be to provide a journey time between the Site and CMK of circa 20 minutes. There is also an option to extend an existing service to the site. As part of the previous submission. Initial discussions with MKC and the operator Arriva indicate that either service 8 or 2 could be extended. This is considered to be adequate to provide a realistic option to new residents, in order to influence modal choice.
- 5.99 The bus service would have a phased operation based on the anticipated 'build-out' of the Proposed Development with the intention to ensure that there is a critical mass of occupied dwellings prior to the commencement of the service, to ensure sufficient potential patronage so that the service would be operationally viable. The proposed bus service between the Site and Central Milton Keynes would commence no later than the occupation of the 100th dwelling. Buckinghamshire Council have requested that a second trigger be applied to the start of the bus service so the service would start no later than the occupation of the 100th dwelling or 12 months from first occupation, this trigger is to be secured through the s106 agreement. BC requires the submission of a bus service phasing plan, which can be secured by condition. Indicative locations of the bus stops are shown on the illustrative masterplan and the majority of residential properties are within 400m walking distance of a bus stop, which is considered appropriate.
- 5.100 The contract for operating the new service would normally be tendered by Milton Keynes Council in conjunction with the public transport team at Buckinghamshire Council. On this occasion however, the Applicants wish to have a service level agreement directly with the preferred operator and agree the appropriate costs to operate a viable high quality service in perpetuity. This will be provided by way of a S106 obligation, in consultation with both Milton Keynes Council and Buckinghamshire Council.

Rail Provision

- 5.101 The nearest railway station to the development sites is Bletchley Railway Station, approximately 4km distance to the east via the A421 / B4034. The station has provision for 628 parking spaces. It provides an hourly service to Milton Keynes, London Euston,

Bedford, Croydon and Clapham Junction and links to the north including Milton Keynes Central and Birmingham New Street.

- 5.102 Bus access to Bletchley Railway Station would be via Bus Route 4 that operates with a frequency of every 20 minutes. The nearest bus stop for Route 4 is on Whaddon Way in Bletchley, a 950m walk from the Buckingham Road site access. Bus users would alight at Sherwood Road, from where it is a 300m walk to the Railway Station. The total journey time for this route would be 20 minutes (11 minute walk, 5 minutes bus, 4 minute walk).
- 5.103 Cycle access to Bletchley Railway Station would be via Buckingham Road. There is an existing Redway along Buckingham Road to Caernarvon Crescent, from where the route would be on-road to the station. The route is 3.2km long, equivalent to a 13 minute cycle (based on an average cycling speed of 15kph). An alternative route would be via the Redway on Buckingham Road initially, then using the quieter on-road routes of Whaddon Way, Shenley Road, Church Green Road, Wilton Avenue and a short cycle path to the station. The route on quieter roads is 4km; equivalent to a 16 minute cycle. The Applicant has proposed a contribution for the provision of additional sheltered and secure cycle parking at Bletchley Station, to promote the use of sustainable travel to and from the station. This is to be secured as an obligation by way of a S106 Agreement.
- 5.104 Milton Keynes Central Railway Station is approximately 7km from the site (via Snelshall Street, Childs Way and Elder Gate). It provides an hourly service to Milton Keynes, Watford Junction, London Euston, Croydon and Clapham Junction. Access to Milton Keynes Central Railway Station by public transport would be via the extended Route 8, with an approximate travel time of 20 minutes from the Site. The station provides sheltered storage for 900 bicycles and can be accessed from the site via the Redway network, a journey of approximately 30 minutes.
- 5.105 Buckinghamshire Council consider that new residents of the proposed development would have ability to access rail services by means other than that of the private car.

Cycle and Pedestrian Provision

- 5.106 The Site is currently served by a network of existing pedestrian footways and public rights of way predominantly to the north and east of the Site and provide suitable access from the site to local footway/footpaths and the local cycle network, providing connections to services and facilities within the area. The existing opportunities for walking to the south and of the Site are limited given the more rural nature of those locations.
- 5.107 National Cycle Route 51 is the nearest cycle route to the A421 corridor; it runs between Bletchley and Winslow, passing to the south of Salden Chase, before continuing on to Bicester. Furthermore, the majority of the A421 corridor consists of unclassified rural roads, where on-road cycling is a viable option.

5.108 The Milton Keynes Cycle Network, known as the Redway System, commences west of the Bottle Dump roundabout and continues eastbound, north of the A421 Standing Way. The existing infrastructure provides highway quality routes from the site to both Milton Keynes City Centre and Central Milton Keynes Railway Station.

5.109 Updated walking and cycling isochrones were provided in TRN1 to highlight the range of facilities and amenities accessible within walking and cycling distance of the Site. These indicate that most of the existing amenities and facilities will be within an acceptable cycling distance but fall outside typical pedestrian distances. This is offset by the proposed development providing on site facilities and amenities which will likely minimise the need for longer walking journeys, with a convenience store, primary and secondary schools, retail space for Café, Pub or Takeaway and community facilities. Furthermore, as part of the S106 agreement the securing of a contribution toward the delivery of healthcare facilities either on or off site has been agreed.

5.110 An updated illustrated masterplan has been submitted in support of the planning application. The masterplan aims to encourage walking and cycling as realistic alternatives to that of the private car, through high quality infrastructure. Pedestrian access to the proposed development will be achieved as follows (with all but the recreational footpaths being available for use by cyclists):

- The old Buckingham Road south of the current A421 dual carriageway
- Whaddon Road - across the A421 close to Bottle Dump Roundabout via the existing subway
- The existing Subway across A421 to Snelshall West
- Buckingham Road – south east of the Tattenhoe Roundabout

5.111 Consideration will need to be paid to pedestrian crossing facilities as part of any future reserved matters application. At this stage the following crossings have been identified:

- A toucan crossing across the Primary Road at Weasel Lane
- A surface crossing to provide safe and convenient access to the secondary school. This should be in the form of a controlled facility
- A Pegasus crossing across Whaddon Road
- Toucan crossings on Buckingham Road East and Buckingham Road West

5.112 The application proposes a new connection for walkers and cyclists between Weasel Lane and the Bottle Dump roundabout, along a green corridor. This will provide an important strategic connection between NCN 51; the proposed new cycling route along the old Buckingham Road (A421); and the Redways alongside the new A421.

5.113 As this is an outline application with all matters reserved except access, details of the cycle and pedestrian infrastructure within the site will need to form and be considered as part of any future reserved matters application.

5.114 Buckinghamshire Council consider that new residents of the proposed development would have ability to access on-site amenities and facilities on foot or on bike, with external trips being achievable by bike but limited local trips on foot due to distance. However, the new high frequency bus service will provide the opportunity for multi-modal journeys to be performed and consider that overall, the development will have a positive impact on pedestrian and cyclist movements.

Public rights of way

5.115 Policy C4 of the adopted VALP seeks to protect public rights of ways and requires that the protection and conservation of public rights of way needs to be reconciled with the benefits of new development, to maximise the opportunity to form links from the development to the wider public rights of way network. Several improvements to the surfacing of the local footpaths are proposed as outlined below. Those within the site will be completed as part of the development and a financial contribution is to be secured as part of the Section 106 Agreement for those routes outside of the site. The improvements within the site include:

- Footway/cycleway/bridleway along Grid Road reserve to be provided and constructed to 'Redway' standard
- Existing PROW
- Upgrade of footpath 19 Newton Longville Parish, resurfaced to a sealed carriageway standard to a width of 3m between Weasel Lane and the railway underpass; route to be dedicated as a public bridleway;
- Restricted byways 20 and 25 Newton Longville Parish and Restricted Byway 15 Mursley Parish, locally known as Weasel Lane, to be resurfaced to a width of 3m, between Dagnell House Buckingham Road to the adopted highway adjacent to Lower Salden farm entrance; and
- Dedicate as a PROW with public bridleway status alongside Whaddon Road from Weasel Lane to Bottle Dump roundabout and provide a sealed surface 3m wide. This would form part of the Milton Keynes boundary walk and would be contained within the Site behind a landscaped buffer.

Weasel Lane

5.116 Passing south-west to north-east through the centre of the site, Weasel Lane is likely to be a busy walking and cycling route used by new residents. Weasel Lane is restricted by a byway, for use by pedestrians, cyclists and horseback. Notwithstanding its status, Weasel Lane is accessible to motor vehicles from both Whaddon Lane and Buckingham Road and provides access to the existing residential property.

5.117 It is proposed as part of this application to improve the surface of Weasel Lane, which will encourage walking and cycling within the site but also longer trips to Milton Keynes and Winslow that National Cycle Route (NCN 51) aims to achieve. A 3m wide walking cycling route should be secured by way of condition and supported by a S106 to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property 'Weasels' Lodge. A 2.5m x 1,200m loose surface, such as road planning was originally suggested, this will be secured by means of the S106 agreement.

Connection to Newton Longville

- 5.118 Footpath 19 Newton Longville Parish connects the parish of Newton Longville with the new development site. As part of the package to mitigate the impact of the development and improve connectivity with Newton Longville, an improvement is required along Footpath NLO/19/2 and NLO/19/3. The footway within the site is to be resurfaced to a sealed carriageway standard to a width of 3m between Weasel Lane and the railway underpass, to be dedicated as a public bridleway. South of the railway bridge, a contribution would be required for the improvement of the footpath between the site and Nos. 36 and 38 Whaddon Road, Newton Longville to provide a 2m wide granite to dust path.
- 5.119 The application site is traversed by public rights of way and as indicated the development will alter/improve those routes. It is clear that the character of these public right of ways would be altered by the proposed development from that of footpaths which presently crosses

Internal Road Layout

- 5.120 As part of the illustrative masterplan submitted in support of the planning application, a new network of Primary Streets will form the principal circulation route for all vehicular traffic. The route will connect with the existing highway network at the three access points. The indicative plans show that the primary street is to be 7.3m wide, with a footway/cycleway of 3m wide, which is considered to be appropriate for the nature of the road.
- 5.121 The primary streets are to form part of the proposed bus route. The primary streets therefore need to be designed to avoid on-street car parking, which could result in obstructions to the bus route. This could be achieved by ensuring appropriate off-street parking is provided, the use of on-street car parking laybys, and frontage car parking with dropped kerbs. This will need to be considered as part of any future reserved matter applications.
- 5.122 The illustrative masterplan shows the tertiary roads to be between 4.8m and 5.5m, which are considered appropriate for the nature of the road. It should be noted that if a shared surface is to be proposed then a minimum width of 4.8m (not including service margins) would be required. All roads will need to be designed to accommodate an 11.2m refuse vehicle in line with Buckinghamshire Council and tracking should be provided as part of any future reserved matters application.
- 5.123 There are two schools (a primary and secondary) proposed as part of the development. The internal road layout will need to be carefully designed as part any future reserve matters application to accommodate these facilities. The design will need to consider drop off provision, widened footways, crossing points, road signage and lining to provide for a serviced school site. In addition, the bus stops serving the school will need to be designed to accommodate the predicted number of buses/coaches, to ensure

that they do not obstruct the free flow of traffic. This will require early engagement with Buckinghamshire Education and Highways Development Management team.

Grid Road

5.124 A grid reserve corridor of 80 m width, to cater for a dual carriageway and associated verge and footway provision, is required to allow for the potential implementation of the Bletchley Southern Bypass at a point in the future if it is determined that such a road is deemed to be beneficial.

5.125 Whilst the proposed development only requires a single carriageway road for access, in accordance with the adopted VALP policy D-NLV001, the masterplan has been developed to ensure that a dual carriageway could be provided in the future. The land for the grid road will need to be adequately secured in the S106 Agreement, so that the Council can develop and implement a scheme in the future. Furthermore, the detailed design should look to limit the future cost of dualling, and this will need to be demonstrated as part of a future reserved matters application.

Framework Travel Plan

5.126 A Framework Travel Plan (FTP) has been developed for the Site with the aim in reducing traffic generated by the Proposed Development and increasing the use of sustainable travel modes. The FTP submitted as part of the planning application includes details of the initial targets that will be set regarding modal shift and details of the measures that will be put into place to achieve this modal shift.

5.127A costed action plan was provided in TRN1 for the residential element of the Framework Travel Plan (FTP) including the role of Travel Plan Manager. This cost has been provided for the life of the TP (i.e based on the agreed FTP) which is assumed to be 14 years from first occupation of the development through to full occupation (anticipated in 2031) plus five years (i.e. 2036).

5.128 Overall, the submitted Framework Travel Plan generally meets the standards set out in the Buckinghamshire Council (BC) Travel Plan Guidance for residential employment and education uses. There are some areas that would require improvement and would be addressed as part of the formal Travel Plan adoption process. Overall Buckingham Council are satisfied that the FTP is well thought out with some good measures to reduce single occupancy car use and the implementation of the FTP will be secured through planning conditions and/or S106 agreement.

5.129 Buckinghamshire Highways Authority consider that new residents of the proposed development would have ability to access rail services by means other than that of the private car, and the benefits of an improved bus service are acknowledged, such that the site is considered to be sustainably located. The inclusion of facilities on site will enable residents to make local shopping trips, which reduce the need for car travel and offers some employment opportunities at a local level. This in turn enables appropriate

social infrastructure to support the residents of the site and enable residents to engage positively with the community and contribute socially with the community, in line with NPPF guidance.

5.130 As part of their objection Milton Keynes Council detailed that the development proposals do not meet MKC policies. It is BC Highways position that the proposal would comply with the principles of the MK Core Strategy including Policy CS6 and to those principles of policies of the adopted Milton Keynes Local Plan including S3 City Expansion Areas, T3, T4 Pedestrians and Cyclists, T5 Public Transport, T10 Traffic, T15 Parking Provision and T17 Traffic Calming amongst others. This was also the finding of the Planning Inspector who detailed in his Planning Appeal Decision Notice (paragraphs 80 to 82):

Paragraph 80. I have found that the appeal proposal, which would facilitate the SWMK development, with the identified mitigation in place would result in an overall improvement to the highway network. It would accord with Plan:MK Policy CT1, as the appellant has demonstrated that it would manage congestion and provide for consistent journey times; and Policy CT2, as it has been shown that it would mitigate impacts through the provision of, or contribution towards, necessary and relevant transport improvements and would not have an inappropriate impact on the operation of the highway network. These are the only policies in Plan:MK given in the reason for refusal.'

Paragraph 81. In so far as Policy SD15 applies, I am satisfied that the technical work carried out by the appellant fully assesses the traffic impacts of the scheme and identifies the transportation improvements necessary to mitigate impacts. I find that the proposal would also comply with Plan:MK Policy CT3, with regard to walking and cycling; and Policy CT5, with regard to the needs of public transport operators and users. The public transport issues would be addressed by the Section 106 contribution of £2 million and the delivery of bus priority measures within LTP4's 3-year initial action plan.'

Paragraph 82. I therefore conclude on the development plan that the appeal proposal accords fully with the relevant policies in Plan:MK. Therefore, the presumption in favour of sustainable development in paragraph 11c) of the 2021 Framework applies in that planning permission should be granted without delay.'

5.131 Overall, the Highways officer considers that the development proposal would not have an unreasonable impact on the highway network. Milton Keynes Council have registered an objection to the development in terms of non-compliance with policy and impact on the network which is contrary to the Council's Highways review. The Highways response to the Milton Keynes objection can be seen in the Appendices which identifies numerous items where the issues have been satisfactorily resolved, or details where the Council's Highways assessment are in disagreement with Milton Keynes.

