



## DELEGATED DECISIONS

**When: Tuesday 29 November 2022 at 5.30 pm**

**Where: Council Chamber**

**Civic, 1 Saxon Gate East, Milton Keynes, MK9 3EJ and**  
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## AGENDA

1.	Development Brief for the former Fire and Police Station Site, Bletchley	Councillor Marland (Leader of the Council) <b>(Pages 4 to 156)</b>
2.	Proposal to Extend the current E-Scooter Trial in Milton Keynes until May 2024	Councillor Wilson-Marklew (Cabinet member for Climate and Sustainability) <b>(Pages 157 to 163)</b>
3.	Extension of the Public Space Protection Order - Vehicle Related Anti-Social Behaviour	Councillor Wilson-Marklew (Cabinet member for Climate and Sustainability) <b>(Pages 164 to 189)</b>
4.	Taxi Licensing Fees and Charges 2023/24	Councillor Trendall (Cabinet member for Customer Services) <b>(Pages 190 to 203)</b>
5.	Development of Additional Communication and Interaction Places at St. Paul's Catholic School	Councillor Z Nolan (Cabinet member for Children and Families) <b>(Pages 204 to 213)</b>

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6.	Disposal of Additional Land in Newport Pagnell to Aston Martin Heritage Trust for the purpose of constructing the Aston Martin Car Museum	Councillor Middleton (Cabinet member for Resources) <b>(Pages 214 to 230)</b>
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# Delegated Decisions report



29 November 2022

## DEVELOPMENT BRIEF FOR THE FORMER FIRE AND POLICE STATION SITE, BLETCHLEY

Name of Cabinet Member	<b>Councillor Pete Marland</b> (Leader of the Council)
Report sponsor	<b>Paul Thomas</b> Director - Planning and Placemaking
Report author	<b>Grant Gibson</b> Design and Special Projects Manager <a href="mailto:grant.gibson@milton-keynes.gov.uk">grant.gibson@milton-keynes.gov.uk</a> Tel: 01908-254727

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>Delivery Plan reference C3</b>
Wards affected	<b>Bletchley Park, Bletchley East &amp; Bletchley West</b>

### Executive Summary

In collaboration with Milton Keynes Development Partnership (MKDP), the council has prepared a Draft Development Brief for the former fire and police station site, located on Sherwood Drive, Bletchley (see red-line plan at **Annex A**).

Situated adjacent to the railway station entrance, and close to the emerging Institute of Technology at MK College, this is a strategically important site in the context of realising our renewal aspirations for Bletchley and capitalising on the generational opportunities flowing from the delivery of East West Rail. Furthermore, the site is the focus of a redevelopment project proposed in the MK: Bletchley & Fenny Stratford Town Investment Plan [2020].

MKDP is the freehold owner of this 1.25 ha site, and the Development Brief has been prepared in accordance with the Council's adopted protocol for preparing development briefs for MKDP sites, to include stakeholder engagement.

A key purpose of the Development Brief is to provide clear planning and design guidance for the site which will then help MKDP to attract high-quality bids and provide potential developers with clarity when preparing planning applications. As such, The Brief will play an important role in paving the way for an appropriate redevelopment scheme and subsequent site disposal.

Public consultation on the Draft Development Brief was undertaken over a six-week period extending from 26 August to 7 October, inclusive.

This report details comments received during the consultation period and the Council's proposed response. Where, following the receipt of consultation comments, amendments to the Draft Development Brief are considered appropriate these are shown in a 'track-changed' version of the document.

Finally, the report seeks approval of the Development Brief, as amended in the light of the consultation responses received.

## 1. Decisions to be Made

- 1.1 That representations received during a six-week period of public consultation on the former Fire and Police Station site, Bletchley, Development Brief (Consultation Draft, August 2022), attached at **Annex C** to the report, be noted.
- 1.2 That the former Fire and Police Station Site, Bletchley, Development Brief, as amended following consultation, and attached at **Annex D** to the report, be approved.
- 1.3 That authority be delegated to the Director - Planning and Placemaking to finalise the arrangements for completion of the Development Brief to include any graphical, typographical, and grammatical corrections.

## 2. Why is the Decision Needed?

- 2.1 The decision is needed to enable and facilitate redevelopment of this strategically important site, located adjacent to Bletchley railway station.
- 2.2 The site is in the ownership of MKDP, and Town Deal 'accelerated' funding has already been expended on the demolition of the former fire station and associated site remediation.
- 2.3 From an MKDP perspective, the Development Brief represents an important step which will facilitate site marketing and subsequent disposal.
- 2.4 Redevelopment of the site represents a good strategic fit with policy aspirations and will help to realise:
  - renewal opportunities flowing from the delivery of East West Rail Connection Stage 1 [NB now estimated to be operational by December 2024];
  - strategic site principles and ambitions set out in Policy SD16 of Plan:MK 2016-31 [2019];

- the renewal vision set out in the Central Bletchley Prospectus [2019];
  - redevelopment of a key site within the MK: Bletchley and Fenny Stratford Town Investment Plan [2020];
  - the opportunities for comprehensive redevelopment at Bletchley, as highlighted in the MK 2050 Strategy [MKCC / MK Futures 2021];
  - placemaking ambitions and design principles set out in the Central Bletchley Urban Design Framework Supplementary Planning Document [adopted 2022]; and
  - the ambitions for high-quality placemaking and the use of East West Rail and the Town Deal to leverage investment and support the regeneration of Bletchley town centre, as set out in the Council Plan 2022-26 [approved June 2022].
- 2.5 Following an Officer Decision taken on 24 August, a public consultation on the Draft Development Brief was undertaken over a six-week period extending from 26 August to 7 October, inclusive.
- 2.6 During consultation the Draft Development Brief was made available on the Council’s website. An associated press release was issued by the Council on 6 September and an e-mail alert, with a circulation of circa. 17k subscribers, on 22 September.
- 2.7 In addition, details of the consultation were posted to the Groundbreaking Bletchley and Fenny Stratford website which draws together a range of information about improving the area’s future prosperity and economic growth, including Town Deal related developments.
- 2.8 Landowners in the vicinity of the site were alerted at the commencement of the consultation process on 26 August.
- 2.9 A presentation on the Draft Development Brief was made to West Bletchley Council’s Environment Committee on 4 October and to the Milton Keynes City Council’s Planning Committee on 6 October.
- 2.10 An extended period of time was granted to West Bletchley Council and Bletchley and Fenny Stratford Town Council for the submission of responses [i.e. until 17 October] due to the impact of the Queen’s mourning period on their scheduled meetings. An extended period of time for response submission was also granted to Milton Keynes City Council’s Planning Committee [i.e. until 17 October] on the grounds that its meeting ‘cycle’ did not dovetail with the consultation period.

## Consultation Responses and Resulting Amendments Proposed

- 2.11 Comments and representation from 13 stakeholders were received. A summary of consultation representations and proposed responses are detailed in **Annex C**.

### 3. Implications of the Decision

Financial	Y	Human rights, equalities, diversity	N
Legal	Y	Policies or Council Plan	Y
Communication	Y	Procurement	N
Energy Efficiency	Y	Workforce	N

#### (a) Financial Implications

Consultation on the Draft Development Brief was undertaken utilising existing resources.

Once approved, the Development Brief will help MKDP to market the site for redevelopment leading to its eventual disposal, probably via a building lease arrangement.

Town Deal Accelerated Capital Funding expenditure in the sum of £200k has been made by the Town Deal Board on the demolition of the former fire station and associated site remediation. These works have helped to de-risk disposal and redevelopment of the wider site.

The Town Deal Innovation Hub project is focussed on the former Fire and Police Station site and is allocated £3.05 million funding out of a £22.7 million Towns Fund award. The approved Development Brief will, therefore, help to underpin the associated Town Deal business case and so unlock significant Towns Fund investment.

#### (b) Legal Implications

Development Briefs prepared and approved by the local planning authority are a legitimate tool to inform developers and other interested parties of the opportunities and restrictions of a site in planning terms. While it is possible to adopt a development brief as a supplementary planning document [SPD], it is not proposed that this Development Brief be adopted as an SPD, according to established MKDP principles. Moreover, it can be noted that the site is already covered by the Central Bletchley Urban Design Framework SPD [adopted, April 2022]. Therefore, it is not necessary to consider whether the document meets the legal requirements for SPDs.

Whilst not forming part of the Council's Local Plan or constituting a formal planning document, following stakeholder consultation and subsequent approval by the Council, the Development Brief will, potentially, constitute a minor material consideration in the determination of planning applications for the site.

Given the document's status, there is no identifiable risk to the Council should it take the recommended action.

The Development Brief appropriately references and responds to the various policies that the proposed site is subject to bearing in mind the effect of s.38(5) of Planning and Compulsory Purchase Act 2004 (PCPA 2004) which sets out how to deal with conflicts in policy. Section 38(5) of the PCPA 2004 provides that if, to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document [to become part of the development plan].

(c) Other Implications

(i) Communication and E-Government

During consultation the Draft Development Brief was made available on the Council's website.

Consultation details were also posted to the Ground-breaking Bletchley and Fenny Stratford website, which draws together a range of information about improving the area's future prosperity and economic growth.

A press release, highlighting public consultation on the Development Brief, was issued by the Council on 6 September. An associated e-mail alert, which is understood to have a circulation of 17k subscribers, was issued on 22 September.

Presentations on the Draft Development Brief and the associated consultation process were made to West Bletchley Council's Environment Committee on 4 October and to Milton Keynes City Council's Planning Committee on 6 October.

Ongoing communication about developments affecting the former Fire and Police Station site, following approval of the Development Brief, should be undertaken to keep local stakeholders fully informed. Such communication should dovetail with the Town Deal stakeholder engagement strategy and MKDP's communication strategy.

(ii) Carbon and Energy Efficiency

There are no carbon and energy management implications associated with the production of the Development Brief itself. However, the Draft Brief does reference the need for sustainable design and alludes to sustainable standards set out in Plan:MK and the Council's Sustainable Construction SPD. The site is also located near to a significant public transport interchange and within walking distance of Bletchley town centre which creates opportunities for sustainable and active travel options.

(iii) Equalities

The site is located within a wider area which is designated for mixed-use residential-led development in the Local Plan [i.e. Central Bletchley Prospectus Area]. The Development Brief will provide the possibility, therefore, of delivering a policy compliant scheme with 31% affordable housing provision.

The site also forms part of a portfolio of redevelopment sites which sit under the MK: Bletchley and Fenny Stratford Town Deal 'umbrella'. The Towns Fund forms part of the Government's 'levelling-up' the regions agenda and is focussed on addressing issues such as deprivation.

(iv) Policies and / or Council Plan

Production of the Development Brief represents a good 'fit' with policy.

The former Fire and Police Station site is located within the Central Bletchley Prospectus Area, as designated in Plan:MK 2016-31. Policy SD16 of Plan:MK states that development within the Central Bletchley Prospectus Area will be guided by several principles. One of the principles cited is "Exploring options for the early redevelopment of the Police and Fire Station sites."

Moreover, the site is covered by the Central Bletchley Urban Design Framework Supplementary Planning Document which, whilst not planning policy in its own right, nevertheless provides supplementary guidance to Policy SD16 in Plan:MK and aligns with the aspirations of the MK: Bletchley & Fenny Stratford Town Deal programme.

The Brief also delivers to an outcome cited in the Council Plan 2022-26; notably, the use of East West Rail and the Town Deal to leverage investment and support for the regeneration of Bletchley town centre.

## 4. Alternatives

- 4.1 The 'do nothing' option is not to approve the Development Brief, as proposed for amendment following public consultation. This is not considered appropriate since it would fail to provide the necessary design guidance to inform site redevelopment proposals. As a consequence, MKDP's prospects of attracting high quality bids with a view to subsequent site disposal would be diminished.
- 4.2 Such a scenario would impact adversely on delivering to the the holistic vision and principles set out in the Central Bletchley Urban Design Framework SPD [approved 2022] and proposals for delivery of a key project in the Town Investment Plan.



- 4.3 From a strategic perspective there would be a risk of failing to capitalise on the generational opportunities for comprehensive redevelopment at Bletchley; renewal opportunities flowing from the delivery of East West Rail Connection Stage 1 would not be grasped in a timely fashion.
- 4.4 The recommended option is to approve the Development Brief, as proposed for amendment following public consultation. An approved Development Brief will provide clear planning and design guidance to inform high-quality redevelopment proposals/submissions which fit with and deliver to the Council’s renewal aspirations and placemaking outcomes.
- 4.5 It represents the next, sequential, step in a process to facilitate site disposal and leverage investment to capitalise on the economic opportunities that will flow from the enhanced connectivity and accessibility provided by East West Rail.

## 5. Timetable for Implementation

- 5.1 If the Delegated Decision to approve the Former Fire and Police Station site Development Brief is taken, then the Brief will become effective, subject to the expiration of the associated ‘call-in’ period, on 9 December 2022.
- 5.2 A five-part business case for the Town Deal Innovation Hub project is programmed for completion and submission to the Department of Levelling-up, Housing and Communities, in January 2023.
- 5.3 Approval of the Development Brief will pave the way for MKDP to commence site marketing in Spring 2023.

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## List of Annexes

Annex A	Former Fire and Police Station Site, Bletchley: ‘redline’ boundary plan
Annex B	Former Fire and Police Station site, Bletchley, Development Brief (Consultation Draft, August 2022),
Annex C	Summary of representations received on the former Fire and Police Station site Development Brief (Consultation Draft, August 2022)
Annex D	Former Fire and Police Station, Bletchley, Development Brief 2022 (Amended Draft to be approved, November 2022)
Annex E	Former Fire and Police Station, Bletchley, Development Brief 2022 (Document highlighting tracked changes to the brief)

## List of Background Papers

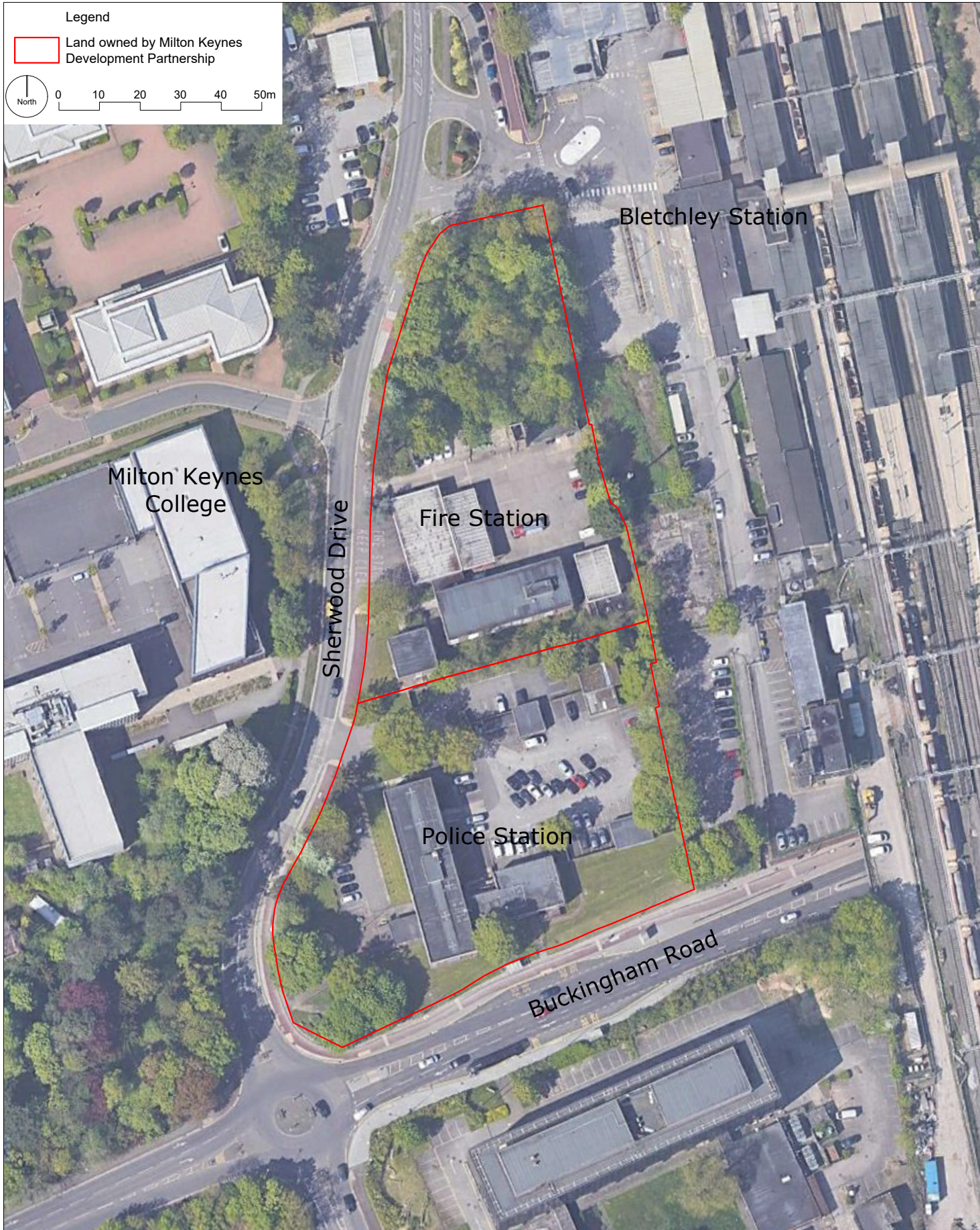
- [Plan:MK \(adopted 2019\)](#)
- [West Bletchley Neighbourhood Plan \(made 2019\)](#)
- [Central Bletchley Urban Design Framework Supplementary Planning Document \(adopted 2022\)](#)





Legend

Land owned by Milton Keynes Development Partnership







Former Fire Station and Police Station,  
Bletchley  
Development Brief  
(Consultation Draft)



[www.milton-keynes.gov.uk/udla](http://www.milton-keynes.gov.uk/udla)

August 2022



This document has been prepared by Milton Keynes Council's Urban Design and Landscape Architecture Team and Milton Keynes Development Partnership who own the land.

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Document Status:	Draft
Revision:	H
Author:	Various
Checked by:	NS
Authorised by:	AS/NS
Issue Date:	August 2022

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# **SECTION 1:** **INTRODUCTION**



## 1.1 Background

1.1.1 This Development Brief sets out the guidance and design principles for the redevelopment of the former Police Station and Fire Station sites in Bletchley, a strategically located development opportunity next to Bletchley Station (see fig 1 & 2). It should be read in conjunction with planning policy documents, including Plan:MK and the West Bletchley Neighbourhood Plan, alongside guidance documents, such as the Central Bletchley Urban Design Framework Supplementary Planning Document (SPD).

1.1.2 Milton Keynes Council (MKC) and the landowner Milton Keynes Development Partnership (MKDP) have high aspirations for these two strategic sites. They can help contribute to an attractive, vibrant, prosperous and well-designed Central Bletchley providing a good quality of life for residents, workers, shoppers, as well as being seen as a destination for visitors. It will offer sustainable lifestyle options and choices fit for the 21st century that is alternative but complementary to much of the Milton Keynes offer.

### Bletchley & Fenny Stratford Town Deal

1.1.3 In November 2019 the Government published a prospectus detailing how it was planning to manage a £3.6 billion national fund to support towns to build prosperous futures, known as the Towns Fund.

1.1.4 The delivery of East West Rail and Bletchley's enhanced connectivity at the heart of the Government's flagship Ox-Cam Arc, the proposed development of South Central Institute of Technology at Milton Keynes (MK) College, transformation at Bletchley Park and a number of vacant sites with redevelopment potential located near to Bletchley Station all combined to provide a favourable context for a Towns Fund bid. Consequently, in December 2019, alongside a decision to approve publication of the Central Bletchley Prospectus, MKC confirmed that Bletchley would be the focus of Milton Keynes' Towns Fund bid.

1.1.5 Informed by an extensive stakeholder engagement process, the Bletchley & Fenny Stratford Town Investment Plan, seeking £25 million to progress and deliver nine projects, was completed and submitted to government in October 2020. The Government's Town Fund investment offer was received in March 2021 and a Town Deal in the sum of £22.7 million was formally agreed the following month.

1.1.6 Redevelopment of the former Fire and Police Station site is a key project within the Bletchley & Fenny Stratford Town Deal programme. Utilising Town Deal 'accelerated capital project' funding Milton Keynes Development Partnership has already overseen the demolition of the Fire Station and associated site remediation, thereby helping to de-risk development of the Fire and Police Station sites.



**Figure 1: The Site**

## 1.2 Bletchley

- 1.2.1 Bletchley is situated on the southern edge of Milton Keynes which is strategically located within the Oxford-Cambridge Growth Arc (See figure 2) where a population of 410,000 and 50,000-90,000 new jobs are proposed by 2050 with the provision of 30,000-35,000 new homes in addition to the 25,000 already planned.
- 1.2.2 The site is located in a key strategic location within Central Bletchley adjacent to the railway station (see figure 3). The development opportunity comprises the former Fire Station and Police Station in Central Bletchley (see figure 1). Both emergency services have been relocated to the Blue Light Hub in West Ashland.
- 1.2.3 The sites are owned by Milton Keynes Development Partnership (a company wholly owned by Milton Keynes Council). The land ownership is set out in Appendix A and shows two parcels of land although they can be treated as one site. For simplicity the land west of the Fire Station site has been altered on the drawings in this document.

