Application Number: 16/01430/OUT

Outline planning permission for the erection of twelve flats together with parking using the existing access including approval of access, layout and scale (appearance and landscaping reserved) (Resubmission of 16/00064/OUT)

AT Site To South West of Bletchley Working Mens Club, Duncombe Street, Bletchley

FOR Mr A Amin

Target: 25th August 2016

Ward: Bletchley Park Parish: Bletchley & Fenny Stratford

Town Council

Report Author/Case Officer: Nicola Wheatcroft Senior Planning Officer **Contact Details:** 01908 252274 nicola.wheatcroft@milton-keynes.gov.uk

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1.0 INTRODUCTION

(A brief explanation of what the application is about)

1.1 The Site

The application site is located within Bletchley town centre, within part of the former car park of the Working Mens Club (WMC). The site is located to the rear of the club and adjacent pub and fast food units. Opposite the site is the Brunel Centre and the Sainsbury's and town centre car park. The car park is surrounded by a laurel hedge and has mature trees around the frontage.

1.2 The Proposal

Outline planning permission is sought for the erection of 12 flats; layout, access and scale are for consideration at this stage. Landscape and appearance will be dealt with at reserved matters stage.

Access is provided to the site from Duncombe Street and the building is proposed along the southern boundary. Two flats are proposed at ground floor with ten parking spaces in two undercroft parking areas. Six flats are proposed at first floor and a further four at second floor. A total of 13 parking spaces are proposed together with a cycle store and refuse storage area.

2.0 RELEVANT POLICIES

(The most important policy considerations relating to this application)

2.1 National Policy

National Planning Policy Framework paragraphs

- 12 Accordance with Development Plan
- 14 Presumption in favour of Sustainable Development
- 17 Core Planning Principles
- 32 Transport
- 47 Delivering a wide choice of high quality homes
- 50 Affordable Housing
- 56-66 Design
- 69 Creating healthy and inclusive communities
- 103 Flood Risk
- 173 Ensuring viability and deliverability
- 176 Safeguards for acceptable development
- 204 Planning Obligations

2.2 Local Policy

Core Strategy

- CS4 Retail and Leisure Development
- CS11 A Well Connected Milton Keynes
- CS12 Developing Successful Neighbourhoods
- CS13 Ensuring High Quality Well Designed Places
- CS21 Delivering Infrastructure

Adopted Milton Keynes Local Plan 2001-2011

- D1 Impact of development proposals on locality
- D2 Design of buildings
- D2A Urban Design Aspects Of New Development
- D4 Sustainable Construction
- **NE2 Protected Species**
- NE3 Biodiversity & Geological Enhancement
- NE4 Conserving & Enhancing Landscape Character
- T3 & T4 Pedestrians and Cyclists
- T5 Public Transport
- T10 Traffic
- T15 Parking
- TC16 Bletchley Town Centre
- H2 H5 Affordable Housing
- PO4 Percent for Art

Supplementary Planning Guidance and Documents

Education Facilities SPG (2004)

Leisure, Recreation and Sports Facilities SPG (2005)

Addendum to Parking Standards For Milton Keynes (2009)

Affordable Housing SPD (2007)

Social Infrastructure SPD (2005)

Sustainable Construction SPD (2007)

3.0 MAIN ISSUES

(The issues which have the greatest bearing on the decision)

- 3.1 1. The National Planning Policy Framework and Housing Supply
 - 2. Principle of Development
 - 3. Design and Impact on Streetscene
 - 4. Residential Amenity
 - 5. Highway Matters
 - 6. S.106 Matters

4.0 RECOMMENDATION

(The decision that officers recommend to the Committee)

4.1 It is recommended that planning permission be granted subject to the S.106 requirements set out in paragraph 5.23 and the conditions set out at the end of this report.

5.0 CONSIDERATIONS

(An explanation of the main issues that have lead to the officer Recommendation)

5.1 The National Planning Policy Framework and Housing Supply

In respect of strategic housing land supply within the Authority Paragraph 49 of the NPPF states that:

"Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."

- In this regard, it has been accepted by the Council that it is unable to meet this requirement and for this reason the Council must rely upon the provisions of Paragraph 14 of the Framework to consider the submitted application. This states that:
 - "... at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. Where the development plan is absent, silent or relevant policies are out-of-date the Council must consider favourably applications for housing development and should grant permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted."
- 5.3 The starting point for the determination of this application is the fact that Authority does not have a 5 year housing land supply, and the proposed development would contribute towards meeting the identified shortfall. An assessment must therefore be made as to whether the proposal can be considered to be sustainable development in terms of the economic, social and environmental roles as set out in the NPPF.