5.132 Having regard to the Highways officer's comment, the amended ES, appeal Inspector's decision and all other material consideration, it is considered that the development would not have an unreasonably adverse impact on highway safety or convenience and would be in accordance with VALP policies T1, T3, T5, T6, T7, T8, T4 and the NPPF.

Landscape and Visual Impact

BE2 Design of new development, NE4 Landscape character and locally important landscape, NE8 Trees, hedgerows and woodlands and D2 Delivering site allocations in the rest of Aylesbury Vale, D-NLV001 Land south of the A421 and east of Whaddon Road.

5.133 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Policies BE2 is consistent with the objectives of the NPPF and states that the design of new development proposals should respect and complement the physical characteristics of the site and surroundings, the scale, context and setting of the site and its setting; local distinctiveness, the building tradition, ordering, form and materials of the locality; the natural qualities and features of the area and the effect on important public views and skylines.

5.134 D-NLV001 seeks to retain existing landscape features, and rights of way and seeks a landscape led approach and responds positively to the best characteristics of the surrounding area. Policy NE4 of the VALP seeks to ensure that the scheme respect the local context and landscape character of the area.

5.135 The Environmental Statement includes a chapter containing a Landscape and Visual Impact Assessment and this has been updated through the submission of an addendum ES statement for the Landscape and Visual Impact Assessment chapter, which takes on board comments from the Councils Landscape Officer on the scope of the LVIA and which assesses the potential landscape and visual effects of the proposed development before and after mitigation measures.

5.136 The site is greenfield land and is located in the open countryside adjacent to the settlement of Milton Keynes and has physical boundaries to the north in the form of the A421, the south by the disused railway line and well treed embankment and also to the west with Whaddon Road and Bletchley to the east. Whilst the proposals represent an extension of built development into the open countryside, these site specifics offer some visual and physical containment of the development.

5.137 The Aylesbury Vale, Strategic Landscape and Visual capacity study (August 2017), states, in respect of the application site (NLV001), that the site is fairly exposed to distant views from the existing settlement on elevated topography to the south and the east (with some limited views from listed buildings and buildings in the conservation area), this is exaggerated by the open nature of the large fields in the intervening landscape. To the north the field boundaries are taller, with little intervisibility or opportunities for views out, screening views of large existing industrial

units. Some views from scattered farmsteads. Site remote and detached from settlement

- 5.138 The ES and the updated addendum assess the visibility and views through a Zone of Theoretical Visibility (ZTV) exercise to establish the representative visual envelope. This exercise has identified a number of viewpoints where the development has been assessed from and evaluates the potential effects through the phases of development. The ES considers that the development would result in a permanent land use change from agricultural land to built development.
- 5.139 The ES has judged that at the outset (on completion of the development) the proposal would result in major-moderate adverse landscape effect on the site, which is concluded as being a locally significant effect. Fifteen years after completion, the Green Infrastructure (GI) would form a mature framework of connected woodland, parks, greenspace and recreational routes that would provide considerable environmental benefits (in line with the enhance and reinforce guidelines) and it is assessed in the ES that these benefits would reduce the degree of adverse effects to moderate adverse and that these effects would not be significant.
- 5.140 Turning to the conclusions of the ES on the visual effects, the report advises that views of the proposed development within the wider landscape would be restricted as a result of the containment created by the built up area of Milton Keynes and Bletchley, and as such marked adverse effects would be limited to receptors that are either within the site or within the immediate landscape. It is assessed that the proposed development would not be an uncharacteristic feature within the landscape given the sites proximity to the edge of Milton Keynes and Bletchley. In the longer terms as the development's GI becomes fully established and mature the framework of woodland, trees and hedgerows around the perimeter of the of the site and within the layout would help to soften and filter views of the built form and as a result it has been concluded that none of the visual effects are judged to be significant in the longer term.
- 5.141 The ES also assesses the night time effects of the development noting the existing baseline situation of Milton Keynes and Bletchley which presently illuminate and impart a level of sky glow on the landscape. Therefore, whilst it is acknowledged that there would clearly be a degree of adverse effect, it has to be recognised that the change to the site will be experienced in the context of the already well-illuminated surrounding built up area especially in long views and therefore, would not be seen to especially intrusive or harmful to the night sky.
- 5.142 The site lies within Character Area Bedfordshire and Cambridgeshire Claylands . It is not situated within a landscape that is afforded any statutory landscape quality protection or designation at an international, national, regional or local scale. The nearest landscape designation being the Whaddon-Nash Valley LLA which lies 1.8km to the north-west of the site. The Aylesbury Vale Landscape Character Assessment (Jacobs 2008) identifies that the site is located within the Newton Longville-Stoke Hammond Claylands Landscape Character Area (LCA). The Strategic Landscape Visual

Capacity (2008 & 2017 respectively) judged the Landscape Character Area (LCA) condition of the site as being moderate with a low sensitivity and an overall guideline to enhance and reinforce the character area. The key characteristics and landscape elements include and which are relevant to the application site; a gently undulating to rolling landform, heavy clay with mixed agricultural use, nucleated settlement pattern and parliamentary enclosures.

- 5.143 The application was originally submitted with a LVIA (dated January 2015) in support of their proposal which concluded that the proposed development of up to 1855 dwellings etc., on this currently green field site, will not result in significant landscape character impacts in the long term on the site itself or in either the short or long term on the wider character area (Newton Longville - Stoke Hammond Claylands LCA 4.9) within which it lies. This was a conclusion that the Council's landscape Officer considered to be unreasonable.
- 5.144 The Landscape officer considers that the proposed development will be perceived, both from within the site and from the wider landscape as a significant change in landscape character terms in both the short and long term when assessed against the existing landscape character 'baseline' of undeveloped agricultural land in open countryside and it is upon this basis that the proposed development should properly be considered.
- 5.145 The landscape officer acknowledged that the original submission addressed a number of concerns which had been raised on the previous planning submission (withdrawn prior to determination) and considered that with regard to the identified need for 'better physical connections across Weasel Lane' this has been addressed in principle by the provision of both a 'primary' and 'secondary' connection north south across the proposed area of GI that occupies the high ground in the centre of the site.
- 5.146 Following lengthy and detailed discussions relating to the landscape and design merits of the application, the applicant proposed a number of changes to the submitted scheme with a view to addressing (amongst other matters) a number of the landscape and visual issues raised in the landscape officers original comments. To reflect these changes, the applicant submitted an 'Addendum Environmental Statement' (dated July 2016) contained within which was a revised Landscape and Visual Impact Assessment (LVIA).
- 5.147 Having considered the revised design, the applicant has concluded in the revised LVIA that the proposed development, with respect to its landscape character impacts, would 'at the outset ... result in a major-moderate adverse landscape effect on the site, which is concluded as being a locally significant effect' but that after 15 years 'the Green Infrastructure would form a mature framework ... that would be providing considerable environmental benefits [and] ...that these benefits would reduce the degree of adverse effects to moderate adverse, and that these effects would not be significant'.

- 5.148 Whilst the Landscape officer accepts the conclusion set out in the LVIA with regard to the impacts at the outset, he disagrees with the conclusions for year 15 and beyond. In line with the officers previous comments he was of the opinion that the proposed development would be perceived, both from within the site and from the wider landscape as a significant change in landscape character terms in both the short and long term when assessed against the existing landscape character 'baseline' of undeveloped agricultural land in open countryside. Whilst it is accepted that the improvements to the layout will, by year 15, have mitigated the impact of the proposed development on the wider landscape to the extent that the effects may reduce to a level that is less than significant, the Landscape Officer does not accept that these improvements would reduce the impact on the landscape within the site to a level that is less than significant .
- 5.149 With respect to the visual impacts of the proposed development, the revised LVIA (updated May 2020) concludes that 'in the longer term, as the development's GI becomes fully established and mature, the framework of woodland, trees and hedgerows around the perimeter of the site, and within the layout, would help to 'soften' and filter views of the built form. As a result, it is concluded in the LVIA that the level of effects on all visual receptors would lessen, and that none of the visual effects are judged to be significant in the longer term'.
- 5.150 The indicative Landscape Masterplan sets out the landscape framework for the proposal and allows for a significant provision of Green Infrastructure (GI), with 53.97ha to be allocated as open space and landscape in a range of forms including an 'eco-corridor', formal and informal open space to create a high quality and distinctive landscape. The proposal sets out mitigation of the potential significant adverse landscape and visual effects and which includes an enlarged perimeter screen and structural planting, the redesign of the proposed layout to facilitate the introduction of tree planting tiered through the site utilising the gradient of the site and an ecological buffer, the inclusion of open spaces, the retention and enhancement of the public rights of way/ bridleway and key features such as hedgerows and trees, sensitively designed lighting scheme and sensitive positioning of development away from the central ridge line.
- 5.151 Turning to the relationship of the proposed development to the adjacent settlement of Milton Keynes, it is considered that the proposed development would provide a generally logical and cohesive extension to the existing settlement pattern and character of the settlement. Whilst the proposed development is designed to be responsive to the specific context and character of the site upon which it is proposed (rather than definitively following the MK 'development style') it is clear that the proposed development does seek to address its relationship with the adjacent settlement in a constructive and positive manner, taking influences from the adjacent settlement character.
- 5.152 The proposed Green Infrastructure delivery seeks to integrate the proposed areas of open space with the extensive city wide network – in particular the MK Boundary Walk

and the neighbouring Chepstow Park, through particularly the extension of the linear park network. With regard to the MK grid road system, whilst the proposed development adopts a more relaxed approach to the delivery of a grid system than that adopted in the wider city, the application seeks to provide and safeguard for the future extension of Snelshall Street (V1) as part of the proposals should this be required in the future.

5.153 Generally, the proposed development adopts an approach to settlement character that seeks to respond to the topographical and landscape issues on the application site rather than proposing a wholly MK based style of development. In that regard it is considered that the principles of those policies set out in Plan MK in particular policy SD15 relating to development on the edge of Milton Keynes has been taken into consideration.

5.154 However, it is clear there will still be significant landscape and visual impacts on the area of the development site itself and its immediate surrounding landscape through the proposed development of a greenfield site and the topography of the land. However, the adverse impact would be limited to the site itself, users of the footpaths and the sites immediate setting due to its position at the urban edge of Milton Keynes. The mitigation package proposed including the structured planting will be secured through S106 agreement to ensure it reduces the impact on the landscape .

5.155 The proposal is landscape led and has taken into consideration the distinctive local landscape character and features and seeks through mitigation measures to minimise the impact on the open countryside. The proposal would retain and enhance natural boundaries, including hedgerows, which contribute to visual amenity. It is considered therefore that the proposal accords with VALP policies BE2, NE4, D-NLV001 and the NPPF

Agricultural land

NE7 Best and most versatile agricultural land

D-NLV001 D-NLV001 Land south of the A421 and east of Whaddon Road.

5.156 The NPPF in paragraph 174 (b) states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land (i.e. Grades 1, 2 and 3a in the Agricultural Land Classification (ACL)). Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land (i.e. Grades 3b, 4 and 5) in preference to that of higher quality. Policy NE7 of VALP states that subject to the development allocations set out in the VALP, the council will seek to protect the best and most versatile farmland for the longer term.

- 5.157 The land is graded depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use.
- 5.158 The ES includes an Agricultural Land Classification Study and it assesses 144 hectares of predominately agricultural land which at the current time is primarily in arable use with a small area of grassland to the northern and western boundaries. The site is occupied by a number of separate farm business, on a variety of different tenures.
- 5.159 The application site is shown on the Provisional Agricultural Land Classification Map as being Grade 3 and 4, and the agricultural land classification survey shows mainly sub-grade 3b land, of moderate quality (88%) with small areas of better quality land, Grade 3a (11%) and other land (1%). The moderate quality land is limited by soil wetness and significant wetness/workability problems. The better quality land is described with lighter textures or having soils with calcareous topsoils.
- 5.160 In summary the site comprises of 16 hectares (of the 144 ha total site area) of best and most versatile agricultural (BMV) land. This falls below the threshold of 20ha set by Natural England. The magnitude of the impact on the agricultural land as a result of the irreversible development of this quantity of BMV land is considered to have an adverse effect. In terms of the 4 occupying farm businesses, three of these businesses will remain operating off-site as viable businesses and the fourth is only a part time business. Having regard to the above it is not considered that the development would conflict with the adopted VALP policy NE7, D-NLV001, or with the aims of the NPPF in this regard.

Trees and Hedgerows

NE8 Trees, hedgerows and woodlands, D-NLV001 Land south of the A421 and east of Whaddon Road.

- 5.161 Policy NE8 seek to enhance and expand existing trees and hedgerows within the Aylebury Vale Area. The Plan policy also accords with the NPPF which states that planning permission should be refused for development resulting in the loss of veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.
- 5.162 The application is accompanied by an Arboricultural Assessment (updated June 2020) to identify the quality and value of existing trees on site which was supported by the Tree Officer. The site has no trees subject to tree preservation Orders. A total of sixty four individual trees and twenty five groups of trees were surveyed as part of the arboricultural assessment. Six of these and three groups of trees were graded as category A, 28 trees and 8 groups of trees were graded as B and 19 trees and 11 groups of trees were graded as C and there are 13 individual and 3 groups of trees graded as category U trees on the site which could be removed as good arboricultural practice.
- 5.163 Trees of A and B category are to be retained and incorporated into the development as the proposal seeks for the retention and protection of existing good quality trees

and hedgerows. All trees to be removed, with the exception of two trees (T47 and T60), were considered to be of low arboricultural quality or low amenity value. The trees assigned category C are those which whilst still relatively young should not present a significant constraint to the potential to develop the site. Loss of category C material can suitably be mitigated for through new tree planting forming part of the overall landscaping proposals which would support the development. Any current amenity value can be regained within a relatively short time frame and therefore such losses should not raise objection from an arboricultural perspective

5.164 New structural and screen tree planting, hedge and shrub planting is also indicated as being proposed as part of the future detailed scheme. On the basis of the detail submitted it is considered that a scheme could be designed to pay adequate regard to the landscaping of the site and subject to completion of a Arboricultural Impact Assessment, Statement Tree Protection Plan and Arboricultural Method Statement such that the development would accord with VALP policies NE8, D-NLV001 and the NPPF.

Ecology

NE1 Biodiversity and geodiversity, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.165 Paragraph 174 of the NPPF requires new development to minimise impacts on biodiversity and provide net gains in biodiversity. Paragraph 180 (NPPF) requires development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity improvements in and around developments should be integrated as part of their design especially where this can secure measurable net gains for biodiversity. Paragraph 120a (NPPF) states that policies and decisions should 'encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside'.

5.166 Adopted VALP Policy 'NE1 states that planning conditions/obligations will be used to ensure net gains in biodiversity by helping to deliver the Buckinghamshire and Milton Keynes Biodiversity Action Plan targets in the biodiversity opportunity areas. A monitoring and management plan will be required for biodiversity features on site to ensure their long-term suitable management (secured through planning condition or Section 106 agreement). Policy D-NLV001 requires that the proposal will need to quantify ecological impacts in a meaningful way to enable pre and post development comparison, sufficient to objectively assess net losses or gains and to provide for multifunctional habitats .