- 1.2.4 Large parts of Bletchley will be undergoing significant change in the near future with investment by the public and private sector. An important driver behind this change is East West Rail, which will deliver new and improved services into the heart of Bletchley, and right next to the site. The Oxford to Bletchley stage is currently under construction with trains due to run between Oxford and Milton Keynes by 2025, with the Bletchley service potentially opening in 2024. Consultation and design work on the links to Bedford and Cambridge is currently underway. Bletchley Station will be revamped whilst there are also plans to provide a new station entrance on the eastern side of the railway, next to Saxon Street, in order to better connect with the town centre.
- 1.2.5 Public money is also being invested at the National and local level. The Towns Fund will help stimulate renewal, deliver a new Innovation Centre, provide land for a new bus station, and change/improve Saxon Street as part of the proposed eastern entrance. MK College Group continues to invest in its Bletchley Campus with a Government grant helping to establish its South Central Institute of Technology (SCIoT)

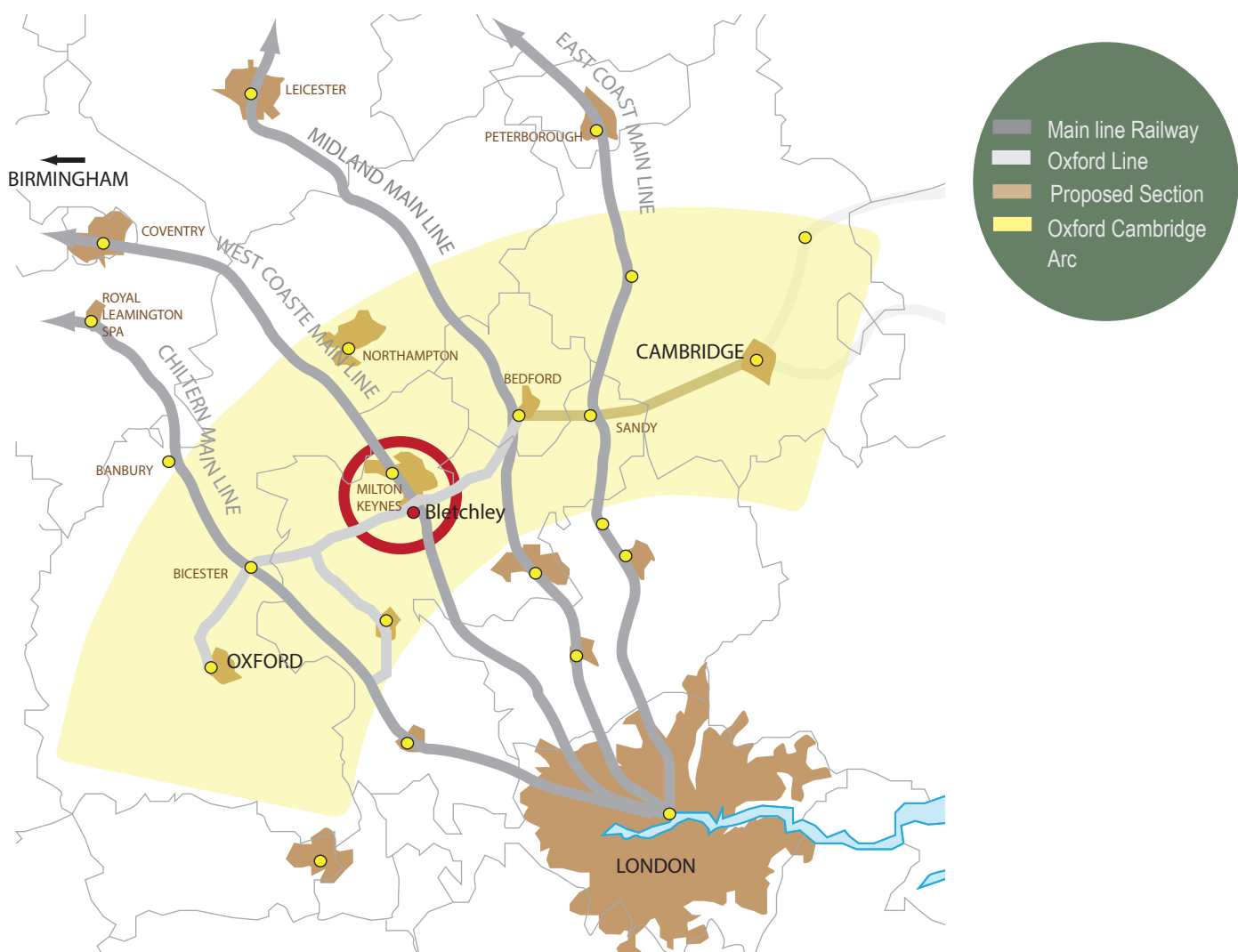


Figure 2: Bletchley location within the Oxford-Cambridge Growth Arc

opposite the Fire Station on Sherwood Drive. Work has recently commenced on this project.

1.2.6 MKDP is also making further acquisitions in the area. In January 2022, MKDP acquired Brunel Shopping Centre, the former Sainsburys' Car Park and Wilko to help deliver the Town Deal. The private sector is also investing. Examples include Caspian View, an office to residential conversion to 112 apartments to the south of the site, and Bletchley View, a new-build development of 184 dwellings just north of the Bus Station, which has recently commenced.

1.2.7 The recent development activity, new rail infrastructure, public/private funding, recently adopted SPD and forthcoming sale of the former Fire and Police Station sites will all combine to create momentum for the renewal of Bletchley.



Figure 3: Site Location





Figure 4: Site Boundary

### 1.3 Purpose of the Development Brief

- 1.3.1 The purpose of this document is to provide planning guidance and key design principles that should underpin any proposal and which will result in a high quality placemaking led scheme. The outlining of key design principles only, means that the Brief isn't seen as stifling the creativity of developers regarding more detailed design.
- 1.3.2 The Brief provides planning and design guidance applicable for the development which will aid the development process. It provides clarity and certainty to developers such that if they adhere to the principles contained within the Brief which reflect Council (MKC), and other local stakeholder expectations for the site, and respect the requirements of MKC planning policy, their proposals will likely be seen favourably by the Local Planning Authority.
- 1.3.3 The Brief has been prepared to help deliver on the policies relating to Central Bletchley in Plan:MK as well as the Central Bletchley Urban Design Framework SPD, and the West Bletchley Neighbourhood Plan.
- 1.3.4 The Development Brief has been commissioned, not by the Planning Authority, but rather by the landowner and it has not been subject to all the statutory requirements that a planning document would have to undergo. The Brief has, however, been prepared to accord with current national and local Planning Policy, and will be subject to formal public consultation. In addition, it will be submitted for approval by MKC Cabinet and, if approved, will become a material consideration in helping determine planning applications albeit with limited weight.
- 1.3.5 Once approved by Milton Keynes Council Cabinet, the guidance contained within the Brief will assist with the marketing of the site by MKDP.

### 1.4 The Vision

- 1.4.1 The aim is to create an attractive new development within an landscape framework, with a strong sense of place, which is based upon a thorough understanding of the context.
- 1.4.2 The scheme will be built at a high density, reflecting its sustainable location and planning policy. There will be new and distinctive frontages along Sherwood Drive and Buckingham Road, improving the quality of these streets and the approach into the town centre.
- 1.4.3 The main use is most likely to be residential although planning policy allows other uses which would help increase vitality whilst benefitting from being adjacent to the town centre, MK College, and the excellent rail links, which will be improved by East West Rail.

### 1.5 Structure of the Brief

- 1.5.1 The Brief is divided into four sections:
- Section 1 outlines the purpose of the brief, as well as its location and ownership.
- Section 2 describes the planning policy context.
- Section 3 provides a site analysis of the site itself and the surrounding area. A thorough understanding of this will have an important bearing on the key design principles and parameters.
- Section 4 outlines the key design and development principles that should inform any development proposals.

# **SECTION 2:** **POLICY CONTEXT**



## 2.1 Introduction

2.1.1 This section of the Brief outlines the key relevant planning policies that underpin the brief and inform the development proposals for the site.

## 2.2 Development Plan

### Plan:MK

2.2.1 Plan:MK was adopted in March 2019 and forms part of the Development Plan guiding future planning applications. Key policies are set out below with additional text in Appendix E.

2.2.2 Policy SD16: Central Bletchley Prospectus Area provides the strategic policy for the area within which the former police and fire stations lie. Part A.5 refers to 'Exploring options for the early redevelopment of the Police and Fire Station sites'. Policy SD16 states:

'Development within the Central Bletchley Prospectus Area will be guided by the following principles:

1. The density of residential development to be 150-250 dwellings per hectare.
2. Improved pedestrian connections and legibility.
3. Improved public realm.
4. Refurbishment and/or redevelopment of key sites and buildings.
5. Exploring options for the early redevelopment of the Police and Fire Station sites.
6. Exploring the potential of existing infrastructure to help enable and unlock residential-led mixed use development opportunities.
7. Further improve the quality of pedestrian routes to and from Bletchley Station.
8. Development should not preclude the delivery of an 'eastern entrance' to Bletchley railway station.
9. The development will provide green infrastructure in line with Policy NE4, providing wellbeing benefits through access to nature.'

2.2.3 The key relevant planning policy within Plan:MK for the site is as follows:

#### Policy DS1 Settlement Hierarchy

'The provision of new homes and jobs will take account of the settlement hierarchy set out in Table 4.2. The majority of development will be focussed on and adjacent to, the existing urban area of Milton Keynes at the locations specified in Table 4.2 and in the context of Central Bletchley from selective infill, brownfield, regeneration and redevelopment opportunities.'

2.2.4 Policy ER2 Protection of Existing Employment Land and Premises. This policy seeks the protection of existing employment land. The Police and Fire Stations Sites are designated on the Plan:MK Policies Map as 'Existing Employment'.

2.2.5 Policy CC3 Protection of Community Facilities. This policy seeks the protection of existing community facilities of which the Police and Fire Station sites are such uses. Loss of community facilities will only be supported where :

1. There is no longer a need for the facility for any type of community use, and this has been robustly evidenced by research and consultation; or
2. An acceptable alternative facility can be provided elsewhere

2.2.6 Policy DS2: Housing Strategy Plan: MK will deliver a minimum of 26 500 net dwellings across the Borough of Milton Keynes over the period 2016-2031. The policy states that new housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes as well as the 3 key settlements, and will be delivered by a range of interventions, including no10: "Regeneration opportunities around the centres of Wolverton and Bletchley."

2.2.7 Policy DS4 Retail and Leisure Development Strategy, Part D. In Bletchley, this section of the policy refers to Milton Keynes Council preparing a Central Bletchley Prospectus to facilitate and promote mixed-use development around Bletchley Station and the intensification of development at sustainable locations with good access to public transport hubs, building on the opportunities created by the development of East-West Rail and the work undertaken in the Bletchley 'Fixing the Links' project.

2.2.8 Policy CT10 Parking Provision

'A. Development proposals should meet the following parking requirements:

1. All development should meet the Council's full parking standards, unless mitigating circumstance dictate otherwise.
2. On-site parking should not be reduced below the Council's full expectations if this would increase additional pressure in off-site parking that could not be resolved by on-street parking controls.
3. Parking areas should be well designed in terms of safety, circulation, appearance and assist access by pedestrians and cyclists.
4. All residential, retail and employment uses should provide electric vehicle charging points (EVCPs) in accordance with the current Milton Keynes Parking Standards, and provide a forward thinking approach. For locations of rapid and fast charging points see policy CT6 D.'

2.2.9 Policy HN1 Housing Mix and Density.

‘Part D of this policy refers to a net density of 150-250 dwellings per hectare in the area covered by the Central Bletchley Prospectus. Part E notes “where no or low levels of parking are proposed, to achieve densities that help realise wider strategic objectives, they will be required to demonstrate the site has good accessibility to frequent public transport services to public transport nodes, district/town/local centres, schools and employment areas.’

2.2.10 Policy HN2 Affordable Housing.

Proposals for 11 or more homes should provide 31% of those homes as affordable housing. Proposals that provide greater than 31% of homes as affordable housing will be strongly supported. However, proposals consisting of 50% or more affordable housing will only be supported provided that they would maintain (or help create) a mix of housing tenures and therefore a mixed and sustainable community within the wider neighbourhood the proposal is situated in.

2.2.11 Policy INF1 Delivering Infrastructure.

A new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:

1. Already in place; or,
2. There is a reliable mechanism in place to ensure that infrastructure, facilities and resources will be delivered in the most appropriate places and at the earliest opportunity, to the required minimum high standards demanded by this Council and its partners. This might include improvements for highway schemes such as bus and rail provisions and enhancement for walking and cycling facilities, or the provision of improved and better connected green infrastructure, local health, shopping and recreational facilities.

2.2.12 Policy NE4 Green Infrastructure

A The network of green infrastructure throughout the Borough will be protected, extended and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change. This is in accordance with the vision and principles (and the large-scale zone maps of Green Infrastructure Opportunity(39)) set out by the Buckinghamshire and Milton Keynes NEP.

B Development proposals will provide new green infrastructure or, if it is not possible, will contribute to the enhancement and strengthening of existing green infrastructure to provide wellbeing benefits to people through access to nature.

C Development proposals will ensure that existing ecological networks are identified and wherever

possible maintained to avoid habitat fragmentation, and that ecological corridors, including watercourses, form an essential component of their green infrastructure provision to support habitat connectivity.

D Green infrastructure protection, improvements and creation must be prioritised in locations where it can deliver most benefits. It should be multi-functional to deliver as many ecosystem services as the site requires, for example flood mitigation, access to nature (wellbeing benefits), plants for pollinators, carbon sequestration, and habitat for wildlife.

2.2.13 Policy CC1 Public Art

A. The provision of public art and cultural activity can not only enhance the environment but also create a wide variety of other important benefits such as:

1. Improving the quality of life for local people.
2. Creating a local distinctiveness and a sense of place.
3. Enriching the cultural life of Milton Keynes and raise its profile.
4. Providing a focus and stimulus for tourism.

B. A minimum of 0.5% of the gross development cost of proposals for 11 or more dwellings or non-residential development of 1,000 sq m or more should, subject to viability, be allocated towards cultural wellbeing. This includes public art that enhances the cultural offer and appearance of the development, its surroundings and Milton Keynes as a whole, and engaging local residents throughout.

2.7.14 Developers should explore the potential for providing public art as part of their proposals. This could be about Bletchley Park but does not necessarily mean Alan Turing and other options should be explored (i.e. history of computing, LGBT rights, women’s role in WWII, etc) which would form part of a wider arts initiative within Bletchley and Fenny Stratford. Developers will need to engage with the relevant parish and Council teams early in the design process.

2.2.135 Policy SC1 (Sustainable Construction)

This sets out the Council’s requirements for sustainable construction, with further detail provided within the forthcoming Sustainable Construction SPD 2021.

2.2.16 Milton Keynes has a unique selling point around its design and therefore its Design Policies are key to inform any proposal. These include:

Policy D1: Designing a High Quality Place, Policy D2: Creating a Positive Character Policy D3: Design of Buildings, Policy D4: Innovative Design and Construction and Policy D5: Amenity and Streetscene.



## West Bletchley Neighbourhood Plan

- 2.2.17 The West Bletchley Neighbourhood Plan was made part of the Development Plan in March 2019.
- 2.2.18 The plan identifies the opportunity to enhance the Station Area (see Figure 5 below). Importantly, it identifies that there is a new catalyst for change. "East-West rail services will be re-instated on a stretch of the old 'Varsity Line' between Oxford and (initially) Bedford through Bletchley and eventually on to Cambridge, within a few years. New station platforms are to be constructed on the eastern side of the station. Bletchley will therefore be at the centre of an axis between two of Britain's most successful and famous universities and fastest growing economies. This provides a renewed impetus to respond to the improved accessibility to both improve the existing station and station forecourt / square, and bring sites alongside the station forward for new development that responds to the superb enhanced accessibility of our area." (Pg 30).
- 2.2.19 Policy BS1 (Station Regeneration) states "Regeneration of existing buildings and land alongside Bletchley Station, as identified in Figure 5, will be supported where it improves the travelling public's experience including new station-related retail and café uses."

- 2.2.20 Policy BS2 (Station Accessibility) states "Improvements to pedestrian, cycle and public transport access between the station and surrounding areas, including the town centre and Bletchley Park, will be supported."
- 2.2.21 Policy BS3 (Station Quarter Development) states "Redevelopment of land and uses within the Station Quarter Opportunity Area , as identified in Figure 5, will be supported where the development is comprehensive and provides a sensitive and balanced mix of uses that can include residential, high quality workspaces, hotel, conference centre/ facilities, café/restaurant/local retail uses, visitor interpretation/facilities and public spaces, and is consistent with the approved development and design brief."
- 2.2.22 Policy BS4 (Station Quarter Development and Design Brief) states "Major development proposals will only be supported where they are consistent with an overarching Development and Design Brief for the Opportunity Area, as defined on Figure 5."

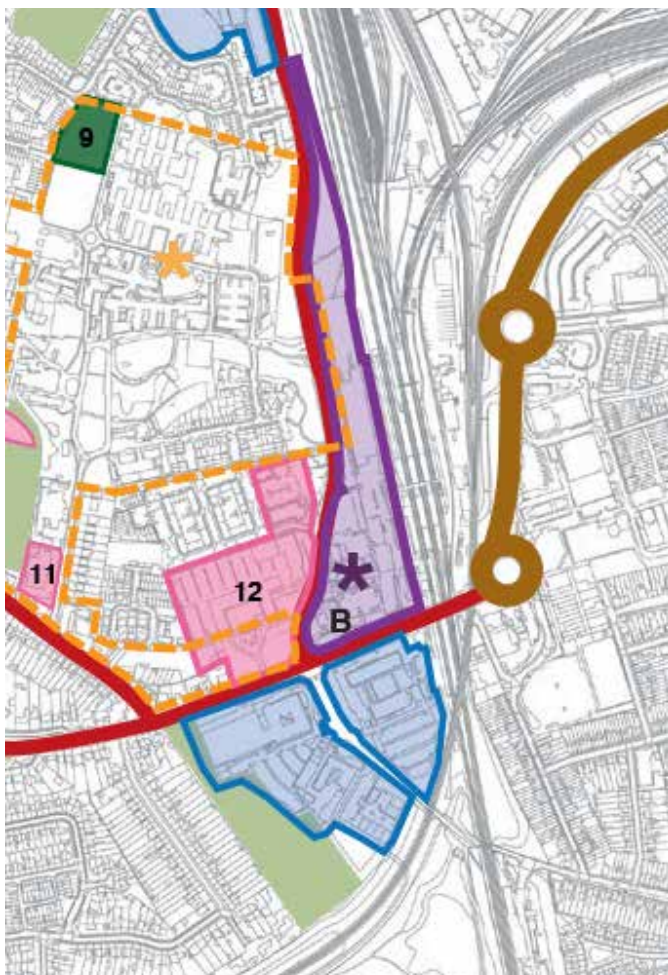


Figure 5: Proposals Map from West Bletchley Neighbourhood Plan (extract only)

## 2.3 National Planning Guidance

### National Planning Policy Framework

2.3.1 The National Planning Policy Framework (updated in July 2021) promotes sustainable development that meets 3 overarching objectives:

1. Economic - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places
2. Social - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing
3. Environmental - including making effective use of land and moving to a low carbon economy (para 8)

#### Section 7: Ensuring the vitality of town centres

Recognise that residential development often plays an important role in the vitality of town centres and encourage residential development on appropriate sites (para 86f).

#### Section 8: Promoting healthy and safe communities

Development should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with - for example, through mixed use developments and active street frontages (para 92a)

To provide the social, recreational and cultural facilities and services the community needs, development should include shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments (para 93)

#### Section 9: Promoting sustainable transport

Development should be focused on locations which are sustainable through limiting the need to travel and offering a genuine choice of transport modes. (para 105).

#### Section 11: Making effective use of land

Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (para 120c)

Promote and support the development of under-utilised land and buildings (para 120d)

Para 124. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

#### Section 12: Achieving well-designed places

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 sets out six criteria that development proposals should meet. These included their function, appearance, layout, landscaping, character, sense of place, mix, uses, health, and well-being.

#### Section 14: Meeting the challenge of climate change, flooding and coastal change

Supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. (Paragraphs 152 to 173).