5.4 Sustainable development

The application site is located within the centre of Bletchley, one of the older established residential areas. The development would provide 12 additional dwellings to meet the currently identified need for housing as well as providing a contribution towards social infrastructure, for the benefit of the whole community.

- In terms of economic issues, the construction activities associated with the development would potentially generate employment opportunities for the local community, and have associated benefits for local services and suppliers. In the longer term the development would also support the local economy in terms of the use of local shops, services and facilities, and potentially result in new investment in Milton Keynes.
- 5.6 Finally, with respect to environmental issues, the application site is a brownfield site mostly recently used as a car park. It is not subject to any environmental designation or protection.
- 5.7 Overall, having weighed these matters, it is considered that the development would meet the definition of sustainable development and therefore would comply with the provisions of paragraph 14 of the NPPF as the adverse impacts of the development would not significantly and demonstrably outweigh the benefits. The reasons for this conclusion are set out in more detail in the remainder of the key issues in this committee report.

5.8 Principle of Development

The site is located in the heart of Bletchley town centre. Local Plan policy TC16 and policy CS4 of the Core strategy seek to encourage and strengthen the retail function of Bletchley. Whilst the proposal does not relate directly to retail provision the introduction of residential properties into this location will result in more residents to use the shops and facilities. This should help to improve the vitality and viability of the Bletchley town centre.

This is also in line with paragraph 23 of the National Planning Policy Framework which states:

- "...that residential development can play an important role in ensuring the vitality of centres .."
- 5.9 Policy H7 of the Local Plan relates to housing on unidentified sites and sets out criteria to assess proposals for new housing against on sites within the limits of development:
 - (i) Whether the site has been previously developed. Whilst this part of the site is has not been used for residential development it was previously part of the Working Mens Club for which there is currently no need for parking.
 - (ii) There are no buildings on the site suitable or otherwise for conversion for residential purposes.
 - (iii) The location and accessibility of the site to jobs, shops and services. The location of the site in the centre of Bletchley means that it is well served by such facilities.
 - (iv) The compatibility of housing development with existing land uses, there are flats at the adjacent property and the erection of flats would not appear out of character will the immediate vicinity.
 - (v) With regard to sufficient capacity in existing infrastructure, no issues or concerns have been raised on water supply, drainage or community facilities.
 - (vi) There are no physical constraints to development from contamination or flood risk. A noise assessment has accompanied the application and no concerns have been raised by the Environmental Health Officer subject to a condition requiring mechanical ventilation on the elevation facing the WMC.

It is considered that the proposal meets the requirements of Policy H7.

5.10 **Design and Impact on the Streetscene**

Policies D2 and D2A and Policy CS13 of the Core Strategy encourage all new developments to be of a high standard of design. The site is part of the car park previously used by the WMC. It is generally unkempt and a focus for flytipping as there is little surveillance of this area. The introduction of a block of apartments will enhance the streetscene and improve the immediate appearance of the area. In addition, it will introduce residents to this area which will benefit from more activity and more natural surveillance.

- 5.11 The scale of the building at three storeys is acceptable in view of the larger WMC and pub adjacent to the site and the Brunel shopping centre building opposite the site. It is considered that the proposed building will be in scale with the surrounding buildings.
- 5.12 The appearance of the building is not a matter for consideration at the present time. However, the accompanying illustrative drawing shows a

building that would not appear out of character in this location. Landscaping is also a matter that would be dealt with at reserved matters stage.

5.13 Overall, it is considered that the proposal is appropriate in terms of scale, and the form and layout will result in a help to make a positive contribution to the character of the area. Therefore, the proposal is line with the policies referred to above.

5.14 Residential Amenity

Policy D1 of the Local Plan states that planning permission will be refused for development that would be harmful in terms of visual intrusion of loss of amenity. The only residential properties in the vicinity are flats located above and to the rear of the adjacent pub and fast food outlets. The properties are located far enough away to ensure that no loss of privacy will result from window to window overlooking or any loss of light. It should be noted that design is not under consideration at the present time, so amenity will be further considered during the determination of any reserved matters application. However in principle, the proposal is considered to meet the requirements of Policy D1 of the Local Plan.