5.167 The application is supported by an ecological assessment which has been updated during the course of the submission. The assessment details the species and habitats currently found on the proposed development site as a number of surveys were carried out (badger, bats, reptiles, great crested newts and birds). The Ecology Officer has

reviewed the updated ecological response and consider that the measures to secure the enhancement features set out in the Ecology Report will need to be implemented to ensure compliance with current legislation and policy. The ecological enhancement measures in respect of habitat impacts will need to be secured with a condition requiring an Ecological Mitigation & Enhancement Management Plan (EMEMP). This will need to detail the measures set out in the Biodiversity Impact Assessment and metric calculation provided.

5.168 In addition, it is considered that the development is not considered to be fully compensating for the impacts of Farmland Birds. The principles of a financial obligation secured by a S106 agreement to enable the applicant to compensate for the residual impact incurred on the farmland birds species identified as being impacted by the proposal have been supported by the Council's ecologist and the BBOWT Planning officer.

5.169 The Ecologist has advised that the impact on bats can be compensated for by an appropriately worded condition on the lighting requirements on the development. Further enhancements within the dwellings proposed will be secured through a condition requiring the applicant to submit details of the species specific integrated bat and bird boxes throughout the development. The scale of enhancements proposed within the units will need to be at the 30% threshold set out in the report. Further species specific enhancements including hedgehog highways will need to be established within the condition to be imposed.

5.170 Natural England has been consulted on the application and considers that the proposed development will not have significant adverse impacts on designated sites and has no objections. The inclusion of green infrastructure is welcomed as it will provide environmental gains locally, and it is advised that biodiversity gain should be embedded into the development. Impacts on protected species was not assessed and instead Natural England has referred the applicant to the standing advice, which has been followed.

5.171 Although officer's consider that the current proposals do not quantify ecological impacts in a meaningful way to enable pre and post development comparison, sufficient to objectively assess net losses or gains of the end-scheme, it is recognised that the application is in outline form where such details would not be known or expected at this stage. The NPPF seeks development to contribute and enhance natural and local environments by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure. It is recommended that a condition could be attached to any approval of this outline application requiring the submission of a scheme, in accordance with the Biodiversity Strategy submitted as part of this application alongside details of the off-site compensation scheme to be secured by way of s106, that provides for net gain of biodiversity on the site and that secures the submission of full details for mitigation in accordance with VALP Policies NE1, D-NLV001, as part of the reserved matters applications.

5.172 Overall, it is considered that the mitigation proposed, to be secured through planning conditions and S106 agreement will result in a development that will be in accordance with VALP policies NE1, D-NLV001 and the NPPF

Environmental issues

NE5 Pollution, air quality and contaminated land and BE3 Protection of the amenity of residents

Air Quality

5.173 The NPPF includes air quality as an issue to be evaluated when considering the need to conserve and enhance the natural environment and that planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. Policy NE5 of the adopted VALP states that “development that may have an adverse impact on air quality will be required to prove through a submitted air quality impact assessment that the effect of the proposal would not exceed the Nationally Air Quality Strategy Standards (as replaced) or the surrounding area would not be materially affected by existing and continuous poor air quality. The potentially polluting development will be required to assess their air quality impact with detailed air dispersion modelling and appropriate monitoring. Required mitigation will be secured through a planning condition or section 106 agreement”.

5.174 The ES includes a chapter which assesses the air quality effects associated with the proposed development and looks at both the construction and operational impacts of the proposals. The assessment methodology was agreed with the Council prior to the assessments being undertaken. Information provided in the Transport Assessment and on traffic modelling has been used to predict local air quality. The designated Air Quality Management Areas (AQMA) are approximately 18km to the south of the application site and would not be affected by development traffic.

5.175 The Council’s Air Quality Officer has accepted the content and conclusions of the assessment. The amendments to the scheme do not alter the quantum of development and overall trip generation and therefore, the air quality impacts remain as originally assessed. The construction works have the potential to create dust and during construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission, and with these measures in place it is expected that any residual effects will not be significant. Mitigation measures can be used and secured by condition. The air quality impacts associated with the construction and operation of the proposed development have been assessed and it has been concluded that the operational impacts of increased traffic emissions arising from additional traffic on local roads will be negligible at all receptors and the impacts on overall operation air quality would be insignificant. On the basis of the assessment, and with the proposed mitigation (to be conditioned in respect of construction works and imbedded design) in place, the proposed development is in accordance with policies BE3 and NE5 of the VALP and with the NPPF.

Noise

- 5.176 Paragraph 185 of the NPPF states that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of the new development and mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development including through the use of conditions. Policy NE5 of VALP requires significant noise generating development to minimise the impact of noise on occupiers of proposed buildings, neighbouring properties and the surrounding environment.
- 5.177 Plan:MK policies D5(Amenity and Street Scene), CT1 (Sustainable Transport Network), CT2 (Movement and Access) and NE6 (Environmental Pollution) are relevant to the consideration of noise impact.
- 5.178 The ES includes a chapter on noise and vibration which considers the impacts arising from construction activities, road traffic and noise associated with the employment uses.
- 5.179 The revised Environmental Statement and addendum (January 2021) identifies that noise and vibration impacts in relation to the scheme will occur during both the construction and operation. The report identifies monitoring locations both within Buckinghamshire and MKC for noise monitoring. During construction, the nearby properties will experience adverse effects from noise and vibration but this will be temporary and intermittent in nature and generic mitigation measures to reduce the effects will be employed. There are potential impacts from the increased levels of road traffic and also from new any fixed installations and plant associated with the proposed development.
- 5.180 The Environmental Health Officer has reviewed the revised documentations and is of the opinion that the significant effects remain substantially unchanged. Since the production of the original ES there have been a number of updates to relevant standards and guidance. No objections have been raised subject to the carrying out of the measures detailed in Chapter 12 of the ES and the Construction Environment Management Plan (CEMP) (updated May 2020) to ensure that the effects of construction noise and dust are minimised for people living nearby. The measures highlighted can be secured via a condition and with detailed consideration of the layout at reserved matters stage, to allow maximum enjoyment of gardens and amenity areas for residents as well as satisfactory internal noise levels within dwellings. Officers are satisfied with the content and findings of the noise assessment in the ES and consequently, following the adoption of the recommended mitigation measures as outlined in the ES and conditions, there is not considered to be a detrimental noise impact from the proposed development .
- 5.181 Overall, in respect of noise and vibration it is considered that subject to mitigation measures, including the imposition of conditions regarding noise and which will also

require the approval of a CEMP the proposal is in accordance with VALP policies BE3 , NE5 and the NPPF.

Contamination

5.182 A further consideration in the NPPF in relation to the need to conserve and enhance the natural environment is contamination, and the guidance states in paragraph 123 that planning decisions should ensure that the site is suitable for its new use taking account of ground conditions.

5.183 The Environmental Statement submitted with the application includes a chapter on ground conditions and contamination assessing the potential environmental effects on ground conditions and contamination. A Phase 1 Desk Study has been completed on the site and it was agreed with the contaminated land officer that no site investigation was necessary to inform the EIA. The land has always been used as farm with two minor tracks and a footpath with a railway line to the south of the site. The only potential sources of contamination related to imported made ground associated with minor areas of hardstanding, the railway lines and associated sidings, contamination associated with factories to the north and contaminants associated with farming. The investigation concluded that there is unlikely to be a requirement for large scale remedial works but it is proposed to conduct ground investigations at the application site prior to the detailed design of the proposed development in order to delineate areas of contamination and any other risks prior to construction. In accordance with VALP policy NE5 a condition can be attached in case any contamination is found.

Waste Management

5.184 The most significant effects of the proposed development from a waste management perspective include construction waste arising from site clearance, excavation and construction activities; and earthworks; household waste generated by residents; and commercial waste generated by businesses and people using the local facilities. The effects of this are assessed within the ES (updated May 2020). The updated ES states that a site waste management plan will be prepared for the construction phase of the proposed development to minimise the amount of waste generated during site clearance and construction activities, so that construction waste is reused on-site or reused or recycled off-site. The ES assessed that the effect of construction waste from the proposed development would be negligible and not significant.

5.185 The proposal will include internal and external waste and recycling facilities which will be provided within the curtilages of the dwellings. Home composting and community composting facilities will be provided for residents. The Council's weekly kerbside waste collection will be utilised, and the ES assessed that the effect on household waste from the proposed development would be negligible and not significant.

5.186 The commercial and industrial uses will be provided with waste and recycling storage facilities. The ES assess that the effect on commercial waste from the proposed development would be negligible and not significant.

5.187 The Site waste management Plan and the measures set out in the ES can be conditioned, in respect of construction waste, operational waste, household and commercial waste.

5.188 Overall, the ES anticipates that the development will have a minor impact in terms of the increase in waste production. It is considered, therefore that the proposed development will accord with VALP policy NE5 and the NPPF.

Historic environment (or Conservation Area or Listed Building Issues)

BE1 Heritage Assets, D-NLV001 Land south of the A421 and east of Whaddon Road.

5.189 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local authorities to pay special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas. This is generally reflective of policy BE1 which make specific references to conservation of heritage assets in a manner appropriate to their significance, including their setting, and seek enhancement wherever possible.

Impact of the built form of the development on the conservation area and listed buildings

5.190 Adopted VALP Policy D-NLV001 states that “the significance of any heritage assets affected including any contribution made by their setting will need to be considered. When considering the impact on the significance, great weight should be given to the asset’s conservation. The protection and enhancement of sites of archaeological importance needs to be considered”.

5.191 The impact of the proposal was evaluated in the ES (updated May 2020) and it confirms that there are no listed buildings within the site. The nearest listed building is Lower Salden Farmhouse (Grade II) located 1.5km south-west of the site and the development sites lies beyond the wider setting of the farmhouse. A number of listed buildings are within Newton Longville Conservation Area and they were considered as part of the Conservation area rather than individually. The relative location of development to the Lower Salden Farmhouse means there will also be no material impact on the contribution that the setting makes to the significance of the Salden Farmhouse (Grade II) Listed Building. Furthermore, there will be negligible impacts on the wider setting of those listed buildings located within the designated Newton Longville conservation area and therefore the character and appearance of this area is preserved.

5.192 In terms of the impact on the designated conservation area at Newton Longville, this is located 850m south west of the site and is surrounded by 20th century housing development and therefore at its nearest point is considered to be sufficiently distant from the development as to not affect its character or appearance. It is acknowledged that the proposed development would be visible in long distance views from the Whaddon Road within the conservation area, but it is considered that the proposal

would not result in any material harm to the character or appearance of the conservation area.

Heritage conclusions

5.193 Special regard has been given to the statutory test of preserving the setting of the listed building under section 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990, which it is accepted is a higher duty. It has been concluded that the development could be designed so as to preserve the setting of the listed buildings. Therefore in applying sections 66 and 72 of the Act it is concluded that the setting of the listed building and the character and appearance of the conservation area would be preserved .

5.194 In consideration of the above, it is considered that the development would accord with adopted VALP policies BE1 and D-NLV001

Archaeology

BE1 Heritage Assets, D-NLV001 Land south of the A421 and east of Whaddon Road

5.195 The NPPF highlights the desirability of sustaining and enhancing the significance of heritage assets including that of archaeological interest. The VALP policy BE1, requires all developments to conserve heritage assets in a manner appropriate to their significance. There will be a presumption in favour of retaining archaeological in situ, wherever practicable, unless it can be demonstrated that the harm will be outweighed by the benefits of the development.

5.196 The Council's Archaeologists welcome the submission of the archaeological evaluation report which included the results of the geophysical survey and trial trenching which have been undertaken within the proposed development area.

The evaluation recorded numerous well-preserved, substantial archaeological features at the site. Relatively large quantities of pottery were recovered. There were four main foci of activity:

- Area 1 contained three enclosures. These spanned the Iron Age/Roman transitional period;
- Area 2 contained at least one late prehistoric enclosure;
- Area 3 contained at least one late prehistoric enclosure and related ditches;
- Area 4 contained a series of enclosures, ditches and other features spanning the Late Iron Age/Roman transitional period into the 4th century AD.

5.197 The evaluation also exposed a number of features which had not been detected by geophysical survey, including some quite substantial ditches in Trench 7. There was some evidence to suggest that some of the features interpreted as furrows in the survey might actually be archaeological features. The proposed development has been designed so as to enable all four settlement areas to be preserved within open space and school playing fields.

5.198 The Archaeology Officer has reviewed the updated ES and has stated that the development or ground works including landscaping, paving /sports fields. MUGA's is likely to have a significant detrimental impact on the buried archaeological remains and is likely to harm significant of a number of heritage assets and has recommended that the proposed development should be subject to appropriate investigation, recording, publication and archiving of results in line with Paragraph 205 of the NPPF.

5.199 In summary there is not considered to be a conflict with the NPPF in respect of heritage assets and the development is in accordance with VALP policy BE1, D-NLV001 and the NPPF

Healthy and Safe Communities

S1 Sustainable development for Aylesbury Vale, D2 Delivering site allocations in the rest Aylesbury Vale, D-NLV001 Land South of the A421 and east of Whaddon Road, I1 Green infrastructure, I2 Sport and recreation, I3 Community facilities and assets of community value, C4 Protection of public rights of way.

5.200 In facilitating social interaction and creating healthy, inclusive communities the proposals should aim to achieve places which enable communities to integrate and come together, including through mixed use developments and strong neighbourhood centres and active streets; safe and accessible environments and developments.

5.201 This should include the provision of sufficient choice of school places, access to high quality open spaces and opportunities for sport and recreation and the protection and enhancement of public rights of way. This should in particular address the need to provide sufficient green infrastructure which provides value in many ways. It will therefore be necessary to consider how each scheme addresses these issues.

5.202 The NPPF seeks to achieve healthy, inclusive and safe places, promoting social interaction, safe and accessible development and support healthy life-styles. This should include the provision of sufficient choice of school places, access to high quality open spaces and opportunities for sport and recreation and the protection and enhancement of public rights of way, and designation of local spaces.

Thames Valley Police

5.203 Contributions have been requested from TVP towards staff, new vehicles, mobile IT equipment, radio capacity, number plate recognition cameras, a programme of works at Bletchley which appears to be planned for release. The majority of these requests are not considered to meet the relevant tests particularly given the police benefit from funding elsewhere.

5.204 The proposed development is in close proximity to a railway which runs adjacent to the development. The railway line is part of the proposed East-West Rail Link. Thames Police have requested that the future use of the railway should be taken into

consideration in assessing the application and has recommended that planning conditions be attached to the proposed development.

