

### Campbell Park Northside Development Brief: Consultation Comments

	Consultee	Comment	Officer Response	Proposed Amendment
1	Cllr John Bint	<p>Can you please expand on the thinking in respect of densities and building heights, from the front (Silbury side) of the development moving back towards the gridroad? It seems to me that the tallest buildings would naturally be towards the back of the building, allowing as many occupants as possible to have views forwards over the park. And yet the document (in para 4.1.6 and elsewhere) seems to imply the opposite.</p>	<p>Regarding your request for clarification on the density / building heights, from a policy perspective the starting point is the CMK Alliance Plan where CMKAP G9 encourages buildings up to 8 storey's in height along boulevards and gates, which assumes therefore that the tallest buildings will likely occur along Silbury Boulevard. There is also a logic to putting highest densities/tallest elements along Silbury Blvd to not only maximise the potential for bus patronage (where the bus stops are on Silbury Boulevard) but also help provide a strong frontage / enclosure to the park (giving the park a more urban character) as well maximising the number of people to live within the shortest distance to it and CMK.</p> <p>Para 5.4.4 does however acknowledge your point about the sloping nature of the site and hence the opportunity to accommodate heights across the site that maximise the opportunity for as many residents as possible to gain views over the park.</p>	

		<p>Can I also make the point that referring to houses - but not flats - as "family homes" seems a bit odd, when there is a clear expectation of 3-bedroom flats</p> <p>Secondly, can I ask you to publish the "demographic" information being referred to (in para 4.1.8), which currently gives a rather "mixed message" that schooling isn't needed on site but will need to be provided off-site. I'm interested to understand both the pupil yield ratio being assumed, and the rationale for preferring the supply of school facilities somewhere off-site. Given all our experience with affordable housing, surely we should be assuming that virtually every unit will have</p>	<p>So in summary, to support Policy CMKAP G9, the Brief encourages buildings up to 8 storeys along Silbury Boulevard but also recognises that the sloping nature of the site and the potential for the development to accommodate building heights that allow as many people as possible to have views over the park. This should mean G9 be applied with a degree of flexibility to recognise the unique context of the site and some taller elements will be permitted further back into the development toward Portway.</p> <p>I accept your point that 3 bedroom flats are seen as family homes. The reference in para 4.1.6 to family housing was meant to constitute townhouses which would accommodate the lowest densities on the site.</p> <p><i>(Response from Mark Halsall, Strategic Lead, Education Sufficiency and Access)</i> Based on those figures, and factoring in the lower pupil yield from flats, we are still looking at 1 form of entry of primary places required (30 per year group, 210 in total). The preference would be to</p>	<p>In para 4.1.5 will delete wording "and more family housing" and replace with "<u>comprising largely townhouses</u>".</p>
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		<p>children, simply based on our allocation prioritisation criteria?</p>	<p>accommodate this demand through existing nearby provision. This may require expansion depending on the timing and therefore we would seek full contributions.</p> <p>The situation is similar for secondary places – albeit at a lower scale – with approx. 12-15 pupils expected from this development. Obviously we still have to accommodate the primary aged pupils when they move through the system so we would therefore seek full contributions for an expansion of a nearby provision.</p> <p>Fig 1 on page 11 shows the average age yield from new housing, not all housing in general. So whilst new development should bring an increased number of Early Years and Primary aged pupils compared to a general housing pupil yield, we also have to consider the significant drop in births that has been experienced both locally and nationally. The pupil yield survey which was completed in 2017 inclusive of affordable housing also found a 6% yield for Reception Year pupils across all types of dwellings (Table 12) so that seems to conclude with your own survey. As we had concerns regarding a</p>	
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			<p>different pupil yield from flats, we requested this was investigated separately - with the results shown in Table 9.</p> <p>For this development, I have used the 'flat and apartments yield' for the flats and apartments and 'housing yield' for the houses. In 2013-14 we saw a drop of approximately 250 births across Milton Keynes. This level has continued up until 2016-17 when there has been a further drop of approx. 180 births. Whilst it is expected that this new development will generate approx. 1 form of entry, there are a number of schools local to Campbell Park that currently have a surplus of places - which is expected to continue based on the birth data we have. We have also pre-empted some of this development through the recently completed expansion of Orchard Academy. Should future birth rates rise then I am confident further expansions of local schools, which would be more economically viable than building a 1 form of entry primary school, would be possible.</p> <p>Cllr Bint requested Rebecca Kurth</p>	
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			<p>from CMK Town Council give her view on this matter and Cllr Kurth replied confirming that CMK Parish has significantly fewer school age children relative to the urban parish average. Cllr Kurth also stated that development on the site should not try and copy a suburban approach such as Oakgrove. In summary Cllr Kurth did not see a school as desirable on site and argued that the 'USP' for CMK was a place where young adults / young professionals want to live and work and enjoy the buzz of city-life which will get even stronger as MK:U gets established. Once they settle down, these young adults move away to raise their families on estates that have a great USP for children. Cllr Bint stated that he was happy to take the view of Cllr Kurth.</p>	
2	Liberal Democrat Group	<p><b>4.14 Housing Mix</b>  The brief says MK needs mainly 2-bed and 3-bed accommodation and the site should house a mix of family housing, homes for older people and for young professionals and realistically mostly flats. The balanced community is fine, but MK currently has, and is expecting over the next few years, a serious over-supply of 1 and 2 bed housing, and an under-supply of 3+ bed. I believe it would therefore be appropriate to make a stronger statement that 3 bed duplex apartments, at least on the</p>	<p>The brief is referencing the 2017 SHMA. The supporting text to Policy HN1 of the Proposed Submission Plan:MK states that what constitutes an appropriate mix of housing within development proposals will be influenced by both site-specific factors, wider trends, information on households with specific needs at that time, and the strategic</p>	<p>Delete the 2<sup>nd</sup> and 3<sup>rd</sup> sentence from para 4.1.4. Add the 3<sup>rd</sup> sentence to the end of a new para 4.1.4. Para 4.1.4 will also include new wording, "<u>Housing types will likely be informed by the demographic expected to live on site, including young adults / young professionals, key workers</u></p>

		<p>lower floors where noise below would not be an issue, would be welcome for family accommodation, and accommodation for elderly, particularly in proximity to the local centre, combined with services or facilities that would encourage down-sizing, to encourage freeing up of 3-bed property elsewhere.</p> <p>5.2.4 and 5.9.2 I think it would make sense to say that Common Lane should be extended to provide a green leisure route right through to the Park, whereas 5.7.6 and 5.7.9 talk about it ending at Overstreet. It's at grade there, and a little further from Portway, so why not have a crossing and continue? Otherwise it's a main path that leads nowhere with the desire point of the Grand Union frustratingly close beyond!</p>	<p>objectives in addition to the recommended housing mix set out in the SHMA. Policy HN1 therefore adopts a flexible approach to housing mix, with proposals to be considered on a case-by-case basis. This flexibility is also required based on the higher densities required as per CMKAP G10 which suggests a greater proportion of apartments.</p> <p>This point is understood but for the following reasons it wasn't extended east across Overgate and down to the Grand Union Canal:</p> <ol style="list-style-type: none"> <li>1. The Neighbourhood Plan doesn't identify Common Lane east of Overgate</li> <li>2. Pedestrians would have to cross a 4 lane road</li> <li>3. The hedgerow doesn't exist in the same linear form between Overgate and Grand Union Canal</li> <li>4. Levels fall away quite significantly directly east of Overgate.</li> </ol> <p>Para 5.7.5 (2<sup>nd</sup> bullet) does outline how pedestrians would end up at the Grand Union Canal (via the central median)</p>	<p><u>(singles and couples) who want to live in proximity to the buzz of CMK as well as retirees and empty nesters."</u></p>
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		<p>5.9.5 Play provision is, in practice, absolutely required for a 1500 home estate even though S106 policy is unclear. This needs strengthening. I would suggest a minimum in line with standards for the rest of MK but modified by the lower expectation of child yield for the type of accommodation, taken from education's figures, and perhaps by the existence of a play area nearby on Downs Barn. How far is Common Lane from the southernmost homes? Do we need the option of play equipment in the linear park to provide facilities at a policy-compliant distance?</p> <p>Absolutely support the need for a community centre on this site.</p> <p>Missing: Where is the required bit about broadband please?</p> <p>And where are they going for health provision?</p>	<p>Play provision will need to be provided according to policy requirements.</p> <p>It is acknowledged that development at Campbell Park as a whole will be required to provide a community centre.</p> <p>Agreed, will include wording about Broadband.</p> <p>No on site health provision is proposed. A response from the NHS</p>	<p>Amend para 5.9.5 to read, Play provision <u>will be required to be provided as per current policy requirements</u> and this could be located as part of the landscape corridor along Common Lane.</p> <p>Add new wording into para 4.1.6, <u>"The provision of community facilities was addressed as part of the previous s106 that covered the entire Campbell Park."</u></p> <p>Add a new section 5.11: <u>Superfast Broadband: New proposed wording: All new developments are encouraged to provide superfast broadband. Larger developments of 30 or more homes can have the infrastructure installed for free if they start the application process very early in the lifecycle of their developments.</u></p> <p>Add a new sentence to para 4.1.7: <u>While there will be no on</u></p>
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			Milton Keynes Clinical Commissioning Group states that S106 will be sought for a variety of buildings / initiatives.	<u>site health provision, financial contributions will also be sought towards existing nearby health centres and associated initiatives subject to compliance with CIL Regulations.</u>
3	Development Control Committee	<ul style="list-style-type: none"> <li>The Development Brief refers to the 2012 version of the National Planning Policy Framework which had now been superseded by the 2018 version and therefore the Brief needed revising to ensure it remains compliant to the NPPF.</li> </ul>	Agreed, will amend	<p>Will include updated references, in particular the following:</p> <p>Para.117:  “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”</p> <p>Para 120 “Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p>

		<ul style="list-style-type: none"> <li>• The affordable housing provision references suggest that there is a challenge to the 30% provision. The brief should reference that current standards <u>must</u> be met or exceeded (rather than should be met or exceeded)</li> <li>• The proposal is for a large volume of housing but there are no references to provision of a school within the document.</li> <li>• Consideration should be given as to whether there was a need for a local centre on a development in such close proximity to Central Milton Keynes shopping centre.</li> </ul>	<p>The wording in the proposed Main Modifications for Plan:MK (MM24 October 2018) on Policy HN2 states: “Proposals for 11 or more homes <u>should</u> provide 31% of those homes as affordable housing.”</p> <p>Access regarding school provision who confirm that a primary school is not needed. CMKTC also have commented that a school is not needed</p> <p>Para 2.1.17 already confirms, “Policy ER15 also identifies the need for a new local centre to serve Campbell Park as a whole, so the site will need to contribute to this local centre provision.” The development is as</p>	<p>a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and  b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”</p>