5.15 With regard to the relationship of the proposed flats with the WMC and any potential noise problems, the WMC still runs a pub and associated activities from the building. There is the potential for noise problems and disturbance to the detriment of the new occupiers of the proposed development. Following the evaluation of a noise assessment by the Environmental Health Officer it is suggested that there is no objection on disturbance grounds subject to a scheme being introduced to provide mechanical ventilation to rooms with windows on the elevation facing the club. A condition is proposed to cover this.

5.16 **Highway Matters**

The Highways Engineer has raised concerns about the proposal on the basis of the loss of the car park for the WMC. However this site has been sold by the WMC and is no longer in their control. The sale of this part of the site was a commercial decision by the WMC who would have needed to consider whether they could continue the business without the need for this size of car park. The town centre location of the WMC may have been a consideration in this matter. The applicant has now acquired this piece of land and there is no proposal as part of this application to provide parking for the WMC. Any refusal of the current application on the basis of the loss of the car park would be very hard to substantiate given the sale of the site by the WMC. The result may be however that parking for the WMC at peak times is displaced

5.17 The applicant has supplied additional information and has confirmed that the proposal will provide 13 parking spaces for the proposed residential scheme. This equates to 12 allocated spaces and 1 unallocated (visitor) space. This

is below the Councils standards which require an additional 3 unallocated spaces. Whilst this means the proposal is not compliant with the maximum parking standards this site is centrally located to Bletchley, within close proximity of bus and rail links, and consequently there is a possibility that people living in these apartments will not be car owners. It should be noted that the application site is located opposite the town centre (Sainsburys) car park which would be able to accommodate some visitor parking as well as parking for the WMC. It is considered that a refusal based on the lack of 3 unallocated parking spaces in this location would be hard to substantiate at any appeal if the application was to be refused on these grounds.

5.18 The Highway Engineer has also raised concerns about the lack of secure cycle parking. The applicant has confirmed that cycle parking will be provided at a ratio of 1 cycle space per unit and will be located in a safe, covered and secure area close to the main building. This matter will be controlled through a condition.

5.19 Impact on Trees

The southern boundary of the site has a laurel hedge and 1 maple and 6 Plane trees all covered by a Tree Preservation Order (TPO). The trees have positive impact on the street scene soften and adding greenery to what is otherwise a relatively 'hard' built environment. The erection of the a block of flats in the location proposed will have an impact on the trees. The applicant has confirmed through the tree report that 2 trees at the west of the site will have to be removed to accommodate the proposed building. The Tree Officer has confirmed that it is likely to be all 7 trees will have to be removed as a consequence of the current scheme. Following the submission of additional information by the applicant, it is considered that it is also likely that due to the proximity of the proposed building a further 3 trees will have to have significant work done to them, this may result in the loss of these trees as well. It is anticipated that the 2 trees at the east of the site will be retained. In terms of mitigation for the loss of the trees, additional tree planting would normally be proposed. However, the site is so constrained that there is no space for any significant tree planting.

5.20 The Tree Officer has objected to the application due to the impact on the trees. The loss of the trees is a negative element of the current application, however, members are advised to consider the application as a whole. The scheme will deliver 12 flats which will count towards the Councils deficit of a 5 year supply of housing. In addition, the proposal will improve and enhance this part of Bletchley town centre adding to its vitality and viability.

5.21 **S.106 Matters**

Policy CS21 of the Core Strategy and Policy PO4 of the Local Plan requires that development of this scale adequately off-set the impacts of the development on local infrastructure. The calculations for these impacts are derived from the Councils Adopted Supplementary Planning Documents and Guidance.

5.22 It is considered that these contributions meet the necessary legislative and legal requirements for Planning Obligations, notably the National Planning Policy Framework (NPPF) and the Community Infrastructure Levy (CIL) Regulation 122 for Planning Obligations and the three Statutory Tests for Planning Obligations which an authority must be satisfied when requesting any Planning Obligations.