Community Facilities

- 5.205 VALP policies I1, I2 and I3 seeks to ensure that appropriate community facilities are provided arising from a proposal (e.g. school places, public open space, leisure facilities, etc.) Policy NLV001 sets out the community facilities and green infrastructure the site will need to provide. The illustrative master plan indicates provision of a comprehensive network of multi- functional open spaces and green corridors with both formal and areas of informal public open space. The GI Plan has been amended to show how Weasel Lane and the Milton Keynes boundary walk are safeguarded and utilised as principal recreational routes and incorporated within broad corridors of greenspace. The proposal provides for 53.97ha of green open space and 1.18ha of allotment land highlighting the importance of open space as a means of establishing a high quality setting for development is recognised and the role it plays in realising a distinctive character of the new community as well as its contribution to the wider Green Infrastructure around Milton Keynes and providing an opportunity to link with the linear park to the southern edge of the site and acts as an extension to the existing Chepstow Park and a new linear park to improve the north western section of the MK Boundary Walk.
- 5.206 The parameters plan as amended makes provision for 9 Locally Equipped Area of Play (LEAP's) and also 2 Neighbourhood Equipped Area's of Play, with each including a multi-use games area. The sizes of the LEAPs have increased to provide an activity area of 500sqm to accord with RoSPA guidance and their disposition across the site provides increased coverage and ensures suitable accessibility to meet the standards set out in the Fields in Trust guidance. In addition to the provision of LEAPs and NEAPs on site, youth shelters, a MUGA, sports hall, changing pavilion, skateboard park, sports pitches, cricket wicket, tennis courts and community centre are proposed. Subject to these measures which could be ensured by S106 Agreement, the proposal can be considered acceptable in terms of leisure provision in accordance with VALP policy D-NLV001, I1 and I3 and the NPPF.
- 5.207 Policy C4 requires regard to be had to the amenity, convenience and public enjoyment of public rights of way and the desirability of their retention or improvement. The application site is traversed by public rights of way and as indicated the development will alter/improve those routes. It is clear that the character of these public right of ways would be altered by the proposed development from that of footpaths which presently crosses open countryside to one passing through a residential development and impact on the character of these public rights of ways and the enjoyment of some of its users. However, this would be mitigated to some degree by the introduction of open spaces flanking the route of the footpath and compensated for by the provision of improved footways and links. It is considered that the convenience resulting from the improvements set against the potential loss in enjoyment to users from the more urban environment through which the path would pass is such that it is considered

that the proposal would benefit the local community and would be in accordance with VALP policy D-NLV001 and C4 and the NPPF.

Education

5.208 Adopted VALP policy D-NLV001 requires the provision for a three-form entry primary school with early years pre-school facilities on 3ha and a secondary school on 5.2ha of land. The proposal includes educational facilities on site and given the position of the site on the edge of the Aylesbury Vale Area, careful consideration has been given to the education requirements and as with the other matters these have been discussed in conjunction with the neighbouring authority MKC.

5.209 The proposed development makes provision for a 3 form entry primary school, with Early Years Pre-school facilities on 3.0 Ha of land and a secondary school on 5.2 Ha of land. Provision is also made for accessible recreation and community uses to serve the new residents, designed and located with the intention to be complementary to the delivery of the new schools. An education facilities assessment is included in the ES to support the proposal.

5.210 The primary, secondary and special schools including Children's Centre provision within the planning area of the development are all currently or projected to be at capacity. The lack of long term housing plan causes significant difficulties for the Local Authority with regard to its ability to effectively plan for additional secondary and special school provision. The development proposal borders Milton Keynes so may well impact on schools across the border. Both local authorities will need to work together to ensure that the effects of the development are most effectively mitigated.

5.211 An agreement has been reached with the applicant that the proposed development will fund the provision of an appropriate number of additional secondary school places in accordance with the Council's Planning Obligations Policy. The s106 agreement will secure the provision of a secondary school on site with a proviso that if the Council does not require a secondary school on site, then the developer will be required to make financial contributions (based on the indicative mix of homes provided), in accordance with the policies set out in its "Guidance on Planning Obligations for Education Provision". The justification for all the contributions identified above is set out in the evidence and demonstrates that they meet the three tests covered under the CIL regulations.

5.212 Having regard to this advice and subject to the required contributions being secured in the S106 agreement, it is considered that this matter would be in accordance with the requirements of VALP policy I3 and NPPF advice.

Healthcare

5.213 The development lies in Newton Longville Parish in the administrative boundaries of Buckinghamshire Council and abuts MKC wards Bletchley Park and Tattenhoe. The Health Impact Assessment (Environmental Statement 2020 - Appendix 13.2) states

that as of October 2018 there were 4,008 patients, resident in the Great Brickhill ward (which includes Newton Longville) registered with a GP. Of that total 3,934 are registered at sixteen different practices. The remaining 74 residents are registered in very low numbers at a further eight practices. In Bletchley and Fenny Stratford ward, as of October 2018, there were 17,1910 patients registered with a GP. Of that total, 16,993 were registered at eleven different surgeries, and the balance is registered in very low numbers at a further twenty-two practises. Newton Longville residents are registered at 22 different GP surgeries: 30% at The Red House (Milton Keynes), 20% at Norden House (Winslow), 16% at Whaddon House (Milton Keynes), and diminishing numbers at the others.

5.214 The HIA (2020) also shows that the local acute hospital is Milton Keynes University Hospital NHS Trust which is 4 miles from the proposed development and the next nearest acute hospital is Luton and Dunstable University Hospital, which is 15 miles from the proposed development. Within a 15 mile radius are Stoke Mandeville Hospital, the Royal Buckinghamshire Hospital for Rehabilitation and Specialist Nursing and Buckingham Hospital, a private hospital.

Primary Care

5.215 In terms of primary care, the MK CCG have advised that the development will result in approx. 4,524 additional residents (based on 2.4 occupancy) and would affect several existing GP surgeries in Milton Keynes - Drayton Road, Hilltops, Parkside, Westcroft and Whaddon surgeries. None of these GP practices currently include the South West Milton Keynes development within their practice boundaries and do not have capacity to absorb the population increase.

5.216 To mitigate the impact of the development, the MK CCG seeks the provision of a site to accommodate a 6-GP surgery, the construction of the GP surgery to NHS England specifications and a contribution per dwelling in line with MK's Social Infrastructure SPD. In addition, the MK CCG requested a financial contribution of £1,990,057 to provide additional facility to offset patient demand in the first year of its operation. The calculation takes into account the phasing capacity of development delivery.

5.217 The amended ES (2020) sets out that the resulting population from the development based on 2.56 average household size will result in 4,749 residents. The amended ES baseline assessment shows that there are 10 General Practitioners within 5km radius of the site and to ensure that adequate services are provided for the new residents, and those who wish to use them. The Development Framework Parameters Plan identifies a parcel of land for a potential 6.no GP practice within an Employment Area (up to 0.2 hectares) to provide accessible (D1) health facilities. The ES acknowledges that further discussions will take place with service providers so that the new facility meets the projected requirements for the area.

Secondary Care

- 5.218 In terms of secondary care provision, the MKC state that it is likely that the majority of residents would expect to use Milton Keynes University Hospital for their care. The MKC (on behalf of the MKUH Trust) consider that there will be an impact on acute/hospital facilities as a result of this development and existing NHS provision will not have the capacity to absorb the likely impact and therefore additional health provision that will be required.
- 5.219 NHS England in their consultation response fully supports the request of the MKCCG. Given the proximity of the development to Milton Keynes and the services located here, it is anticipated by MKC that the impact of this development will directly affect MK Hospital. This is supported by the HIA. NHS England have commented that the scale of this proposed development, distance, and most importantly due to other significant developments planned in the area, NHS England needs to take a more holistic view. The NHS England also support the MKC in their request for a contribution per dwelling (“the Hospital Contribution”)
- 5.220 Initially, the financial contribution request from the MKC could not be justified as the MK SPD (2005) was a ‘tariff’ style cost based on a strategy of meeting projected costs of healthcare provision for the City to 2016 and did not apply in the Aylesbury Vale area. The basis for the costing was considered to be out of date and the request for a per head contribution in addition to land and buildings would not comply with the CIL Regulations. When this application was initially brought to the legacy AVDC Strategic Planning Committee in June 2017, the delegation from members to officers to defer and delegate subject to a s. 106 agreement did not include a requirement to secure a planning obligation for the Hospital Contribution, as officers concluded the request did not comply with CIL regulations.
- 5.221 The non-compliance of the tariff style cost with CIL regulations was highlighted by changes to the Government’s National Planning Practice Guidance (NPPG) September 2019 on funding formulas. The NPPG (2019) requires that any evidence of need for infrastructure based on ‘formulaic’ approaches to determining planning obligations need to be part of the plan making process, so it could be examined. The NPPG (2019) led to the removal of the financial / tariff type formulas from the MKC’s Social Infrastructure SPD and a revised SPD was adopted in February 2021.
- 5.222 In February 2019, (prior to the changes to MK’s Social Infrastructure SPD) following on-going discussions, Milton Keynes Council submitted a supporting document from the NHS Trust regarding the likely impact of the South West Milton Keynes development (SWMK) on the Milton Keynes University Hospital (MKUH). This demonstrates and quantifies the impact from the development via a detailed impact assessment and derives a projected contribution for the development based on activity rates of the MKUH catchment population. Finally, MKUH has specified patient facilities to which the contribution will be applied to allow for monitoring of the financial contribution. Thus, officers are satisfied that the contribution satisfies CIL Regulation 122.

- 5.223 Following these negotiations in February 2019, an agreement was reached with MKC. Officers presented the MKC's request for health care obligations to Members at the former legacy AVDC Strategic Development Management Committee meeting in April 2019 pursuant to which a resolution to delegate to officers to include the financial contribution for secondary health care facilities at Milton Keynes University Hospital (MKUH) to the S106 agreement was reached.
- 5.224 The Hospital Contribution will be applied towards: i) a new cancer unit or extension to the radiotherapy centre; ii) a new pathway unit incorporating a frailty unit as well as associated diagnostic and intervention facilities and iv) support service infrastructure. The total contribution requested (£1,990,057) would be split equally into three payments with payments to be secured through a S106 agreement and indexed from the date of the Agreement.
- 5.225 As for the request from MKCCG for a GP surgery, the proposal includes provision for D1/D2 uses (up to 575 sq.m) to be located within the local centre, and there is additional flexibility provided within the scheme in that a parcel of land has been identified within the employment area (up to 0.2 hectares) to accommodate the construction of a health care centre building in accordance with NHS England specifications or a financial contribution to meet the costs of equivalent provision off-site. The health centre land and alternative provision will be secured through the S106 agreement.

BHT Request For Financial Contributions Towards Acute and Community Healthcare Services

- 5.226 In March 2019, in addition to the request from the MKCCG and MKC, Buckinghamshire Hospital Trust (BHT) requested S106 contributions of £1,748,228.00 to be used to provide additional health care services to meet patient demand. The demand is based on BHT's calculation that the development would equate to 4,656 new residents. Using 2017/18 demographic data and the referral rates to BHT from Norden House Surgery formed the BHT's projection, that the development would generate over the period of 12 months 3,173 acute and 2,772 community interventions.
- 5.227 The BHT seeks financial contribution for revenue funding for operational costs for its acute and community care services. The contribution is based on a formulae that assumes 100% referral from the new population comprising the development would be from Norden House. Currently only 20% of Newton Longville residents are registered with the Norden House GP surgery which is located approx. 6.5 miles (shortest walking distance) from the development site. Moreover, the BHT projections makes assumptions on concealed households and existing residents that is at variance with the data contained in the HIA.
- 5.228 Officers have reviewed BHT's request for section 106 contribution and in this instance, the request cannot be supported as the BHT has not provided sufficient evidence and adequate justification to demonstrate in accordance with the CIL regulations how the

sums are necessary to make the development acceptable in planning terms or how they are directly related to the development or fairly and reasonably related in scale and kind to the development (CIL Regulation 122). The Community Infrastructure Levy or CIL test requires obligations to be necessary, directly related to the development and be proportionate.

5.229 Officers are satisfied that the health care obligations provided in the S106 agreement have the potential for flexibility to meet the wider strategic vision for the delivery of health care in the future. Notably, the health care obligations secured in the S106 are supported by MKCCG and MKC. Furthermore, the provision is in accordance with policy requirement as set out in VALP policy D-NLV001.

5.230 In view of the proposed provision of health care facilities, sports fields, playspaces and other public spaces, the proposal is considered therefore to be in accordance with VALP policies S1, D2, D-NLV001, I1, I2, I3, C4 and the NPPF.

Raising the quality of place making and design

BE2 Design of new development, NE4 Landscape character and locally important landscape, D2 Delivering site allocations in the rest of Aylesbury Vale, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.231 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. The focus of policy BE2 (Design of New Development) of the adopted VALP is on local distinctiveness, and development are required to be appropriate to its contexts; and individual identify that either complements or forms an attractive contrasts with its surrounding is encouraged. Furthermore, the site specific requirements (Policy D-NLV001) is conserving and enhancing the natural environment in terms of the impact on the landscape, the site proposal should use land efficiently and create a well defined boundary along the western edge of Milton Keynes. In addition, the proposals will be required to identify the building tradition of the locality, and the scale and context of the setting, the natural qualities and features of the area and the effect of the development on important public views and skylines including the protection of Newton Longville and Whaddon villages.

5.232 The rationale for the design and layout of the proposed development is set out in detail in the Design & Access Statement and the addendum Design and access statement submitted in August 2016 (updated June 2020). In summary, the form and layout of the proposed development is strongly influenced by principles set out in the adopted VALP and MK Core Strategy place-shaping principles for sustainable urban extensions in adjacent Local Authorities. The proposed development includes a primary road grid structure, local routes with pedestrian/cycle route connections, a neighbourhood centre at a prominent east west junction of the main connecting route, which would create lively, well used streets and walkable neighbourhoods which encourage linked trips and foster community cohesion.

- 5.233 All matters are reserved at this stage except for access, and as such the assessment has been considered against those plans submitted and in particular the amended Development Framework Plan and amended Illustrative Masterplan (2020).
- 5.234 The design of the proposed development seeks to respond to the specific spatial context of both Milton Keynes and Aylesbury Vale Area, and in particular the characteristics (density, built form, and open space) which define the built form of the residential areas located around or in close proximity to the Application Site. The three areas which have informed the design and layout are: the traditional grid square of Tattenhoe; the neighbourhoods in the southern part of Newton Longville; and the western neighbourhoods of Far Bletchley. The proposed design approach has been the subject of detailed discussions with both BC and MKC officers and amendments were sought to the scheme which responds to more closely to the site constraints and context.
- 5.235 In summary, the proposed uses would comprise residential development; employment area; neighbourhood centre; land for a three form entry primary school with early years provision and four form entry secondary school; green infrastructure and associated drainage, highway and transport infrastructure and the proposed distribution of uses across the site are set out on the land use parameters plan.
- 5.236 The proposed development includes a variety of residential densities, with the average density being shown as 36 dwellings per hectare (dph), which is typical of other Milton Keynes expansion areas. Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The building heights are determined by their location within the site and the proposed use. The residential buildings are higher at key entrances or intersections to provide landmark or gateway buildings. The application is supported by an amended density plan which indicates the development in the southern, western and eastern edges in more visually sensitive locations will be restricted to 20-30 dph, with development increasing to 30 to 35 dph within less visible locations at the site. Towards the centre and north of the site (adjacent to primary routes) the density increases to 35-40 dph; and close to the neighbourhood centre 40-45 dph and a density of 66 dph for the extra care housing. This approach is supported by the indicative building heights which prominently proposes development limited to 2-2.5 storeys (up to 10m) with a small areas of 3 storeys (up to 11m) restricted to along primary routes and at key entrances or intersections in order to provide landmark or gateway buildings. Within the employment area building heights are shown with a maximum of 12m, which is similar to other employment sites opposite and adjacent to A421. The proposed neighbourhood centre indicated a maximum of 13m with retail and community uses at ground floor and residential above. The extra care housing will be up to 13m and the changing pavilion up to 5.5m. The proposed primary school would comprise heights up to 10m and 2 storeys for efficient use of site and the secondary school up to 12m.
- 5.237 The proposal includes large areas of open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-

Use Games Area (MUGA), a skateboard park, children's play areas, and allotments. These facilities are located where they are easily accessible to residents within the site and also from neighbouring areas.