#### Section 15: Conserving and enhancing the natural environment

Paragraph 174 requires development to contribute to and enhance the natural and local environment. This includes sites with biodiversity value. Proposal should minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Part e) states ‘preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

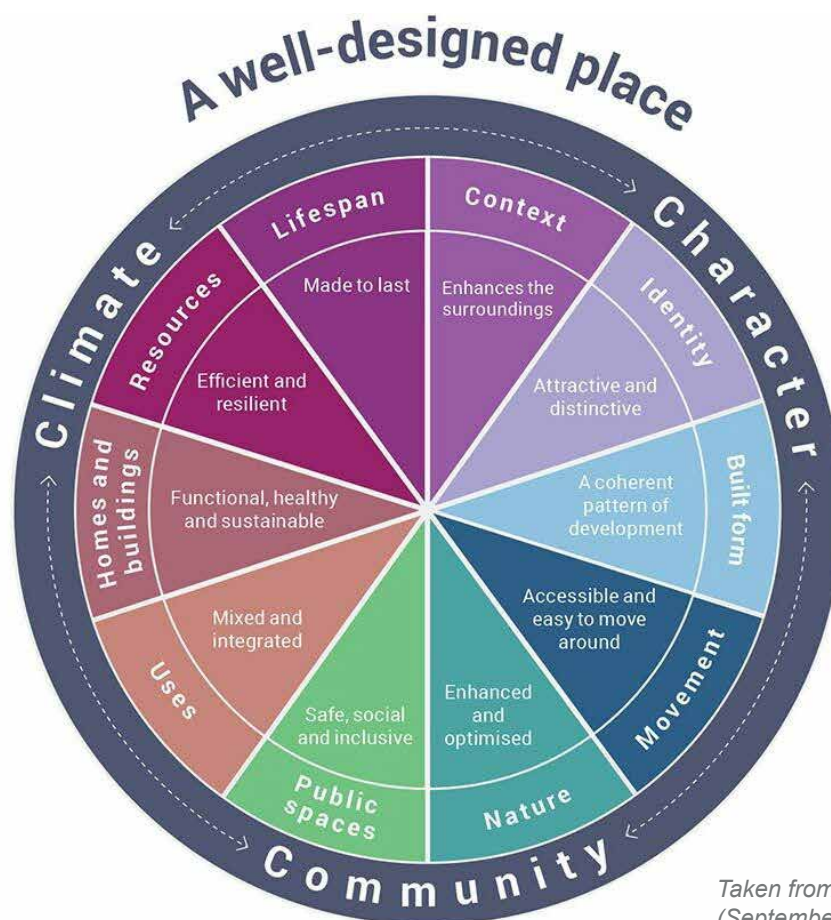
Paragraphs 179-182 set out the requirements regarding habitats and biodiversity.

## National Design Guide

2.3.2 The National Design Guide (updated in January 2021) was created to ensure beautiful, enduring and successful places are delivered. It outlines 10 characteristics of well designed places.

1. Context - enhances the surroundings
2. Identity - attractive and distinctive
3. Built Form - a coherent pattern of development
4. Movement - accessible and easy to move around
5. Nature - enhanced and optimised
6. Public Spaces - safe, social and inclusive
7. Uses - mixed and integrated
8. Homes and Buildings - functional, healthy and sustainable
9. Resources - efficient and resilient
10. Lifespan - made to last

2.3.3 Especially important in the context of this site is it advocates compact development, that lines/ addresses the adjacent streets providing active frontages, and landmarks/key buildings in appropriate place to help with legibility as well a mix of uses.



*Taken from the National Design Guide (September 2019)*



## 2.4 Central Bletchley Urban Design Framework SPD

- 2.4.1 The Central Bletchley Urban Design Framework SPD was adopted in March 2022. The SPD will capitalise on the significant opportunities flowing from the enhanced connectivity and accessibility, enabled by EWR, through the provision of guidance which promotes holistic and inclusive renewal within Central Bletchley.
- 2.4.2 It will inform landowners and potential investors about the placemaking and development opportunities within Central Bletchley which will deliver on the agreed aspirations for the area. East-West Rail will bring Oxford and Cambridge within a 40 minute train journey from Central Bletchley while London Euston is only 40 minutes away via the West Coast Mainline.
- 2.4.3 The SPD build's on the approved Central Bletchley Prospectus through the provision of further detailed land use and design guidance for opportunity areas which will provide greater clarity, certainty and speed for applicants when preparing planning applications.
- 2.4.4 The site lies within the Sherwood Drive Quarter Opportunity Area (see figure 6 below - SPD parameters plan). The Police and Fire Station is identified as an opportunity site to be redeveloped for mixed use development including an Innovation Hub

and housing. A small element of retail space could be provided in a prominent position to help generate activity and capture footfall around the existing western train entrance.

- 2.4.5 As part of the redevelopment of the Police and Fire Station Site, a pedestrian route was shown running across the site. This was included as the Innovation Hub was likely to be seen as a separate development and therefore a piece of public realm including a pedestrian route was seen as a good response for the site context.

## 2.5 Central Bletchley Prospectus

- 2.5.1 This Prospectus was approved by Milton Keynes Council in 2020.
- 2.5.2 It was produced to both highlight, and capitalise on, the significant renewal opportunities flowing from the delivery of EWR as a consequence of Central Bletchley's enhanced connectivity and accessibility.



Figure 6: Urban Design Framework Parameters Plan (Sherwood Drive and Buckingham Road Quarter)

## 2.6 Other Planning Guidance

### Supplementary Planning Guidance (SPG)/ Documents (SPDs)

- 2.6.1 The following Supplementary Planning Guidance/ Documents (SPG/SPDs) should be considered as material considerations when preparing any planning application for the site:
- Sustainable Construction SPD (2021)
  - Parking Standards SPD (2016)
  - New Residential Development Design Guide SPD (2012)
  - Affordable Housing SPD (2020)
  - Milton Keynes Drainage Strategy – Development and Flood Risk SPG (2004)
  - Planning Obligations SPD (2021)
  - Designing Dementia-friendly Neighbourhoods SPD (2022)
  - Health Impact Assessment SPD (2021)
  - Biodiversity SPD (2021)
  - Transport and Sustainable Transport SPD (2009).
- 2.6.2 MKC is currently undertaking a partial review of its parking standards, including a reduction for Private Rental (PRS) or Built to Rent (BRS) schemes in more sustainable locations such as Central Bletchley. A draft is due out for consultation on 10 August 2022.

## 2.7 Planning Assessment

- 2.7.1 This planning assessment has been prepared in the context of this Brief proposing mixed use development with housing likely being the predominant use.
- 2.7.2 The key policies to be addressed are Policies CC3 (Protection of Community Facilities) and ER2 (Protection of Employment Land).
- 2.7.3 It is the view that the requirements of relevant sections of Policy CC3 have been met because the activities provided at the Fire Station (now demolished) and the Police station had been relocated elsewhere, in the case of the fire station to the Blue Light Hub in West Ashland where there is also a police presence.
- 2.7.4 Regarding Policy ER2 it is acknowledged that the Fire and Police Station sites are shown on the Plan:MK policies map as employment land within a wider designation as a site within the Central Bletchley Prospectus Area (CBPA) where Policy SD16 applies. Policy ER2 seeks the protection of existing employment land and premises, and the proposed mixed use (with residential being the likely predominant use) as outlined within this Brief would change the primary use of the site to a non-employment use. Plan:MK would require that a proposal is in accordance with Policy ER2 to justify the loss of employment land. However, Policy BS3 of the WBNP (post adoption Plan:MK) has allocated

the Station Quarter to be redeveloped for mixed uses and similarly, the Central Bletchley Urban Design Framework (CBUDF) SPD states the first key principle for the Sherwood Drive Quarter is for the redevelopment of the police and fire station for mixed used development including an Innovation hub.

- 2.7.5 As the WBNP was made/adopted after Plan:MK, it [the WBNP] was considered to be the most up to date plan and one that carried considerable weight.
- 2.7.6 Therefore, the designations for mixed use redevelopment for the Police and Fire Station sites outlined within the WBNP and CBUDF justifies the loss of employment land and principle of change of use.

## 2.8 Planning Summary

- 2.8.1 The preceding summary of key relevant policy and other guidance outlines a favourable policy context that supports the Council's aspirations for the site.
- 2.8.2 In summary, it is a brownfield site located within a highly sustainable location likely within Plan:MK Policy SD16 which furthermore calls for the early redevelopment of the Police and Fire Station Sites.
- 2.8.3 The West Bletchley Neighbourhood Plan outlines a range of permissible uses, including residential and supporting local retail uses while the Central Bletchley Urban Design Framework SPD envisages the site to be developed for residential led mixed use development at densities up to 250dph.

# **SECTION 3:** **CONTEXTUAL ANALYSIS**



### 3.1 Introduction

3.1.1 This section describes the key characteristics of the two sites and their context. It includes location, site description, land uses, key environmental/technical aspects such as noise, topography and utilities. There is also a short summary of transport aspects and local character. The section includes the site's opportunities and constraints which have informed the key design principles in the next section.

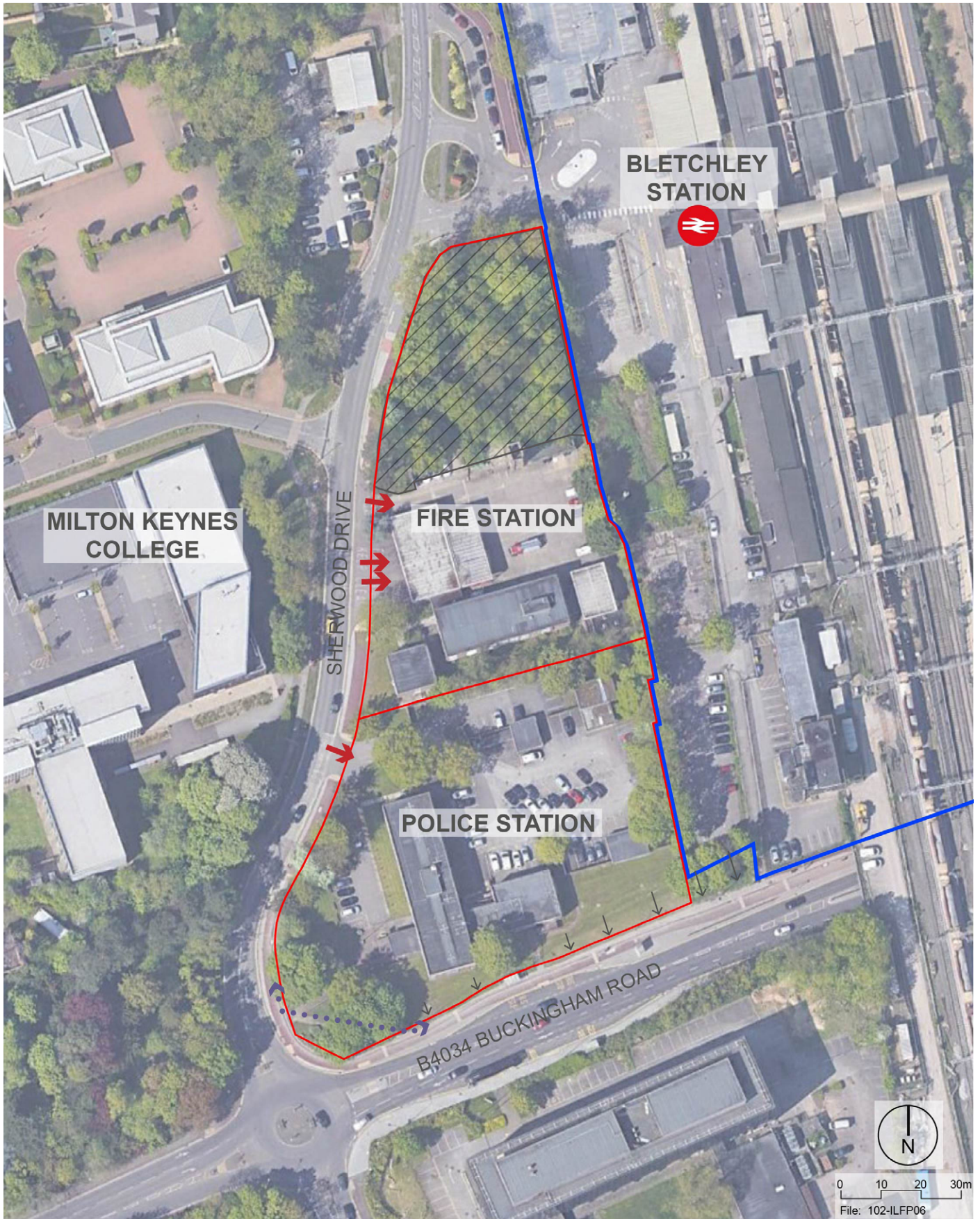
### 3.2 Location

3.2.1 The sites are located on the western edge of Bletchley town centre, adjacent to Bletchley Station. They are in a mixed use area with Milton Keynes College to the west, the famous Bletchley Park to the northwest, mainly employment uses to the south, whilst to the east is the West Coast Mainline. The sites are located within a commercial/institutional arc between the town centre and residential suburb of West Bletchley to the west.



Figure 7: Site Location





- Site Boundary
- Network Rail/Operator land
- TPO Area
- ..... Informal Pedestrian Route
- ➔ Vehicular Access
- ↓ Slope Down

Figure 8: Site Plan



### 3.3 Site Description

- 3.3.1 The Police Station site occupies approximately 0.68 Ha (1.68 Ac) whilst the Fire Station is 0.57 Ha (1.41 Ac), giving a combined area of 1.25 Ha (3.09 Ac). Note that the site area given for the fire station is lower than the area on the Land Registry title (0.63 ha) as it is assumed that the site boundary would only extend to the edge of the pavement.
- 3.3.2 The Police Station comprises a two-storey L-Shaped building in a modernist style (see Figure 8 and photos). There is a car park to the rear, which includes a few ancillary buildings, and a small car park by the front entrance. There are several trees within and around the edges of the site, including mature specimens.
- 3.3.3 The Fire Station site, which was cleared in 2021, originally comprised a group of modernist style buildings set within a landscape framework. They included a garage for the fire tenders, accommodation block/offices, tower, training area, and car park. The original basement under the accommodation block remains in situ as demolition was completed to ground slab level only.
- 3.3.4 The northern half of the fire station site contain trees and shrubs and is designated as a woodland tree preservation order (TPO). Trees are also present along the site's boundaries. There is a ditch running north-south within the wooded area.
- 3.3.5 Each site takes access off Sherwood Drive. For the Fire Station, the access area is quite large in order to provide access to each fire tender whilst there is a separate access to the yard at the back. There are pedestrian connections to both sites from Sherwood Drive. Both facilities have secure rear compounds.



(Copyright Bing Maps)

*Bird's Eye View of Sites from south*



*View inside former Fire Station site looking towards Buckingham Road (top) and front of former Thames Valley Police Station*





- Site Boundary
- Area covered by the Urban Design SPD
- ⚡ Stations (EWR Buildings Under Construction)
- ⋯⋯⋯ Pedestrian Route from Station to Centre
- - - Cycle Route (Redway) near site
- 🚌 Bletchley Bus Station
- 🚗 Car Parks
- 1 Police Station: Now Vacant
- 2 Fire Station: Buildings Demolished
- 3 WMT Staff Building
- 4 WMT Parking Area for Drivers
- 5 Signal Box
- 6 Vacant Area
- 7 Station Parking and Drop-off
- 8 Pedestrian Bridge for Platforms (extension to EWR Transfer Building under construction)
- 9 CEMEX Plant
- 10 Brunel Centre
- 11 Former Sainsbury's supermarket
- 12 Wilko
- 13 Brunel Roundabout
- 14 Stephenson House
- 15 Area with Permission Mixed Use Scheme
- 16 Office Building Recently Converted in Housing
- 17 Santander Training Centre
- 18 Extent of Proposed IoT Building
- 19 Former Cricket Pavilion Building

File: 102-ILFP04

Figure 9: Site Context Plan



### 3.4 Description of Surrounding Area

- 3.4.1 In terms of the immediate surroundings, the area to the east comprises car parking (rail related and public), metal fencing, an overgrown area which previously housed a building, a telecom mast, staff accommodation, a signal box and Bletchley Station. There is an unattractive and poorly surveilled pedestrian link running in between the parking areas and Network Rail buildings, which links the station with Buckingham Road and then on to the town centre.
- 3.4.2 To the south, the land drops down to Buckingham Road beyond which lies a five-storey former office building which is currently being converted into apartments. Sherwood Drive runs along the western edge, with Milton Keynes Colleges Bletchley Campus on the western side of Sherwood Drive. The College's new Institute of Technology faces the former Fire Station.
- 3.4.3 Adjacent to the Police Station on the corner of Sherwood Drive and Buckingham Road is the former, now overgrown cricket pavilion site. It is heavily landscaped and fenced off from public access. The Central Bletchley Urban Design Framework SPD however identifies it as an opportunity site to be restored as a small publicly accessible pocket park together with a small amount of housing.
- 3.4.4 The area to the north of the fire station contains rail-related uses such as the station entrance, pick up/drop-off (PUDO) and two-storey car park. There is also a hire car firm opposite the station entrance.
- 3.4.5 MKDP and MKC have held meetings with Network Rail, East West Rail and the station operator (London Northwestern Railway) about the land immediately to the east of the site (see Appendix A for ownership/lease arrangements). There is an opportunity to improve the environmental quality and functionality of this area although the Signal Box building needs to remain. Network Rail are currently exploring the options for this area and will continue to meet with MKDP and MKC.



View south along footpath with overgrown area to right and Signal Box on left



View south along Sherwood Drive with former Fire Station behind temporary fencing



View towards former Fire Station site (buildings now demolished) from entrance to MK College

### 3.5 Landscape and Environmental

#### Topography

3.5.1 A topographic survey has been completed on the two sites and shows that there is a gradual fall from north to south, with a more significant drop along the southern edge, down to Buckingham Road (see photo below).

#### Trees and Vegetation

3.5.2 There are a number of trees within the site and along the adjacent streets, which contribute towards the character of the area. A tree survey has been completed on the sites by Andrew Belson (see extract in Appendix B) and this includes details about the condition of the trees. The northern part of the Fire Station site is covered by a Woodland Tree Preservation Order made in 2010.

#### Ecology

3.5.3 A Preliminary Ecological Appraisal was completed by Ecology by Design in October 2021. The Baseline Habits Map is shown in Appendix C. The Executive Summary provides a list of key findings and recommendations for additional surveys regarding bats. There is a recommendation for improving the biodiversity value of the site, which may require offsetting.

#### Flood Risk

3.5.4 The sites do not lie in any flood zone and are hence classified as Flood Zone 1. According to the Government website, parts of the site have a low-medium risk of flooding from surface water.

#### Noise

3.5.5 The site lies close to the West Coast Mainline and proposed route of the new route for East-West Rail. Therefore, consideration will need to be given to the impact of noise on the future residents and users of the development, including amenity spaces. There will also be noise from Buckingham Road.

### 3.6 Utilities

3.6.1 A utilities report on the site has been prepared by Atkins (see extract in Appendix D) and is available upon request. These have not been added to constraints plan and the developer will need to carry out their own assessments of the existing services to ascertain their implications for development and whether they act as constraints, particularly the sewers crossing the site.



*The more steeply sloping part of the site along its southern boundary*



*Trees within northern part of former Fire Station with station entrance on left*



### 3.7 Land Uses

3.7.1 The sites are located in a mixed use area which is typical of an edge-of-centre location (see Figure 10). To the east lies Bletchley town centre which contains a range of high street businesses. Its western end is defined by Brunel Shopping Centre, with a range of local and national businesses, and the retailer Wilko.

3.7.2 The western side of the railway lines comprises mainly educational, government and commercial uses, typically offices. Situated in between these two areas are predominantly transport related uses such as the station, ancillary buildings, car parks, car hire firm, and a CEMEX plant which is served by the adjoining railways. Extending outwards, the uses comprise mostly housing, with predominantly Victorian terraces to the east and inter-war suburbs to the west. Other notable uses include the bus station, higher-density apartments in Stephenson House and the educational/tourism at Bletchley Park to the northwest.

3.7.3 Some of the older commercial areas are now in residential use. For example, Caspian View, the office block to the south is now in residential use as is the land north of the bus station currently being redevelopment into 184 dwellings and community uses (Bletchley View).