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4	CMK Town Council	<p><b>Overview</b>  CMK Town Council supports the Council’s aspiration to develop the northern flank of Campbell Park but strongly objects to the current draft development brief to promote a ‘residential-led mixed use scheme’ in this location. The draft brief fails to comply with the Council’s Development Plan, notably CMK Alliance Plan (CMKAP) policies, in pursuing a residential-dominant scheme and in the treatment of classic infrastructure on the sites.</p> <p><b>Proposed Site Uses</b>  The CMK Alliance Plan provides over 50,000m2 of B1 floorspace on this site and around the flanks of Campbell Park. Evidence gathered during the preparation of the CMK Alliance Plan indicates that the undeveloped blocklets in Block F1 are some of the best undeveloped city centre sites in southern England. This is why CMKAP</p>	<p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell</p>	



		<p>In line with CMKAP Policy SS1, the Town Council asks that the brief be re-written to promote schemes incorporating provision for an extension of the university campus, major research or similar institute or international headquarter offices or government establishment which would raise the profile of Milton Keynes nationally and/or internationally.</p> <p>Classic Infrastructure The CMK Alliance Plan in Figure 15 clearly sets out the areas of classic infrastructure on this site. An except is included below: Whilst the draft development brief acknowledges the classic infrastructure on the north side of Silbury Boulevard, the classic infrastructure areas on the full lengths of Overgate and Skeldon Gate is not mentioned.</p> <p>In line with CMKAP Policy G1 the present design and character of both gates should be retained. The 'opportunity to explore alternative treatment of existing infrastructure' element shown on both Skeldon Gate and Overgate should be removed from Figure 7 in view of this, as should the reference to altering the character of Skeldon Gate in paragraph 5.7.5.</p>	<p>attract an entirely different sector of demographic to Oakgrove, it will be built at much higher densities and not have a school.</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that 'the northern side of Campbell Park will be developed for largely residential purposes.'</p> <p>It is accepted that Skeldon Gate and Overgate are classic infrastructure and this will be stated in para 2.1.7 (2<sup>nd</sup> bullet)</p> <p>The Brief acknowledges the policy requirements around classic infrastructure. In order to deliver the Vision Statement on pg 5 it is believed necessary to explore a re-imagined use of the classic infrastructure. In saying this, the Brief will make it</p>	<p>Include wording in 2<sup>nd</sup> bullet para 2.1.7, "Classic CMK Infrastructure (CMKAP G1), which for this site includes <u>Skeldon Gate and Overgate, the space for two rows of parking adjacent to Silbury Boulevard, the underpasses around Skeldon Gate and Overgate as well as the granite quadrants and kerbs.</u></p> <p>Add in new para 5.7.6 to read, "<u>As identified in para 5.2.2, if in order to help deliver the vision for the new neighbourhood any changes are made to the classic infrastructure, the development of those areas needs to meet the relevant policy requirements.</u>"</p>
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		<p>paragraph should be removed and replaced with one encouraging retention and enhancement of the existing infrastructure and the existing character of Silbury Boulevard.</p> <p>The summary of Policy G11 quoted in paragraph 2.1.7 does not mention the need for any development that alters classic infrastructure to undergo a process of public engagement and conduct an analysis of alternative G1-compliant options. Policy G11 allows policy G1 to be applied flexibly in exceptional circumstances and the development brief should be written with an assumption that Policy G1 will be applied unless an exceptional proposal is forthcoming and undergoes the full G11 process, as took place with the recent Hotel La Tour planning application.</p> <p>Figure 6 should not include the 'option to extend development into parking areas' shading. The development brief should not encourage violation of CMKAP Policy G1. If a developer wishes to propose development on classic infrastructure the G11 process outlined above should be followed, but it is not appropriate for a development brief to propose this.</p> <p>Other Comments The 'Context' section on Page 17 should make more reference to the existing residential area at Adelphi Street and include an image of the homes there to encourage appropriate design on the side of the site that is adjacent to Adelphi Street.</p>	<p>The intention is not to repeat all wording for each CMKAP policy within para 2.1.7. If a developer wanted to alter the classic infrastructure they would need to justify it against CMKAP G11.</p> <p>As stated previously, in order to help deliver the vision or an integrated neighbourhood across all 3 sites, the re-imagining of classic infrastructure is stated as a possibility to explore. This would need to be meet current policy requirements.</p> <p>Agreed – will add further information on this.</p>	<p>Add new para 3.2.5 <u>"Immediately to the west of the site is a set of approximately 50 three storey townhouses. Only one home actually has its entrance onto Adephe Street and facing the site - the rest take their access and face west into</u></p>
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		<p>Section 3.4: Existing access points do exist on both Skeldon Gate and Overgate and these should be incorporated into any designs, avoiding new vehicular access points being created except where necessary.</p>	<p>Agreed. Existing access points exist on the east side of Skeldon Gate and west side of Overgate. The brief will also acknowledge these existing access points in para 5.7.1</p>	<p><u>the neighbourhood. Their design, incorporated features and common palette of materials have created a strong character for this residential development.”</u> Add a new sentence to the end of final bullet in ‘Constraints/Challenges’ in Section 3.5: <u>“In particular building heights should be of an appropriate scale to respond to the surrounding residential context.”</u></p> <p>Amend para 3.4.1 to read, <u>Skeldon Gate provides no existing vehicular access to the site although an existing vehicular stub is located on the eastern side of Skeldon Gate. Overgate provides access to the site via Eskan Court</u> Amend para 5.7.1 to include a final sentence, <u>“In this instance the existing vehicular stub off Skeldon Gate and Eskan Court should be used in the first instance and others only incorporated where necessary. Additional vehicular access points should be positioned a minimum of 50m back from the</u></p>
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		<p>The acknowledgement that underpasses provide “continuous unimpeded pedestrian movement” is welcome, although more commitment to retain and enhance the existing underpasses under Skeldon Gate, Overgate and Silbury Boulevard is required. Any development should encourage pedestrian movement via the existing underpasses or new grade separated crossings, not new at-grade crossings.</p> <p>The proposal for an at grade crossing in Paragraph 5.7.5 on Overgate is not appropriate for the character of the road, especially given the proximity to the A509 roundabout, and a crossing should only be considered here if a grade separated solution is proposed. The suggestion of a grade separated footbridge crossing on Skeldon Gate is welcomed and would connect the two main halves of the site safely and effectively.</p> <p>The intention to retain the full ‘green frame’ planting along H5 Portway is welcomed. The development brief should make this more explicit by referencing CMKAP Policy G5, which applies in this location.</p>	<p>The Brief is proposing to retain the existing underpasses and they will be an important element of the pedestrian / cycling network</p> <p>The brief isn’t proposing an at-grade crossing across Overgate. In order to deliver the vision of an integrated neighbourhood, the brief is however suggesting that the treatment of the lower halves of Skeldon Gate and Overgate could be explored such they help integrate the 3 development sites especially from a pedestrian perspective. If developers choose to pursue this, since it is classic infrastructure they will need to meet relevant policy requirements.</p> <p>Agreed will add in reference to the Greenframe in Section 2.1 as well as additional text in para 3.3.1</p>	<p><u>North Skeldon or North Overgate Roundabout.</u></p> <p>Include new text as 2nd bullet in para 5.7.5 to read, <u>“Consideration could be given to an alternate surface treatment and design to the lower halves of both Skeldon Gate and Overgate to enable at-grade crossings, thereby respecting potential pedestrian desire lines and facilitating the delivery of an integrated neighbourhood.”</u></p> <p>Will add into Section 2.1.7 <u>Retention of the Green Frame (CMKAP G5)</u> Will add in Section 3.3.1 <u>“which is identified as part of the greenframe around CMK, the retention of which is sought by</u></p>
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		<p>The architectural examples on pages 33 and 34 should be replaced with examples more in keeping with the established architectural style in Milton Keynes.</p> <p>The development massing indicated on Figure 7, with taller and denser development closer to the Boulevard and lower, less dense development further back, is consistent with the CMK Alliance Plan aspiration for taller buildings of up to 8 stories on Boulevard frontages.</p>	<p>Will relook at example photos, however disagree – MK is known as an architectural patchwork and doesn't have a defined architectural style. There is no immediate context (other than small amount of housing adjacent to Adelphi Street) either that needs to be adhered to or used to inform the architectural approach to the development.</p> <p>Comment noted</p>	<p><u>Policy CMKAP G5"</u></p> <p>The key in figure 5 will also include Grid Road Reserve Planting / <u>Greenframe</u></p>
5	Campbell Park Parish Council	The Planning, Infrastructure & Transport Committee of Campbell Park Parish Council considered the draft brief and resolved to support the proposals.	Noted	n/a
6	NHS	<p>If this development materialises, it would affect the following services which cover the proposed development as follows:</p> <p>Fishermead Practice The patients from this development will be able to register</p>	Noted subject to compliance with CIL Regulations	

	<p>in this practice. According to our records the premises floor area is 199.4m2 NIA (net internal area) and their patient list as of 1 July 2018 was 7,107.</p> <p>According to the Department of Health's Principles of Best Practice, a surgery with 7,000 registered patients is recommended to have approx. 580m2 NIA of floor space for GP core services and at the moment the space is insufficient for the practice needs. The practice is overstretched at the moment in terms of space and there are options to expand to other rooms that are occupied by another tenant if there is some capital to be able to develop this space.</p> <p>Ashfield and Sovereign Medical Centres The practices have populations of 11,510 and 10,459 patients respectively as at 1 July 2018. They have an issue with workforce at the moment and if the development is to go ahead will affect both these practices who will be unable to cope with the pressures of the new patients growth if there is no additional funding to support the increase especially in clinical workforce. This will mean that there will be more patients ending up at the hospital or walk in centre for treatment.</p> <p>Central Milton Keynes Practice We have recently agreed for the practice to be have increased extension for clinical rooms. However if the development is to go ahead it will lead to increased demand on the practice as it's the closest proximity to the development proposed. This will lead to workforce issue and they will be unable to cope with the pressures of the new patients growth if there is no additional funding to support the increase especially in clinical workforce. This</p>		
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	<p>will mean that there will be more patients ending up at the hospital or walk in centre for treatment.</p> <p>The Walk In centre is currently being accessed by patients who are registered at the above practices for their urgent and out of hours GP service and if this development is approved to go ahead, the patients will likely use the same service hence a pressure on the service in terms of facilities as well as workforce. When patients are not able to see their own GPs they end up at the Walk In centre and hence a huge demand on this service. A contribution would help develop better ways of working in terms of workforce and technology between the GP surgeries and Walk In Centre to help sustain the increase in population for this proposed development.</p> <p>The NHS 111 service will also be affected as this is the default number for patients to call out of hours when a medical centre is closed. There will be increased demand due to new patients from the proposed development. For 1500 houses the expectation would be an extra 3000-3500 new patients. A contribution would help the CCG in investing in better technologies, increased workforce to help cope with the demand and for better working arrangements between the local medical centres to enable deal with the demand</p> <p>The Community Services are being stretched at the moment and looking at rationalising and centralising services and the contribution will enable them to reconfigure areas to accommodate more patients.</p> <p>We would therefore like to seek a contribution in line with</p>		