- 5.238 The existing rights of way and cycle routes through the Application Site will be retained and incorporated into the proposed development. The proposed development includes new and enhanced walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 5.239 The mixed use scheme is set within approximately 54ha hectares of parkland and a comprehensive green infrastructure strategy providing areas of public open space, structural landscaping including a linear parkland area of open space of some 40-50 metres typical width. The supporting DAS indicates that this approach has sought to create a landscape lead approach and a form of development which responds to the site context. The DAS suggests a building style of 'arts and crafts' influenced style housing with well-articulated building forms and varied roof lines to reflect a traditional 'edge of settlement' character.
- 5.240 The Crime Prevention and Design Advisor from Thames Valley Police have commented on the proposal and confirmed that they do not wish to object to the proposals at this time, however, they do identify a number of concerns which should be addressed and incorporated at the Reserved Matters stage and subject to any other conditions. A condition is recommended which would ensure the proposed development would be substantially in accordance with the Secure by Design guidance.
- 5.241 The NPPF advises that consideration should be given to using design codes to help deliver high quality outcomes. It is considered that design codes can go some way to demonstrate that the proposal would comprise sustainable development, create and sustain an appropriate mix of uses and support local facilities and transport networks and achieve high quality and inclusive design. The detailed design of the proposal is a reserved matter for later consideration and it is therefore not possible to assess this aspect fully at this stage. However, subject to appropriate conditions on any approval, it is considered this issue could be adequately addressed through design codes and the consideration of any subsequent reserved matters applications. The need for a design code (to inform future reserved matters applications) can be secured by way of condition and or s106 agreement.
- 5.242 MKC have confirmed that their Urban Design Officer considers that this application would fit well as an urban extension to Milton Keynes and complements many of the grid squares in MK for example with the inclusion of the grid road reserve and underpasses, Redway (along primary street) as well as the high provision of open space (Appendix C of MK Local Plan). The central primary street proposed also mirrors many other primary streets that "loop" through established MK estates such as Shenley Brook End, Shenley Lodge and Old Farm Park/Browns Wood.

5.243 Subject to the imposition of appropriate conditions on any outline approval to agree the specific details of design codes, materials, boundary treatments, landscaping, slab levels and lighting, it is considered the proposal could comprise an appropriate form of design in the context of the site, in accordance with VALP policies BE2, NE4, D2, D-NLV001 and NPPF advice. The proposal would accord with the principles of policy SD15 of the MK Core Strategy..

Flooding and drainage

I4 Flooding, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.244 Paragraph 166 of the NPPF requires new development to consider the risk of flooding to the site and elsewhere. Developments need to demonstrate resilience to climate change and support the delivery of renewable and low carbon energy which is seen as central to the economic, social and environmental dimensions of sustainable development. This will not only involve considerations in terms of design and construction but also the locational factors which influence such factors. Development should be steered away from vulnerable areas such as those subject to flood risk whilst ensuring that it adequately and appropriately deals with any impacts arising.

5.245 The Environment Agency flood map shows the majority of the site to lie within Flood Zone 1. However, the north western corner of the application site lies within Flood Zone 3. All built development is located in Flood Zone 1 (lowest risk) where the annual probability of flooding in any year is less than 1 in 1000. As there are no vulnerable land uses (classified as less, more or highly vulnerable uses (as set out in table D.2 (Flood Risk Vulnerability Classification) in the EA Guidance Note within Flood Zones 2 or 3, it is not necessary to require the applicant to carry out a Sequential Test, as the built development has been steered away from these higher risk zones, in accordance with para 166 in the NPPF.

5.246 The ES includes a chapter on drainage which incorporates the findings of the Flood Risk Assessment, which sets the drainage strategy for the site. The proposed mixed use development is on a greenfield site covering an area of approximately 144 ha. The Tattenhoe Brook flows along the northern western corner of the site prior to being culverted under Standing Way (A421) and Bottle Dump roundabout. There is a tributary of the River Ouzel, located 100 m to the south of the site, with several field drains (culverted under the railway) discharging into it. Soakage rate tests carried out on the site have established that infiltration unlikely to be viable, and it is proposed that surface water will be discharged via a series of attenuation ponds to the Tattenhoe Brook on the northern boundary (requiring consent from the Bedford Group of Drainage Boards), with run-off to the south being conveyed via attenuation basins into the network of existing field drains.

5.247 The SuDS systems required for drainage purposes will take the form of 'green' SUDS features such as swales and attenuation ponds and will be formed in the areas of open space and will be designed and managed to provide ecological opportunities.

- 5.248 The proposed dwellings would be required to be constructed to modern standards of design and sustainability to accord with current building regulations.
- 5.249 It is not considered that the proposed development would materially increase or exacerbate flood risk on the site nor in the wider locality. Therefore, the proposed development would be resilient to climate change and flooding in accordance with the NPPF.
- 5.250 In summary the LLFA has carefully considered the proposed development and Officers consider that having regard to the amended ES, the FRA and the drainage scheme proposed that the development would be acceptable. This would be subject to conditions to ensure that development does not begin until a surface water drainage scheme for the site based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development as set out in the FRA and also a “whole life” maintenance plan for the site have been submitted to and approved by the Council to be secured by a S106 agreement, and these conditions are considered to be required to make the scheme acceptable.
- 5.251 The ES states that Construction Environmental Management Plan will be prepared for the construction phase to manage flood risk and drainage and to prevent pollution to water. The assessment identified negligible effects on flood risk, surface water drainage, geomorphology, water resources and ground water during the construction phase. The FRA identified a minor adverse effect on water quality during the construction phase, but the effect is not significant and guidance on water pollution would be implemented to protect water quality. The ES concludes that there would not be a significant effect on flooding. The commitment to incorporating flood alleviation measures into the development as well as the detailed flood risk assessment demonstrates that the proposal takes full account of flood risk.
- 5.252 The FRA states that the Environment Agency and MK have been consulted on the proposal and they are keen for the development to encompass a range of sustainable drainage systems as part of the surface water drainage strategy. The development will include sustainable drainage systems comprising rainwater harvesting and permeable paving, and attenuation basin. The ES concludes that there would not be a significant effect drainage and water. Having regard to the flood attenuation proposals set out above it is considered that the development would provide wider benefit in terms of water quality, ecology and contribute towards the Water Framework Directive and therefore complies with policies I4 and I5 of the adopted VALP and with the NPPF.
- 5.253 It is considered that subject to the imposition of appropriate conditions and S106 obligations, the proposal has measures in place to manage drainage and flooding issues. In addition, it is considered that the proposed development would be in accordance with VALP policy I4 and the NPPF.

Supporting high quality communications

16 Telecommunications

- 5.254 The NPPF states that advanced high quality communications infrastructure is essential for sustainable economic growth. Paragraph 116 of the NPPF requires Local Planning Authorities' to ensure that they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communication services. Given the nature and location of the proposed development, it is considered unlikely for there to be any adverse interference upon any nearby broadcast and electronic communications services as a result of the development.
- 5.255 It is noted that telecommunication services are located nearby in Whaddon Road and environs and has some support for ultrafast broadband with maximum upload speed of 30MBS and download speed of 151.6Mbps. It is considered that the development should maximise the use of existing capacity in utility services in accordance with planning policy guidance.
- 5.256 In accordance with VALP policy I6, developers are also expected to have explored the option of providing on-site infrastructure, including ducting to industry standards in any new residential development for efficient connection to existing networks. A planning condition will ensure that this is adequately addressed.

Amenity of existing and future residents

BE3 Protection of the amenity of residents, D-NLV001 Land South of the A421 and east of Whaddon Road.

- 5.257 The NPPF in its core planning principles seeks to secure a good standard of amenity for all existing and future occupants. One of the principles set out is that authorities should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Policy BE3 of adopted VALP states that, amongst other things, proposals for development will be supported provided that it does not adversely affect neighbouring properties by way of loss of privacy, daylight, noise, visual intrusion or amenity. In addition, that any new development does not result in the loss of any existing publicly accessible open space.
- 5.258 At this stage, the matters of the detailed appearance, layout and scale of the proposed development are reserved for approval at a later date (and the submitted layout plans provided are illustrative only). It is therefore not possible to make detailed assessments relating to the direct impacts the new houses would have on existing neighbours or one another (or indeed the impact that other matters such as the landscaping proposals or lighting of the site may have).
- 5.259 However, the indicative details submitted show a layout which following discussions has been amended to reflect the character and appearance of the adjacent development within MKC and that provides for spacing between and about properties such that it is considered should ensure that no adverse over or interlocking between properties should occur and that acceptable amounts of amenity space could be

achieved. Therefore, It is considered that the scheme could be designed at a detailed stage so as to ensure that the amenities of future occupants would not be adversely affected.

5.260 Matters of air quality, noise and disturbance are covered above. In summary, the ES addendum concludes that there will be varying degree of noise and vibration impacts on nearby residential receptors arising from construction and operational traffic. Subject to an appropriate layout and scale of development, it is considered that the proposed development would not result in any significant loss of light, outlook, or overshadowing to, neighbouring properties. Although there will be some impact from during the construction phase a condition requiring compliance with the submitted Construction Environmental Management Plan (CEMP) to ensure that amenities are adequately protected. It is therefore considered that at the detailed stage the proposal could be designed in accordance with VALP policies BE3, D-NLV001 and the NPPF.

Building sustainability

C3 Renewable Energy, T8 Electric Vehicle Parking

5.261 The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

5.262 The application is accompanied by a sustainability strategy which sets out how the adopted sustainability principles will be translated into practical measures on the ground and how the different sustainable interventions combine and interact to create a place where sustainable living is both desirable and achievable. In addition, an Energy strategy was submitted which reviews the range of options that exists for the generation of energy from renewable sources. The proposal will seek at reserve matters stage to address efficiency including solar gain and shading, fabric heat loss, glazing performance water demand control, through fittings and appliances etc. The solar gain will be utilised to meet both Building Regulations Requirements and the proposed developments energy target for 10% of the site's total energy demand to be served using on-site renewable energy sources and sets the residential development on a path to 'zero carbon' by 2016.

5.263 The applicant has evidenced in the submitted energy strategy how the proposed development can also be designed to achieve high standards of sustainable design and construction, with the residential aspect being compliant with Part L of the Building Regulations and the non-residential buildings will achieve BREEAM 'Very Good' as a minimum, with an aspiration to achieve BREEAM 'Excellent'. The Energy Statement identifies the use of enhanced building fabric thermal performance, reduced thermal bridging, enhanced air permeability, solar control glazing, passive solar design and

natural ventilation as design measures which would enable the housing to deliver a sustainable design. The sustainability statement highlights that an Energy Strategy and Design codes will be submitted for approval at the reserved matters stage. The development would be required to include electric charging points in accordance with policy T8 (electric vehicle parking), in addition details of high water use efficiency will be required. These would be secured by conditions and as such the development would accord with VALP policy C3, T8 and with the NPPF.

Infrastructure and Developer Contributions

H1 Affordable Housing, H6b Housing for older people, BE2 Design of New development, BE3 Protection of the amenity of residents, NE1 Biodiversity and Geodiversity, NE8 Trees, Hedgerows and Woodlands, T3 Supporting local Transport Schemes, I1 Green Infrastructure, I2 Sports and recreation, I3 Community facilities and assets of community value, D-NLV001 Land South of the A421 and east of Whaddon Road.

Assessment of open space, sports and recreation needs for Aylesbury Vale (March 2017).

5.264 As noted in the sections above, there are a number of requirements which would need to be secured in a Planning Obligation Agreement to secure their delivery. Having regard to the statutory tests in the Community Infrastructure Levy regulations and the National Planning Policy Framework it is considered that the following planning obligation(s) are required to be secured within a section 106 agreement: namely, 1) financial contributions towards provision of education (primary and secondary); 2) on or off site sport and leisure provision; 3) off site farmland bird mitigation; 4) on-site provision of affordable housing, 5) financial contribution for hospital facilities; 6) provision of community facility; 7) onsite provision of primary school facilities and land for a secondary school; 8) provision of a health centre (GP surgery) (and/or financial contributions thereto); 9) provision and maintenance of public open space and recreation and play areas; 10) on-and off-site highways contributions/ works/road infrastructure works, travel plans, sustainable transport measures (and/or financial contributions thereto); 11) SUDS maintenance; and 12) phasing plan. Specific projects are also to be identified for the financial contributions to ensure compliance with CIL Regulations in consultation with relevant sections of the Council and the Parish Council.

5.265 It is considered that such requirements would accord with The Community Infrastructure Levy (CIL) Regulations 2010. Regulation 122 places into law the Government's policy tests on the use of planning obligations. It is now unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development of this nature if the obligation does not meet all of the following tests: necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

5.266 In the context of this application the development is in a category to which the regulations apply. The requirement for all of the above named measures being sought, if the proposals were to be supported, would need to be secured through a Planning

Obligation Agreement. These are necessary and proportionate obligations that are considered to comply with the tests set by Regulation 122 for which there is clear policy basis either in the form of development plan policy or supplementary planning guidance, and which are directly, fairly and reasonably related to the scale and kind of development. Specific projects would be identified within the Section 106 in accordance with the pooling limitations set forth in CIL Regulation 123 to ensure that the five obligations limit for pooled contributions is not exceeded.

5.267 The applicant has confirmed that he is willing to enter into a legal agreement and a draft of the S106 agreement was published on 28 June 2021 and is available on the Council's planning web page.

6.0 Weighing and balancing of issues / Overall Assessment

- 6.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
- a. Provision of the development plan insofar as they are material,
 - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations.
- 6.2 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 6.3 VALP is an up-to-date adopted local plan and the proposal accords with VALP policies and the NPPF.
- 6.4 Special regard has been given to the desirability of preserving the setting of nearby listed buildings and the conclusion is that the proposal would preserve the setting of those listed buildings. In addition, in relation to the setting of the nearest conservation area, the impact of the built form of the development is not considered to result in any material harm to the Conservation Area.
- 6.5 The proposals comply with VALP and the NPPF relating to trees and hedgerows, parking and access, promoting sustainable transport relating to cycling, walking and public transport, public rights of way, meeting the challenge of climate change and

flooding, and conserving and enhancing the natural and historic environment, archaeology, well-designed places and design, healthy and safe communities contamination, air quality, and residential amenities.

- 6.6 Although, there would be harm to the character of the landscape and visual impacts, the proposal includes mitigation measures that minimise the impact of the development.
- 6.7 The proposal would deliver a very significant level of new homes and make a valuable and significant contribution to the Council's medium to long term housing land supply. It would also make a significant contribution to affordable housing, create significant economic benefits as a result of population growth and investment in construction and the local economy/businesses. There would be a net gain in biodiversity.
- 6.8 The proposal is acceptable on highway grounds, subject to a number of mitigation works to be secured as part of the S106 and conditions.
- 6.9 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

Prematurity

- 6.10 Objections were raised that the proposal is premature. In light of the recent adoption of the VALP (September 2021), the objections are no longer relevant.