These tests are:

- 1. it is necessary to make the development acceptable in planning terms
- 2. it is directly related to the development
- 3. it is fairly and reasonably related in scale and kind to the development
- 5.23 The requirements for a scheme of 12 flats are set out below:

Education:

	Contribution
Total Early Years	£8,501.46
Primary pupils	£42,007.19
Secondary pupils	£45,212.11
Post 16 pupils	£9,806.69

Leisure Recreation & Sports:

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	Provision Cost	Maintenance Cost
Playing Fields	£5,252.83	£4,492.80
Local Play	£7,862.40	£5,591.04
Neighbourhood Play	£7,488.00	£9,584.64
Community Hall	£2,318.09	n/a
Local Parks	£998.40	£1,447.68
District Parks	£1,996.80	£2,895.36
Swimming Pool	£3,164.76	n/a
Allotments	£936.00	n/a
Sports Hall	£1,163.77	n/a

Social Infrastructure:

	Contribution
Library & ACE	£3,644.16
Crematorium/Burial Grounds	£998.40
Museums and Archives	£1,747.20
Health Facilities	£17,097.60
Waste Management	£2,820.48
Waste Receptacles	£1,200.00
Social Care - Day Care	£599.04
Social Care - Older Persons	
Housing	£3,669.12
Emergency Services	£549.12
Voluntary Sector	£2,071.68
Inward Investment & Skills	
(University & College)	£12,754.56
Public Art - 1% (Estimated)	£8,520.00

Carbon Offsetting:

	Contribution
Carbon Neutrality (Estimated)	£4,260.00
Transport	£48,838.00

- This equates to a contribution of £269,490 (£22,457 per unit). This includes an indicative figure for Carbon Offsetting which is estimated at £4,260.00, to be calculated in accordance with the Sustainable Construction SPD and Saved Policy D4 of the Local Plan.
- In conclusion it is considered that the Section 106 requirements as set out in this report are fair and reasonable and are required to offset the impacts of the scheme, are in accordance with the Newport Pagnell Neighbourhood Plan, are in compliance with the CIL Regulations (specifically Regulation 122) and the NPPF. Officers can confirm no Pooling issues exist for any of these contributions, in accordance with CIL Regulation 123.
- 5.26 The applicant has agreed to secure these financial contributions by way of s106 agreement, and the decision will only be issued once a s106 Agreement has been completed in accordance with the above requirements.

5.27 Conclusion

The introduction of residential units will help to re-invigorate this part of Bletchley town centre, helping to improve the vitality and viability of the centre of the town in line with the NPPF. Whilst the development is not compliant with parking standards for visitor parking to serve the scheme, and involves the development of land that formerly served the WMC for parking purposes, on balance the provision of housing, which will help to increase the Council's 5 year supply of developable housing land, and general environmental improvements to the locality which will result from this redevelopment, outweigh these issues.

6.0 CONDITIONS

(The conditions that need to be imposed on any planning permission for this development to ensure that the development is satisfactory. To meet legal requirements all conditions must be Necessary, Relevant, Enforceable, Precise and Reasonable)

1. Approval of the details of the scale, appearance of the buildings, access thereto and landscaping of the site (hereinafter called "the reserved matters") shall be obtained in writing from the Local Planning Authority before any development is commenced.

Reason: Outline Planning Permission only is granted in accordance with the application submitted.

2. Application for approval of all the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.

Reason: To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.

3. The development hereby permitted shall be begun on or before the expiration of two years from the date of the approval of the last of the reserved matters to be approved.

Reason: To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.

4. The Reserved matters application shall be accompanied by a scheme showing secure cycle parking for the development. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development provide adequate cycle facilities.

5. The Reserved matters application shall be accompanied by a scheme which provides glazing and ventilation specifications in the apartments to achieve acceptable internal noise levels as detailed in the application. The development shall be carried out in accordance with the approved details.

Reason: To protect the amenities of the occupiers of the flats hereby permitted.

6. The reserved matters application shall be accompanied by a Sustainability statement detailing how the scheme accords with the principles of Policy D4 (Sustainable Construction) of the Milton Keynes Local Plan.

Reason: In the interests of Policy D4 of the Local Plan.

7. The reserved matters application shall be accompanied by details of the proposed finished floor levels of all buildings and the finished ground levels of the site, in relation to existing site levels of surrounding property, shall be submitted to and approved by the Local Planning Authority before any work commences. The development shall be carried out in accordance with the approved levels.

Reason: To ensure that construction is carried out at suitable levels having regard to drainage, access, the appearance of the development and the amenities of neighbouring properties.