Former office building to south of site being converted into apartments (Caspian View)

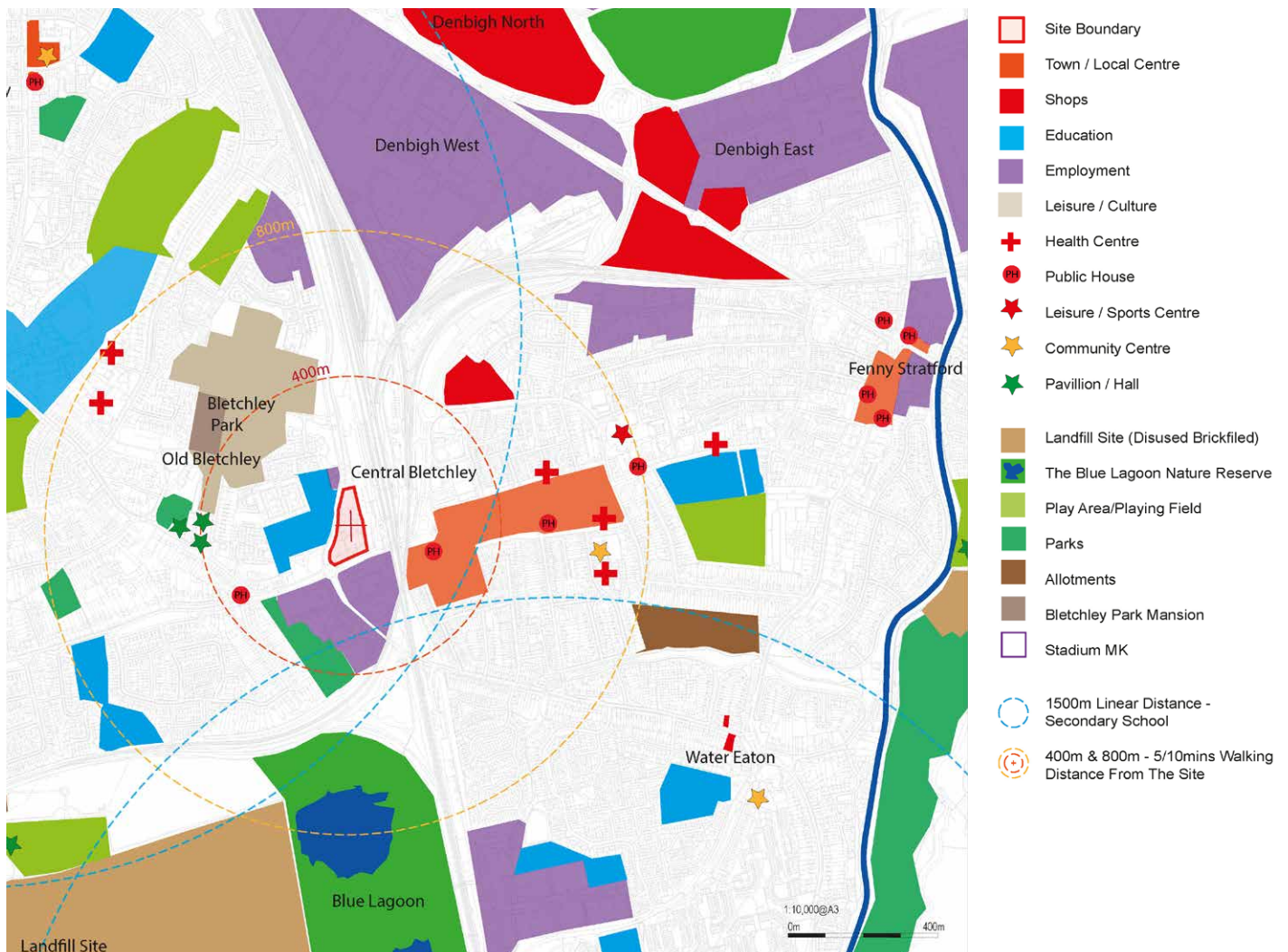
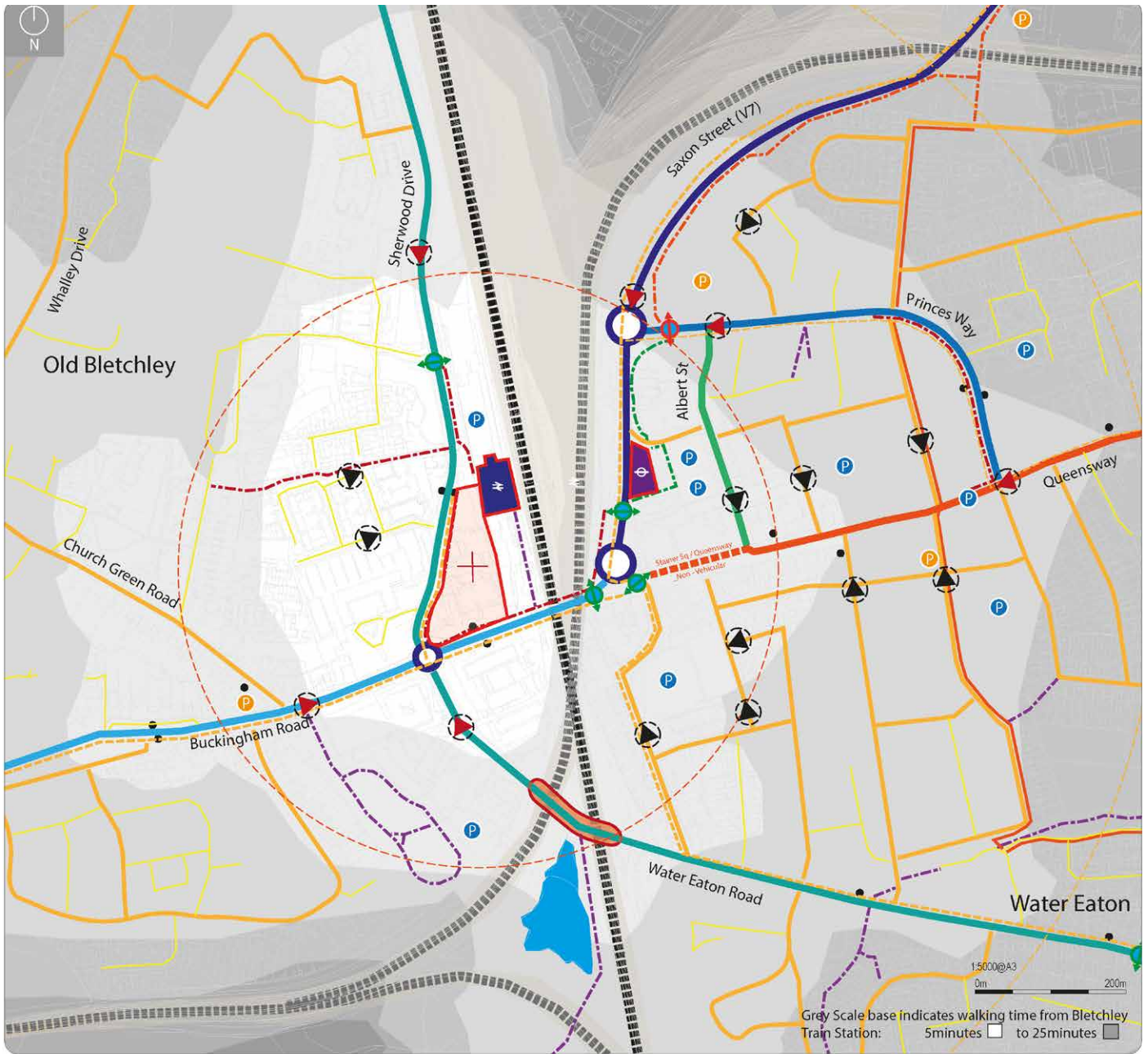


Figure 10: Land Use Plan

(Plan based upon p21 of Urban Design SPD)





Grey Scale base indicates walking time from Bletchley Train Station:  
 5minutes to 25minutes

- |   |   |  |
|---|---|--|
| Site Boundary   | Existing Vehicular Access Point   | Bus Route                                |
| Saxon Street, V7 Grid Road<br>Dual Carrageway (Primary Distributor) | Strategic Access Point  | Footpath                                 |
| Queensway   | Railway Line - West Coast Main Line   | Leisure Route (Pedestrian / Cycle Route) |
| Princess Way  | Railway Line - East West Rail   | Redway (Pedestrian / Cycle Route)        |
| Buckingham Road   | Railway Station   | Redway Super Route                       |
| Sherwood Drive / Water Eaton Rd                                     | Bus Terminus  | National Cycle Route (Route 6)           |
| Albert Street   | Traffic Signals -Constrained Road Width<br>(Water Eaton Drive, under the railway) | Pedestrian Road Crossing Points          |
| Local Distributor   | Bus Stop  | Poor Pedestrian Crossing Points          |
| Local Access Road   | 400m from site (5 mins walking)   | Parking (public)                         |
|   | 800m from site (10 mins walking)  | Parking (customer only)                  |

(Plan based upon p24 of Urban Design SPD)

Figure 11: Movement Network

## 3.8 Access & Transport

### Vehicular

- 3.8.1 The sites are located at the junction of Buckingham Road and Sherwood Drive (see figure 11). The B4034 Buckingham Road is a busy main road running into and around Bletchley town centre. Each site is accessed from Sherwood Drive which connects onto the roundabout along the B4034 Buckingham Road.

### Public Transport

- 3.8.2 The sites are very well served by public transport. They are next to Bletchley Station with regular services to London Euston and Milton Keynes Central. The new East West Rail service will add further destinations, including Oxford and Bedford. There are also bus stops along Buckingham Road and Sherwood Drive whilst the town's bus station lies immediately on the eastern side of the railway line and is within easy walking distance.

### Walking and Cycling

- 3.8.3 The sites are well connected to existing footpath and cycle networks with a redway running along their southern and western boundaries. There are no footpaths crossing the site although there is an informal desire line crossing the southwest corner. There are pavements along both sides of Buckingham Road and Sherwood Drive which then links into the station and College.
- 3.8.4 There is a poor quality pedestrian link providing the shortest walking distance between the town centre and train station. It includes steep steps providing access onto Buckingham Road.



Access into Police Station (Footpath/Cycle link in front) with secure rear compound and turning for car parking to right.



View of Brunel Roundabout with transfer building for East West Rail under construction



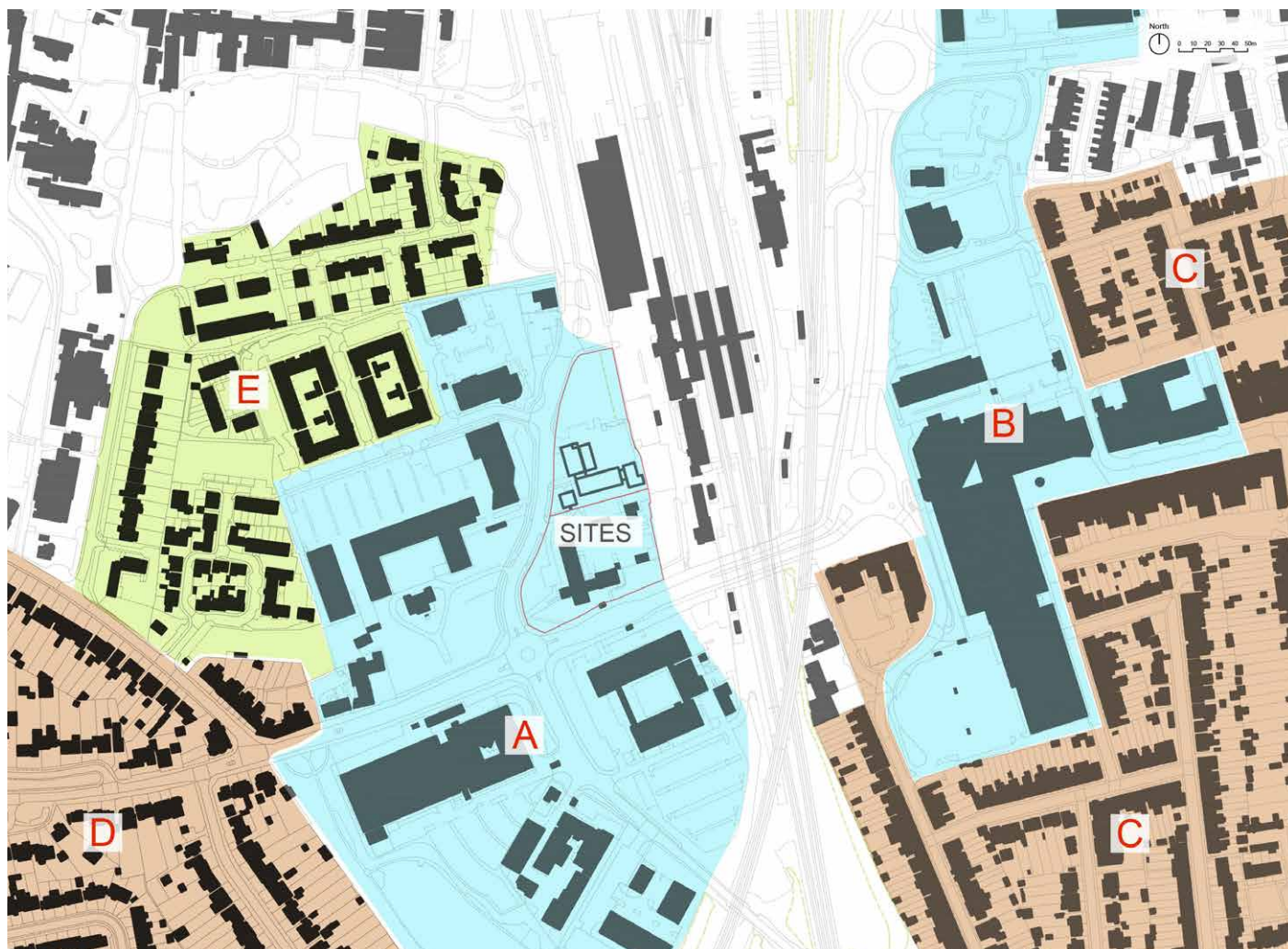
Bletchley Station entrance and car park with edge of former Fire Station site on right



### 3.9 Local Character

- 3.9.1 The site and surrounding area comprises mostly modern, stand-alone type buildings set back from the adjoining streets, which have a sylvan character. The buildings have a similar orientation, running perpendicular to Buckingham Road.
- 3.9.2 Figure 12 below is a figure/ground plan of the area and shows the variety across this edge-of-centre location. The area around the site has a coarser grain, which reflects the modernist principles, whilst the Victorian centre and inter-war suburbs have a finer grain.

- 3.9.3 In terms of heritage assets, there are no listed buildings on or next to site although there is a conservation area to the southwest of the police station.
- 3.9.4 In terms of activity, Buckingham Road is a busy main route into and out of Bletchley and beyond, whilst the station and College create activity along Sherwood Drive and the footpath to the east.



- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #d2b48c; border: 1px solid black; margin-right: 5px;"></span> Fine Grain</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #90ee90; border: 1px solid black; margin-right: 5px;"></span> Medium Grain</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #add8e6; border: 1px solid black; margin-right: 5px;"></span> Coarse Grain</li> </ul> | <ul style="list-style-type: none"> <li><b>A</b> Mostly Commercial or Educational Buildings</li> <li><b>B</b> Large Footprint buildings, including Brunel Shopping Centre, with mostly commercial uses</li> <li><b>C</b> Mainly Victorian terraced housing and town centre</li> </ul> | <ul style="list-style-type: none"> <li><b>D</b> Mostly Inter-War Housing</li> <li><b>E</b> More modern housing created through infill or regeneration of other uses</li> </ul> |
|---|--|--|

Figure 12: Figure/Ground Plan





The area fronting onto Brunel Roundabout comprising Victorian buildings and back of The Brunel Shopping Centre



Mercury House - a 1980s office building, designed by Milton Keynes Development Corporation and currently being converted into apartments



View across Brunel Roundabout looking towards Queensway/town centre. Modernist Brunel Shopping Centre is on right with more recent Wilko storey in the middle and the 10 storey residential block of Stephenson House on left

(Copyright Google Streetview)



Typical Victorian terrace alongside town centre



MK College buildings at the entrance with more recent four-storey apartment buildings in the distance



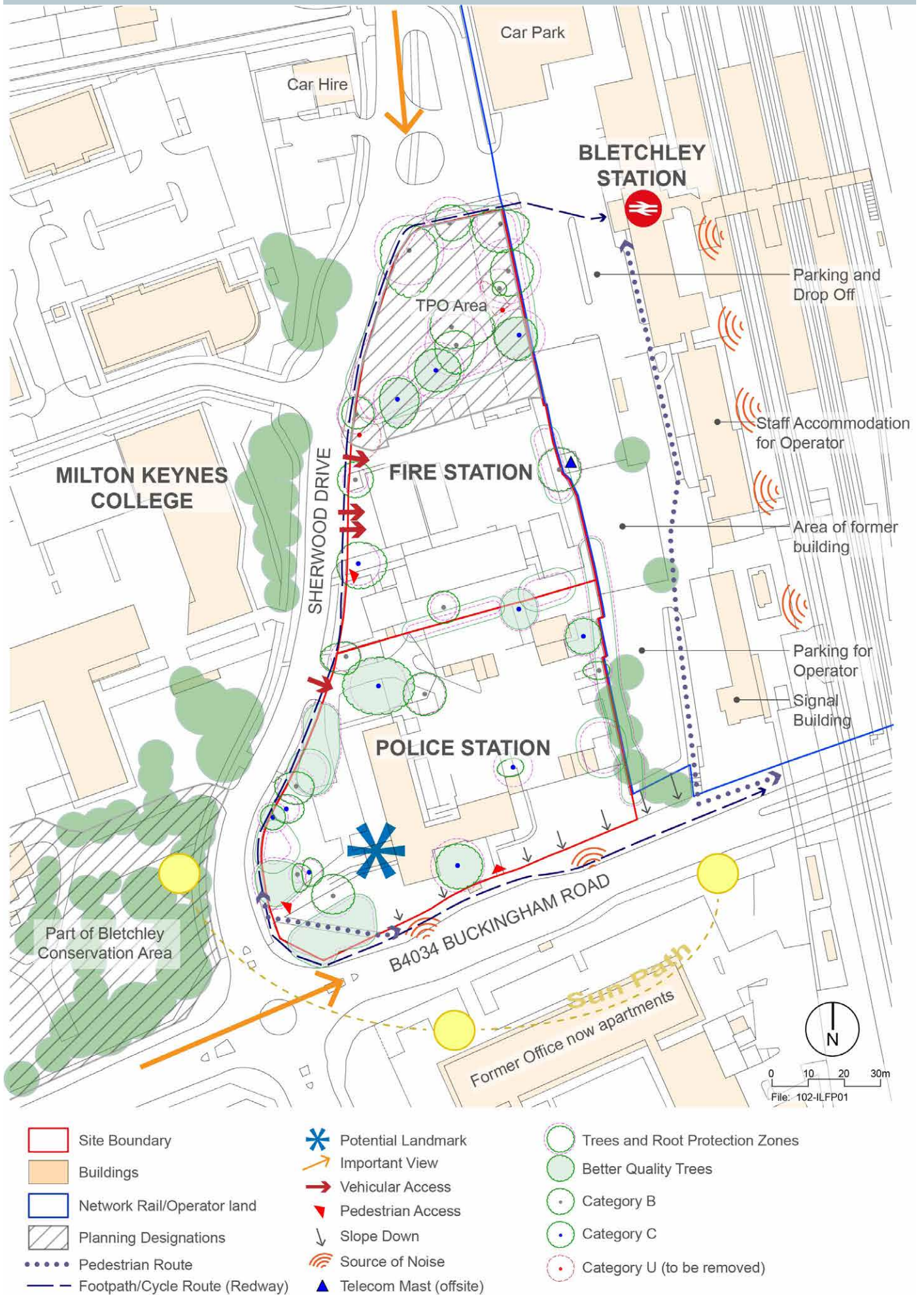


Figure 13: Opportunities and Constraints Plan

### 3.10 Opportunities and Constraints

3.10.1 The key opportunities and constraints are set out in Figure 13 and summarised below.

1. There is an opportunity to redevelop this site for mixed use development which could include high-density housing, a hotel, café, restaurant, or local retail uses.
2. There is an opportunity for a landmark building and/or new frontages along Buckingham Road.
3. The proposal should consider the impact upon the existing trees and plant new trees and vegetation. There could be an opportunity to develop within the Woodland TPO, provided it can be justified in planning policy terms, or to use the area for another function.
4. The scheme must consider noise from the railway lines, station area and main road.
5. Access can be from Sherwood Drive using one or both existing connections.
6. There is an opportunity to improve safety of the pedestrian route to the station, situated to the east, by providing natural surveillance.
7. Some of the underground utilities could affect the layout, especially the foul water sewers which could be expensive to move.

3.10.2 Developers will need to provide their own opportunities and constraints plan as part of the design process in order to demonstrate a good understanding of the site and its context.