7.0 Working with the applicant / agent

- 7.1 In accordance with paragraph 38 of the NPPF (2021) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 7.3 In this instance:
 - The agent and applicant were updated of issues and consultee concerns and provided opportunity to submit further information to address these
 - The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

8.0 Recommendation

- 8.1 The officer recommendation is that the application be Deferred and Delegated to the Director of Planning and Environment to GRANT permission subject to the satisfactory completion of a S106 agreement to secure the requirements set out in the report and subject to any conditions considered appropriate or refuse if a satisfactory S106 agreement cannot be completed for such reasons as officers considers appropriate.

List of Appendices

- Appendix A: Site Location plan
- Appendix B: Proposed Masterplan
- Appendix C: Consultee Responses
- Appendix D: General Representations
- Appendix E: Highways Response
- Appendix F: Highways Response to Milton Keynes
- Appendix G: Milton Keynes Response
- Appendix H: Planning Inspectorate MKC Appeal Decision
- Appendix I: Newton Longville Comment
- Appendix J: Whaddon Parish Council Comments

Appendix B: Proposed Masterplan



APPENDIX C: Consultation Responses (Consultees)

Councillor Comments

Comments inserted verbatim and/or attached as appendices

MP, Rt. Hon. John Bercow

A letter of objection of been received from the MP, Rt. Hon. John Bercow, raising concerns regarding the policy position and in particular the consideration of the application ahead of Newton Longville's neighbourhood plan. Concerns are raised relating to the highway and traffic implications and the increased strain on infrastructure and congestion, the limitations of access to public transport and the ultimate reliance on the private car. Furthermore, concern is raised on the grounds of the loss of a distinctive aspect of the village and the implications of further linking development onto Far Bletchley. Finally objections are raised to the additional pressures this development would place on doctors surgeries as well as other vital infrastructure. In conclusion it is not considered that the development would comprise sustainable housing growth

Cllr Scott Raven

I would like to state a strong opposition to this development. Regardless of the need to meet the demand for new housing, we should not be allowing the obliteration of existing towns and villages in the process. This major development will add no benefit to the surrounding villages and will put an enormous further strain on local hospitals, highways, and welfare and education services. Furthermore, building a major development in this area of North Bucks is against previous consultant recommendations that housing is required in the South of the County. This seems like a continuation of the Oxford-Cambridge Arc project which was tabled last year by national government, and an attempt to sneak through huge scale development in the area bit by bit until the area is unrecognisable.

Cllr Ben Everitt* 30.10.2020

Please register my consultation response as strongly opposed. Grounds include but are not limited to traffic, environment, public services, loss of enmity, highways.

**Mr Ben Everitt was a Councillor at the time of providing comment.*

Cllr Allan Rankine (Milton Keynes Councillor) 27.07.20

I am responding to your request for comments dated 8 July 2020

I am a Councillor for Bletchley Park Ward which borders with this application site.

I object to this development for the following reasons:

1. Strategic

This development must be considered within the wider framework of your local plan, Plan MK and the more strategic work of the National Infrastructure Commission (NIC) on Oxford-Milton Keynes Cambridge corridor. It also pre-empts and therefore cannot be informed by MKC's 2050 strategy paper for the expansion of Milton Keynes.

In their report to Government '[Partnering for Prosperity in November 2017](#)' NIC refers to the delivery of housing across the East- West arc:

It is unlikely that this level or quality of development can be delivered if growth is focused exclusively on the fringes of existing towns and cities.

Such an approach to development can:

- *be deeply unpopular with existing communities: focusing development on much loved periurban landscapes, and making it difficult for local authorities to provide for ambitious growth in their local plans;*
- *fail to deliver necessary supporting infrastructure: the incremental pattern of growth means that no single development is ever sufficient to trigger the need for investment in city-wide infrastructure and services. This can reinforce perceptions that development is a burden on communities; and*
- *reduce the potential to capture land value uplifts to fund infrastructure: as land on urban fringes is acquired, traded by speculators, or optioned by developers, the 'hope' value of the land increases. This can reduce the scale of further uplifts that result following the granting of planning permission. Local mechanisms typically used to capture land value uplifts from incremental developments (CIL and S106 agreement) are not sufficiently powerful to influence decisions on land trading and speculation, whereas statutory mechanisms to support the delivery of other forms of development (e.g. new settlements and major urban extensions) can be more effective.*

NIC also says:

BUILDING INVITING, EFFECTIVE AND LIVEABLE COMMUNITIES

The delivery of new developments should not be of detriment to the interests of existing communities, nor need they have adverse impacts on the quality of the natural and built environment. Developing wholly new settlements provides the opportunity to recognise, celebrate and reflect the environmental and cultural assets that have made the Cambridge Milton Keynes-Oxford arc such an attractive place to live. This is an opportunity that incremental urban fringe developments, city-centre regeneration and infill developments can rarely exploit. This presents a major challenge to development around the fringes of these major regional centres, and their satellite towns. Further population growth in new suburbs, and in satellite towns and villages, together with increases in city-centre employment will place even greater demand on these towns and cities' infrastructure. It is vital therefore, that any deal under which local authorities agree to accelerated housing delivery also supports the delivery of supporting and enabling infrastructure that make it easier for businesses to locate in key towns and cities, and which enable people access the jobs they can create.

Instead, NIC believes that major house build growth will be delivered by building brand new large towns along the Arc. This development should not go ahead until the Government makes a decision on new garden cities. On cross border developments, HMG requires planning developments to be consistent across local authorities and for plans not to be considered in isolation of each other. We risk making unnecessary errors for the futures of our communities if new housing and infrastructure developments are made in the absence of an overall strategic plan for the corridor. There needs to be fully thought-through and joined-up thinking between all of the affected local authorities.

Current infrastructure projects such as East-West Rail and the Oxford-Cambridge Expressway offer huge opportunities for our area but need to be fully integrated into local plans in Aylesbury Vale,

Milton Keynes and beyond. Innovation in intelligent transport and “smart city” technologies also provides opportunities for new ways of providing new housing, rather than relying on traditional urban expansion. The impact of Covid-19 has changed work behaviours that are likely to persist long term and this will have a direct consequence on housing need.

Milton Keynes Council is committed to plan-led rather than developer-led development and that commitment and expectation extends beyond its borders. Milton Keynes Council has an agreed policy for urban extensions on the border of Milton Keynes, defined in Policy SD15 of Plan:MK, including provisions for integration with Milton Keynes (including the grid system, Redways and linear parks).

This development could place unacceptable strain on the infrastructure and services in Milton Keynes including on highways and transport infrastructure, quality public open space, GP services and school provision;

The development proposals lack any conformity or integration with the surrounding and adjoining infrastructure of Milton Keynes BUT would likely be regarded informally and geographically as part of Milton Keynes. However, it falls outside the administrative boundaries of Milton Keynes Council so any planning decisions and future income would not fall to Milton Keynes Council. It could become a ghetto, ignored by both local authorities.

The new Buckinghamshire Council should engage with Milton Keynes Council about the long-term sustainability of extension settlements. Any urban extension to Milton Keynes within Buckinghamshire Council should adopt the Milton Keynes approach of adopting a Design Brief focussed on good ‘placemaking’, agreed by the local authority, which developers will be expected to conform to, rather than allow a developer-led design.

National guidance is clear that housing needs should be calculated and accommodated across Housing Market Areas as a whole. Where these cross Local Authority boundaries, the Duty to Cooperate should be engaged to ensure needs are met.

Through this Duty to Cooperate the new Buckinghamshire Council and MKC have established a point of disagreement over what the Housing Market Area proposed allocations should be attributed to.

I cannot support this development in the absence of a strategic long-term vision in which infrastructure precedes housing development and not the other way around.

2. Transport Infrastructure

SWMK have not properly considered the highways impact on Buckingham road. The highways impact focusses on Standing Way and the connection with Milton Keynes

The closest services and retail provisions are in Central Bletchley accessed via Buckingham Road. The level of congestion on Buckingham road at peak times is very bad with tail backs that stretch from the railway bridge in Central Bletchley to the roundabout at the Three Trees pub. That is about one mile and approximately half the Bletchley stretch of Buckingham road.

There are many documented flaws in the highways modelling and I have no confidence in it. The congestion on Buckingham road is real. For years, every political campaign that has been run in

Bletchley Park Ward has seen calls for a Bletchley Southern By-pass to alleviate pressure on Buckingham road

The development at Salden Chase accesses Buckingham road directly. SWMK say that any harm to the local area from road access from this development can be “adequately mitigated or would only be short to medium term in impact.”

They are talking about Standing Way not Buckingham road. There are no possible mitigations for congestion on Buckingham road. That is why residents are calling for a by-pass

Additional traffic from the Salden Chase housing development cannot make our traffic problems better but because the flawed modelling does not recognise the existing issues it therefore cannot calculate the added problems that will result from any new developments.

The application should be rejected on the basis that there are no mitigating solutions to the severe congestion issues on Buckingham Road and that new access onto Buckingham Road would add to this congestion and make life unbearable for residents.

MKC Development Control Committee have rightly recognised the flawed highways modelling and agreed with submissions on this matter. That is why the DCC rejected the highways modifications to service the SWMK development at Salden Chase. That planning application remains rejected but subject to appeal.

Buckinghamshire Council should not approve a development that has no proper access to MKC highways infrastructure and in recognition that if it did have access then it would add to the existing traffic chaos that already exists on Buckingham road.

Parish/Town Council Comments

Newton Longville Parish Council (23.11.20)

Objection by Newton Longville Parish Council

Application: 15/00314/AOP “Salden Chase”

For: Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

At: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

(Note: The description above is as quoted by Buckinghamshire Council in their consultation letter to NLPC and site notices. It is not accurate, see 19 below.)

1. For the reasons detailed below, we respectfully request Buckinghamshire Council:

Reject the application now in accordance with the decision of the AVDC Strategic Development Management Committee on 7th June 2017 that:

*“That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer’s report and subject to conditions as considered appropriate by officers. **If this cannot be achieved, then the application will be refused for reasons as considered appropriate by officers.**”*

Amongst other things it is clear there is no executed, or even agreed, section 106 agreement. Surely three years is more than enough time for a Section 106 agreement to be completed.

2. Failing that, then Buckinghamshire Council should undertake a far more comprehensive and legally compliant meaningful and effective public consultation exercise which should be ongoing for as long as the applicants keep submitting changes in what they propose. Newton Longville Parish Council is more than happy to work with Buckinghamshire Council to ensure the appropriate consultation is carried out on this (as it has on planning application 20/03539/APP <https://bit.ly/GasTankerBletchleyRoad> which has attracted over 1,100 objections in less than a month due to efforts of NLPC and others).

3. The fundamental objections to this application and how it has been incorrectly handled by Aylesbury Vale District Council, is well documented and reproduced as an Appendix to this objection.

4. The application is a cross-boundary application. How a cross boundary application should be dealt with is detailed in our letter of 6th June 2016. It is not two different applications, but identical applications submitted to each planning authority each of which must be made considered holistically, not for each planning authority to act as if in a silo without any regard for the application site as a whole.

5. The consultation letter sent to Newton Longville Parish Council by Buckinghamshire Council required comments by 20th November, however it is clear, that far from adequate consultation has been undertaken by Buckinghamshire so far, as is demonstrated by the very low number of public comments as a result of the re-consultation on the amended proposals.

6. It is clear, from what has said by the QC representing Buckinghamshire Council as a Rule 6 party in the Appeal against the refusal of the application by Milton Keynes Council, that the applicants have been asked by Buckinghamshire Council to provide further information which is to be submitted by the applicants in December. This will inevitably mean further consultation is needed.

7. Under the temporary publicity requirements due to Coronavirus (as explained at <https://bit.ly/335K3Q9>) it is clear that Buckinghamshire Council should have done much more than the minimal efforts made so far to consult on the very significant, and ongoing, material changes made to this application since it was submitted over five years ago, but still not determined.

8. Given the size of this proposed development and particularly that it is subject to an Environmental Impact Assessment, Buckinghamshire Council is under an obligation to take reasonable steps to inform any persons who are likely to have an interest in a planning application.

9. The temporary changes allow local planning authorities to take a flexible and pragmatic approach according to their local circumstances. This means that Buckinghamshire Council are required to publicise an application **“in a manner which is proportionate to the scale and impact of the development”** but so far have not done so. Flimsy notices on generally inaccessible lamp columns

are of little use when they are nowhere near people affected, particularly when people are subject to lockdown, nor is an advert in a newspaper which is not generally in circulation in the area.

10. Site notices were erected dated 14th August 2020 at various locations requiring comments by 13th September (Annex 1). Further site notices were erected dated 30th October requiring comments by 29th November (Annex 2). The Town and Country Planning (Development Management Procedure) (England) Order 2015 gives interpretation of “by site display” as “the posting of the notice by firm fixture to some object, **sited and displayed in such a way as to be easily visible and legible by members of the public**”.

11. Given the current closures of most rights of way around the site, due to works being carried out by East West Rail, there is even less chance of site notices being seen. Similarly, displaying notices on such as on Whaddon Road and Standing Way in isolated locations subject to National Speed Limits are not “sited and displayed in such a way as to be easily visible and legible by members of the public”.

12. The detail within the site notices and press advert(s) do not comply with the requirements the Town and Country Planning (Development Management Procedure) (England) Order 2015.

13. Schedule 3 to the order contains the appropriate form for the notices to be published in the local press and posted on site, which subject to the temporary Coronavirus regulations, must (inter alia):

- state that a copy of the Environmental Statement is included in the documents which will be open to inspection by the public and give the address where the documents can be inspected free of charge
- state the latest date by which any written representations about the application should be made to the local planning authority (being a date not less than 30 days later than the date on which the notice is published).

14. The most recent press advert in the Milton Keynes Citizen, for which a copy is on the planning register, was on 16th July 2020 (Annex 3). Yet it was not until 29th September, over two months later that a copy of the advert was uploaded to the planning register. It appears a further advert was placed on 29th October but not copy is on the planning register. Advertising in Milton Keynes Citizen is not an appropriate way to make residents of Newton Longville and nearby villages in Buckinghamshire aware of a planning application.

15. The Environmental Statement must be placed on Part I of the planning register ... **as soon as possible** after publication, but this was not done.

16. An Environmental Statement should be in an easily accessible form, but it has been uploaded to the Buckinghamshire Council website in a haphazard way, making navigating through it a “paper chase” contrary to the principles laid down by Lord Hoffman in *Berkeley v SSETR* [2000].

“It may consist of one or more documents, but it must constitute a “single and accessible compilation of the relevant environmental information and the summary in non-technical language”

17. As the government guidance on the temporary regulations makes clear **“Greater and more frequent publicity** would be appropriate where the potential impact of the planning application is **expected to generate a large volume of representations**. This may be the case, for example, for

large scale applications ... or where there has been a previous application which has attracted interest.”