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		<p>Social Infrastructure Planning Obligations SDP, towards the additional capital and revenue consequence that this additional development will be bringing to the Milton Keynes CCG to help with the services above.</p> <p>I trust this will be sufficient in order to proceed, however, should you require more information, please do not hesitate to contact me.</p>		
7	MK Forum	<p>We support the preparation of the Brief for this important, strategic site and accept many of the points that have been made.</p> <p>We are however concerned that the Brief looks at Campbell Park Northside at an apparently superficial level in that it appears to consider what might be appropriate for the site itself in isolation of its context within the rest of MK in general and CMK in particular.</p> <p>We are particularly concerned about the way that Policy SS1 of the CMK Alliance Plan has been cast aside without explanation. If MK wishes to attract high quality employers and compete with other locations then we have to be able to offer high quality sites. Policy SS1 recognises this and identifies two within CMK – Block B4 and Blocklets F1.2-1.4. The former has now been allocated for MKU, leaving only the latter.</p> <p>We believe that it would be extreme folly to abandon this important policy and reallocate the uses for F1.2-1.4, particularly when there are indications that MK will double in size. The continuing growth of MK will place an even greater emphasis upon the primacy of CMK and the sustainable need to have major employers within the city centre rather than dispersed through the urban area. Even though such occupiers will only appear intermittently it is important to look back through the development of</p>	<p>Noted</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p>	

	<p>CMK to recall the large occupiers who have come here since the opening of the Shopping Building – Argos, Stone and Webster, Abbey National (now Santander), Mobil and, latterly, Network Rail. Some companies change and move on but others remain and the recent announcement of the major expansion of Santander is an example of this.</p> <p>It is not well known but the original intention of Abbey National was to build their HQ at Willen Lake but a change of management led to the site in CMK. Now, nearly forty years later, their further expansion (which could not have been predicted) has arisen because of the existence of a vacant site in CMK, albeit one that they own. Handled properly, this will bring incalculable benefits to CMK.</p> <p>We strongly feel that successful city building necessitates planners and others taking a long view and having the confidence to reject “quick wins” in the knowledge that experience will bear out their decision-making.</p> <p>The CMKAP was put together using a lot of professional expertise by a steering group that included representatives of the Council. No concern has previously been expressed about SS1 and, if the Council genuinely believes it to be a bad policy, then it should say so and justify its argument so that it can be discussed in public forum.</p> <p>Our similar concern for successful city building means that we cannot support the general shift away from office use within Northside. Again, this was a clear inclusion within the CMKAP for the very real reason of building a proper mixed-use city centre area and not one dominated by a single use that closes down at certain times of the day. As drawn, one could envisage that the Brief will result in a residential area with, at best, some commercial uses on the Silbury Boulevard frontage:</p> <p>this is neither good enough nor appropriate for land within</p>		
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		<p>a short distance of one of the biggest and most popular shopping centres in the country.</p> <p>Whilst it is not part of the Brief it is our view, in passing, that the potential order of development in Campbell Park seems haphazard and not making the best use of the development that has occurred and is in progress. We would have thought that it would have made more sense to develop Southside first rather than Northside to capitalise upon the Crest Nicholson scheme, especially the commercial and community facilities, and make them more sustainable (and also make the new supermarket on Avebury Boulevard, more sustainable). This would leave either H1 or G1 to be developed next, followed by the other and leaving F1.2-1.4 in abeyance for a major occupier. We suggest that this particular point is worthy of wider debate.</p> <p>We have the following specific comments upon the draft brief:</p> <p>1.1 a. The clear intention of the CMK Alliance Plan (hereafter CMKAP) is that this area should be mixed use see eg CMKAP Fig 16. We are concerned that there is no mention of this in the “Vision Statement”, which makes no reference to office use.</p> <p>b. The existing lane is not Common Lane (which runs from CMK to Bradwell). As far as we are aware, it did not have a name. The CMKNP would seem to be mistaken in this matter. If you are seeking a new name, Willen lane may be more appropriate given that this was the destination of the route.</p>	<p>Comment noted but not relevant to this Brief</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>This is the reference in the CMKAP so in order to avoid confusion it is considered best to retain reference to it.</p>	
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		<p>2.1.6 There is no mention of office use, which is an integral part of the CMKAP.</p> <p>2.4.2 See 1.1b above.</p> <p>Fig 4 The drawing does not show the substantial areas of open space in the central courts of some of the surrounding housing areas eg Downs Barn and Springfield. The drawing should also show the Campbell Park Marina development, given that it has now received planning consent and construction work has started.</p> <p>3.3.3 See 1.1b above</p> <p>3.5 a. There is no mention of the opportunities provided by mixed-use development.</p>	<p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>See above response.</p> <p>The rationale for figure 4 is to outline what other land uses exist within walking distance of the site as this assists in acting as an informant to what uses are required on the site. Following on from this, while it is accepted that there are other areas of open space, these are intended for the immediate residents and don’t impact on site requirements for Campbell Park Northside.</p> <p>Agreed should show Campbell Park Marina.</p> <p>See previous response</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states</p>	<p>Amend Fig 4 to include Campbell Park Marina development.</p> <p>Include new 2<sup>nd</sup> bullet point under Opportunities, <u>“Capitalise on higher density residential development to deliver a range of supporting non-residential</u></p>
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		<p>b. See 1.1b above.</p> <p>c. There is no mention of the opportunity for reserving F block for a major employer (CMKAP SS1).</p> <p>d. There is no excuse for not knowing the location of services as we presume that full records will exist.</p> <p>4.1 We are concerned that there is no reference to office use.</p> <p>5.2 The image of single storey housing is inappropriate for this site. The same comment applies to other images as well and we would ask that they all be reconsidered.</p>	<p>that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>Agreed will amend</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>It is beyond the scope of the Brief to identify all site constraints</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>This figure on pg 29 is intended to convey the relationship between built form and open space to portray a communal public space (not building heights). There will likely be some 2/3 storey</p>	<p><u>uses on the site”</u></p>
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		<p>5.2.2 We do not support the incorporation of the boulevard parking within the site unless the G11 test is fully satisfied. It should not be offered as part of the Brief. The parking areas form a key part of public parking for uses in the Park and should be retained.</p> <p>5.2.4 See 1.1b above.</p> <p>5.3.5 See 1.1b above.</p> <p>5.3.6 Whilst “corners” are important in any scheme it should be clear that we are looking for coherent and humane design across the whole site and not just in particular locations.</p> <p>5.6.1 This section is very weak. The Council, as (effective) landholder is in a position to set whatever energy standards it wishes in excess of local policies. We believe that it should be ambitious in requiring that Northside is a zero carbon development.</p>	<p>housing within the development toward the northern edge.</p> <p>Agreed – As stated previously, in order to help deliver the vision or an integrated neighbourhood across all 3 sites, the re-imagining of classic infrastructure is stated as a possibility to explore. This would need to be meet current policy requirements.</p> <p>It is considered standard practice for a redline boundary to include areas that won’t necessarily be developed. The redline should furthermore include the boulevard parking as there will be a requirement on the developer to at the least neaten / tidy it up.</p> <p>See previous response</p> <p>See previous response</p> <p>Comment noted</p> <p>Comment noted but will be discussed at the planning application stage</p>	<p>Add in a new final sentence to para 5.2.2 , <u>“If any of the parking areas (classic infrastructure) are ‘re-imagined’ so as to help deliver the vision, the development of those areas would need to meet the relevant policy requirements.”</u></p>
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		<p>5.7.5 a. See 1.1b above.</p> <p>b. At grade crossings of Skeldon Gate and Overgate are not acceptable due to the width of the roads and the existence of convenient underpasses.</p> <p>We support the provision of grade separated crossings on the line of (Common Lane) and would ask that their design follows that used for the other bridges in the area eg over H5, V9 and Darley Gate (Downs Barn). There is a strong design aesthetic in this local area that should be respected.</p> <p>5.9.2 See 1.1b above.</p>	<p>See previous response.</p> <p>The Brief acknowledges the policy requirements around classic infrastructure. The brief isn't proposing an at-grade crossing across Skeldon Gate and Overgate. In order to deliver the vision of an integrated neighbourhood, the brief is however suggesting that the treatment of the lower halves of Skeldon Gate and Overgate could be explored such they help integrate the 3 development sites especially from a pedestrian perspective. If developers choose to pursue this, since it is classic infrastructure they will need to meet relevant policy requirements.</p> <p>Agreed that there is a design aesthetic created by these bridges. The brief is guidance so can't make it an absolute requirement but can mention the existing design aesthetic which could be explored.</p> <p>See previous response</p>	<p>Include new text as 2nd bullet in para 5.7.5 to read,  <u>"Consideration could be given to an alternate surface treatment and design to the lower halves of both Skeldon Gate and Overgate to enable at-grade crossings, thereby respecting potential pedestrian desire lines and facilitating the delivery of an integrated neighbourhood."</u></p> <p>Include new wording within para 5.7.5, <u>"If a bridge is proven to be a viable grade separated crossing then it could be explored whether the design aesthetic created by other overbridges connecting CMK with adjacent estates can be extended to this bridge."</u></p>
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	<p>5.9.3 Any SUDS scheme should be properly integrated into the design of the area and not treated as small, independent sites akin to “bomb craters”. We suggest that it would make sense, as a first step, to see if it is feasible to exploit the existing watercourse (the Leat) that runs along the north side of Campbell Park to the pond alongside the canal.</p> <p>5.10.1 It should be made clear that the public art contribution is 1% of the total construction cost.</p> <p>General a. There is no particular reference to the range of housing to be provided. It is important to cater for all ages and a site for a retirement community should be a requirement, along with the opportunity for self-build. The latter should be modelled upon the Dutch experience eg Almere where self-builders build terraced houses and could, perhaps, be located between H5 and the old lane.</p> <p>b. The overall design should avoid a monolithic appearance and a wide variety of architects should be used (with the potential exception of Blocks F1.2-1.4 if developed for a single occupier). There should therefore be a clear master plan with a restriction (to be determined) upon the maximum length of street frontage</p>	<p>Noted and agreed</p> <p>The Brief states that public art should be provided in line with council policy requirements – it doesn’t need to go into detail suggested as needed.</p> <p>Will provide further guidance on this. Given the densities that need to be met, self build plot aren’t seen as appropriate.</p> <p>Agreed, don’t want monolithic appearance and para 5.5.1 states that a variety of character architecturally should be created on the site as well as more formal and informal character either side of</p>	<p>Add new wording to the end of para 5.9.3: <u>“In addition it is suggested that the existing watercourse (the Leat) that runs along the north side of Campbell Park to the pond alongside the Grand Union Canal be explored to establish whether it can be exploited to assist with the delivery of a SUDS.”</u></p> <p>Add in new 2<sup>nd</sup> sentence to para 4.1.4, <u>“Housing types will likely be informed by the demographic expected to live on site, including young adults / young professionals who want to live in proximity to the buzz of CMK as well as elderly people and empty nesters”.</u></p> <p>Include final sentence in para 5.5.2 to read, <u>“.....that would help raise the profile and reputation of Milton Keynes.”</u></p>