*Opportunity for new landmark building on southwest corner of site, set back behind existing trees.*



*Southern part of site where the existing trees could be treated as a constraint. There is also the potential to add additional trees and vegetation.*

# **SECTION 4:** **DESIGN PRINCIPLES**



## 4.1 Introduction

- 4.1.1 This section sets out guidance and requirements to be taken into account by the developer and their design team. They have been informed by good urban design practice, policy guidance (including the Central Bletchley Urban Design Framework SPD), alongside a thorough understanding of the site and its context. The development proposals need to provide a clear design framework to include the key objectives and a concept. This could include assessing more than one option and the reason for proposing the final scheme.
- 4.1.2 High density developments require careful design, particularly those in complex built up areas. The Architect will need to think creatively, have experience designing these typologies and incorporate lessons from other precedents.
- 4.1.3 The design and layout will need to be imaginative in response to the noise conditions, shape of the site and adjoining station environment, whilst making the most of key views.
- 4.1.4 The key considerations are set out on the Design Principles Plan in Figure 14 and described in the following section. The Plan only identifies those key principles which are important to delivering the overall vision of the scheme and need to be adhered to, allowing significant design creativity with other design elements of the scheme. This section should be read alongside the development plan and other material considerations, including the New Residential Development Design Guide SPD, and the NPPF. The guidance here relates to this particular site and hence does not include all the standard urban design principles to be followed.
- 4.3.3 A key consideration is the approach towards the existing trees. There is a requirement to retain trees and vegetation around the edges of the site in order to protect the character of the adjoining streets and provide an attractive setting for the buildings, no to mention the environmental benefits. It is possible to propose development within the TPO area provided it can be justified in planning terms. If this area is not built upon then the developer needs to decide what to do with the area. This includes its function, future ownership, boundary treatment, and relationship to the surrounding area, particularly the station entrance and car park.
- 4.3.4 New trees and vegetation should be provided, including along the site's boundaries although the aim is not to screen the buildings. Where trees are removed the 'green edge' should be enhanced through new planting within the private defensible space along Sherwood Drive and Buckingham Road in particular.
- 4.3.5 A landmark building and/or strong frontage should be provided along the Buckingham Road edge, a busy approach into the town centre, as well as being visible from the adjoining railway lines. It needs to be carefully designed to have a presence, respond to the road/junction whilst avoiding adverse impact upon the other parts of the development in terms of shade.
- 4.3.6 The layout should ensure that the adjoining public realm is overlooked and there is a clear distinction between public and private realms. Key frontages should be maximised although it may not be possible to be provide them along the entire periphery because of the width of the block depth. Therefore, the focus should be on key principles which are to provide passive surveillance in the southeast corner, parts of the eastern side, improving the look and feel of the pedestrian link to the station, and Sherwood Drive. The College generates activity but the buildings provide limited natural surveillance and even then only during opening times. The layout should obviously avoid direct views towards the telecom mast.

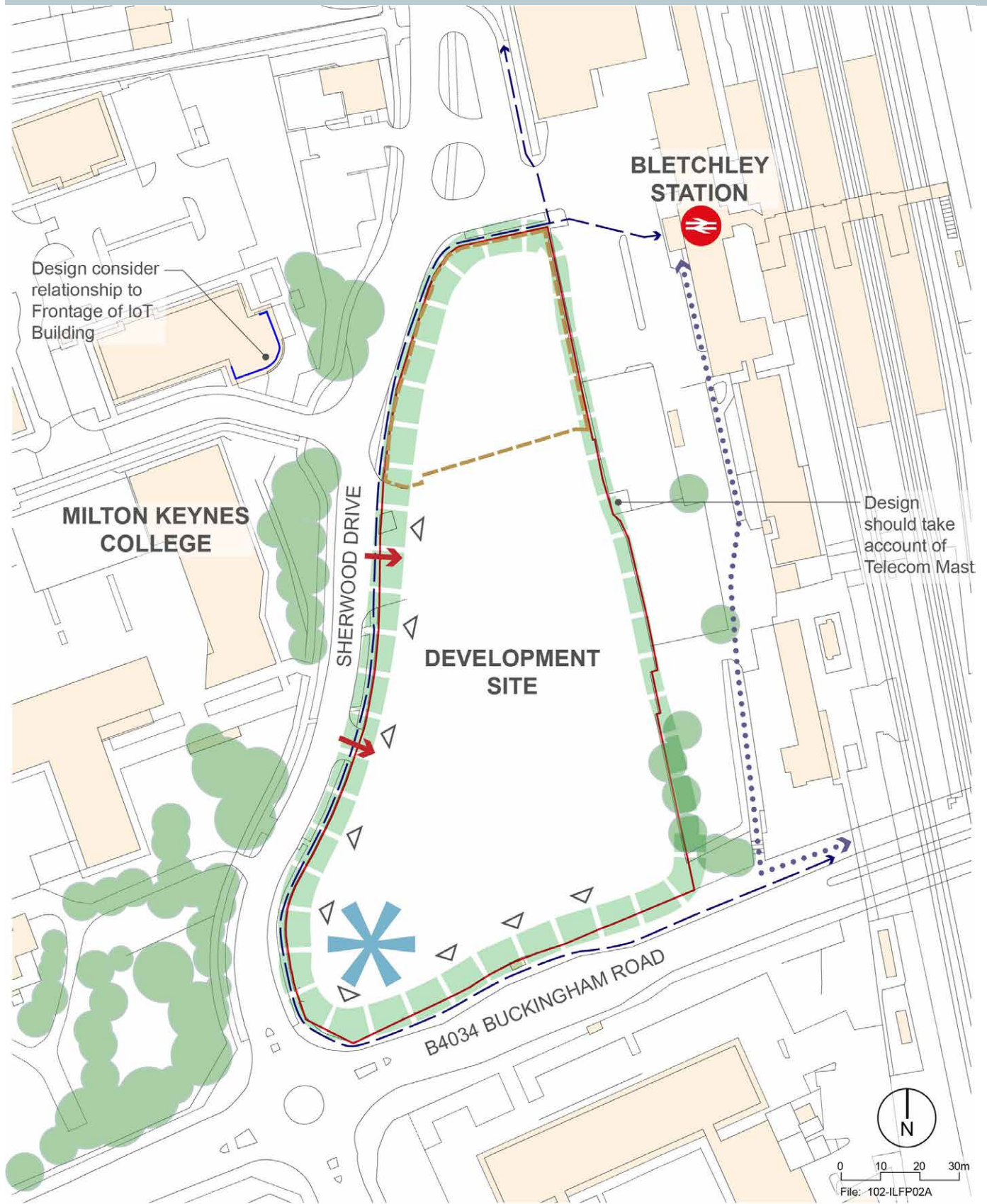
## 4.2 Land Use and Housing Mix

- 4.2.1 As set out in planning policy, the site is suitable for mixed use development which could include housing, a hotel, café, restaurant, or local retail uses.
- 4.2.2 The proposal should accord with planning policy in terms of density and housing mix.
- 4.3.7 The Council will seek to design out opportunities for crime and anti-social behaviour following best practice guidance in 'Secured by Design'. Most importantly, the layout of the development should avoid the creation of areas of public realm that are 'leftover' and not overlooked by any development, as they can become areas of anti-social behaviour. Furthermore, there should be no ambiguous space in terms of ownership.

## 4.3 Layout

- 4.3.1 Development should aim to provide an attractive and strong frontage onto Buckingham Road and Sherwood Drive, increasing surveillance onto them. Doors, entrances and primary habitable room windows should also be focussed on these two streets.
- 4.3.2 The approach should also provide some surveillance of the existing footpath to the east of the site but given the unattractive and uncertain future of the Network Rail owned land immediately to the east of the site, this edge can be designed as a secondary frontage in comparison to the Sherwood Drive and Buckingham Road frontages. The layout should clearly avoid direct views towards the telecom mast.
- 4.3.8 Where residential exists at ground floor there needs to be private defensible green space included along the Sherwood Drive and Buckingham Road frontages. The designer needs to consider the relationships between the building, its function and the boundary with the back of the redway.





- Site Boundary
- Area Covered by TPO
- ✳ Potential Landmark
- △ Key Frontages
- Green Edge
- Existing Trees Outside Site Boundary
- ⋯ Pedestrian Link to Station
- Footpath/Cycle Path (Redway)
- ➔ Potential Access Point(s) for vehicles

Figure 14: Design Principles Plan

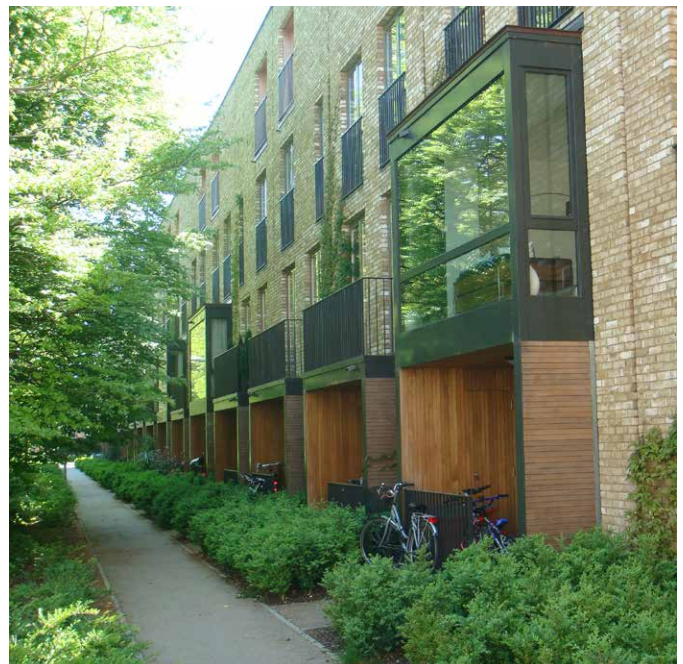
- 4.3.9 The design needs to think carefully about the type of non-residential use, its location and relationship with the housing. For example, any café/convenience store would need to take access off Sherwood Drive and provide space for parking and servicing.
- 4.3.10 The layout will need to consider noise from the railway line and roads. This could be in the form of site layout or floor plans. The design will also need to consider the impact upon the amenity space and accord with any maximum noise levels (and preferably be well below them). A noise survey will be required early on in the design process to ensure that noise levels are acceptable (this will need to include assumptions about East West rail). The approach will need to ensure that any non-residential uses do not disturb residential amenity.
- 4.3.11 Underground services will also need to be considered, particularly the sewers.

#### 4.4 Density and Building Heights

- 4.4.1 The development should aim for a density of 150-250 dwellings per hectare as set out in Policy SD16 of Plan:MK. The precise amount of development will need to consider site constraints, context, car parking standards and viability. Given the density target and market considerations, the most likely type of housing will be one and two-bedroom apartments.
- 4.4.2 There is a degree of flexibility for heights given the site's context and buildings could range from 4-10 storeys. The Architect should also consider the relationship with the new Technology building.
- 4.4.3 Any apartment complex will need to provide suitable amenity space between the buildings. If the amenity space is provided above the car parking, the designer will need to give careful consideration to the quality of the amenity space, relationship with the surrounding homes and the access points. Suitable distances between buildings are set out in the Residential Design Guide SPD.
- 4.4.4 The designer will need to explain how solar orientation has been taken into account in terms of natural light, shelter and solar gain. This relates to the external amenity space as well as the interiors.

#### 4.5 Landscape and Open Space

- 4.5.1 Landscaping and vegetation can play an important role in integrating apartment buildings into their context. They can serve to soften hard materials, help with the transition from public to private, provide visual interest, and deliver ecological / environmental benefits. The following principles and advice should be taken into consideration:
- Opportunities to include green infrastructure as part of the proposed building, either in the form of a green roof, roof garden, growing spaces, green walls, balconies and/or planters, can provide amenity landscape at various levels of a building design.
  - The edges of the development need to be carefully considered to retain and/or create a green edge around the site where it forms part of the character of the area. The aim is to keep the area facing Buckingham Road and Sherwood Drive in particular 'open' and green, but it needs to be defensible, with clear public /private boundaries.
  - All proposals must be accompanied by a plan illustrating indicative landscape principles for the site and how the design deals with the interface with the adjoining streets.



*Example of clearly defined pedestrian access with semi-private approach into each building.*



## 4.6 Architectural Approach

- 4.6.1 The buildings should be designed with a contemporary architectural style to help create a strong identity and sense of place. The approach should be selective in terms of materials, chosen for their appropriateness to the site and its context.
- 4.6.2 The building entrances need to be legible and welcoming. Stairwells within the building should be flooded with natural light whilst access into any rear amenity space needs to be well designed and located to preserve amenity.



*An attractively designed contemporary design where the building and landscape setting work together*

## 4.7 Residential Amenity

- 4.7.1 The residential uses should deliver a good standard of amenity in terms of privacy, sunlight, daylight and noise. The scheme will need to provide suitable amenity space, such as shared courtyard/garden, balconies, small patios inside the site (with low fenced off area for any ground floor flats) and roof gardens. The amenity space for a higher-density scheme needs to be carefully designed especially if lies on a parking area.
- 4.7.2 If balconies are included, it they are a crucial elevation detail and need to be carefully designed. They can often be too small and/or appear 'stuck on'. Balconies must be an integral part of the design and consider privacy, useable space, and climate. On this particular site, the design will need to consider noise from the railway, the sun path, the trees being retained, and the relationship with the effect of any taller building along the southern boundary.

## 4.8 Access and Movement

### Vehicles

- 4.8.1 Vehicular access will need to be from Sherwood Drive. The preference is for one or two at the most, in order to limit the potential conflict with pedestrians and cyclists using the redway.

### Pedestrians and Cyclists

- 4.8.2 The building entrances need to be designed with amenity and activity in mind. The number and location of entrances should help animate and activate the street whilst avoiding having too many apartments buildings served off a single entrance.
- 4.8.3 The informal pedestrian route across the southwest corner of the site could be closed off and the area returned to grass/vegetation with defensible space and better quality trees retained. This should create an attractive public realm, clear public/private distinction whilst removing future maintenance liabilities.
- 4.8.4 The development should consider the existing Redway that runs along the edge of the site and provide a safe and convenient link into the required cycle parking area.

### Car Parking

- 4.8.5 Underground or undercroft parking should have a high standard of security with automated access controls. Car parking should be designed to be unobtrusive and place close attention to the links between the car parking areas and dwellings in terms of security and access. In line with Plan: MK Policy HN1E a case could be made for provision of parking below current standards. Note that these standards are currently being consulted upon with lower requirements for Build to Rent types of development.
- 4.8.6 Any undercroft parking should not have an adverse impact upon the surrounding area, especially Buckingham Road or Sherwood Drive. Those that do face onto the street should be either screened or have enhanced architectural features or landscaping to ensure that the ground floor provides interest. The developer should aim to provide at least one space for a car club. There needs to be a electric vehicle charging point for every car.



*Example of an integrated parking solution (Vizion Development, CMK) where the car park entrance is kept to a minimum and designed as part of building facade*



### Cycle Parking

- 4.8.7 Cycle parking can be provided in apartments, provided the space is in addition to the Nationally Described Space Standards. It requires level access and an adequately sized lift. Communal bike stores may be provided externally, in basement car parks or in freestanding structures. These should be as near as possible to the entrance for convenience, and both the store and the bike stands should be lockable.
- 4.8.8 The cycle parking should be well-lit, with a sense of personal safety and be included in any CCTV set up. External parking should be overlooked by dwellings and not screened.

## 4.9 Servicing and Utilities

- 4.9.1 The layout and design of the building(s) shall accommodate requirements and access for servicing, waste storage and collection and utilities equipment. Methods of dealing with, and integrating servicing, waste storage and collection shall reflect the town centre location and form part of the building envelope, with no separate enclosures. Service yards and parking entrances should be integrated into the design and should not dominate any elevation.
- 4.9.2 Servicing arrangements should minimise any adverse impact upon the street scene or residential amenity. It may be better to locate the servicing needs together to minimise their impact possibly alongside car parking for any non-residential use which could sit alongside Sherwood Drive rather than be within any block. The design needs to take account of the size of refuse collection vehicles and waste collection systems to ensure that their turning requirements do not compromise the layout or change the design at a later stage in the process.
- 4.9.3 Where Anglian Water requires the diversion of, or any other works to, adopted sewers within the site, the developer is responsible for all works and costs incurred in meeting their requirements. The sewers shall be constructed in accordance with the current edition of 'Sewers for Adoption' irrespective of their future adoption status.
- 4.9.4 Here, the designer will need to take account of the existing utilities as per the plan in this document, especially the sewers. Some of the sewers run across a similar area in the southern part of the site and hence this could be a reason for retaining them.
- 4.9.5 The developer should speak to utilities providers and Network Rail in order to see if any new or re-directed underground services should take account of future development elsewhere. For example, if the sewers are redirected there could be benefits of installing a larger pipe to accommodate capacity for say new staff accommodation or possible student housing.
- 4.9.6 All new developments should be 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 life cycle of their developments. All the necessary information for developers is on the Openreach website.

## 4.10 Sustainable Design

- 4.10.1 Milton Keynes has a history of pioneering approaches to sustainable design new technologies and aspires to be the greenest city in the world. Our local plan - Plan:MK - commits to continue the borough's dedication to high environmental standards, green urban landscapes and being 'different by design'.
- 4.10.2 Alongside this are the Council's objectives of being carbon neutral by 2030 and carbon negative by 2050. Therefore, proposals for the site should look to meet or surpass the sustainable standards laid out in Policy (SC1) of Plan MK and the subsequent Sustainable Construction SPD. As such development should be aiming for a BREEAM rating of Outstanding (>85%) level of certification which requires implementing innovation across all aspects of the project. Policy SC1 from Plan:MK and the Sustainable Construction SPD set sustainability standards that will have to be considered as part of the overall design process.

## 4.11 Ecology

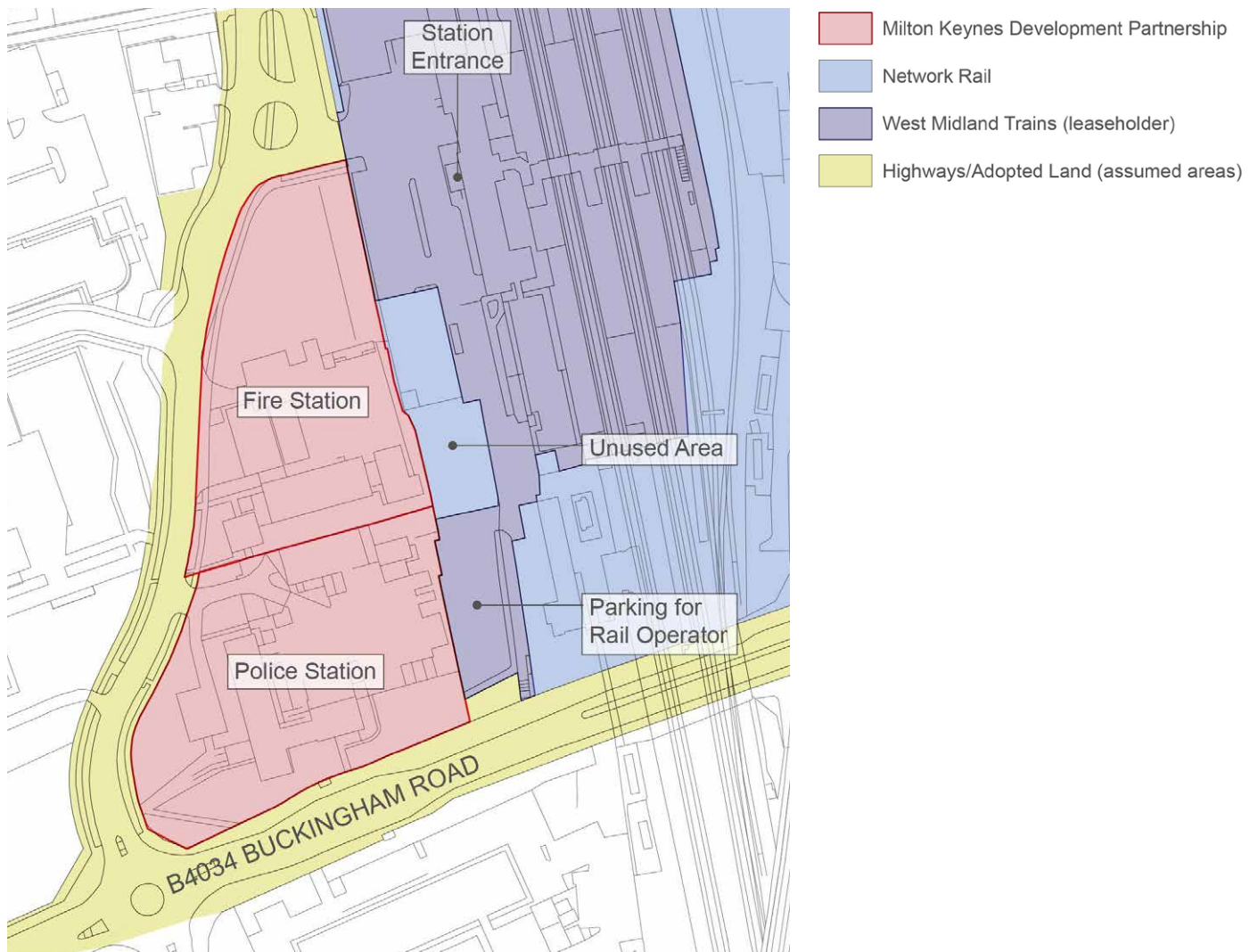
- 4.11.1 Policy NE3 of Plan:MK on Biodiversity Enhancement has the objective of achieving positive gains for biodiversity in the design of new development. All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floor space in excess of 1000 sqm (in the case of other development) will be required to incorporate proposals to enhance biodiversity.
- 4.11.2 New buildings provide many opportunities for wildlife with benefits for biodiversity and the building occupiers. Specialist boxes or spaces are available (for example bird/bat bricks, swallow nest cups and sparrow terraces). Elements such as climbing plants can create habitat and enhance the visual appearance of buildings, as well as providing cooling, insulation and microclimate moderation. The developer will also need to consider the findings of the ecology report

## 4.12 Flooding and Drainage

- 4.12.1 When making planning applications it is essential that, to get the best results, the integration of water and SuDS options are considered early in the site evaluation and planning process, not just at the detailed design stage. Full consideration of SuDS at the pre-application and outline stage is important to ensuring surface water management is fully integrated into the development, leading to an effective drainage design, providing multiple benefits and with costs considered from the outset.
- 4.10.2 Further guidance and information can be found in the "Milton Keynes Council Surface Water Drainage; Local Guidance for Planning Applications", which is available on the Council's website.