8. A landscaping scheme, which shall include provision for the planting of trees and shrubs, shall be submitted to and approved by the Local Planning Authority before any part of the development is commenced. The scheme shall show the numbers, types and sizes of trees and shrubs to be planted and their location in relation to proposed buildings, roads, footpaths and drains. All planting in accordance with the scheme shall be carried out within twelve months of commencement of development. Any trees or shrubs removed, dying, severely damaged or diseased within two years of planting shall be replaced in the next planting season with trees or shrubs of such size and species as may be agreed by the Local Planning Authority.

Reason: To protect the appearance and character of the area and to minimise the effect of development on the area.

9. A drainage strategy for the site shall be submitted to, and approved by, the Local Planning Authority before any work on the site commences. The drainage works shall be constructed in accordance with the approved details before the development is first occupied.

Reason: To ensure satisfactory drainage of the site.

Full details of replacement tree planting to be submitted for approval as part of the general landscaping scheme for the development, and which should include full details of tree sizes (at least 20-22cm stem circumference), numbers (at least 14no.), species, planting locations, planting spacing's, pre-planting ground preparations, planting method and long term maintenance. Also where appropriate details of root deflection barriers and permanent protective measures against compaction, impact, de-icing salt etc. Particular attention should be paid to ensuring the trees are planted in a sufficient quantity of high quality growing medium, to ensure their quick establishment and the early provision of maximum benefit to the locality.

10. All existing trees, woodlands and hedges to be retained are to be protected according to the provisions of BS 5837: 2012 'Trees in relation to design, demolition and construction - Recommendations'

Reason: To adequately safeguard the trees on the site.

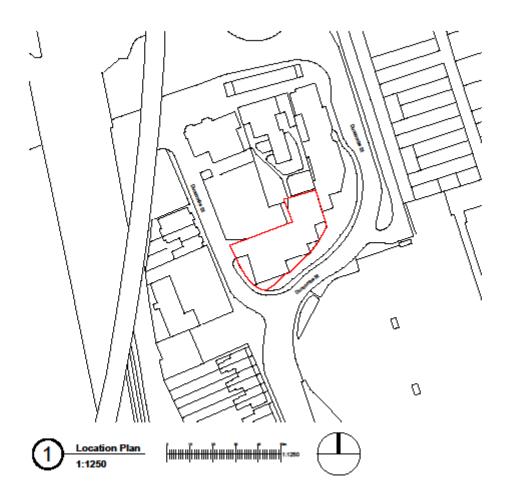
11. Prior to any work commencing a tree survey and report, an arboricultural impact statement, a tree protection plan and an arboricultural method statement all in accordance with BS 5837:2012 shall be submitted to and approved by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

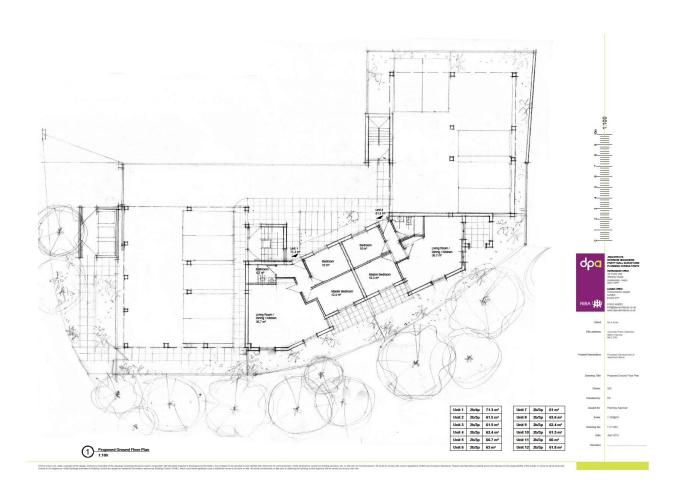
Reason: To adequately safeguard the trees on the site

Informatives

- 1. If construction-facilitation pruning of the trees is required, this should be carried out by a competent, qualified and experienced tree surgeon according to the provisions of BS 3998: 2010 and current arboriculture industry best practice. The Local Authority arboriculture officer shall be given a week's notice before the works are carried out so they have the opportunity to attend on site and agree the exact extent of the works with the tree surgery contractor.
- 2. Where roots are encountered outside the root protection areas excavate carefully, avoid de-barking, breaking, splitting, splintering or shattering the roots. Once uncovered the roots which will have to be removed to accommodate the construction should be cut back to a point 100mm beyond the nearest edge of the construction, they must be pruned back cleanly with sharp, clean pruning saws or

bypass loppers making level, smooth right angle cuts with no ragged edges. Shuttering should be used to keep concrete pours 100mm away from the cut root ends. The void should be backfilled with an approved tree planting compost mix finished to the surface. Substances toxic to roots to be kept away from roots, i.e. tars, fuels, oils, bitumen, cement etc.