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		<p>to be designed by one architect.</p> <p>c. We think it important that the layout of the buildings fronting the Boulevard should respect the alignment of the CMK grid rather than the Boulevard, as with the existing developments in Campbell Park.</p>	<p>Skeldon Gate (para 5.2.2). A further sentence can be included that emphasises the importance of high quality architecture. The brief can't however be that prescriptive to place restrictions on how much can be designed by 1 architect.</p> <p>This will have the effect of building lines not running parallel to Silbury Boulevard (with 'leftover spaces' occurring between buildings and the boulevard) which could be argued doesn't support CMKAPG8b) which says that "development should clearly define the edge of the public realm" which would normally be the classic infrastructure.</p>	
8	Xplain	<p>General comments</p> <p>Overall, Xplain supports development on the identified sites and recognises there are positive aspects to the draft development brief, eg aspirations for innovative high quality design and retaining the historic Common Lane. However we have three major caveats:</p> <p>1. The F1 site is far too valuable to be used for housing. Its location, as part of CMK, with excellent access, transport links, and overlooking a premier urban park all argue in favour of retaining the site for a major institutional development which puts MK on the map and provides major employment opportunities as well as a mixed element of housing. With institutions such as Channel 4 looking to relocate from London, surely MKDP should not be wasting this unique opportunity on a housing project,</p>	<p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that 'the northern side of Campbell Park will be developed for largely residential purposes.'</p>	

	<p>especially when there are so many other places in MK where housing can be built.</p> <p>Furthermore, the CMK Neighbourhood Plan seeks to retain the site for strategic development (even though the University was also earmarked for block B.4, F1 was not given as an either/or option but an 'as well'. F1 is still the last, great development site in CMK).</p> <p>2. To be fit for purpose the brief should send developers clear and consistent messages, but in the case of public infrastructure it does not. Why does it not clearly state that the existing infrastructure serves an extremely valuable purpose and in all normal circumstances it will be retained?</p> <p>Instead, there are many negative comments about the infrastructure which, unless removed, will undermine public trust in MKC's intentions and motives. After recognising the problems of using similar phraseology in the Saxon Court draft development brief it is particularly surprising to see the same flaws surfacing again.</p> <p>3. Similarly, the red lines are highly contentious. They should be re-drawn to exclude areas of public highway and classic CMK infrastructure. We cannot see any reason for MKC to attempt to repeat the mistakes of the Hub, and upset local people, by propagating the idea that it is acceptable to break up and build over the original grid layout and street pattern of CMK.</p> <p>The red lines also need revising otherwise they are in direct conflict with policies in the Council's Development Plan and in particular with the CMK Neighbourhood Plan. It is certainly a good idea to 'bring the park into the development' but NOT to bring development closer to the</p>	<p>In order to help deliver the vision as identified on page 5 and create a stronger relationship to the park (with the park permeating the development) it is believed necessary to include the option to at least allow for the exploration of the surface level parking to be 'reimagined'. The brief isn't stating that it must be removed.</p> <p>It is considered standard practice for a redline boundary to include areas that won't necessarily be developed. The redline should furthermore include the boulevard parking as there will be a requirement on the developer to at the least neaten / tidy it up.</p>	
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	<p>park!</p> <p>Detailed comments:          Para 1.3.1 Suggested amendment from a negative to a positive description:          The three sites are served by (not 'split by') Skeldon Gate and Overgate therefore amend to read This Development Brief covers three sites (served by split by Skeldon Gate and Overgate) known as Block F1, G1 and H1 etc.          Fig 2 – redline boundary should be amended to exclude public highways and classic CMK infrastructure as noted above.</p> <p>Fig 3 – aerial view of site – again, the redline boundary should be amended to exclude public highways and classic CMK infrastructure as noted above.</p> <p>2.1.7 2nd bullet point.          Amendment needed because the highways adjacent to Silbury Boulevard are not simply 'parking areas' but also provide slow streets for vital, safe and convenient access off the urban clearway. Suggested amendment:          "Classic CMK Infrastructure (CMKAP G1), which for this site particularly relates to the access or 'slow streets' and two rows of parking adjacent to Silbury Boulevard etc..."</p> <p>3.4.3 Please add reference to slow streets again, ie "An</p>	<p>Not quite clear what the proposed wording is but happy to amend to sound less negative</p> <p>It is considered standard practice for a redline boundary to include areas that won't necessarily be developed. The redline should furthermore include the boulevard parking as there will be a requirement on the developer to at the least neaten / tidy it up.</p> <p>See above response</p> <p>Section 2.1 is just highlighting the key policy and not going into the detail of the supporting text to the CMKAP where the reference to 'slow streets' is made.          CMKAP G1 itself makes no reference to 'slow streets'</p>	<p>Propose in para 1.3.1 to delete wording "split by Skeldon Gate and Overgate"</p>
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		<p>existing redway runs along the northern edge of the slow streets and parking areas adjacent to Silbury Boulevard...”</p> <p>3.5 – Opportunities. 5th bullet point gives the impression that CMK lacks character which, as we all know, is an unhelpful myth! We suggest a small addition as follows: “Lack of nearby development allows the development to create its own character – being distinctive, bold and memorable while reinforcing the unique character of CMK.”</p> <p>8th bullet point – altering existing infrastructure to replace it with problematic alternatives is not an opportunity but a threat. As per notes on constraints section below, this bullet point should be removed.</p> <p>9th bullet point - Parking statement needs qualifying so that developers realise that public parking bays are not there to serve private residential schemes, ie “Existing parking areas alongside Silbury Boulevard can provide public (but not private) parking for the development.”</p> <p>3.5 – Constraints 1st bullet point: It is inaccurate and irrational to describe</p>	<p>See above response</p> <p>This bullet was more of a reference to architectural character so it is unclear how this ‘architectural character’ relates to the unique character of CMK. This will be clarified in the wording</p> <p>The Brief acknowledges the policy requirements around classic infrastructure. The wording is however included because it is seen as important to explore in terms of maximising integration from a pedestrian perspective across the 3 development sites, thereby delivering the vision on pg 5 for an integrated neighbourhood</p> <p>The existing parking is to serve the development</p>	<p>Will additional word into new 6<sup>th</sup> bullet of “Opportunities” , “<u>architectural</u> character” to clarify this point further</p> <p>Will amend 9<sup>th</sup> bullet of “Opportunities” to read, “Existing parking areas alongside Silbury Boulevard <u>are there to serve the new neighbourhood</u>”</p> <p>Amend 1<sup>st</sup> bullet</p>
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		<p>Skeldon and Overgate as “heavily engineered ... barriers to east-west integration and pedestrian movement.”</p> <p>Anyone who understands CMK realises that the Gates are designed to give safe, convenient and direct access off the grid roads to access development via a logical and effective street pattern of boulevards and slow streets. Please amend this misleading statement along the lines of “Skeldon Gate and Overgate are designed to offer vehicular access off the grid roads to all three development sites via Silbury Boulevard and its slow streets. However while east-west pedestrian movement is already provided the north-south footpaths have not been laid out.”</p> <p>4th bullet point: Again, this is very misleading. The ‘parking areas (sic)’ do not ‘separate development from the park’ but are vital access points which serve both future development as well as the existing park.</p> <p>As an inaccurate and unhelpful point this should be deleted.</p> <p>5th Bullet point: This appears to be the only reference to existing housing/residents in the area. Surely it needs more than ‘requires careful consideration’? What about building heights, overshadowing, privacy, access, avoiding adding to existing parking issues and retaining existing landscaping and trees?</p>	<p>They are heavily engineered (this is a fact) but it is understandable why as they provide direct access off the H5 grid road and onward access to CMK.</p> <p>In terms of delivering the vision of integrating the park into the development sites the parking areas do separate the development from the park but potentially could be re-imagined so that the park is integrated with and permeate the development. It is also acknowledged that the parking areas do provide other benefits – this is outlined within the ‘Opportunities’ section.</p> <p>Comment noted and agreed with. The brief will provide further guidance on this.</p>	<p>Add in new wording, “Skeldon Gate and Overgate <u>were designed to cater for the vehicular access off Portway but the engineering requirements that this entailed mean they currently act as</u> barriers to east-west integration and pedestrian movement / connectivity <u>and a resulting integration across all three development sites at Campbell Park Northside</u></p> <p>Add new para 3.2.5  <u>“Immediately to the west of the site is a set of approximately 50 three storey townhouses. Only one home actually has its entrance onto Adephi Street and facing the site - the rest take</u></p>
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		<p>4.1.4 states that “A variety of housing types will likely be sought across the site. The 2017 Strategic Housing Market Assessment indicates that across Milton Keynes as a whole the predominant property types needed are 2 and 3 bedroom houses.”</p> <p>But Campbell Park is not ‘Milton Keynes as a whole’. Having stated the unique qualities of the site the brief now treats it like an average suburb, which is clearly incorrect. Campbell Park is not suitable for families looking for 2 and 3 bedroom houses. It has no medical, community or educational facilities. Instead, Campbell Park, as part of CMK, attracts a particular demographic – singles, couples, empty-nesters, retirees and key workers as well as professionals who want or need the convenience of city centre living in a park-side setting.</p> <p>Therefore 4.1.4 needs amending to reflect the actual demands and opportunities.</p> <p>4.1.8 There is a serious lack of community facilities in CMK, and this is a good chance to state the need for</p>	<p>Para 4.1.4 was meant to simply what the SHMA says but then say that this will be different to reflect the context of CMK/Campbell Park.</p> <p>Agreed though – can amend Brief to reflect the actual demographic</p> <p>Comment noted but it is the role of planning applications to provide the</p>	<p><u>their access and face west into the neighbourhood. Their design, incorporated features and common palette of materials have created a strong character for this residential development.”</u></p> <p>Will amend bullet 5 to read, <u>“In particular building heights should be of an appropriate scale to respond to the surrounding residential context.”</u></p> <p>Will include new wording in para 4.1.4 to read, <u>“Housing types will likely be informed by the demographic expected to live on site, including young adults / young professionals , key workers (singles and couples) who want to live in proximity to the buzz of CMK as well as retirees and empty nesters.”</u></p> <p>Add a new sentence to para 4.1.8: <u>“While there will be no on</u></p>