# APPENDIX A: OWNERSHIP PLAN





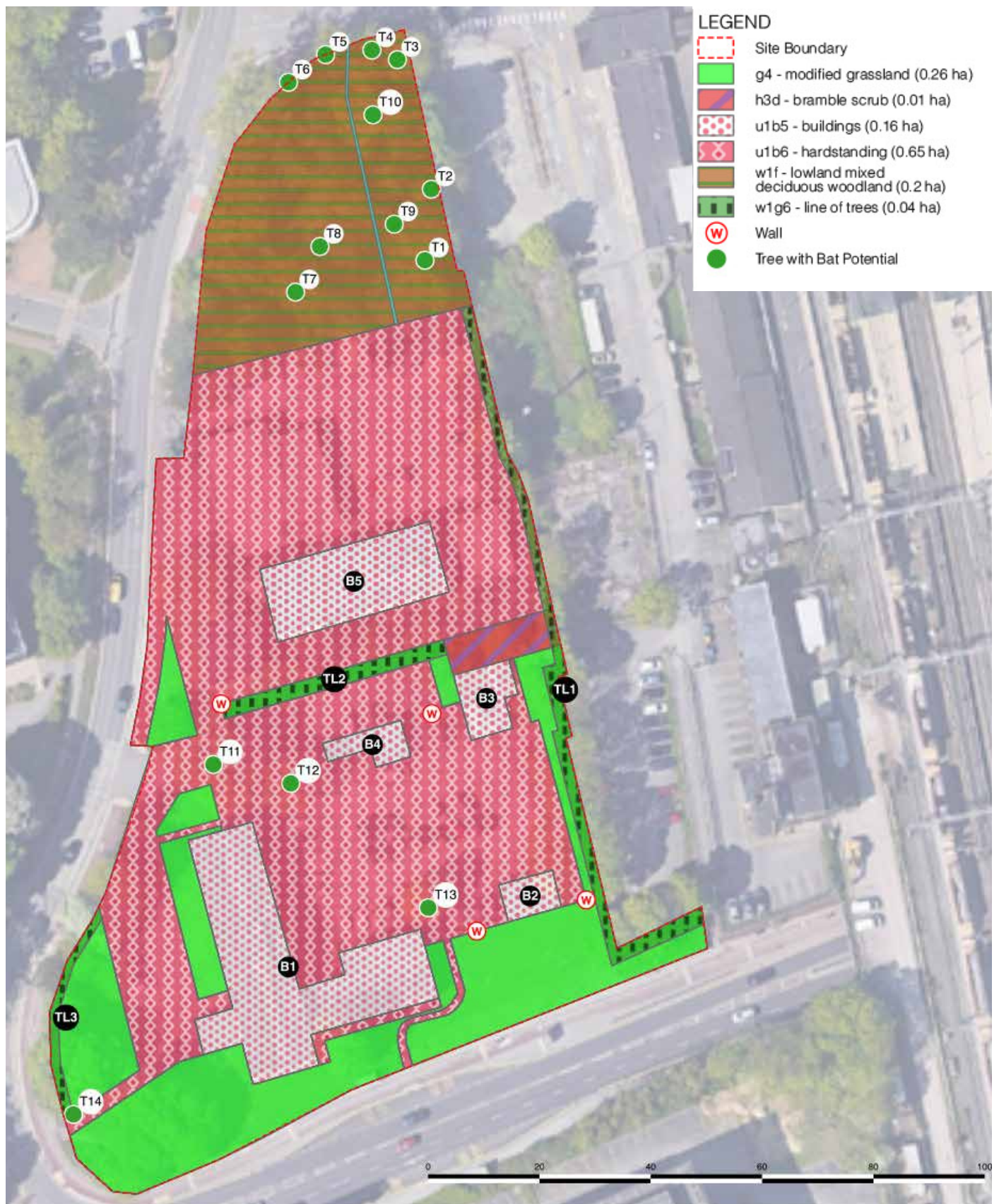






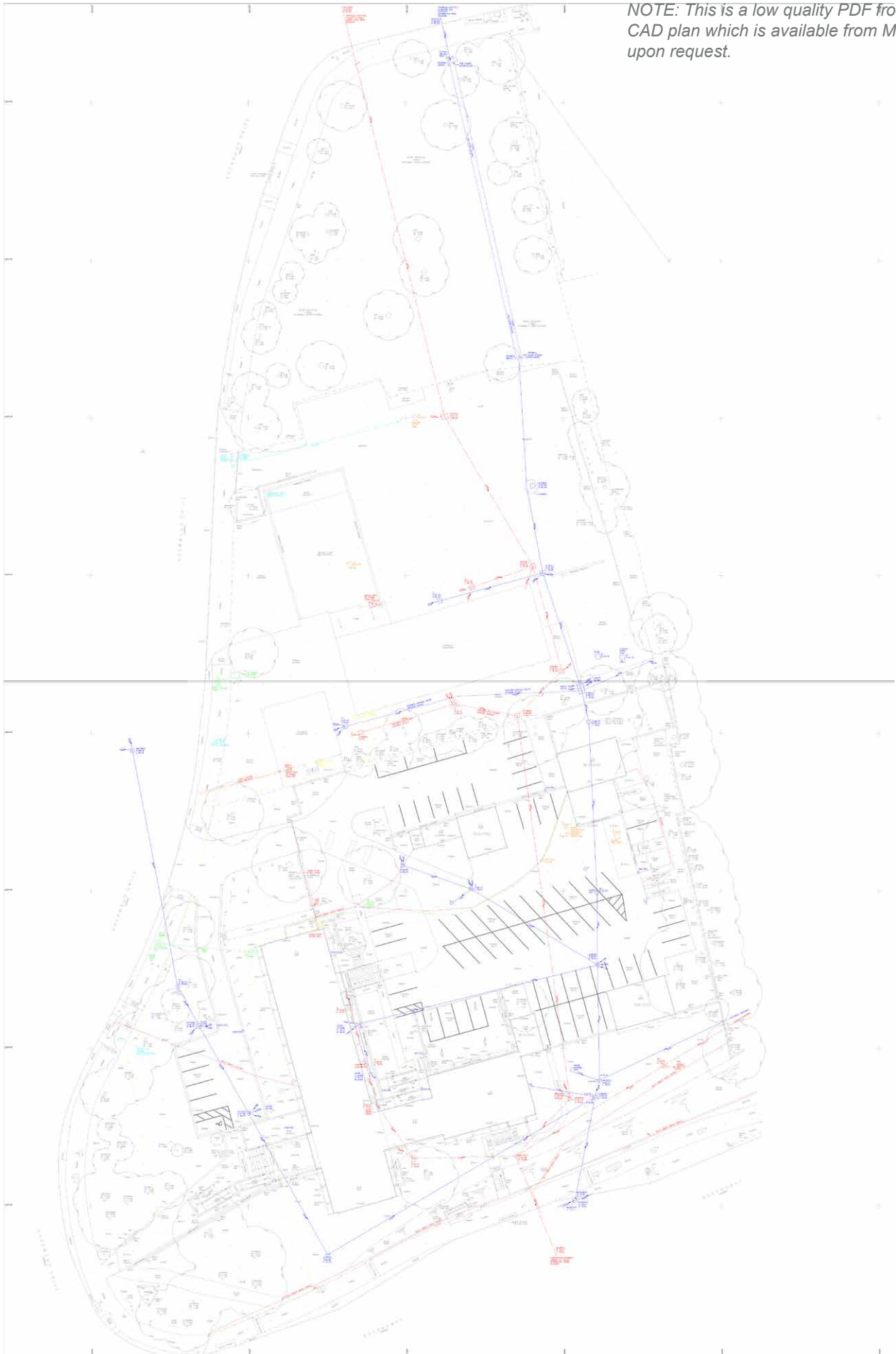


# APPENDIX C: PHASE 1 ECOLOGY MAP





# APPENDIX D: UTILITIES PLAN



*NOTE: This is a low quality PDF from the CAD plan which is available from MKDP upon request.*





## APPENDIX E: ADDITIONAL PLANNING POLICIES

### Additional Plan:MK Policies

- Policy SD1 (Place-making principles for Development)
- Policy ER10 (Assessing Edge of Centre and Out of Centre Proposals)
- Policy ER16 (Hotel and Visitor Accommodation)
- Policy HN3 (Supported and Specialist Housing)
- Policy HN4 (Amenity, Accessibility and Adaptability of Homes)
- Policy CT2 (Movement and Access)
- Policy CT 3 (Walking and Cycling)
- Policy CT5 (Public Transport)
- Policy CT6 (Low Emission Vehicles)
- Policy CT9 (Digital Communication)
- Policy EH6 (Delivery of Health Facilities in New Development)
- Policy EH7 (Promoting Healthy Communities)
- Policy FR1 (Managing Flood Risk)
- Policy FR2 (Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management)
- Policy NE2 (Protected Species and Priority Species and Habitats)
- Policy NE3 (Biodiversity and Geological Enhancement)
- Policy L4 (Public Open Space)
- Policy D8 (Mains and Telecommunications Services)
- Policy CC3 (Protection of Community Facilities)
- Policy SC2 (Community Energy Networks and Large-Scale Renewable Energy Schemes)
- Policy SC3 (Low Carbon and Renewable Energy Schemes)





[www.milton-keynes.gov.uk/udla](http://www.milton-keynes.gov.uk/udla)





## Summary of Consultation Representations &amp; Proposed Response

Response ID	Respondent	Section of Draft Brief	Summary of the Responses/Issues	Council Response & Proposed Changes to Draft Brief
1	MKCC Highways		<p>[1] Para 3.10.1 (5) refers to "existing connections" whereas para. 4.8.1 does not mention existing accesses. To maintain flexibility and to avoid the potential for conflicts from selecting two existing accesses, it is recommended that the text does not refer to only two existing accesses. However, at p.34 [Figure 14] there is a plan which has selected two potential access points - these seem to have adequate separation so, subject to geometry and visibility splays, these would be acceptable.</p> <p>[2] At para 4.8.1 or para. 4.8.2 mention that the building line position is important to ensure that there is adequate visibility of cyclists and pedestrians using the Redway from any vehicle emerging from within the building.</p> <p>[3] At para. 4.8.7 and 4.8.8 [although covered generally under Plan:MK Policy CT10] cycle parking would be expected for both residents/staff but also some within the public realm for visitors. The wording at 4.8.8 refers to "overlooked by dwellings" but assume that this could be overlooked by any other active frontages?</p> <p>[4] Para. 4.9.1 - servicing/delivery vehicles to be able to enter and park clear of the highway with space provided to turn and exit the site.</p>	<p>[1] Noted &amp; amend para. 3.10.1 (5) to read: "Access can be taken from Sherwood Drive using one or two connections, subject to achieving satisfactory geometry, visibility splays and separation."</p> <p>[2] Noted &amp; amend para. 4.8.1 to read: "Vehicular access will need to be from Sherwood Drive. The preference is for one or two access points at most, to limit the potential conflict with pedestrians and cyclists using the Redway. Due consideration will need to be given to the building line position to ensure there is adequate visibility of both cyclists and pedestrians using the Redway from any emerging vehicles."</p> <p>[3] Noted. [a] amend para. 4.8.7 to add final sentence: "In addition to the provision of parking for both residents and/or staff, and consistent with MK:Plan Policy CT10, there will be an expectation to provide some cycle parking within the public realm, for visitors." [b] amend para. 4.8.8 to read: "The cycle parking should be well-lit, with a sense of personal safety and be included in any CCTV set up. External cycle parking should be overlooked by dwellings and/or active frontages and should not be screened."</p> <p>[4] Noted. amend para. 4.9.1 to add final sentence, "Servicing/delivery vehicles should be able to enter the site and park clear of the highway with space provided to subsequently turn and exit the site."</p>
2	Roxanne Corral	General	Promotes the provision of a convenience store/shop	Section 4 of the Draft Development Brief indicates that, the site is suitable for mixed-use development and explicitly states that could include local retail uses [p.33, para. 4.2.1]. <b>No change proposed</b>
3	Network Rail	General	<p>[1] Welcomes the proposed redevelopment and the benefits that this could bring in terms of improving accessibility and permeability to the station.</p> <p>[2] Highlights opportunities to incorporate adjacent NR land, perhaps as later phases of any redevelopment plans - engagement suggested to explore these opportunities.</p>	<p>[1] Support for the redevelopment of the site and the benefits this can deliver in terms of accessibility/permeability to the station is noted. <b>No change proposed</b></p> <p>[2] The opportunity to, potentially, incorporate small parcels of Network Rail land within the scope of the site redevelopment area is noted. The response indicates that incorporating parcels of Network Rail within the scope of the site redevelopment area would be predicated on several dependencies. Moreover, the response also states that the release of any Network Rail</p>

Commented [IS1]: That's fine. I was trying to make the point that there aren't really any active frontages along Sherwood Drive and hence safety/security could be an issue.



			<p>land will be subject to formal clearance and regulatory approvals and may be on the basis that existing uses are suitably relocated/re-provided. Given the conditions and level of uncertainty still attaching to the availability and delivery of these parcels of land, it is likely to be some time before agreement on disposal of the same can be reached and the Former Fire &amp; Police Station site is the focus of a Town Deal project with time limited funding. Moreover, it can be noted that Network Rail land which is the subject of this representation falls within the designated Central Bletchley Prospectus Area and, therefore, falls within the scope of the Central Bletchley Urban Design Framework Supplementary Planning Document which seeks to facilitate holistic renewal of the area. In the circumstances, it is suggested that dialogue with Network Rail concerning the potential use of land in its ownership, as part of an extended site redevelopment scheme at a later phase, is ongoing.</p> <p><b>No change proposed</b></p>
		<p>[3] Cautions that, due to operational equipment and existing uses, some parcels of NR land might be challenging to free-up for redevelopment.</p> <p>[4] Caveats that the release of any NR land will be subject to formal clearance and regulatory approvals and may be on the basis that any existing uses are suitably relocated/re-provided.</p>	<p>[3] Noted. <b>No change proposed</b></p> <p>[4] Noted. <b>No change proposed</b></p>
4	<b>Tony Worsfold</b>	Proposes that the site should be devoted to a peaceful park area - either wholly or partially.	<p>The site is designated for 'residential-led' mixed-use development and identified for the delivery of a key project [i.e. Innovation Hub] in the MK: Bletchley &amp; Fenny Stratford Town Investment Plan which has secured Government funding. The importance of providing green space as part of redevelopment proposals is recognised in adopted policy. The site is situated in the Central Bletchley Prospectus Area [CBPA] as designated in Plan:MK and Policy SD16 states that development within the CBPA will [i.e. amongst other things] provide green infrastructure in line with Policy NE4, providing well-being benefits through access to nature. The former Fire &amp; Police Station site has the potential to provide some incidental open/green space [i.e. alongside mixed-use development], however, the site sits within the wider and overarching Central Bletchley Urban Design Framework Supplementary Planning Document Area (CB UDF SPD) [adopted 2022]. The CB UDF SPD identifies a Sherwood Drive Quarter [pp.60-61] - which also incorporates the Former Fire &amp; Police Station site - and indicates that the unobtrusive green space at the corner of Buckingham Road and Sherwood Drive [i.e. former Cricket Pavilion site] has the potential to be transformed and opened to the public as an urban park with some enabling residential development. The Former Fire and Police Station site is also located within a short walking distance of a large area of publicly accessible green space at Eight Belles Park, situated off Buckingham Road.</p> <p><b>No change proposed</b></p>

5	YMCA	General/housing	<p>[1] The development site provides an opportunity to create additional, high-quality, supported housing for young people in MK.</p> <p>[2] The YMCA seeks to 'provide additional and affordable high-quality homes for young people in communities across the Borough'. The places of most interest are those with good transport links and local amenities so that young people can access employment opportunities without accessing a car. YMCA is also interested in expanding social enterprises and work beyond housing so strong local hubs are essential and one key area of focus is, therefore, Bletchley. Location wise the Former Fire &amp; Police Station site fits with the criteria above.</p> <p>[3] The YMCA believes it can provide high-quality affordable homes to young people that are delivered in a way that is complementary to the wider development project and would like to be viewed as a trusted partner that can work alongside MKCC and MKDP to develop the site.</p> <p>[4] It is envisaged that bespoke blocks of 12-18 flats could be delivered offering 1 or 2 bed units. Alternative models, with a view to the provision of innovative move-on social housing options for employed 18-35 year olds in Bletchley would be considered.</p> <p>[5] As a Registered Provider of Social Housing, YMCA can access funding opportunities that are not available to public bodies. Moreover, its fundraising team has secured over £2 million for similar projects over the last two years.</p>	<p>[1] Noted</p> <p>[2] Noted</p> <p>[3] Noted &amp; insert Paragraph: 4.2.3 The provision of high-quality affordable homes and move-on social housing for young people, potentially in conjunction with YMCA, should be explored as part of the mix of uses proposed for the site.</p> <p>[4] Noted</p> <p>[5] Noted</p>
6	Bletchley Park Trust		<p>[1] Overarching support for mixed-use development of the site.</p> <p>[2] Hotel would be a valuable additional asset to Bletchley for incoming visitors.</p> <p>[3] Good to note that access and car-parking have been considered in some detail - Sherwood Drive is a busy road which services 3-4 large volume establishments. New development must take this into account and make provision to prevent 'on road' parking and business 'drop-offs' from putting additional demand on Sherwood Drive which would impede businesses and annoy residents.</p>	<p>[1] Support for mixed-use development of the site noted - <b>no change proposed.</b></p> <p>[2] Support for development of a hotel [i.e. as part of a mixed-use development scheme] noted. The potential for development of a hotel is already referenced in the Brief - <b>no change proposed.</b></p> <p>[3] Comments on site access and car-parking issues in the environs of Sherwood Drive are noted. Vehicular access to the site is referenced in the Brief [refer Figure 14 &amp; para. 4.8.1.]. Policy concerning Parking Provision [Plan:MK CT10] is referenced in the Brief [refer p.11, para.2.2.8]. In line with that policy, any planning application for the site would be assessed against MKCC's adopted parking standards. The design of underground or undercroft parking is addressed at para s. 4.8.5 &amp; 4.8.6. - <b>no change proposed.</b></p>
7	Gladman Retirement Living Ltd		<p>[1] The words 'elderly', 'older', 'retirement' etc do not feature in the Brief and yet the need for this form of accommodation in MK is pronounced. For example, the 2017 SHMA notes that over the period 2016-2031 the number of people aged 65 and over will increase rapidly.</p>	<p>[1] The requirement to provide housing to meet the needs of elderly people given MK's changing demographic is noted. It is acknowledged that the Brief does not make specific reference to the possibility of providing housing/accommodation for elderly people, however, elderly housing is mentioned under Plan:MK Policy HN2 which is cited in the Brief. Please also refer to response [3] below.</p>

			<p>[2] The overall intention of the Dev Brief is supported - the redevelopment of this key site will further enhance the area and contribute to the wider objectives of MK growth.</p> <p>[3] It is considered that further consideration should be given to whether the site could be suitable for specialist older person's housing, and if it is concluded that it is then the development brief should be updated to positively express support for such accommodation.</p>	<p>[2] Support for the overall intention of the Brief is noted. <b>No change proposed.</b></p> <p>[3] Consideration has been given to whether the site could be suitable for specialist older persons housing. On balance, it has been decided that references to the potential provision of older persons housing can be included in the development brief. <b>Change proposed:</b> insert paragraph: 4.2.4 Consideration should also be given to whether the site could be suitable for an element of specialist older persons housing as part of the overall mix of development.</p>
8	Cllr. K McLean		<p>First sentence of para. 4.7.2 at p.36 does not make sense - please could someone correct it?</p>	<p>Noted and agreed. <b>Change proposed:</b> amended first sentence of para. 4.7.2 to read as follows: "If balconies are included, they will form a key elevation detail and will need to be carefully designed."</p>
9	Santander		<p>[1] Overall, supportive of the proposals and for regeneration of the site and the wider area. The site has the potential to be a catalyst for further investment in and redevelopment of the area around Bletchley railway station.</p> <p>[2] Potential for strong connections to development proposals coming forward for the Santander Campus on Buckingham Rd.</p> <p>[3] Supportive of high-density residential development on the site given its sustainable location and proximity to Bletchley railway station and should be combined with further residential development within the surrounding area, such as the Santander site on Buckingham Rd.</p> <p>[4] The Brief needs to emphasise the fact that the site lies within an area undergoing a huge amount of change, particularly regarding the change of use within the area from 'office' use to predominantly 'residential'. This site, and others in the vicinity that have been converted to residential use, should set the precedent, and lead the way in terms of design aspirations for the wider area as a large scale, high-density residential area.</p> <p>[5] Welcomes the reference under section 3.8 [Access &amp; Transport] to the excellent surrounding transport links which also benefit the Santander site on Buckingham Rd.</p> <p>[6] The Brief refers to residential development throughout but then appears to</p>	<p>[1] Noted and agreed. Plan:MK Policy SD16 references the early redevelopment of the Police and Fire Stations sites within the designated Central Bletchley Prospectus Area as part of its approach to deliver, wider, transformational regeneration. <b>No change proposed</b></p> <p>[2] Noted and agreed. [These connections and opportunities are set out in the Central Bletchley Urban Design Framework SPD [adopted April 2022]. The redevelopment of both the Fire &amp; Police Station site and the Buckingham House [Santander] site are both identified and illustrated within the context of the 'Sherwood Drive Quarter' of the SPD area.] <b>No change proposed</b></p> <p>[3] Noted and agreed. Policy guidance supports the notion of focussing higher density residential development around transport hubs and locations which can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. <b>No change proposed</b></p> <p>[4] The Brief emphasises that the site lies within an area undergoing a huge amount of change in paragraph 1.2.4, The change of use within the area from 'office' use to predominantly 'residential' is also highlighted within paragraph 1.2.6 <b>No change proposed</b></p> <p>[5] Noted. <b>No change proposed</b></p> <p>[6] . The brief lays out the policy and context in sections 1 and 2, and does refer to residential being the main use at paragraph 1.4.3., However, this does not preclude other mixes being</p>

Commented [IS2]: Do there need to be additional text here (and in other responses)? Can it not just say noted?