Proposed Front Elevation

DESIGN PROPOSAL FOR THE ERECTION OF NEW BLOCK OF APARTMENTS

Site Address - Chandos Place Bletchley Milton Keynes MK2 2SN



Appendix to 16/01430/OUT

A1.0 RELEVANT PLANNING HISTORY

(A brief outline of previous planning decisions affecting the site – this may not include every planning application relating to this site, only those that have a bearing on this particular case)

A1.1 16/00064/OUT

Outline planning permission with some matters reserved for the erection of twelve flats, together with parking, using the existing access

Withdrawn May 10.05.2016

A2.0 ADDITIONAL MATTERS

(Matters which were also considered in producing the Recommendation)

A2.1 None

A3.0 CONSULTATIONS AND REPRESENTATIONS

(Who has been consulted on the application and the responses received. The following are a brief description of the comments made. The full comments can be read via the Council's web site)

Comments Officer Response

A3.1 **Environmental Health Manager (original comments)**

I've reviewed the noise assessment submitted with this application and agree that noise from the adjacent Working Mens Club can be easily dealt with be providing mechanical ventilation to rooms with windows on the elevation facing the club. However the report makes no assessment of noise from nearby roads and the West Coast Main Line railway (although it does mention noise from these sources). My reply to the pre-app on this site specifically named these sources as my concerns, therefore I am surprised that the assessment seems to have ignored any impact from these noise sources.

I am unable to fully comment on the impact of noise on the proposed development in the absence of any assessment of road and railway noise in the area and its impact on the proposal.

Revised Comments

I've now reviewed the updated noise assessment and can confirm that I have no objections to the application, I recommend the following condition:

Prior to commencement of the development the applicant shall submit details for the approval of the Local Planning Authority of glazing and ventilation specifications in the apartments to achieve acceptable internal noise levels as detailed in the application Noise Assessment. The applicant shall then provide certification that subsequently approved specifications have been included as part of the development.

Highways

My recommendation for this proposal remains as previously due to the loss of Noted see paragraphs 5.16-5.18 an existing parking facility. I refer to paragraph 3.4.1 in the transport statement (TS):

Noted and condition proposed.

"The existing car park provided approximately 20 car parking spaces for the Working Men's Club when at its peak usage. However, for a number of years the car park has become redundant and has become what can best be described as a dumping ground. Therefore, any existing car parking spaces have been classed as redundant and a zero baseline approach has been taken."

In response to the above I restate my previous comments regarding this point: "I cannot accept this approach. During my site visit I noted that the car park was untidy but was being used for car parking. I counted 13 cars parked within the area that the proposals will consume. Secondly, the working men's club is still an operating club so no doubt this will generate parking activity to it. I therefore conclude that the proposals will result in a displacement of parking to other areas."

Car Parking

Under the council's adopted parking standards (January 2016) the parking requirement for 12 x 2 bedroom flats in zone 2 (where the site is located) is:

Allocated spaces (1 per unit) = 12 spaces Unallocated (0.33 per unit) = 4 spaces Total: 16 spaces

The TS mentions that the site will provide 13 car parking spaces (12 allocated and 1 unallocated parking space). A plan is included in the TS showing this number. However, I cannot seem to locate this as being a registered plan on the planning system. The current plan is showing a layout with 10 spaces. I haven't therefore been able to check dimensions other than on the 10 space layout – the 10 space layout did not meet our standard layout requirements of 2.5m x 5m with a 6m reverse distance (wider spaces to be provided next to obstructions).

Cycle parking

The provision of open and exposed Sheffield style cycle stands will not be This will be controlled through a condition acceptable in a residential location. These need to be in a secure, lockable structure. I would also add that it is disappointing that the TS summarises that the site is "well placed to promote travel by sustainable modes..." yet the proposals fail to meet the council's adopted cycle parking standards. I would refer to paragraph 6.1 – 6.4 for the required design aspects and table 2 within the parking standards which sets out requirements.

Traffic

I agree with the TS's conclusions that impact on the highway network will be negligible.

Conclusion

Due to the loss of an existing car park I object to the proposals.