18. As has already been made clear in earlier correspondence (See Appendix) the Environmental Statement for this application was already an inappropriate “paper chase” by 2016. Then as part of their appeal an “updated” Environmental Statement was produced in May 2020 and submitted to Buckinghamshire Council by email on 19th June. This included yet another new TA with much changed or remodelled, but fundamental errors still there. 19. There had been an ongoing issue of AVDC, and now Buckinghamshire Council, failing to put documents on the public planning file in good time, if at all. For example, the letter from the agent (Annex 4) sent by email on 19th June was not uploaded until 19th August, two months later. The letter sent by email on 8th October 2020 (Annex 5) was not uploaded until 19th and 23rd October 2020. Despite several requires for an explanation for these and other delays no explanation has been provided by Buckinghamshire Council. 20. Since then there have been even more changes submitted applicants/appellants in September and October purporting to amend the Environmental Statement submitted in May 2020. Overall, this amounts to an even bigger paper chase than before. 21. The description used for the application has not been amended to include the addition a 60 bed care home as detailed in the letter from the applicant’s agent on 8th June 2020, nor does it include any mention of provision for a 6 GP surgery. The letter gives the description as:

“Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.”

22. The applicants and their highways consultants have had over five years to get this right, but it seems they are either unable or unable to defend the “data” submitted which led to the refusal by MKC. So, what should have been a new application for a fundamentally scheme was submitted, but which is still not correct. As a result, every week or so it seems another change is submitted.

23. As soon as a change is submitted, it does not take long for those very competent highways experts supporting and advising NLPC/WBC and MKC as well as Buckinghamshire Council Highways to find and point out the latest errors and/or omissions. So, there is yet another change and so the circle goes on. This is an abuse of process that should be stopped now.

24. How many attempts does it take to sort this out?

25. Within the Appeal Case Management Conference Call on 20th November it became clear that there has been multiple correspondence between Buckinghamshire Council and the applicants/appellants or their consultants which has not as yet all been made available on the public register. That these may have been Highways matters is no justification for not placing them on the planning register as required by law. The planning system is meant to be open and transparent.

The full text including the appendices attached to Newton Longville Comment is attached as Appendix I

Buckingham Town Council notes with concern that in 2020 this 2015 application has still not been determined by either AVDC or its successor the Buckinghamshire Council and wishes to reiterate their previously expressed fears over the increase of traffic generated by this proposal on the single-carriageway A421 both in the vicinity of the site (which affects commuter traffic between Buckingham and Bletchley station and school transport for the MK pupils attending the grammar school) and in the wider area, which does not appear to have the necessary capacity; and on the effect on local schools, in particular the Royal Latin School which will be the most convenient grammar school for residents' children who pass the 11+. They also support the more detailed opposition of the surrounding parishes, and the effects on the local infrastructure.

Drayton Parslow Parish Council (01.04.2015)

Stance: Customer objects to the Planning Application

Comment Reasons: - Residential Amenity - Traffic or Highways

Comment: At its meeting on 30th March 2015 Drayton Parslow Parish Council resolved to object to this development as it will add a considerable volume of vehicles to an already overburdened traffic system for those wishing to access Milton Keynes or Buckingham via the A421, resulting in their usage of the roads in and around Drayton Parslow as a 'rat run'.

Little Horwood Parish Council (5.03.2015)

Little Horwood Parish Council OPPOSES this application due to the impact it would have on traffic and particularly the flow of traffic along the A421 from the West of the development into Milton Keynes. In addition the Parish Council does not believe adequate consideration had been given to the additional infrastructure and supporting services that will be required.

Many of the surrounding villages have difficulty accessing the A421 from the South when heading towards Milton Keynes. This is particularly difficult for traffic from Little Horwood and the surrounding area where access to the A421 is via a very dangerous exit at the end of Warren Road.

This development provides the District and County with an opportunity to improve safety and the amenity to local residents by making changes to this junction.

Little Horwood Parish Council (LHPC) proposes that as part of this development either:

a. The Junction from Warren Road is closed to exiting traffic and traffic is redirected down Shucklow Hill and onto the A421 via a new roundabout situated when the road meets the A421. This also provides an opportunity to remove a dangerous staggered junction with the road towards Nash.

Or

b. A roundabout is installed at the Warren Road exit. It is noted that as this is on a blind brow this may not be the best option.

In addition, the additional traffic from this development will further compound the traffic bottleneck at the Bottledump roundabout when heading East. LHPC asks AVDC to ensure appropriate changes are made to this roundabout to ensure a clear route for traffic from the A421 and avoid unnecessary queuing at peak times.

For a development of this size the Parish Council believes there should be greater provision made for additional infrastructure, support services and amenities to meet the increased demand created by a significant increase in the number of residents in the area.

The Parish Council would like to speak at Committee should this be appropriate.

Mursley Parish Council – Oppose the application

Whaddon PC

The Parish have provided lengthy comments which have been appended in full to this report at Appendix J In summary their comments fall into various categories mainly relating to Traffic and Transport; Sustainability; Need and Location; Landscape and Coalescence.

Consultation Responses (Summaries)

External consultee responses

Milton Keynes Council

11.02.2021 – The changes to the proposal are not substantial. It is relevant to note that Milton Keynes Council objected to the previous application, but their views were overlooked by AVDC. It is also relevant to note that a parallel application for the previous proposal to Milton Keynes Council (reference 15/00619/FUL) for physical improvement to Bottledump Corner and a new access on to the A421 to accommodate the development of land in Aylesbury Vale District was refused by Milton Keynes Council and is currently the subject of a planning appeal. The reason for refusal was: *“That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and grid road network with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.”*

Summary A new Transport Assessment (TA) was prepared as part of the appeal mentioned above and an identical TA accompanied this application, titled as “Updated Transport Assessment” (albeit it represents a completely new analysis and can be considered a new TA). That new TA is now understood to have been superseded by the submission of TRN3 on 29th January 2021, as is the information submitted by the applicant / appellant in the intervening period. BC has very recently consulted MKC on TRN3 (and also on TRN2 which relates to its own highway network). MKC has commenced its own assessment of TRN3 and will respond under separate cover once it is able to do so; in the meantime, we trust that the following response is helpful. In terms of traffic impact, which was the main concern of the Council last time around, the new TA took an entirely new approach, which is also reflected in TRN3. The previous TA relied on data from the Milton Keynes Traffic Model to test the impact within Milton Keynes but the new TA relies on a ‘count and factor’ approach. This means that new traffic surveys were done at a number of junctions early in 2020 (before the traffic conditions were affected by Covid) to give up-to-date base data. These were then growthed to 2033 using standard factoring (TEMPRO), with traffic from the development added in and junctions analysed using junction capacity models. The two key differences over the previous TA are the fact that there is no redistribution of traffic as congestion builds up (unlike when the traffic model was used) so traffic on a particular route just continues to grow. In addition, the forecast year is now 2033 not 2026, to reflect the time that has passed since the original application and the latest estimates for build out of the development. As a result of this forecast, the 2033 base network (no development) is more congested than the 2026 base in the previous TA. Concerns have been raised with the applicant over evidence relating both to the ongoing appeal and this planning application. These discussions are ongoing and relate to matters including the Council’s serious concerns with the subsequent capacity analysis and proposed mitigation. On the basis of the new TA, the final situation with all in place is worse than if the development doesn’t happen. This is defended in the TA on the basis: i) In practice there will be some redistribution of traffic on the grid road network. ii) The mitigation means that the situation is better than if the development came forward with no mitigation. iii) The residual impact is not severe as required in NPPF.

In response to these points it is considered they are not valid because: i) There is no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted at this stage. ii) The correct comparison is with the base situation not with the development with no mitigation. iii) The residual impact is considered severe as there is a significant

reduction in performance even with the mitigation measures in place. It is relevant to note that the mitigation package overall is more substantial than for the previous application, where improvements were proposed to the three main A421 roundabouts only.

Conclusion

Based on the new TA, the development has an adverse impact on the road network in Milton Keynes which is still judged to be severe with the proposed mitigation in place. On that basis, Milton Keynes Highways would recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds. However, it is now understood that TRN3 updates the new TA in relation to junctions within Milton Keynes. The Council therefore reserves its position on the application until such time as it has had time to fully consider it.

MKC Local Planning Authority resolved on the 17 November 2016 to object to the planning application consultation from Aylesbury Vale District Council, as an adjoining Local Authority to the planning application for the following reason:

The application fails to take account of the level of services and facilities required to meet the day-to-day needs of its future residents and fail to make a proportionate contribution towards an increase in the capacity of existing facilities within Milton Keynes to satisfy these increased demands and to mitigate the impact of the proposed development on existing services and infrastructure in Milton Keynes. It is therefore considered that the proposal fails to meet the statutory test for the use of planning obligations in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. Policy SD15 of the Core Strategy and Paras. 209-210 of the National Planning Policy Framework.

MKC objects to the proposal on the basis that the proposed development will also result in an adverse impact on the highways network of Milton Keynes.

MKC LPA fully support the comments put forward by NHS England and the Milton Keynes Clinical Commissioning Group in respect of the need for onsite primary healthcare provision and a per dwelling contribution in support of secondary health care facilities at Milton Keynes Hospital. Milton Keynes objects to the proposal on the basis that the development would not provide adequate primary and secondary healthcare facilities to offset the impact of the development. Furthermore should Aylesbury Vale District Council be minded to grant planning permission Milton Keynes Council Local Planning Authority would support the request from NHS England and Milton Keynes CCG that health care requirements are secured within a collaborative section 106 agreement.

Milton Keynes Council object to the proposals on the basis of the adverse impact the development would have on existing education facilities within Milton Keynes. It is considered that the proposed on site education provisions are insufficient to offset the education needs generated by the development and that given the sites proximity to Milton Keynes the burden would fall on existing facilities within Milton Keynes. It is confirmed that Milton Keynes Council does not have capacity to accommodate education need generated by this development and given the sites location within the Aylesbury Vale District Council administrative area any education need arising would need to be accommodated within Aylesbury Vale.

Whilst it is acknowledged that Aylesbury Vale District Council maybe unable to demonstrate a five year housing land supply at the time of the determination of this application and therefore

paragraphs 49 and 14 of the NPPF would be engaged Milton Keynes Council request that full consideration is given to the test of if this site would constitute a sustainable development. On the basis that the current development proposals do not incorporate the necessary critical physical and social infrastructure to constitute a sustainable development in the terms set out within paragraph 14 and therefore consider that this proposal should be refused on this basis despite the 5 year housing land supply position.

A list of S106 requirements has been provided and is addressed in more detail in the report under the heading promoting healthy communities.

West Bletchley Council formally OBJECTS to this planning application. The objection relates to both the principle and detail of the proposed development; the particular reasons include the following:

1. The principle of a development at the site is not supported by any adopted development plan or supplementary planning document;
2. The proposed development would place an unaccepted burden on the transport infrastructure;
3. The proposed grid road that would follow the route of a known gas main is not shown to be technically viable nor that such a proposal does not represent a health and safety risk to existing or future residents or users of the road;
4. The proposal would result in the loss of a significant amount of best and most versatile agricultural land;
5. Unreasonable draft Heads of Terms that do not reflect the way a real world timetable operates nor does it allow sufficient flexibility to account for an uncertain commercial market;
6. The impact on local services;
7. The location of the proposed allotments;

Buckingham And River Ouzel Drainage Board - this site is outside the Boards district, in this instance the Board has no comment to make

Crime Prevention Design Advisor (CPDA) - Do not wish to object to the proposals at this time, however, identify a number of concerns which should be addressed either prior to planning approval being considered or via specific conditions attached to any subsequent approval.

22.05.21 - Additional concerns/ previous comments remain relevant

Environment Agency - Following the submission of the FRA addendum we are satisfied that the proposed development can incorporate a sustainable method of surface water drainage without increasing the risk of flooding on or off site.

19.02.21 – No comments on the amended plans as submitted

Natural England - The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Sports England - The additional/amended information received does not appear to relate to sport and recreation facilities therefore Sports England's comments submitted on 28th July 2020 are still applicable

Anglian Water - No objections and recommend the imposition of conditions

Highways England - Following the receipt of amended plans and additional information Highways England raise no objections and recommend that conditions should be attached to any planning permission that may be granted.

Berkshire Buckinghamshire Oxfordshire Wildlife Trusts (BBOWT) – No further comments subject to condition to secure Landscape Ecology Management Plan which incorporates a revision of the Biodiversity Impact Assessment once the details of the site landscaping are known so as to demonstrate the final plans will achieve Biodiversity Net Gain as being indicated at outline stage.

Internal consultee responses

Archaeology – No objection in principle and recommend the imposition of a condition is applied to require the developer to secure appropriate protection, investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 141 (NPPF 2019)

PROW Officer – Raises no objection to the application and recommends the imposition of conditions

Drainage Engineer - Following the receipt of further details the drainage engineer withdraws their previous comments and therefore has no objections to the application on surface water drainage grounds and recommends the imposition of the standard drainage condition be placed upon the application.

Flood Management - Based on the information provided BCC Strategic Flood Management Team has no objection to the proposed development subject to the imposition of conditions.

Biodiversity - These proposals involve the development of a greenfield site and are therefore highly likely to have a negative impact upon biodiversity if unmitigated. A series of ecological assessments has been produced and submitted in support of this application by the consultant FPCR. These reports detail the species and habitats currently found on the proposed development site. It is considered that this element of the ecological assessment acts as an accurate account of the features found at the time of the assessment. The recommendations of this report are not considered to be detailed enough to address the enhancement aspects of a major development of the scale proposed and the applicant will need to demonstrate how the development minimises impacts on biodiversity, provides net gains in biodiversity, and conserves and enhances biodiversity, in accordance with NPPF. The mention of ecology links in the Design and Access Addendum is welcomed but detail is required on how these measures will be achieved

Contaminated Land Officer - A Phase 1 Geo-Environmental Desk Study report written by Pell Frischmann has been submitted as part of the ES for the above application. After reviewing the Desk Study report and section 16 of the ES, which relates to the Ground Conditions and Contamination, it is concluded that based on the historic land uses and its current operational use, the overall risk from land contamination at the site is considered to be low for the current developments, and low for the re-developed site. However, this would need to be confirmed by appropriate intrusive investigation, testing and assessment of the results of the investigation. The officer confirms that she agrees with this conclusion and recommends the imposition of conditions on any planning approval.

Education - Primary, secondary and special schools including Children's Centre provision within the planning area of the development are all currently or projected to be at capacity. The development proposal borders Milton Keynes so may well impact on schools across the border. Both local authorities will need to work together to ensure that the effects of the development are most

effectively mitigated. Notwithstanding these issues, should the application be approved the County Council would require the developer to make contributions in accordance with the policies set out in its Guidance on Planning Obligations for Education Provision :

Environmental Health - The Environmental Statement dated January 2015, identifies that noise and vibration impacts in relation to the scheme will occur during both the construction and operation. The noise mitigation measures detailed in chapter 12 must be implemented as part of the Construction Environmental Management plan. Should this application be approved then further information will be required regarding the siting of noise sources, the use of low-noise road surfacing and any other noise mitigation measures to demonstrate that residential properties will comply with the standards specified in 8S8233:2014.