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		<p>contributions, ie “While the nature of the future demographics indicates that on-site education provision will not be required, contributions to off site provision will be sought, as well as contributions to new community facilities.”</p> <p>5.2.2 Extending the park into the development is a positive idea, but once again the brief implies that ‘parking areas (sic)’ are a barrier, which is not the case. There is already a good example of the park extending into the development areas around Campbell Park at Dalgin Place, on the south side, where a park extension provides local residents in higher density development with a green outlook, threaded with footpaths, which cross Avebury Boulevard linking in to footpaths into the park, and also link up with existing footpaths and underpasses in the adjacent grid square development at Springfield. Therefore we suggest deleting “This may consequently have implications for some of the existing parking areas alongside Silbury Boulevard which currently may hinder this vision but this brief is not discouraging the inclusion of existing parking into the new development.” And replacing the para with a textual reference and photo of the existing park extension around Dalgin Place. Pg 32 – the photo of a ‘contemporary taller building’ looks</p>	<p>detail of what the contributions for what projects will be. It is acknowledged that development at Campbell Park as a whole will be required to provide a community centre.</p> <p>Comment noted</p> <p>The lack of vegetation to the front</p>	<p><u>site health provision, financial contributions will also be sought towards existing nearby health centres and associated initiatives subject to compliance with CIL Regulations.”</u> Para 4.1.6 to include new wording, <u>“The provision of community facilities was addressed as part of the previous s106 that covered the entire Campbell Park.”</u></p> <p>Will delete / replace with new</p>
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	<p>like something from a war zone! Surely MKC can provide a better reference than this.</p> <p>Pg 35 - photo caption – delete reference to existing infrastructure which ‘can be removed’. This is not desirable and is in conflict with CMKAP G1.</p> <p>5.7.5 – access and parking section. The second bullet point is a misleading statement of opinion that ignores the well-known advantages of the existing grid road layout, alienates residents, fosters mistrust in MKC, and leads potential investors down a very long, costly and problematic path. For example, what justification is there in encouraging developers to replace safe underpasses with dangerous at-grade crossings? Is MKC really this keen to ignore lessons learned from the failed experiment at the Hub? Therefore, instead of describing Skeldon Gate as a ‘visual barrier’ and suggesting that underpasses are replaced with at-grade crossings in a putative search for ‘permeability’, we strongly recommend that the 2nd bullet point is deleted in its entirety, ie: “Skeldon Gate is currently a wide 3 lane 30mph road that acts not only as a visual barrier to an integrated development but also hinders pedestrian permeability across the entire site. The layout of development can either restrict or enable pedestrian at grade access over</p>	<p>doesn’t help – it is still a construction site, but agreed – will delete / find a better photo</p> <p>Disagree policy CMKAP G8d) does allow for closure of streets as long as alternative arrangements for equivalent public accessibility and permeability of the Block are provided. Para 5.2.3 can include additional wording to state this requirement.</p> <p>The Brief acknowledges the policy requirements around classic infrastructure. The brief does not state that underpasses are to be removed. As previously stated in order to help deliver the vision for the site as outlined on pg 5 which is for an integrated new neighbourhood, the brief states that the treatment of Skeldon and Secklow Gate could at least be explored as an alternate treatment may help deliver the ambition of an integrated development from a pedestrian perspective allowing for example, pedestrians to cross these 2 gates on desire lines. In order to deliver the Vision Statement on pg 5 it is believed</p>	<p>photo</p> <p>Include new wording in para 5.2.3 to read, <u>“Where existing streets are removed, to meet policy requirements equivalent public accessibility and permeability of the Block shall be provided.”</u></p> <p>Add in new para 5.7.6 to read, <u>“As identified in para 5.2.2, if in order to help deliver the vision for the new neighbourhood any changes are made to the classic infrastructure, the development of those areas needs to meet the relevant policy requirements.”</u></p> <p>Propose to delete first 2 sentences of 2<sup>nd</sup> bullet as suggested. Include new text as 2nd bullet in para 5.7.5 to read, “Consideration could be given to an alternate surface treatment and design to the lower halves of both Skeldon Gate and Overgate to enable at-grade crossings,</p>
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	<p>Skeldon Gate and consideration needs to be given to this as it will inform any potential changes to Skeldon Gate. In this regard it is suggested that the lower half of Skeldon Gate is explored further to establish whether an alternative treatment could occur to enable at-grade crossings and thereby be an integrator and not a segregator. This will include exploring whether any footways should run along the southern part of Skeldon Gate. If the southern half of this route does have an alternative treatment this will need to continue around into Silbury Boulevard for a short stretch.”</p> <p>Similarly, the second bullet point should be deleted, ie “The current surface level parking running alongside Silbury Boulevard undermines a close integration between the park and the new neighbourhood and innovative ways needs to be explored as to how this parking can be reconceived to ‘knit’ together the park and the neighbourhood particularly east of Skeldon Gate.”</p> <p>When is MKC going to accept that there are real advantages in sticking to the original ethos of MK and setting homes back from the edge of busy roads, whether grid, boulevard or gate? The benefits are especially important for high density developments where residents have limited or zero outside space.</p> <p>The building line has already come forward on the south side of Campbell Park, at the Taylor Wimpey ‘Campbell Square’ development, and the result is an impoverished environment for both residents and pedestrians that totally fails to enhance the setting of Campbell Park, makes a poor impression and damages the reputation of MK for innovative living.</p> <p>5.9.1 (Landscape) - reference should be made to the</p>	<p>necessary to explore a re-imagined use of the classic infrastructure. In saying this, the Brief will make it clear that if developers do re-imagine the use of the classic infrastructure, they will need to meet policy requirements, most notably CMKAP G11.</p> <p>Comment noted. The development</p>	<p>thereby respecting potential pedestrian desire lines and facilitating the delivery of an integrated neighbourhood.”</p> <p>Amend final bullet in para 5.9.2</p>
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		important double row of trees that front Silbury Boulevard on both the park and development sides, ie “While Campbell Park Northside does benefit from extremely close access to the acclaimed Campbell Park, and the established rows of trees which frame either side of Silbury Boulevard, the public realm and landscaping will be a critically important feature etc.	would have no impact on the established rows of trees on the southern/park side of Silbury Boulevard but happy to include this wording	to read, “ <u>Existing established row of trees lining either side of Silbury Boulevard as well as those lining both sides of Adelphi Street should be retained.</u> ”
9	Bidwells on behalf of Crest Nicholson	Crest welcomes the opportunity to provide comments on the Development Brief which will play an important role in shaping the future development of one of the most exciting development opportunities in Milton Keynes. Crest is generally supportive of the content and level of detail provided in the Development Brief. The comments set out in this letter are made with the intention of enhancing the clarity and usability of the document as a material consideration in the determination of future planning applications. Overall, the level of detail contained in the Development Brief is consistent with its role. It is important that the brief does not become overly prescriptive and allows flexibility for the development partners to take a creative approach to the design and planning of the site. The focus of the brief is rightly on the high-level parameters of the development, guided by the policies of the CMK Alliance Business Neighbourhood Plan (2013) but it is also important that it provides guidance on some of the particular challenges that planning and delivering the site will bring. As such, a number of the comments made below highlight areas where there may be challenges in delivering a high quality, creative and innovative scheme given specific policy requirements, and highlight where Crest would	It must be remembered that it will only have limited weight.	

		<p>welcome additional guidance and flexibility in the Brief. Planning Policy</p> <p>The Development Brief identifies a number of the Neighbourhood Plan policies against which development proposals will be considered. Many of the policies cover points of design detail, such as use of weather protection and provision of an active/mixed frontage to Silbury Boulevard, as well as more strategic issues, such as the retention of “classic infrastructure”, including the parking along Silbury Boulevard.</p> <p>The Brief could be improved by setting out more clearly how these design requirements fit with the Development and Design Proposals set out at section 5. Whilst certain policies of the Neighbourhood Plan are referred to in section 5, such as the approach to residential density, not all policies are picked up. Although we would not expect the Brief to interpret each of the Neighbourhood Plan policies, those which will affect the key planning and design principles of the scheme, particularly the protection of “classic infrastructure”, could be more clearly translated into the Development and Design Proposals. This point is covered in more detail below.</p> <p>As a general note on the Planning Policy section, the Brief refers to the National Planning Policy Framework (NPPF) 2012. A revised NPPF was published in July 2018 and the Brief should be updated to reflect this.</p>	<p>The view is that the Brief has done this without trying to be too prescriptive or give lack of recognition of CMKAP G1.</p> <p>Agreed will update to July 2018 version of NPPF</p>	<p>Will include updated references, in particular the following: Para.117: “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”</p>
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		<p>Similarly, depending on progress towards approval of the Brief by MKC Cabinet, it may be the case that Plan:MK has been adopted prior to the Brief being finalised. If so, this will also need to be reflected in the brief.</p> <p>Development and Design Proposals</p> <p>Crest generally support the Development Proposals set out in sections 4 and 5 of the Brief. The proposals reflect our</p>		<p>Para 120 “Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</p> <p>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”</p>
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		<p>understanding of the policy requirements for the site and provide clear, high level parameters to guide its future development. However, as noted earlier, the Development and Design Proposals section would benefit from providing a clearer interpretation of some of the more detailed policy requirements set out in section 2 of the Brief. Whilst key parameters are correctly established for matters such as building height and density, which are welcomed, the Brief would be more helpful if it addressed some of the potential challenges that may arise by strict adherence to the policies of the Neighbourhood Plan and Plan:MK.</p> <p>Specifically, at section 5.2, the brief could be improved by being more supportive of the potential for a public open space/piazza at the western end of the site. To be effective, such an approach would inevitably necessitate the loss or alteration of an area of “classic infrastructure” that could be considered to be at odds with the policies of the Neighbourhood Plan. It would therefore be beneficial for the Brief to address such conflicts and provide clear guidance for developers or indicate that flexibility exists to make changes to the “classic infrastructure” in order to deliver an appropriate scheme of good design quality. Similarly, whilst Crest acknowledges the desire to retain the “classic infrastructure” car parking on Silbury Boulevard, it would be helpful if the Brief (at section 5.8) provided clarity on the expectations for the future role and use of this parking area.</p> <p>Section 3.5 of the brief suggests that the areas can provide parking for the development which is welcomed, and it would be helpful if section 5 of the Brief clarified this can be used for either allocated and or visitor parking for the new development.</p>	<p>Could include this on the basis of contributing to a more formal character west of Skeldon Gate?</p> <p>The Brief – given its weight - can only provide guidance in so far as CMKAP policies are to be interpreted as to how the vision for the site can be delivered – it can’t provide absolute clarity on how CMKAP policies are to be applied.</p> <p>The parking is there to serve the development</p>	<p>Include new wording in para 5.2.2. to read, <u>“and character through for example the inclusion of a piazza/plaza”</u></p> <p>Will amend 9th bullet of “Opportunities” to read, <u>“Existing parking areas alongside Silbury Boulevard are there to</u></p>