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Commented [GG4R2]: I think some of the responses help to assure stakeholders that we are considering their comments.



		<p>change its tenor to mixed-use development at para. 3.10 to include high density housing, a hotel, cafe, restaurant, and local retail uses; if mixed-use development is proposed, this should be made clear from the outset of the Brief.</p> <p>[7] Support for a proposed landmark building with a strong frontage along Buckingham Road and this provides an opportunity to reflect this with a landmark building in the corner of the Santander site which is located, diagonally, across the road</p> <p>[8] The range of 4-10 storeys could be extended further and it is suggested that up to 12 storeys would be appropriate, particularly in terms of the landmark building so that this becomes a focal point from the station along Buckingham Rd.</p> <p>[9] Questions whether the proposed density could be pushed higher than 150-250 dwellings per hectare by virtue of the highly accessible location and proximity to large areas of green space.</p> <p>[10] The Brief provides the opportunity to remove car-parking from the site in line with MK aspirations to be the greenest city in the world. The Brief states "a case could be made for provision of parking below current standards". Given the highly accessible location and the climate change emergency, more ambition is needed on this issue, to include the consideration of car-free development within the brief.</p> <p>[11] More ambition is required regarding sustainability with examples set out as to how the BREEAM rating of outstanding can be achieved. Given the cost-of-living crisis, this should also reference how energy costs could be kept to a minimum for future occupiers.</p>	<p>proposed. It is assumed that this would also be the case with a mixed-use development proposal as this would generally require a residential-led mixed-use development with mixed uses usually occupying lower public facing floors, and the greater percentage of residential above.</p> <p>[7] Supportive comments noted. <b>No change proposed</b></p> <p>[8] The 4-10 storey range mentioned in the brief is indicative, this does not preclude a detailed proposal for a taller landmark building coming forward as part of a proposal for the site. Equally, a building is not required to be 12 storeys or above to determine it as a landmark, which is generally determined by the quality of design and context of the building itself. <b>No change proposed</b></p> <p>[9] The density range of 150-250 dwellings per hectare reflects adopted policy in the adopted Local Plan [i.e. Plan:MK Policy SD16]. The Development Brief cannot change adopted policy. <b>No change proposed</b></p> <p>[10] Plan:MK Policy CT2 [Movement &amp; Access] states that 'Development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. Plan:MK Policy CT10 [Parking Provision] states that the Council expects to meet its parking standards, unless mitigating circumstances dictate otherwise. Mitigating circumstances might include development proposals located in a high-density area or within close proximity of a public transport node such as rail/bus station and, therefore, parking provision might need to reflect specific developments and their location. Both Policy CT2 and Policy CT10 are referenced in the Draft Brief. <b>No change proposed</b></p> <p>[11] Noted. Section 4.10 Sustainable Design sets out the 'outstanding' BREEAM rating requirement for the site and references Plan:MK Policy SC1 [Sustainable Construction] and the Council's [award-winning] Sustainable Construction Supplementary Planning Document. The Draft Brief notes that innovation will be required across all aspects of the scheme to achieve an BREEAM 'outstanding'. On balance it is considered that for the purposes of the Brief sufficient direction is provided on sustainability. <b>No change proposed</b></p>
10	East West Rail Co	<p>[1] Broadly supportive of the principles set out in the Brief.</p> <p>[2] Acknowledges the references to East West Rail [EWR] within the brief and welcomes the recognition of EWR's future role at Bletchley station.</p>	<p>[1] Support noted. <b>No change proposed</b></p> <p>[2] Noted. <b>No change proposed</b></p>

		<p>[3] Urban design principles in the Brief are supported, especially those to improve pedestrian safety along the east of the site through natural surveillance [para. 3.10.1], the requirement for an attractive public realm in the south-west of the site [para. 4.8.3], and the requirements for the incorporation of active travel linkages [para.4.8.4]. The successful delivery of these components should facilitate a significant enhancement to the western approach to Bletchley station.</p> <p>[4] On a matter of detail the principle and positioning of the northern vehicle access point [i.e. into the existing fire station site from Sherwood Drive as denoted in Figure 14] as the location and delivery of a vehicle access point in this location aligns with EWR Co's ambitions for Bletchley station.</p>	<p>[3] Support noted. <b>No change proposed</b></p> <p>[4] Noted. <b>No change proposed.</b></p>
11	<b>Bletchley Park Area Residents Assn. [BPARA]</b>	<p>[1] The overall impression is that the Brief has been produced with the intention of marketing the site for residential purposes only. This needs to be addressed in the revised Brief.</p> <p>[2] The West Bletchley Council (WBC) Neighbourhood Plan clearly states development in the Station Quarter Area should be a "balanced mix of uses that can include residential, high-quality workspaces, hotel, conference centre/facilities, café/restaurant/local retail uses, visitor interpretation/facilities and public spaces...." As the Innovation Hub will now be sited elsewhere, there is little in the Brief to cater for uses other than residential as has been set out in the Vision - point 1.4.3 of the Brief!</p> <p>[3] BPARA agrees with point 1.1.2 that these two strategic sites should contribute to an</p>	<p>[1] Noted. There is mention of 'mixed-use' development throughout the Draft Brief. Amended para. 1.4.3 to read: "The main use is most likely to be residential although planning policy allows other uses which would help increase vitality whilst benefitting from being adjacent to the town centre, MK College, and the excellent rail links, which will be improved by East West Rail <b>Please also see response to 9.6</b></p> <p>The Development Plan [WBC NP &amp; Plan:MK] is supportive of mixed-use development. Policy SD16 of Plan:MK references '..... unlocking residential-led mixed-use development opportunities."</p> <p>[2] Noted. The Development Plan, comprising WBC NP and Plan:MK, is supportive of mixed-use development. Policy SD16 of Plan:MK references '..... unlocking residential-led mixed-use development opportunities.'" The site is covered by the CB UDF SPD [adopted 2022] which, whilst not planning policy in its own right, nevertheless provides further guidance attaching to Policy SD16 in Plan:MK that promotes the Sherwood Drive Quarter [i.e. to include the Former Fire &amp; Police Station site] for residential-led mixed-use redevelopment. The Former Fire &amp; Police Station site is identified as a redevelopment project in the Bletchley &amp; Fenny Stratford Town Investment Plan 2020. Town Deal Accelerated Capital Funding expenditure in the sum of £200k has been made by the Town Deal Board on the demolition of the former fire station and associated site remediation. These works have helped to de-risk disposal and redevelopment of the, wider, combined emergency services site. The Town Deal Innovation Hub Project is focussed on the Former Fire &amp; Police Station site and is currently allocated £3.05 million funding out of a £22.7 million funding award. It is anticipated that a business case for this project will be completed, under the direction of the Town Deal Board, in time for submission to DLUHC in January 2023.</p> <p>[3] Comments noted and welcomed.</p>

		<p>attractive, vibrant, prosperous and well-designed Central Bletchley. However, these sites are in West Bletchley close to Bletchley Park, The South-Central Institute of Technology (SC IOT), and the eagerly-awaited East/West Rail link – this area being regarded as the Technology/Transport Hub for Milton Keynes. Given the amount of residential development already taking place at Caspian View, Bletchley View (total of 296 properties) and, potentially, on the Burger King, Cricket Pavilion &amp; Santander sites, this site should be for <i>Mixed Use</i> with landmark, quality development whether it be residential or hotel or retail or other uses.</p> <p>[4] 1.2.5 refers to Bletchley Station being re-ramped and provision of an eastern entrance. There is also an aspiration for Station regeneration/improvement in the WBC Neighbourhood Plan, and 2.2.18 of the Brief refers to “improve the existing station and station forecourt/square.” The Neighbourhood Plan was approved more than 3 years ago, and the advent of East/West Rail has been known for much longer. In 2022, it is difficult to find out how and when the existing rail station and western entrance will be improved as the various rail companies appear, to the public, to have no burning desire to do anything, and MK Council states that they are reliant on the rail companies taking the lead. East/West Rail is due to open in 2025 and passengers will exit the station to an unattractive, run-down area – not an attractive, vibrant, prosperous Bletchley! However, point 4.3.2 states that meetings are taking place between the rail companies and MK Council/MKDP, and the public needs to be kept informed!</p> <p>[5] Section 2.2.2 refers to density of residential development of 150-250 hectares – WBC needs to confirm whether this is appropriate for this site and complies with the WBC Neighbourhood Plan.</p> <p>[6] 2.2.8 refers to Parking – BPARA has objected to the Sherwood Drive area becoming Zone 2 under the Draft Parking Standard SPD. As stated in the consultation response “Without wishing to appear cynical, BPARA believes that the new Zone 2 designation will enable more densely populated residential development in the Central Bletchley/Sherwood Drive area.” It is widely known that there are already serious</p>	<p>The site is located within the wider Central Bletchley Prospectus Area which is designated for ‘residential-led mixed-use development’ by Plan:MK [Policy SD16].</p> <p><b>No change proposed</b></p> <p>[4] Comments noted. Ongoing uncertainty concerning the intentions of East West Rail Co &amp; Network Rail make for a challenging renewal context. Different land ownerships also make the renewal and redevelopment process challenging. Notwithstanding those uncertainties and challenges, the production of a Development Brief will, in line with Plan:MK Policy SD 16, expedite options for the early redevelopment of the Police and Fire Station sites.</p> <p><b>No change proposed</b></p> <p>[5] Plan:MK Policy SD16 facilitates residential development in the 150-250 dwellings per hectare range. Plan:MK was subject to formal consultation and, following its adoption, now forms part of the Development Plan covering the Former Fire &amp; Police Station site. Plan:MK Policy DS2 [Housing Strategy] states as follows: ‘Plan:MK will deliver a minimum of 26,500 net dwellings across the Borough of Milton Keynes over the period 2016-2031. New housing development will be focused on, and adjacent to, the existing urban area of MK as well as three key settlements and will be delivered by [inter alia] ... regeneration opportunities around the centres of Wolverton and Bletchley.’ There is, therefore, no requirement to seek confirmation from WBC that the density range cited is appropriate.</p> <p><b>No change proposed</b></p> <p>[6] MKCC is currently undertaking a review of its Parking Standards. BPARA’s consultation response to the Draft Parking Standards SPD will be considered as part of that process. For completeness, that is an entirely separate process to the production of a Development Brief for the Former Fire &amp; Police Station site. The Draft Development Brief appropriately</p>
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		<p>parking issues in the Sherwood Drive/Buckingham Road area, and Zone 2 should not apply here as this would exacerbate the parking problems that already exist. A new multi-story carpark on rail land for use by both passengers and the public with reasonable charges is needed. In Northampton, the Grosvenor Carpark serves both the public and residents living opposite the carpark. I request that MK Council &amp; MKDP take account of BPARA's response to the Draft Parking Standard SPD which details the <u>existing</u> parking problems in this area.</p> <p>[7] The site is an employment area under Policy ER2, and if used for mixed use development, including a hotel and retail, then there would be no need to change this designation.</p> <p>[8] The basement of the Fire Station is intact – is this a bunker that Dr Peter Jarvis used when a Police Surgeon and why left intact?</p> <p>[9] 3.4. &amp; 4.3.2 refer to unattractive/uncertain future of Network Rail land next to the site, and meetings held between the rail companies and MK Council/MKDP. These parties have missed an opportunity to discuss/agree plans for re-development of this area in conjunction with the sites in this Brief and the proximity of this rail land must adversely impact the marketability and development of the sites in the Brief – the proposals in the 2019 WBC Neighbourhood Plan have been ignored!</p>	<p>references Plan:MK Policy CT10 [Parking Provision], refer page 11. <i>Inter alia</i>, that Policy states that, "All development should meet the Council's full parking standards, unless mitigating circumstances dictate otherwise."</p> <p><b>No change proposed</b></p> <p>[7] Noted. There is no proposal to change land use designations within the Development Plan, via the Development Brief - a development brief needs to reflect adopted planning policy and cannot make new planning policy.</p> <p>The site is designated as an 'existing employment site' and a 'community facility' on the Plan:MK policies map, and those policies are a core element of the development plan context for the site. However, it also comprises part of a wider designation, as a location within the Central Bletchley Prospectus Area [Policy SD16 within Plan:MK], which facilitates residential-led mixed use development in the density range of 150-250 dwellings per hectare. The West Bletchley Neighbourhood Plan also forms part of the development plan for the site and provides more up to date policy supportive of mixed-use development within the Station Quarter [Policy BS3]. Furthermore, the site is covered by the Central Bletchley Urban Design Framework SPD which, whilst not planning policy, provides supplementary guidance to Policy SD16 in Plan:MK that aligns with the renewal aspirations of the Town Deal programme. On balance, therefore, and affording greater weight to more recent planning policy, it is considered that policy provides a favourable context which supports the Council's redevelopment ambitions for the site. That policy is supportive of site redevelopment to deliver higher density housing and a mix of uses that would benefit from being next to the railway station, MK College and the new South-Central Institute of Technology and make best use of its sustainable location. Such redevelopment will help to underpin town centre viability and renewal.</p> <p><b>No change proposed</b></p> <p>[8] Noted. It is understood that the basement was used in connection with the Fire Station although the precise history is unknown. The demolition of the buildings on the site was intentionally taken down to ground level and cleared to allow for the eventual developer of the site to determine if the below ground void should be utilised as part of the proposed development or infilled accordingly.</p> <p><b>No change proposed</b></p> <p>[9] Ongoing uncertainty concerning the intentions of stakeholders such as East West Rail Co &amp; Network Rail make for a challenging renewal context. The response to this</p>
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		<p>[10] Incorrectly states that Caspian View is in residential use whereas construction work is in progress.</p> <p>[11] <b>3.8. Access</b> – Sherwood Drive, a major route in West Bletchley, is busy during normal working hours with local traffic and those accessing the rail station, Bletchley Park, The SC IOT and Bletchley College and becomes congested when traffic backs up on the approach to the roundabout with Buckingham Road, another major road used by local and through traffic, as acknowledged in 3.9.4. The level of traffic on Buckingham Road will increase with developments at Salden Chase, Caspian View and Bletchley View. Congestion on Buckingham Road will increase further should Saxon Way be reduced to a single carriageway. The level of traffic that used to access the entrances to the Fire &amp; Police Stations was low. There is a fallacy that those living close to public transport do not require/own vehicles – this can be disproved by those living in properties on nearby land that was formerly part of Bletchley Park! The level of residential development should be limited due to access issues onto Sherwood Drive. There has been no investment in Bletchley’s road network in years, and despite the desire to achieve carbon neutrality, the number of vehicles has increased as development has taken place both within and close to Bletchley. Instead of a costly and complex eastern station entrance which is light years away, the current stepped access to the rail station from Buckingham Road (which is close to the Brunel Centre/Stephenson House and described as the shortest walking distance between station and town centre) should be made more pedestrian-friendly and could be achieved via the police station site owned by MKDP.</p>	<p>consultation received from Network Rail indicates that incorporating parcels of Network Rail within the scope of the site redevelopment area would be predicated on a number of dependencies. Moreover, the response also states that the release of any Network Rail land will be subject to formal clearance and regulatory approvals and may be on the basis that existing uses are suitably relocated/re-provided. Given the conditions and level of uncertainty still attaching to the availability and delivery of these parcels of land, it is likely to be some time before agreement on disposal of the same can be reached. Moreover, the Former Fire &amp; Police Station site is the focus of a Town Deal project with time-limited funding. It can be noted that Network Rail land which is the subject of this representation falls within the designated Central Bletchley Prospectus Area and, therefore, falls within the scope of the Central Bletchley Urban Design Framework Supplementary Planning Document which seeks to facilitate holistic renewal of the area. In the circumstances, it is suggested that dialogue with Network Rail concerning the potential use of land in its ownership, as part of an extended site redevelopment scheme at a later phase, is ongoing.</p> <p>[10] Noted, Amend Paragraph 3.7.3 to read: Some of the older commercial areas are now in residential use. For example, Caspian View, the former office block to the south is currently being converted to residential use as is the land north of the bus station currently being redeveloped into 184 dwellings and community uses (Bletchley View).</p> <p>[11] Site access issues in the Draft Development Brief have been reviewed and considered by MKCC’s Senior Engineer - Highway Development. No significant issues with site access have been raised. Plan:MK Policy CT2 [Movement and Access] states as follows: A. Development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. B. Development proposals that generate significant amounts of movement or impact on level crossings must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel plan with mitigation implemented as required. The issues with the current stepped access to the rail station from Buckingham Road have been acknowledged for some time. However, it should be noted that the steps in question are not located on land within or immediately adjacent to the boundary of the Former Fire &amp; Police Station site. MKC and MKDP have held meetings with Network Rail, East West Rail Co and the station operator about the land immediately to the east of the site and the</p>
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		<p>[12] 3.9 &amp; 4.4.1 - MK College building/apartments has a mix of three and some four storey buildings, not just the latter.</p> <p>[13] <b>3.10 - Opportunities/constraints</b> – agree.</p> <p>[14] <b>4.3.5</b> A hotel would make a good landmark building and assist tourism as well as being close to the rail station, SC IOT and Bletchley Park, and a hotel was welcomed by individuals, including senior influential figures, attending a tour of Bletchley Park in September 2021. Two new hotels have opened in CMK in the last year, whilst Bletchley has had only two hotels for years – the Doubletree at MK Stadium and the Campanile close to Pink Punters on Watling Street. A hotel was mentioned at a meeting last October – has market research now been carried out? A hotel, restaurant/cafe/teashop, small retail units to service rail passengers as well as residents in conjunction with an acceptable level of residential development would be fitting for such a prime position - this will be the Gateway to East/West Rail and major enterprises on Sherwood Drive. Excessive residential development would have a serious impact on already stretched services such as education and health. N.B. The current retail unit at the Rail Station poorly serves passengers and is in urgent need of replacement.</p> <p>[15] <b>4.8.5</b> Underground parking works well elsewhere in CMK, and initial plans for the redevelopment of the Burger King site made similar provision.</p> <p>[16] <b>4.12</b> Buckingham Road still floods on a regular basis and disrupts both traffic and pedestrians - drainage from this site could exacerbate this problem.</p>	<p>opportunity to improve the environmental quality and functionality of this area is highlighted in the Draft Brief [para. 3.4.5]. As noted in the Draft Brief, Network Rail is currently exploring the options for this area and will continue to meet with MKCC and MKDP regarding this matter. It is likely that any improvements to the existing stepped access [e.g. provision of ramped access] would necessitate the partial use of highway/adopted land in the ownership of MKCC. <b>No changes proposed</b></p> <p>[12] Comment noted but cannot ascertain where this is stated within the brief <b>No Change proposed</b></p> <p>[13] Comment noted. <b>No Change proposed</b></p> <p>[14] The Draft Development Brief alludes to the possibility of mixed land uses on the site, and explicitly references potential hotel use [para. 4.2.1, p.33]. Ultimately, it will be a matter for the market to decide whether hotel development is viable. It is understood that soft-market testing, to be undertaken by MKDP following approval of the final Development Brief, will raise the potential of this use. The site is designated in Plan:MK for residential-led mixed use development. Residential density parameters for the site and the wider Central Bletchley prospectus Area are provided in Policy SD16. Health and education services will need to be provided, as appropriate, alongside planned housing growth. S106 planning obligations will be sought to fund this provision. It can be noted that the Council reviews school-place planning on an annual basis. <b>No change proposed</b></p> <p>[15] Comment noted. The Draft Development Brief already references the potential provision of underground [and undercroft] - parking [p.36]. Ultimately, parking and provision and design will be an issue for a developer to consider as part of a comprehensive development scheme, alongside development viability. <b>No change proposed</b></p> <p>[16] Comment noted. Flooding and drainage are addressed at Section 4.12 of the Draft Development Brief. Development proposals for the Fire &amp; Police Station site will need to make appropriate provision for site drainage. However, the site will not be expected to provide drainage solutions for existing off-site drainage issues. <b>No change proposed</b></p>
12	Bletchley & Fenny	[1] Welcomes production of the Brief and largely supports the guidance & design	[1] Noted and welcomed. <b>No change proposed</b>