MKC Urban Design

I don't object in principle to this application but I do have the following concerns-

- There is no evidence provided regarding how the proposed development reflects the existing built-form in the area both in terms of style and materials. The Plans are and the Design and Access Statement are shown out of context. Surrounding roads and buildings should be shown to help justify the proposed design, without this information it I difficult to assess the extent that the proposed design relates to and enhances the surrounding environment.
- All new development must be based on a thorough site appraisal and be sensitive to its context

Discussed in paragraphs 5.10 – 5.13

- I'd also question the inclusion of the proposed turrets which have been placed on top of the balconies and the stairwell.
- The proposed development would better define public and private areas if the public entrance wasn't in the parking courtyard and main building entrances were on the street.
- The Parking area at the rear must be a secure and private space.

Sustainability

I have no objection subject to the applicants signing a s106 on carbon offset contribution and a condition requiring sustainability statement to be submitted at the reserved matters stage.

Noted and condition proposed

Lead Local Flood Authority

- I have no objection to the principal of development from a flood risk perspective
- The site is not within a fluvial flood zone and there is little to no risk to the site from surface water flooding, therefore I would not require an FRA for the development (presuming it is under 1 ha)
- The applicants have not submitted any information regarding the drainage of the site, either existing or proposed. As this is a major application it falls under the national planning policy's requirements to provide SuDS on site and whilst it is a brownfield site, in line with national standards we would expect to see new development provide a betterment to the surface water runoff rates from the existing site, unless this can be evidenced as being unviable.
- Whilst I fully expect infiltration or discharge to a watercourse to be inappropriate in this location, and therefore discharge to a surface water drain to be necessary, I would expect the applicants to have carried out some consultation with Anglian Water to see if they are likely to set a discharge rate for this development.
- I have attached a copy of our surface water drainage guidance which

Noted and condition proposed

outlines the standards we expect to be met and also the information we seek to be submitted at the different stages of the planning process. I would appreciate it, if you forward this to the applicants and ask them to provide the details we require for an outline application. I would particularly request that they focus on outlining the existing drainage of the site, any changes to the areas of permeable and impermeable areas of the site as a result of the development, evidence that the site has an agreed point of discharge, an indication of existing and post development run-off rates, an indication of any storage required on site, the method of attenuation and a plan showing this can be achieved.

Anglian Water

- The foul drainage from this development is in the catchment of Cotton Valley Water Recycling Centre that will have available capacity for these flows.
- The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option.
- Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.
- The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).
- We request a condition requiring a drainage strategy covering the issue(s) to be agreed.

Noted and condition proposed

Tree Officer

1 object to this development on the basis that all seven TPO protected trees See paragraphs 5.19 – 5.20 on the site will be lost as a result. While it is a small site, all of the trees are at or near the site margins and so should be relatively easy to retain in any scheme that was sympathetic to the on-site arboricultural assets. I note that some of the artists impressions of the development show a considerable amount of proposed tree planting some of which is outside the redline boundary. If this scheme obtains planning permission I would like to see a considerable amount of replacement tree planting conditioned which would necessitate a new redline plan taking those areas in, otherwise the tree planting condition might be unenforceable. New trees will take a long time to make up for the loss in visual amenity, carbon sequestration and general ecosystem services lost by removal of the TPO trees, so the replacements should be greater in number than those lost, and of substantial size at the outset. Trees outside but adjacent to the site must be protected in accordance with the provisions of BS 5837: 2012 'Trees in relation to design, demolition and construction - Recommendations'.

Suggested conditions if permission is granted;

- 1. Full details of replacement tree planting to be submitted for approval as part of the general landscaping scheme for the development, and which should include full details of tree sizes (at least 20-22cm stem circumference), numbers (at least 14no.), species, planting locations, planting spacing's, pre-planting ground preparations, planting method and long term maintenance. Also where appropriate details of root deflection barriers and permanent protective measures against compaction, impact, de-icing salt etc. Particular attention should be paid to ensuring the trees are planted in a sufficient quantity of high quality growing medium, to ensure their quick establishment and the early provision of maximum benefit to the locality.
- 2. All existing trees, woodlands and hedges to be retained are to be protected

according to the provisions of BS 5837: 2012 'Trees in relation to design, demolition and construction - Recommendations'