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		<p>The Development and Design Proposals section does not set out any guidance for the provision of a local centre or other non-residential uses. Whilst the requirement for a local centre is set out at paragraph 2.1.17, and paragraph 2.4.3 alludes to the fact that this will not be expected to serve the whole of Campbell Park, section 5 of the Brief does not provide any guidance for its location or size. The same is true of other uses, such as a hotel, which are an expectation of the mix of uses set out in section 4, but which aren't covered in section 5.</p> <p>Whilst not wanting to overly restrict the potential layout of the development, we feel the brief would benefit from amendments which provides developers with broad parameters for the location and design of non-residential uses. It is suggested that the optimal location is in the area at the junction of Skeldon Gate and Silbury Boulevard with active ground floor uses on the frontages to either of the main routes.</p> <p>Access and Movement</p> <p>Crest supports the overall movement framework set out in the Development Brief. It will be important that the site connects effectively with its surroundings and creates an attractive pedestrian environment.</p> <p>Crest believes in this regard the brief provides clear guidance to shape future development proposals.</p> <p>Crest also supports the fact that the brief provides flexibility in the approach to addressing the interface with, and crossing of, Skeldon Gate. Whilst the desire to consider grade separated crossing of Skeldon Gate along the route of the Common Lane Open Space is understood, this should not become a requirement of the Development Brief. There are numerous constraints to this, not least the</p>	<p>This is considered too much detail for a Brief</p> <p>Will include reference to this location for non-residential uses.</p> <p>A grade separated crossing isn't a requirement in the brief.</p> <p>Unclear why utilities would be an</p>	<p><u>serve the new neighbourhood"</u></p> <p>Include a new para 5.3.2 to read, <u>"The optimal location for non-residential uses is in the area at the junction of Silbury Boulevard and Skeldon Gate.</u></p>
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		<p>practicalities and costs of rerouting underground utilities. Therefore, the flexible approach in the brief is the most appropriate approach for the brief to take.</p> <p>Once again, thank you for the opportunity to comment on the Development Brief. We hope the comments provided are taken in the positive light that they are intended, and we look forward to working alongside the Council to deliver what we hope will be a flagship development for Milton Keynes.</p>	<p>issue if an overbridge across Skeldon Gate is provided.</p>	
10	<p>Corrina Ozturk (Adelphi Street resident)</p>	<p>Dear Mr Sainsbury</p> <p>Thank you for the opportunity to comment on the development brief for Northside Campbell Park. Our house is one of those that faces directly opposite the currently empty fields on which some of the proposed development will be built so we will be keeping a close eye on how things go. We previously lived in the development called 'The Square' on the other side of Campbell Park, in fact in the weird pink clad building right at the front facing the Park. We were owner occupiers of a ground floor flat. We sold up and moved for several reasons but not least; Taylor Wimpey have spent nearly 9 long years developing and selling what is by comparison, a small site. This has meant anyone who actually owned a flat there, living in a building site for a very long time. The sales office right in front of the building is still there to this day (we were told it would come down in Dec 2017, there are flats still awaiting the parking spaces allotted to them as a result).</p> <p>So on the back of this, my comments are as follows and I'm be grateful for feedback on them in due course:</p> <p>a. How is the council going to ensure that a developer</p>		<p>Comment noted, but this is beyond</p>

		<p>keeps to a reasonable time scale for build, sell and finish for the far larger North Campbell, so that we are not once again sat in a building site for years to come?</p> <p>b. How is the council going to ensure that sales offices, flags etc are taken down in decent time (the Square has no more flats to sell or develop but Taylor Wimpey advertising is still there)?</p> <p>c. How is the council going to insist that adequate parking (which needs to be permit parking from the start due to proximity both to the Centre and the Park) is in place?</p> <p>d. We can see there is provision in the plans for social housing (good) and for family housing and not just big blocks of flats that get rented out and as a consequence no sense of community is built up. How will you ensure mixed use is maintained and that big houses don't get turned into HMOs later?</p> <p>e. There are plans to protect the ancient hedgerow that runs down the site, this needs a wide area each side. Because we live where we do and we are owner/occupiers we can see the wildlife that lives in it (several foxes, a hedgehog, some nightingales and various other small flora and fauna, we hope they remain despite the disruption. A green walking route would be very welcome. Will the current row of trees lining the road onto our site be retained?</p>	<p>the scope of the Brief and will be addressed as a planning condition on subsequent planning applications. Response above refers. This may be an enforcement issue.</p> <p>A Transport Assessment will determine the parking needs for the development</p> <p>There will not be a high proportion of big houses, if any at all. HMO's furthermore require planning permission.</p> <p>Agreed – this is the intention to include public open space each side of the hedgerow.</p> <p>The intention will be to retain the existing trees along Adelphi Street.</p>	<p>Amend final bullet in para 5.9.2</p>
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		<p>f. We are lucky to have a lovely view across the field down to Campbell park, we realise this would not last so it's not about preserving it (though I'll make sure I've plenty of pictures before the works begin) but will the height of buildings close to Adelphi St be restricted? We are in a 3 storey town house, would this be the maximum height for this particular bit of the site?</p> <p>g. With both the Square and earlier works on the other side of Campbell Park and the new Crest Nicholson development at the canal and now this, we badly need a community centre for the Campbell Park residents and visitors (as you have for other distinct MK areas). Though we are a 3 min walk from John Lewis (nice, can't complain</p>	<p>The brief is going to include additional guidance about the nature of the relationship of new development to Adelphi Street. It will however be taller adjacent to Silbury Boulevard where the Business Neighbourhood Plan encourages up to 8 storeys in height.</p> <p>Comment noted. A community centre will provided as part of the overall development across Campbell Park. The CMKAP requires mixed uses along Silbury Boulevard and the sort of uses that likely will</p>	<p><u>to read, "Existing established row of trees lining either side of Silbury Boulevard as well as those lining both sides of Adelphi Street should be retained."</u> plus added to Fig 7: <u>Parameters Plan</u></p> <p>Will include new para 3.2.5, <u>"Immediately to the west of the site is a set of approximately 50 three storey townhouses. Only one home actually has its entrance onto Adephi Street and facing the site - the rest take their access and face west into the neighbourhood. Their design, incorporated features and common palette of materials have created a strong character for this residential development."</u></p> <p>Will amend bullet 5 in Section 3.5 Constraints/Challenges: to read, <u>"In particular building heights should respond to the surrounding residential context."</u></p>
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	<p>about location!) but there is no super market, an overworked central Drs Surgery in Bradwell Common and no school nearby. Both Waitrose and Sainsburys having moved out and nothing has filled that yawning gap. There are very few independent shops, cafes or restaurants in the Centre (of the sort that thrive in smaller areas where rents are cheaper). We live in the Centre but sometimes it's a bit of a desert (for normal everyday living).</p> <p>h. Will the Council look at innovative and electric transport to and from the Centre and the train station to Campbell Park and areas? With a lot more citizens this makes sense and it's a straight route. Can we think about the kind of innovative solutions that MK is rightly famous for?</p> <p>i. Will the development be carbon neutral or even negative (give energy back?).</p> <p>j. Is there a chance for interested citizens and young people to be involved in the whole development from start to finish? Could young adults come and learn what it's like to do good town planning, what it's like to be an architect, will council/developer taken on a number of apprentices to learn from this build and experience and take that to other sites?</p> <p>On the whole MK does planning exceptionally well so please ensure this prime site in the heart of the City gets the right treatment.</p> <p>As you can tell we all love MK in our house and want to</p>	<p>be delivered are included in section 4. This will likely include the type of uses you are seeking. There will not be school provision or a new health centre provided.</p> <p>This beyond the scope of the Brief but is being explored as part of the wider 2050 Growth Strategy for MK.</p> <p>Comment noted but will be discussed at the planning application stage</p> <p>Possibly – comment will be passed onto MKDP and developers</p> <p>Comment noted and appreciated</p>	
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		work with the Council to make this particular development, that is so close to our home (and therefore our hearts) work well for all who live and play here for generations to come.		
11	Jim McGowan (Adelphi Street resident)	<p>Dear Mr Sainsbury,</p> <p>This document is in response to your letter of 21 Aug, which invited residents to comment upon the Campbell Park Northside Development Brief. To help orientate you, my home is at the very northernmost end of Adelphi Street, overlooking the Northside site.</p> <p>Please forgive the length of my response, but I am passionate about the issue and wanted to provide a considered response.</p> <p>Response Summary</p> <p>In my opinion, Campbell Park Northside is a uniquely prime development opportunity.</p> <p>From what I have read and inferred from the proposal document, I have an overbearing concern that that this opportunity is about to be squandered. I fear that the proposal will translate into a mediocre housing development if allowed to proceed. This fear is largely based upon the example of the recent constructions across the park from where I live, on the south-side of Campbell Park.</p> <p>My suggestion is to instead refocus development of Northside so as to significantly increase provision of premium mixed-use, high density, development.</p>	<p>It is not believed that the tone of the Brief will lead to this result.</p> <p>Notwithstanding this, the vision statement on pg 5 will be amended to strengthen the desired quality as well new wording in section 5</p> <p>The brief provides guidance for a high quality residential development with supporting mixed uses.</p> <p>These matters have been considered in detail through the Plan:MK Examination and this brief is consistent with the proposed Main Modification MM14 which states that ‘the northern side of Campbell Park will be developed for largely residential purposes.’</p> <p>Agreed, there will be additional wording in the Brief about the relationship of new development to the Adelphi Street housing.</p>	<p>Will include following new wording within Vision Statement, “There will be a strong sense of place with a wide variety of high quality <u>exceptionally designed</u> bespoke, adaptable and energy efficient private and social housing.....”</p> <p>Propose new wording in Section 5.5.2 to read, “<u>that would help raise the profile and reputation of Milton Keynes.</u>”</p>

		<p>Specifically, I would urge planners to accommodate an equal proportion of office space. I believe that Campbell Park should be a true continuation of CMK and not just devolve into yet another housing estate. I think that a refocussing of purpose would better serve the rest of Milton Keynes.</p> <p>Finally, in summary, if this is not achievable from current development proposals, I would like to see a way forward to reserve this land for more ambitious use in the future. I also want to stress that I personally do not have a typical “NIMBY” outlook. I have some understanding of town planning and I am actually supportive of a high quality development. I just wish to influence that this becomes the actual outcome.</p> <p>Consideration as applies specifically to Adelphi Street.</p> <ul style="list-style-type: none"> <li>I am concerned that the document seems to provide minimal acknowledgement of the presence of Adelphi Street as it is immediately adjacent to the proposed development. There seems to be no guidance as to how the new development will integrate with the old.</li> </ul> <p>- Other than passing geographic references, the only mention of note to this Adelphi Street, is on page-25, where there is a bullet point stating “the interface with the housing that fronts onto Adelphi Street requires careful consideration”, and a picture caption noting the avenue of trees.</p>	<p>Para 5.8.1 states that new development will need to meet the Council’s Parking Standards</p>	<p>Will include new para 3.2.5, “Immediately to the west of the site is a set of approximately 50 three storey townhouses. Only one home actually has its entrance onto Adelphi Street and facing the site - the rest take their access and face west into the neighbourhood. Their design, incorporated features and common palette of materials have created a strong character for this residential development.”</p> <p>Will amend bullet 5 in Section 3.5 Constraints/Challenges: to read, In particular building heights should respond to the surrounding residential context.”</p> <p>Will include a new para 3.2.5 to read as follows, “<u>Immediately to the west of the site is a set of</u></p>