‘There are no further environmental health comments over and above those made by colleagues in their memos dated 19.02.2015, 05.09.2016 and 29.07.2020 in respect of this application. This memo does not include comments relating to air quality or contaminated land, where relevant, these comments will be provided separately’

Housing - Should the scheme achieve 1855 dwellings housing officers would expect at least 556 units of affordable housing to be offered in order for it to be policy compliant at 30%. These units should be of a type and size reflective of the overall housing mix whilst also taking into account the district-wide need with a suitable tenure mix to be agreed and secured as part of S106 discussions. It should be noted, however, that the affordable element of a scheme should be broadly in line with the site’s overall housing mix.

Highways – Following extensive discussions and the submission of amended plans detailed comments the outline application is acceptable to the Highway Authority subject to a Section 106 Agreement to secure works and contributions and to a number of suggested conditions and informatives. A full copy of the detailed comments has been appended to this report at Appendix E of this report. In summary the required contributions relate to the following matters;

- A421 Corridor Improvements - A financial contribution towards corridor improvements between Buckingham and Milton Keynes
- Newton Longville Traffic Calming A contribution towards the design, consultation and implementation of a traffic calming scheme in the village of Newton Longville to mitigate the impact of the development traffic
- Bus Service Provision - An obligation to enter into a Service Agreement with a bus operator to encourage sustainable modes of travel between the site and Milton Keynes and to support the aspirations and targets set out in the Travel Plan.
- Travel Plan – To submit for approval a Travel Plan in general accordance with the approved Travel Plan Framework and County Council’s Travel Plan Guidance for Developers.
- Travel Plan Monitoring – A financial contribution towards the auditing of the travel plan.

- Upgrade to Footpath 19 Parish of Newton Longville - A contribution is required for the improvement of the footpath between the site and the path to the footway between Nos. 36 and 38 Whaddon Road, Newton Longville to provide greater connectivity between Newton Longville and the site.
- Whaddon - A contribution towards road safety improvements on Coddimoor Lane and Stock Lane.
- Cycle Parking Provision – A financial contribution to provide additional cycle parking at Bletchley Station to encourage sustainable modes of travel between the site and the railway station and to support the aspirations and targets set out in the Travel Plan.
- Highway Works – An obligation to enter into a Highway Works Delivery Plan to secure the delivery of the following works:
 - 1) Improvements to Bottle Dump Roundabout and a Pegasus crossing on Whaddon Road in general accordance with drawings D018 Rev.A and D015 Rev.B to include CCTV camera provision and variable message signs.
 - 2) Improvement to Whaddon Road/A412 Roundabout in general accordance with drawing D019 Rev. B.
 - 3) Site Access to Whaddon Road.
 - 4) Site Access to Buckingham Road to include toucan crossings on Buckingham Road (East) and the development access road.
- Grid Road Reserve – An obligation to dedicate the land for the grid road reserve to Buckinghamshire County Council as Highway Authority, in order to not prejudice the ability of the Council's to deliver this scheme in the future.
- NLO/19/1 – An obligation to dedicate a public bridleway along the alignment of Footpath NLO/19/1 between Weasel Lane and the railway line, under Section 25 of the Highways Act.
- Weasel Lane – A contribution to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property Weasels' to provide improved connectivity to the wider rights of way network for leisure purposes.

Milton Keynes Council has set out the following obligations, which are considered necessary to mitigate the impact of the development within Milton Keynes, to be secured under Section 278 Agreement:

1. Capacity Improvements at the following junctions within Milton Keynes:
 - Bleak Hall Roundabout on A421
 - Elfield Park Roundabout on A421
 - Emerson Roundabout on A421
2. Redway provision and connections (to the A421 Redway, the old A421 itself and the new link to Buckingham Road). These connections will require improvements to surfacing, lighting and signage.

3. Phasing and timing of infrastructure provision

Landscape Officer – Following discussions and the submission of amended plans and updated ES documents the Landscape Officer accepts that the improvements to the layout will improve the visual mitigation on the receptors beyond the site boundary (in particular the views from Newton Longville to the south-east), however does not accept that views of the proposed development from the footpaths that traverse the application site would reduce to a level that any reasonable observer would regard as not being a significant change from the existing baseline views over open countryside. For these reasons the Landscape officer disagrees with the overall conclusions in the submitted revised LVIA and would advise that the scheme should be considered to have a significant adverse landscape and visual impacts to the application site itself.

In respect of the proposed impact on settlement character and identity it is concluded that generally the proposed development adopts an approach to settlement character that seeks to positively respond to the topographical and landscape issues on the application site rather than proposing a wholly MK based style of development.

Tree Officer - No objection - Further information required at reserved matters stage. Due to the outline nature of the application, and the resultant lack of detailed layout and technical design information etc, it is not possible to accurately assess the likely significance of impacts to trees.

However, it is clear that consideration has been given to existing trees and the constraints they may pose, and to opportunities for new planting. Therefore it is possible to state with confidence that the proposal is feasible without significant detriment to the tree stock – subject to appropriate mitigation and continued consideration of trees throughout the design process.

Accordingly, should the balance be in favour, it would be appropriate to attach conditions to any permission to secure:

- A full AIA of the final layout or individual development phases, taking into account the comments raised above, and including indicative tree protection details and Arboricultural Method Statement, in accordance with BS5837:2012.
- Full details of new planting, including a design statement, specifications for planting and aftercare, and detail showing there is sufficient space for the trees to achieve full growth potential, taking into account guidance within BS8545:2014 and clause 5.6 of BS5837:2012

The British Transport Police (BTP) Designing Out Crime Unit (DOCU)

This planning application was brought to BTP's attention by the Thames Valley Police Designing Out Crime Officer due to the close proximity of the proposed development to the railway running to the adjacent to the development. The railway is part of the proposed East-West Rail Link and BTP has recommended that the future use of the railway should be considered as part of their response.

Whilst not objecting to the application. The Officer is of the opinion that there will be an impact on the railway land and a condition should the development go ahead be imposed. The condition requires that a fence on the boundary of the railway must be in line with the Network Rail Standards should be put on the developers. Further guidance is available to help clarify risks within the proposal and provide designing out crime advice for those parts of the development which may impact on the railway.

APPENDIX D: General Representations

Amenity Societies/Residents Associations

Bletchley Park Area Residents Association (BPARA) and the Consortium of Bletchley Residents Associations (COBRA).

- Considers that the Committee failed to have regard to any of the important information provided by various parties who opposed the application.
- Disappointed that AVDC is continuing to consider this application rather than defer any consideration until 2 important matters are concluded:
 - Approval of the Aylesbury Vale District Local Plan (AVDLP), and
 - Confirmation of the precise route of the Cambridge/Milton Keynes/Oxford Expressway:
- The draft AVDLP refers to only 35% of development in rural areas, of which application 15/00314/AOP must form part.
- It is disappointing to note that Milton Keynes Council are no longer seeking contributions via Section 106 monies for a number of services other than a contribution towards Milton Keynes University Hospital. As previously stated, Council Tax Payers in the Milton Keynes area will have to fund these services and any infrastructure requirements as residents of the proposed development will use Milton Keynes and not Aylesbury Vale services.
- AVDC have a duty to seek to ensure contribution to Blue light services are properly investigated rather than requests dismissed as relevant tests not met

Newton Leys Residents Association

Newton Leys is a development that straddles the boundary of Milton Keynes and Aylesbury Vale. We believe that development of this size which cross local authority boundaries, simply do not work. We have first hand experience of much needed community facilities not being developed, and political squabbling between authorities

Milton Keynes and Aylesbury Vale have very different policies for local residents, and Newton Leys is an example where people living either side of the same road can have refuse collected either weekly or fortnightly and be subject to completely different planning policies. People who are situated at Newton Leys will generally use the facilities within Milton Keynes, without funding support from Aylesbury Vale. It simply does not work. We suggest that is building go ahead, the area should be subject to a boundary review and ceded to Milton Keynes.

No development should take place without local transport infrastructure in place such as the Southern Bletchley relief Road, and the development of an interchange on the East West rail link, this would allow quick access via train to Aylesbury, Bletchley and Milton Keynes.

The Parks Trust Milton Keynes

- insufficient about how the Old Buckingham Road along the northern edge of the development. There is some reference to this being enhanced as a pedestrian/cycle green link however there is still no indication of how the informal car parking area that currently

exists at the west end of the old road is to be treated. This area has a history of anti social behaviour and fly-tipping.

- The application should be supported by a clear strategy setting out on how the open spaces and green infrastructure in the development will be managed and maintained in the long term. This should identify which body/bodies will take on this function and how the future maintenance of the open spaces will be funded.
- A general Landscape Strategy should be developed setting out the design principles for new areas of open space, play areas as well as retained landscape and ecological features such as hedgerow and trees
- A set of clear landscape design principles for the SUDS/attenuation ponds and basins should be developed. In particular these principles should include guidance on the safety risks of water bodies in public open spaces and how good design can reduce these risks (e.g. shallow bank gradients) and how the features will be maintained via good access routes for machinery to cut
- vegetation, dredge accumulations of silt, etc. The guidance should also include for the landscaping of these ponds to optimise their amenity and ecological potential in line with their drainage function.

Other Representations

A total of 482 letters of representation had been received to the original submission, 478 of which raise objections, and 4 letters raise comments that neither support nor object. The salient objections raised are as follows:

- Existing road which runs East-West through Newton Longville is already deteriorated from use by all classes of vehicle, and many people exceed the speed limit.
- Potentially an extra 1000+ cars to the roads during peak hour will increase noise disturbance, air pollution and further damage the road surface, as well as increasing the risk of a road accident for those who live in the village.
- There was previous significant opposition to the development in 2010/2011.
- Roads around Newton Longville, Far Bletchley, Stoke Hammond, Mursely, Drayton Parslow, Stewkley and Whaddon, as well as the Bottle Dump roundabout and the A421 will have to work beyond their capacity and congestion is experienced in the vicinity and there are already bottlenecks experienced as a result of infrastructure constraints present.
- Current road infrastructure around Bletchley is unable to cope with the volumes of traffic. Any increase is unacceptable.
- Inadequate public transport means the majority of residents will use their cars to travel everywhere.
- Development will be too high density, and there will not be enough off-street parking spaces.
- There is inadequate parking provision in Bletchley to accommodate the shoppers that would arise from the proposal, there are currently capacity issues.
- Provision of the layout and location of access points to the site is inadequate. All 3

are very dangerous with 2 being on 60mph roads, with bends and hazards, and 1 on a 70mph dual carriageway on a downhill slope that is regularly used by large goods vehicles. During rush hour it would take a long time for the road to be clear for just 1 car to safely exit the site, let alone a potential 2,000 cars. Accident waiting to happen.

- There is no practical pedestrian access from the new development to the nearest shopping destination – Bletchley centre.
- The development would put strain on the already hard-pressed police resources in Milton Keynes.
- There will be an adverse impact on the current village school, either it will not be able to cope with the influx of students, or it will close due to students going to the new school that is proposed.
- The educational infrastructure is inadequate to provide for an influx of this size, they are stretched thin as is.
- Despite being residents of Aylesbury Vale, residents of this development would likely use the facilities in MK, due to their closer proximity. E.g. being expected to use Stoke Mandeville hospital is preposterous when it is a 45 minute drive away, while MK hospital is just a 15 minute drive away. The development would therefore put significant strain on services in MK, namely Milton Keynes General hospital.
- The development threatens the settlement identity of Newton Longville.
- Amenity and recreation from the footpaths that cross the historic field system will be denied for current and future generations of the village.
- The development will generate further noise, light and air pollution.
- Proposed 3 storey buildings will create unacceptable visual exposure and be out of character with the village of Newton Longville as well as be detrimental to the appearance of the countryside.
- There is a risk of flooding that will impact this development and the surrounding areas.
- Disruption of and loss of precious habitat for wildlife, including an endangered protected species of bird
- Wildlife highly valued by local residents, provides a spectacle for recreation when walking in the countryside.
- The traffic and identity implications experienced by Newton Longville as a result of the development will severely detract from the conservation area.
- The proposed housing would be very close to existing housing, blocking both light and taking considerable privacy.
- Valuable agricultural land will be lost, reuse of existing buildings and brownfield sites should be sought first.
- The application is premature, submitting before the completion of the VALP and emerging Neighbourhood Plan.
- The development of an urban extension, with a population of a small town in a largely rural setting is not in keeping with the rural context of Newton Longville and the wider area.
- AVDC will get the vast majority of council tax and S106 taxes, while MKC will have to put up with the costs and additional strain.

- “As a taxpaying Milton Keynes residents, object strongly to having to fund facilities for residents in Aylesbury Vale”.
- To consent this proposal without a whole-hearted approval from MKC will store up problems for the future. The district council boundary should be moved to include the area within MKC, only then can a rational decision be made.
- There is no need for this volume of housing in AVDC or MKC, hence it is superfluous to requirements.

Following receipt of amended plans/additional information in August 2016, 102 further letters of representation were received. The letters reiterated those points set out above and whilst a number of letters acknowledge the changes to the scheme, they continue to raise objections to the proposals and make the following additional material considerations;

- There is a need for the provision of further infrastructure associated with the scheme including a youth centre, bowling green and public house
- The proposed local centre should be more accessible
- There is a need for greater emphasis to be given to the employment provision on the site
- The requirement for duty to co-operate has failed to be met by AVDC
- No regard has been given to the future potential of the Oxford – Cambridge expressway proposals
- Granting permission on this site sets clear future precedents for similar schemes which would have a significant impact on the adjacent settlement identifies and landscape impact
- The grid road should make provision for a dual road. The current position of the reserve grid road is considered inappropriate
- The proposals would put increased pressures on already stretched infrastructure, further emphasised by the failure of the proposal to improve hospital provision
- Insufficient traffic surveys/assessments have been undertaken and the possible potential of increased use of Newton Longville as a rat run is underestimated
- The provision of an additional roundabout on the A421 would negatively impact upon traffic flow
- The impact of construction traffic will have significant adverse impacts particularly given the extensive period for construction
- Proposal has a contrived and insufficient parking provision and fails to address the issue of the displacement of existing on street parking that would be lost through the development of this site.

Following receipt of amended plans/additional information in July, October 2020 and February 2021 respectively, 3 further letters of representation comprising one letter of support and 2 letters of objections were received. The following additional material considerations matters were raised.

Objections

- The issues raised relates to overstretched amenity especially health and educational facilities

- Impacts on Highway network – clogged roads, rats runs, massive roadside and pavement parking.
- The development should be considered within the wider framework of the Local Plan and overall strategic plan for the corridor
- The development should not go ahead until the Government makes a decision on new garden cities
- The impact of Covid-19 has changed work behaviours that are likely to persist long term and this will have a direct consequence on housing need.
- Cannot support this development in the absence of a strategic long-term vision in which infrastructure precedes housing development and not the other way around
- SWMK have not properly considered the highways impact on Buckingham Road. The highways impact focusses on Standing Way and the connection with MK. The closest services and retail provisions are in Central Bletchley accessed via Buckingham Road. It is my personal experience that the level of congestion on Buckingham Road at peak times is very bad with tail backs stretching one mile.
- There are no possible mitigations for congestion on Buckingham road
- there are no mitigating solutions to the severe congestion issues on Buckingham Road and that new access onto Buckingham Road would add to this congestion and make life unbearable for those of us resident in this area

Support

- It is a logical development area. It provides schools and will prevent secondary school children having to travel from Newton Longville to Wing, Aylesbury or Buckingham. It may well provide better local amenities.