- 3. The submission of a tree survey and report, an arboricultural impact statement, a tree protection plan and an arboricultural method statement all in accordance with BS 5837:2012 would be appropriate, following which pertinent amendments should be made to the proposed layout and levels in light of the arboricultural findings, in order that the best existing trees are viably retained within and/or outside the development for the long term. It should include a scale plan accurately marking the position of all the retained trees and hedges, the extent of the root protection areas, the BS 5837: 2012 tree protection fencing along the root protection area margin, any areas to be covered in BS 5837: 2012 ground protection, construction details for the BS 5837: 2012 fencing and ground protection and sufficient detail of hard & soft landscaping works, service and drainage runs and proposed & existing spot levels in sufficient numbers and at appropriate spacing's to enable the impact of the development on the tree root zones to be assessed.
- 4. If construction-facilitation pruning of the trees is required, this should be carried out by a competent, qualified and experienced tree surgeon according to the provisions of BS 3998: 2010 and current arboriculture industry best practice. The Local Authority arboriculture officer shall be given a week's notice before the works are carried out so they have the opportunity to attend on site and agree the exact extent of the works with the tree surgery contractor.
- 5. Where roots are encountered outside the root protection areas excavate carefully, avoid de-barking, breaking, splitting, splintering or shattering the roots. Once uncovered the roots which will have to be removed to accommodate the construction should be cut back to a point 100mm beyond the nearest edge of the construction, they must be pruned back cleanly with sharp, clean pruning saws or bypass loppers making level, smooth right

angle cuts with no ragged edges.

Shuttering should be used to keep concrete pours 100mm away from the cut root ends. The void should be backfilled with an approved tree planting compost mix finished to the surface. Substances toxic to roots to be kept away from roots, i.e. tars, fuels, oils, bitumen, cement etc.

Bletchley & Fenny Stratford Town Council support the application.

Ward Councillor Clancy no comments received Ward Councillor Wales no comments received Ward Councillor McKenzie no comments received

Clir Gowans

Has made the following comments:

- 1. Policy T15 Shortfall in parking spaces
 - a. Proposal should comply with current parking standards
 - b. Central Bletchley is a zone 2 area
 - c. Scheme should have 4 visitor spaces, only has 9 parking spaces and 1 visitor space, his is a shortfall of 44%
 - d. Any parking overflow onto the public highway is unacceptable.
 - e. Loss of parking for Working Mens Club, the applicant has failed to the expected parking for this facility, the club should comply with the policy.
 - Scheme now includes 10 parking spaces which equates to a shortfall of 37.5%.
- 2. Design and Appearance
 - a. Lack of active frontages as ground floor provides the parking.

- b. Private/public space, the siting of the access to the flats in the parking courts confuses the space between public and private. The prarking should be provate and there should be a separate public access.
- c. Inappropriate in a Victorian setting, it should be inkeeping and keep the strong building lines

Conclusion

Whilst redevelopment of the site s welcomed this is not the right development in this site. It will exacerbate parking problems and is an overdevelopment of the site without active frontages.

Local Residents

The occupiers of the following properties were notified of the application:

The Concourse 30 Brunel Centre Locke Road

20 The Concourse Brunel Centre Locke Road

Flat 6 15 Duncombe Street Bletchley

Flat 8 19 Duncombe Street Bletchley

Flat 2 The Park Chandos Place

Flat 1 The Park Chandos Place

The Park Chandos Place Bletchley

26 The Concourse Brunel Centre Locke Road

28 The Concourse Brunel Centre Locke Road

14 Duncombe Street Bletchley Milton Keynes

12 Duncombe Street Bletchley Milton Keynes

Flat 7 17 Duncombe Street Bletchley

4 Duncombe Street Bletchley Milton Keynes

6 Duncombe Street Bletchley Milton Keynes

1 Chandos Place Bletchley Milton Keynes

10A Duncombe Street Bletchley Milton Keynes

10 Duncombe Street Bletchley Milton Keynes

Flat 8 Duncombe Street Bletchley

8 Duncombe Street Bletchley Milton Keynes

Flat 9 21 Duncombe Street Bletchley Flat 1 Chandos Place Bletchley

2 objections have been received, the main comments are as follows:

- As a working mens club events and performances are put on weekly, this includes bands and parties. There have been no complaints from existing flats but we have concerns that the proposed dwellings which are located closer will lead to noise complaints.
- Rights of access over site
- Impact on trees
- Overlooking of existing flats
- Overbearing impact
- Shortfall of parking spaces