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		<p>- The proposal needs to be revised to better accommodate guidance.</p> <p>Impact of development on current parking at Adelphi Street.</p> <ul style="list-style-type: none"> <li>Based on the precedent of recent Campbell Park south developments, I am very concerned that developers will not adequately allow for parking, and will overly rely upon existing street parking provided by Adelphi Street.</li> </ul> <p>- Nothing causes neighbourhood problems quite like car parking frustrations.</p> <p>- Residents of Adelphi Street have, for many years, been fighting against the problem of parking caused by displaced CMK visitors (seeking to avoid paid-for parking). This has been recently resolved with the introduction of parking restrictions.</p>	<p>A Transport Assessment will be required to assess the parking needs for the development</p>	<p><u>about 50 three storey townhouses. Only one home actually has its entrance onto Adelphi Street and facing the site - the rest take their access and face west into the neighbourhood. Their design, incorporated features and common palette of materials have created a strong character for this residential development.</u></p> <p>Will amend bullet 5 in Section 3.5 Constraints/Challenges: to read, <u>“In particular building heights should respond to the surrounding residential context.”</u></p> <p>Propose to delete first sentence in para 5.8.1 and replace with, <u>“A Transport Assessment will be required to assess the parking needs for the development.”</u></p> <p>Amend final bullet in para 5.9.2 to read, <u>“Existing established row of trees lining either side of Silbury Boulevard as well as those lining both sides of Adelphi Street should be</u></p>
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	<p>- To clarify, Adelphi Street does not have any inherent problems with under-provision of spaces for residents. All dwellings have at least one dedicated parking space and a garage, whilst many have two or more.</p> <ul style="list-style-type: none"> <li>In contrast to Adelphi Street, the recent residential developments on the south side of Campbell Park generally have minimal parking provision. A number of dwellings do not have any private allocation, whatsoever. This, when combined with the same problems of general-public use that we had until recently, makes for a miserable experience for residents who often struggle to park near to their home.</li> </ul> <p>Preservation of trees and green space.</p> <ul style="list-style-type: none"> <li>I am concerned that mature trees will be removed as part of a redevelopment.</li> </ul> <p>- When arriving home to Milton Keynes, having visited other towns and cities around the UK, I have often said, when driving along the Campbell Park section of Silbury Blvd, "what a beautiful place we live in".</p> <p>- I think it would be undesirable to lose this attractive tree-lined boulevard, even in part.</p> <ul style="list-style-type: none"> <li>The diagram on page-30 seems to suggest that the trees along Silbury Blvd are to be retained (as identified by a green spotted line).</li> </ul> <p>- I note that currently, Silbury Blvd actually has a double-row of trees along the northern roadside. I would seek reassurance that both of these lines of trees will be</p>	<p>All mature trees along both sides of Silbury Boulevard as well as Adelphi Street are proposed to be retained.</p> <p>Yes they are to be retained</p> <p>Yes they will be retained</p>	<p><u>retained."</u> plus added to Fig 7: Parameters Plan</p> <p>Amend final bullet in para 5.9.2 to read, "<u>Existing established row of trees lining either side of Silbury Boulevard as well as those lining both sides of Adelphi Street should be retained."</u> plus added to Fig 7: Parameters Plan</p>
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	<p>entirely preserved. It is worth noting that this double-tree line was originally present on the equivalent section of Avebury Blvd, to the south, but developers removed a row of trees and replaced this with a footpath.</p> <ul style="list-style-type: none"> <li>The diagram on page-30 does not show that the trees along Adelphi Street are intended to be preserved. This concerns me.</li> </ul> <p>- Adelphi Street is framed on either side by an attractive, well maintained, avenue of trees. The proposal document acknowledges this avenue, but makes no mention of whether they should be preserved. I am very concerned that a new development will have these trees removed, with construction made right up to the edge of the street. I would hope that any new development would accommodate a margin that preserves these trees – perhaps they could be incorporated into a new, second, pavement (as seen elsewhere in CMK).</p> <p>- I would also note that this mature treeline extends “around the corner” and into the unused part of Adelphi Street (along the northern edge of the land, parallel to Portway).</p> <ul style="list-style-type: none"> <li>Section 5.9.2 comments that the green northern edge of Portway should be retained.</li> </ul> <p>- There seems to be contradiction to this on page-23. The diagram appears to indicate that there would be a narrowing of the grid-road green margin, in the area near to Pilgrim Street. This is indicated to narrow even further, so as to completely overbuild the green margin, in the area</p>	<p>The brief will state that existing trees along Adelphi Street should be retained</p> <p>Comment noted</p> <p>There is no intention to narrow the margin of the green frame in this location. This can be clarified in Fig 6 and 7. It should however be noted that these drawings are not</p>	<p>Amend Fig 5,6 and 7 to show full extent of green frame along Portway.</p> <p>Add in new para <u>5.7.6</u> to read, <u>“As identified in para 5.2.2, if in order to help deliver the vision for the new neighbourhood any changes are made to the classic</u></p>
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		<p>adjacent to North Overgate roundabout.</p> <p>...I have other comments, made later in this response, related to this location - but this specific objection is to the removal of mature green areas...</p> <p>Preservation of classic infrastructure.</p> <ul style="list-style-type: none"> <li>I wish to see classic infrastructure and layout remain unaltered or removed.</li> </ul> <p>- This is already a criteria of the Neighbourhood Plan.</p> <p>- Specifically, I am strongly opposed to any construction of buildings over current parking bays, down the entire length of Silbury Blvd.</p> <p>- I am also strongly opposed to any possibility that underpasses are removed and replaced with surface-level crossings.</p> <ul style="list-style-type: none"> <li>Section-2.1.7 (second bullet) acknowledges underpasses around "Secklow Gate" and "Overgate". I presume that this is an error and the document intends to be referring to "Skeldon Gate".</li> <li>Section-2.1.7 makes reference to Policy G11 (exceptional development), as a way to make exception to the Neighbourhood Plan.</li> </ul> <p>- I have not seen anything in the proposal that is indicative of an "exceptional development", so would seek to resist</p>	<p>technical drawings where 100% accuracy is required.</p> <p>Comments noted. The Brief acknowledges the policy requirements around classic infrastructure.</p> <p>The brief is not stating they should be built on but in order to help deliver the vision of integrating the park with the development particularly from a pedestrian perspective the brief suggests that the use of classic infrastructure to be reimagined be explored.</p> <p>The brief does not propose the filling in of any underpasses.</p> <p>Correct – this is an error and will be rectified</p> <p>Comment noted.</p> <p>The Brief acknowledges the policy</p>	<p><u>infrastructure, the development of those areas needs to meet the relevant policy requirements."</u></p> <p>Will amend Secklow Gate in para 2.1.7 to read, "Skeldon Gate"</p>
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	<p>this clause being applied to this development and see no grounds to alter or remove any classic infrastructure.</p> <p>- The closest to what could be termed “exceptional development”, as indicated in the document, is a “key corner building” (based upon a representative image on page-34). If this is representative of the best the site can offer, in my opinion, this is neither of national or international ambition.</p> <p>- The recent development on the south side of Campbell Park, has a building that has been constructed over the original surface-parking (I am referring to the building which has a Budgens store). I think this is a poor precedent and is another example of the classic building line being broken. I am ignorant to the reasons that resulted in planning permission being granted for this building. It seems odd, when the adjacent building of Columbia Place (the distinctive red-coloured building) respects the building line. I very much hope that there is no intention to repeat this on the north side of Campbell Park (again stressing that these developments cannot be interpreted as “exceptional”).</p> <ul style="list-style-type: none"> <li>• Section 5.2.22 talks about a shift of “formality”, between the east and west ends of the land.</li> </ul> <p>- I am wary that this will translate into an excuse to</p>	<p>requirements around classic infrastructure.</p> <p>Section 2.1 simply highlights key policies with the Neighbourhood Plan. The brief is not assuming the development will be classed as an ‘exceptional development’ as defined in CMKAPG11. If developers want to alter the classic infrastructure they will need to demonstrate they have met approved policy and created an exceptional development.</p> <p>Comment noted</p> <p>Comment noted. This will certainly</p>	
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		<p>abandon the classic CMK structure and building lines. In many respects, the classic CMK structure forces developers to maintain a high standard of layout. I fear that the blurring of this distinction could result in a chaotic layout that developers seem to favour elsewhere (because this allows them to maximise land density, at the cost of access and open space).</p> <ul style="list-style-type: none"> <li>On page-30, the diagram marks the southern end of Skeldon Gate as an “opportunity to explore alternative treatment of existing infrastructure”. I wasn’t clear as to what this was eluding to and would like to see this expanded upon.</li> </ul>	<p>not give developers a licence to build something that maximises land density, at the cost of access and open space. The formal/informal transition would in effect encourage more open space to be provided in the informal ‘character area’ east of Skeldon Gate.</p> <p>The intention is to explore if, the lower or southern end of Skeldon Gate and Overgate potentially had a different surface treatment, this would help integrate development sites either side of Skeldon Gate from in particular a pedestrian movement perspective and thereby help deliver the vision for the site. In terms of Skeldon Gate, because the non-residential uses are proposed to cluster around the Silbury Boulevard / Skeldon Gate junction, pedestrian desire lines might be created across Skeldon Gate and an alternative surface treatment might facilitate respecting pedestrian desire lines and crossing at grade.</p> <p>See earlier response. This is certainly not the intention. Figure 6 and 7 will be amended to show the green frame fully protected in this location</p>	<p>Amend Fig 5,6 and 7 to show full extent of green frame along Portway.</p>
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		<ul style="list-style-type: none"> <li>• ...returning to a point touched upon previously, regarding green space... On page-30, the diagram includes a red line indicating the site boundary at its northern edge next to H5 Portway</li> <li>- I am especially concerned that the diagram seems to indicate that, in the area nearest to the North Overgate Roundabout, the intent is to build right up to grass verge of the dual carriageway.</li> <li>- Surely this is not in keeping with the Neighbourhood Plan, which I understood to identify that the Grid-Road margins should not be developed upon?</li> <li>- The precedent of the development at Petersfield Green (which was constructed over the grid road margin) should not, in my opinion, have been granted planning permission and should not now be allowed to reoccur here.</li> <li>• On page-30, there are markers on the diagram indicating placement of major buildings on the corners adjacent to North Overgate Roundabout;</li> <li>- It may be tempting for developers to view these as iconic “gateway buildings” to CMK. However, the proposal for the development appears to be intended to be primarily residential, not commercial. So in reality, this is a proposal to build homes with “prime” views over a roundabout on one of the busiest grid-roads in Milton Keynes. I do not think this creates a quality place to live and should not be acceptable.</li> </ul>	<p>The brief does not encourage development to encroach into the green frame as occurs at Petersfield Green.</p> <p>This is more to show off high quality architecture and a distinctive sense of place (something called for in the NPPF). It will also help with vehicular wayfinding around the MK grid road network especially helping with first impressions for visitors.</p>	
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	<p>- H5 Portway is arguably the main interconnect from the M1 to CMK – and onwards to the A5. On those occasions when the M1 is entirely or partially closed (e.g. due to accident), this road bears the weight of the motorway, as traffic diverts to the A5 (you are certainly aware of hundreds of HGVs at night, when that happens).</p> <p>- My home, being at the very end of Adelphi Street, is immediately adjacent to this road. One of the compromises with what is otherwise a lovely place to live, is that even though I benefit from a relatively wide margin of trees and shrubs, this road is still hugely loud and polluting.</p> <p>Commercial Use of CMK</p> <ul style="list-style-type: none"> <li>• This is a confusing problem; my thoughts gravitate around an observation that we seem to be witnessing the de-commercialisation of CMK. Businesses are being driven away – and they’ve been leaving for a number of years.</li> </ul> <p>- The reasons for this may not be fully understood, but could be reasonable to suggest that perhaps the costs and inconveniences of operating in CMK (such as a poor supply of expensive car parking) outweigh the benefits. I know first-hand a number of businesses that have relocated to industrial estate elsewhere in the town.</p> <p>- In their wake, empty office buildings are now being converted to residential use.</p> <ul style="list-style-type: none"> <li>• I am concerned that CMK will devolve into another housing estate and cease to be a significant employment</li> </ul>	<p>Comment noted – this is one downside of having 60/70mph roads.</p> <p>The brief keeps the northern development boundary behind the green frame / grid road corridor.</p> <p>Renaissance CMK certainly proposes to re-address this and make CMK a dynamic place to live in, work in and play in.</p> <p>In this context this site is ideal exploit for a high density residential led mixed use development that allows future residents the benefits of both worlds – close/walking access to green space (Campbell Park and Grand Union Canal) and the wide range of opportunities with the city centre part of CMK.</p>	<p>Will delete first sentence in para 4.1.4 which refers to general SHMA requirements for MK as a whole.</p> <p>Will include new wording in para 4.1.4 to read, “<u>Housing types will likely be informed by the demographic expected to live on site, including young adults /</u></p>
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		<p>hub.</p> <p>- Looking at this simplistically, people typically want to live close to where they work. If the implication is that commerce is shrinking in CMK, the question arises “why do people want to live either in, or nearby to, CMK?” This is a point worth reflecting upon when there are more spacious and affordable dwellings elsewhere in the town.</p> <ul style="list-style-type: none"> <li>• Section-4.1.4 identifies that the predominant need for housing across Milton Keynes is actually for 2 and 3 bedroom houses. I would speculate that this is because Milton Keynes is comprised of a significant demographic of mainly younger families looking for affordable, but more spacious, homes.</li> </ul> <p>- Section-4.1.4 then goes on to acknowledge the CMK Alliance Plan density requirement for CMK/Campbell Park.</p> <p>- I do not believe that the demand for “Family homes” can be well served by high-density 3 or 4 bedroom apartments, as these would not be affordable. Instead, high-density developments typically cater for the small 1 and 2 bedroom size of dwelling, which contradicts the type of demand required in MK (as identified in section-4.1.4)</p> <p>- I’m not suggesting that there is not a need for smaller/affordable high-density apartments in CMK, but I strongly suspect that the demand for this type of smaller dwelling will be driven by typically younger and/or individual people wishing to commute to a place of work in London. If this is true, then development of this type is</p>	<p>The Renaissance CMK Agenda certainly does not propose reducing the amount of commerce – this is critical to the success of CMK and MK.</p> <p>This section on likely future residents will be revisited to focus more on the likely demographic that will be attracted to the development</p> <p>The brief will revisit the likely demographic that will live at Campbell Park Northside and the resulting housing that will be required to serve this demographic. It is unlikely that large family homes will be developed – there are numerous other areas of MK that cater for this demographic. The required density will also determine they type of housing to be built – again less supportive of a lot of larger family homes.</p> <p>The brief can’t however be too specific on the type of housing to be built – the market will build what it believes can be sold in the context of the site.</p>	<p><u>young professionals , key workers (singles and couples) who want to live in proximity to the buzz of CMK as well as retirees and empty nesters.”</u></p>
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	<p>going to better serve that particular demographic, by being located much nearer to the train station. This is not a problem, because the undeveloped plot in the southernmost corner of CMK is prime for this purpose and is already zoned appropriately by the CMK Alliance Plan.</p> <p>- To continue this line of reasoning, I would strongly question the benefit of building blocks of predominantly high-density, small-scale residential ... specifically on the Campbell Park site ... where there is currently a diminishing commercial presence in CMK.</p> <p>-What purpose are these homes being built to serve, other than to appease a statistic for construction of new-homes?</p> <ul style="list-style-type: none"> <li>• I happen to think that the Neighbourhood Plan is generally correct in its zoning density requirements. This is why I voted for it democratically. I agree that Campbell Park should not be a place for low-density suburban housing. There are many potential sites for lower density suburban dwellings elsewhere in Milton Keynes.</li> </ul> <p>- What I believe is needed in Campbell Park is a true mix of high-density use – catering in equal amounts for commercial use as well as residential. Let’s actually set out to build a new place that creates an ambitious new employment hub and combine that with high-density residential to support those people who want to live within walking distance of those new jobs.</p> <p>- Show me a business owner that wouldn’t want a prestigious office which offers stunning views across the park?</p>	<p>The Renaissance CMK Agenda certainly does not propose reducing the amount of commerce – this is critical to the success of CMK and MK</p> <p>Comment noted and agreed.</p> <p>The brief provides guidance for a high density residential led mixed use development. These matters have been considered in detail through the Plan:MK examination and this brief is consistent with the proposed modification.</p>	<p>Will include new wording in para 4.1.4 to read, <u>“Housing types will likely be informed by the demographic expected to live on site, including young adults / young professionals , key workers (singles and couples) who want to live in proximity to the buzz of CMK as well as retirees and empty nesters.”</u></p>
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		<ul style="list-style-type: none"> <li>Section-4.1.5 Talks about an “appropriate mix”, but I see no rationale as to how this is translated into this proposal.</li> </ul> <p>Miscellaneous comments.</p> <ul style="list-style-type: none"> <li>The landowners current minimal/poor maintenance of the site (in terms of being overgrown, with any associated damage being caused to the existing infrastructure) should not cause the site to be viewed as a candidate in desperate need for regeneration. The document even acknowledges overgrown vegetation in an image caption on page 25 and again in section 5.9.4</li> <li>I was very encouraged to see that the plan seeks to preserve the historic “Portway Hedgerow” combined with its use as a new and alternative pathway down to the canal. I also am very supportive of a proposal to build a new pedestrian bridge crossing Skeldon Gate.</li> <li>Section 5.3.2 briefly mentions active frontages to the canal. I didn’t infer any real emphasis of ambition from the proposal. I really do hope that this is seen as an absolutely prime opportunity to have water-fronted retail.</li> </ul>	<p>Para 4.1.5 is not stating what the appropriate mix is but says that the appropriate mix will be influenced by site specific factors wider trends, information on households with specific needs at that time.</p> <p>Comment noted</p> <p>Comment noted although it should be pointed out that while the Brief sets the aspiration for a pedestrian bridge to be built across Skeldon Gate the brief can’t make it an absolute requirement.</p> <p>Comment noted. This para can be expanded on, however it must be remembered that quite a lot of non-residential development is proposed</p>	<p>Include new wording in para 5.3.3 to read, <u>“An element of mixed use development would also be desirable facing the canal if demand exists.”</u></p>
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		<p>I hope that provision for visitors is fully explored (e.g. car-parking for visitors of a potential waterside restaurant, etc).</p> <p>Statement.</p> <ul style="list-style-type: none"> <li>Please do not waste this opportunity on something that isn't special, just because of an immediate pressure to build cheap homes.</li> </ul> <p>This site represents an opportunity within MK that is almost unique.</p> <p>This location could be home to a genuinely iconic development, of the oft-quoted "national pride" standard. This could be of the kind that CMK has, in the past, been able to deliver – so it is not unrealistic nor unachievable. In my opinion, it would be far better to reserve the land for a future use, that is a genuinely impressive development (or some other completely more ambitious use). To use the land this way would be to serve the entirety of MK far better.</p> <p>However, as presented in the proposal document, there is absolutely nothing which makes me feel sympathetic or excited about the upcoming proposed use of the land. Instead, all I see is a reproduction of the type of development that has recently appeared on the south side of the park. What a waste this would be.</p> <p>I am of the opinion that, in this location, we do not currently need a development proposal that is dominated by residential-only. These, small-scale, cheaply-made apartment blocks only frustrate the people who ultimately live there.</p>	<p>as part of the Crest Nicholson Canalside development which is currently being built out, so the demand needs to be considered.</p> <p>Comment noted – your aspirations are shared by MKDP and the Council!! The brief has been worded to enable this opportunity to occur</p> <p>As mentioned earlier, the Vision Statement has been amended to include the words, "exceptionally designed"</p> <p>This will not be a solely residential development – there will be supporting non-residential development particularly along the</p>	
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	<p>I accept that this “holding off” is politically problematic in the short-term. It requires both resistance to the pressure from central government to build thousands of new homes and resistance to pressure from capitalist developers seeking profit over civic responsibility. However, I also know that the economy moves in cycles of growth and recession. There will eventual be a positive financial climate that could lead to far better opportunities and uses for this prime location.</p> <p>For example, consider the difference in the type and quality of a development that was built during economically better times (as perfectly exemplified by Campbell Heights, constructed in the early 2000s) and then go and compare that with recent housing developments, built in the current time of relative austerity.</p> <p>Specifically in Campbell Park, I would call-out the recent disappointing development of Dalgin Place; these homes are near-featureless cuboids, broken up only with bolt-on balconies. In my opinion, they do not make for quality or attractive development (see Fig1 below). The dismal lack of parking provision for residents also exemplifies, in my opinion, a poor quality development.</p> <p>Similarly, the development of the nearby “The Hub” (see Fig2), with its destruction of classic CMK infrastructure and street-facing, uncovered, featureless walls along Witan Gate (unless huge vents are thought of as attractive) are another example of what is, in my opinion, poor quality development.</p> <p>I always feel that the original vision for Milton Keynes - and specifically Central Milton Keynes - was hugely well planned and considered. The Development Plan honours</p>	<p>Silbury Boulevard frontage.</p>	
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		<p>and upholds these principles.</p> <p>On a closing note, I would caveat that all of this planning and consultation effort can be for nothing. I would make the observation that we seem to be operating in a climate where developers can apparently seek to disregard and bypass planning guidelines, when the weight of commercially-backed legal wrangling comes to bear.</p> <p>This can be exemplified by the recent debacle that is the multi-story carpark (adjacent to John Lewis) and the upcoming redevelopment of the former Midsummer Place shopping centre extension.</p>		