	<b>Stratford Town Council</b>	<p>principles for redevelopment of the site - the guidance &amp; design principles are compatible with the wider planning policy context and with the Central Bletchley Urban Design Framework SPD which was also endorsed by B&amp;FSTC.</p> <p>[2] Recognises the opportunities &amp; constraints set out in Section 3 Contextual Analysis, particularly those referenced under para. 3.10.1.</p> <p>[3] Appreciates the importance of attracting significant investment and development into the town centre, including this development site, in order to revitalise the town and the surrounding areas.</p> <p>[4] Supports the design principles set out in Section 4 of the Brief and hope to see any development conforming to these principles.</p> <p>[5] Emphasises the importance of planning gains from the development of this site being allocated to the improvement of the infrastructure of the town centre, of which it forms part.</p>	<p>[2] Noted. <b>No change proposed</b></p> <p>[3] Noted. <b>No change proposed</b></p> <p>[4] Noted and support welcomed. <b>No change proposed</b></p> <p>[5] Planning obligations attaching to the redevelopment of this site will be assessed, against adopted policy and relevant supplementary planning guidance, at the planning application stage. <b>No change proposed</b></p>
13	<b>West Bletchley Council</b>	<p>[1] The Development Brief is focusing on the site in isolation, rather than dealing with the Station Quarter comprehensively, in line with Policy BS3 of West Bletchley Neighbourhood Plan [WBNP].</p> <p>[2] WBC believes the site owned by MKDP should be developed for mixed development with new housing to meet the needs of Bletchley residents.</p> <p>[3] In line with Policy HN2 Affordable Housing, MKDP should support a mixed development with 50% of the development site being affordable housing, consisting of 30% Council or social rent housing and the remaining 20% as affordable rent or shared ownership.</p>	<p>[1] The Draft Development Brief is focused on the Former Fire &amp; Police Station site since that is the extent of MKDP's land ownership and such an approach aligns with Plan:MK Policy SD16 [Central Bletchley Prospectus Area] which states that one of the principles which should guide renewal is exploring the options for the early redevelopment of the Fire &amp; Police Station sites. Progress with the redevelopment of this specific site is also necessary on the grounds that it is the identified site for the delivery of the Town Investment Plan Innovation Hub project. Associated Town Deal funding needs to be expended by end of the '25/'26 financial year so progress with the redevelopment of this site needs to be expedited. MKC/MKCC has not committed to production of a development and design brief for the Station Quarter [i.e. as referenced in the West Bletchley Neighbourhood Plan]. However, MKC has produced and recently adopted the Central Bletchley Urban Design Framework Supplementary Planning Document [CB UDF SPD] which provides a design framework to guide holistic development across the designated Central Bletchley Prospectus Area. Both the Former Fire &amp; Police Station site [i.e. the focus of the Draft Development Brief] and the Station Quarter [i.e. as referenced in WBNP] are covered by the CB UDF SPD. The CB UDF SPD identifies several 'opportunity areas' within the overarching Prospectus Area. For completeness, it can be noted that the Former Fire &amp; Police Station site is located in the Sherwood Drive Quarter in the SPD whilst the remainder of the 'Station Quarter', as referenced in WBNP, is located in the 'Station Quarter opportunity area' identified in the SPD. The WBNP was 'made' in 2019 whilst the CB UDF was adopted, as a Supplementary Planning Document to Policy SD16 [NB a strategic policy], in April 2022. <b>No change proposed</b></p>

				<p>[2] The desire for housing to meet the needs of West Bletchley residents is noted. It is envisaged that any housing development will include both market and affordable housing elements which will help to meet the needs of local people. <b>No change proposed</b></p> <p>[3] • Plan:MK Policy HN2 [Affordable Housing] states that proposals for 11 or more homes should provide 31% affordable housing and this policy is specifically referenced in the Draft Brief. • Plan:MK Appendix J comprises a list of strategic policies to be considered when preparing neighbourhood plans and that list includes Plan:MK Policy HN2 [Affordable Housing]. • West Bletchley Neighbourhood Plan 2016-26 includes policy covering the development of new housing. Policy BNH [New Residential Development] states that the development of new housing will be supported where certain criteria are met to include the provision of affordable housing "to reflect both MKC and current National planning policy." • The Draft Development Brief, therefore, reflects affordable housing policy contained in both Plan:MK and the West Bletchley Neighbourhood Plan and, in that respect, is considered 'policy compliant' [NB the Development Brief cannot be utilised as a vehicle to change adopted policy, rather it must reflect such policy]. • No evidence to support or substantiate the viability of 50% affordable housing provision on the Former Fire and Police Station site has been submitted. However, it can be noted that the viability testing of policies and proposals in Plan:MK, to include Policy HN2 [Affordable Housing], was undertaken as part of the preparation of the Local Plan. • Whilst it is proposed that the Development Brief should continue to reflect the level of affordable housing provision set out in Plan:MK, it can be noted that, subject to viability, MKDP has an aspiration to deliver 36% affordable housing on sites in its ownership. <b>No change proposed</b></p>

# Former Fire Station and Police Station, Bletchley Draft Development Brief



[www.milton-keynes.gov.uk/udla](http://www.milton-keynes.gov.uk/udla)

November 2022



This document has been prepared by Milton Keynes Council's Urban Design and Landscape Architecture Team and Milton Keynes Development Partnership who own the land.

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Document Status:	Draft
Revision:	I
Author:	Various
Checked by:	GG
Authorised by:	
Issue Date:	November 2022



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# **SECTION 1:** **INTRODUCTION**

## 1.1 Background

1.1.1 This Development Brief sets out the guidance and design principles for the redevelopment of the former Police Station and Fire Station sites in Bletchley, a strategically located development opportunity next to Bletchley Station (see fig 1 & 2). It should be read in conjunction with planning policy documents, including Plan:MK and the West Bletchley Neighbourhood Plan, alongside guidance documents, such as the Central Bletchley Urban Design Framework Supplementary Planning Document (SPD).

1.1.2 Milton Keynes Council (MKC) and the landowner Milton Keynes Development Partnership (MKDP) have high aspirations for these two strategic sites. They can help contribute to an attractive, vibrant, prosperous and well-designed Central Bletchley providing a good quality of life for residents, workers, shoppers, as well as being seen as a destination for visitors. It will offer sustainable lifestyle options and choices fit for the 21st century that is alternative but complementary to much of the Milton Keynes offer.

### Bletchley & Fenny Stratford Town Deal

1.1.3 In November 2019 the Government published a prospectus detailing how it was planning to manage a £3.6 billion national fund to support towns to build prosperous futures, known as the Towns Fund.

1.1.4 The delivery of East West Rail and Bletchley's enhanced connectivity at the heart of the Government's flagship Ox-Cam Arc, the proposed development of South Central Institute of Technology at Milton Keynes (MK) College, transformation at Bletchley Park and a number of vacant sites with redevelopment potential located near to Bletchley Station all combined to provide a favourable context for a Towns Fund bid. Consequently, in December 2019, alongside a decision to approve publication of the Central Bletchley Prospectus, MKC confirmed that Bletchley would be the focus of Milton Keynes' Towns Fund bid.

1.1.5 Informed by an extensive stakeholder engagement process, the Bletchley & Fenny Stratford Town Investment Plan, seeking £25 million to progress and deliver nine projects, was completed and submitted to government in October 2020. The Government's Town Fund investment offer was received in March 2021 and a Town Deal in the sum of £22.7 million was formally agreed the following month.

1.1.6 Redevelopment of the former Fire and Police Station site is a key project within the Bletchley & Fenny Stratford Town Deal programme. Utilising Town Deal 'accelerated capital project' funding Milton Keynes Development Partnership has already overseen the demolition of the Fire Station and associated site remediation, thereby helping to de-risk development of the Fire and Police Station sites.



Figure 1: The Site

## 1.2 Bletchley

- 1.2.1 Bletchley is situated on the southern edge of Milton Keynes which is strategically located within the Oxford-Cambridge Growth Arc (See figure 2) where a population of 410,000 and 50,000-90,000 new jobs are proposed by 2050 with the provision of 30,000-35,000 new homes in addition to the 25,000 already planned.
- 1.2.2 The site is located in a key strategic location within Central Bletchley adjacent to the railway station (see figure 3). The development opportunity comprises the former Fire Station and Police Station in Central Bletchley (see figure 1). Both emergency services have been relocated to the Blue Light Hub in West Ashland.
- 1.2.3 The sites are owned by Milton Keynes Development Partnership (a company wholly owned by Milton Keynes Council). The land ownership is set out in Appendix A and shows two parcels of land although they can be treated as one site. For simplicity the land west of the Fire Station site has been altered on the drawings in this document.

- 1.2.4 Large parts of Bletchley will be undergoing significant change in the near future with investment by the public and private sector. An important driver behind this change is East West Rail, which will deliver new and improved services into the heart of Bletchley, and right next to the site. The Oxford to Bletchley stage is currently under construction with trains due to run between Oxford and Milton Keynes by 2025, with the Bletchley service potentially opening in 2024. Consultation and design work on the links to Bedford and Cambridge is currently underway. Bletchley Station will be revamped whilst there are also plans to provide a new station entrance on the eastern side of the railway, next to Saxon Street, in order to better connect with the town centre.
- 1.2.5 Public money is also being invested at the National and local level. The Towns Fund will help stimulate renewal, deliver a new Innovation Centre, provide land for a new bus station, and change/improve Saxon Street as part of the proposed eastern entrance. MK College Group continues to invest in its Bletchley Campus with a Government grant helping to establish its South Central Institute of Technology (SCIoT)

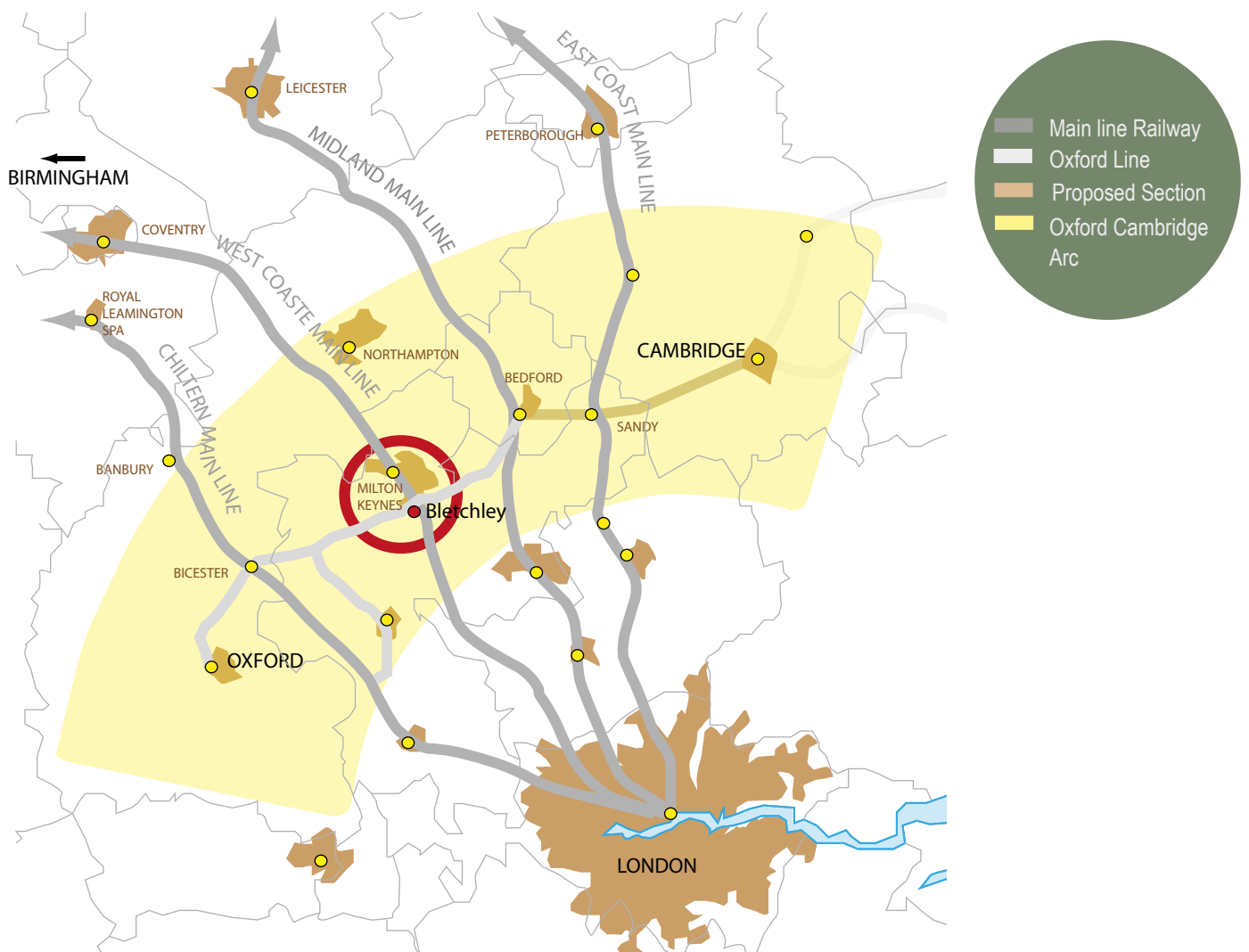


Figure 2: Bletchley location within the Oxford-Cambridge Growth Arc



opposite the Fire Station on Sherwood Drive. Work has recently commenced on this project.

1.2.6 MKDP is also making further acquisitions in the area. In January 2022, MKDP acquired Brunel Shopping Centre, the former Sainsburys' Car Park and Wilko to help deliver the Town Deal. The private sector is also investing. Examples include Caspian View, an office to residential conversion to 112 apartments to the south of the site, and Bletchley View, a new-build development of 184 dwellings just north of the Bus Station, which has recently commenced.

1.2.7 The recent development activity, new rail infrastructure, public/private funding, recently adopted SPD and forthcoming sale of the former Fire and Police Station sites will all combine to create momentum for the renewal of Bletchley.



Figure 3: Site Location



Figure 4: Site Boundary



### 1.3 Purpose of the Development Brief

- 1.3.1 The purpose of this document is to provide planning guidance and key design principles that should underpin any proposal and which will result in a high quality placemaking led scheme. The outlining of key design principles only, means that the Brief isn't seen as stifling the creativity of developers regarding more detailed design.
- 1.3.2 The Brief provides planning and design guidance applicable for the development which will aid the development process. It provides clarity and certainty to developers such that if they adhere to the principles contained within the Brief which reflect Council (MKC), and other local stakeholder expectations for the site, and respect the requirements of MKC planning policy, their proposals will likely be seen favourably by the Local Planning Authority.
- 1.3.3 The Brief has been prepared to help deliver on the policies relating to Central Bletchley in Plan:MK as well as the Central Bletchley Urban Design Framework SPD, and the West Bletchley Neighbourhood Plan.
- 1.3.4 The Development Brief has been commissioned, not by the Planning Authority, but rather by the landowner and it has not been subject to all the statutory requirements that a planning document would have to undergo. The Brief has, however, been prepared to accord with current national and local Planning Policy, and will be subject to formal public consultation. In addition, it will be submitted for approval by MKC Cabinet and, if approved, will become a material consideration in helping determine planning applications albeit with limited weight.
- 1.3.5 Once approved by Milton Keynes Council Cabinet, the guidance contained within the Brief will assist with the marketing of the site by MKDP.

### 1.4 The Vision

- 1.4.1 The aim is to create an attractive new development within an landscape framework, with a strong sense of place, which is based upon a thorough understanding of the context.
- 1.4.2 The scheme will be built at a high density, reflecting its sustainable location and planning policy. There will be new and distinctive frontages along Sherwood Drive and Buckingham Road, improving the quality of these streets and the approach into the town centre.
- 1.4.3 The main use is most likely to be residential, although planning policy allows other uses which would help increase vitality whilst benefitting from being adjacent to the town centre, MK College, and the excellent rail links, which will be improved by East West Rail.

### 1.5 Structure of the Brief

- 1.5.1 The Brief is divided into four sections:
- Section 1 outlines the purpose of the brief, as well as its location and ownership.
- Section 2 describes the planning policy context.
- Section 3 provides a site analysis of the site itself and the surrounding area. A thorough understanding of this will have an important bearing on the key design principles and parameters.
- Section 4 outlines the key design and development principles that should inform any development proposals.

# **SECTION 2:** **POLICY CONTEXT**



## 2.1 Introduction

- 2.1.1 This section of the Brief outlines the key relevant planning policies that underpin the brief and inform the development proposals for the site.

## 2.2 Development Plan

### Plan:MK

- 2.2.1 Plan:MK was adopted in March 2019 and forms part of the Development Plan guiding future planning applications. Key policies are set out below with additional text in Appendix E.
- 2.2.2 Policy SD16: Central Bletchley Prospectus Area provides the strategic policy for the area within which the former police and fire stations lie. Part A.5 refers to 'Exploring options for the early redevelopment of the Police and Fire Station sites'. Policy SD16 states: 'Development within the Central Bletchley Prospectus Area will be guided by the following principles:
1. The density of residential development to be 150-250 dwellings per hectare.
  2. Improved pedestrian connections and legibility.
  3. Improved public realm.
  4. Refurbishment and/or redevelopment of key sites and buildings.
  5. Exploring options for the early redevelopment of the Police and Fire Station sites.
  6. Exploring the potential of existing infrastructure to help enable and unlock residential-led mixed use development opportunities.
  7. Further improve the quality of pedestrian routes to and from Bletchley Station.
  8. Development should not preclude the delivery of an 'eastern entrance' to Bletchley railway station.
  9. The development will provide green infrastructure in line with Policy NE4, providing wellbeing benefits through access to nature.'

- 2.2.3 The key relevant planning policy within Plan:MK for the site is as follows:

#### Policy DS1 Settlement Hierarchy

'The provision of new homes and jobs will take account of the settlement hierarchy set out in Table 4.2. The majority of development will be focussed on and adjacent to, the existing urban area of Milton Keynes at the locations specified in Table 4.2 and in the context of Central Bletchley from selective infill, brownfield, regeneration and redevelopment opportunities.'

- 2.2.4 Policy ER2 Protection of Existing Employment Land and Premises. This policy seeks the protection of existing employment land. The Police and Fire Stations Sites are designated on the Plan:MK Policies Map as 'Existing Employment'.

- 2.2.5 Policy CC3 Protection of Community Facilities. This policy seeks the protection of existing community facilities of which the Police and Fire Station sites are such uses. Loss of community facilities will only be supported where :

1. There is no longer a need for the facility for any type of community use, and this has been robustly evidenced by research and consultation; or
2. An acceptable alternative facility can be provided elsewhere

- 2.2.6 Policy DS2: Housing Strategy Plan: MK will deliver a minimum of 26 500 net dwellings across the Borough of Milton Keynes over the period 2016-2031. The policy states that new housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes as well as the 3 key settlements, and will be delivered by a range of interventions, including no10: "Regeneration opportunities around the centres of Wolverton and Bletchley."

- 2.2.7 Policy DS4 Retail and Leisure Development Strategy, Part D. In Bletchley, this section of the policy refers to Milton Keynes Council preparing a Central Bletchley Prospectus to facilitate and promote mixed-use development around Bletchley Station and the intensification of development at sustainable locations with good access to public transport hubs, building on the opportunities created by the development of East-West Rail and the work undertaken in the Bletchley 'Fixing the Links' project.

- 2.2.8 Policy CT10 Parking Provision

'A. Development proposals should meet the following parking requirements:

1. All development should meet the Council's full parking standards, unless mitigating circumstance dictate otherwise.
2. On-site parking should not be reduced below the Council's full expectations if this would increase additional pressure in off-site parking that could not be resolved by on-street parking controls.
3. Parking areas should be well designed in terms of safety, circulation, appearance and assist access by pedestrians and cyclists.
4. All residential, retail and employment uses should provide electric vehicle charging points (EVCPs) in accordance with the current Milton Keynes Parking Standards, and provide a forward thinking approach. For locations of rapid and fast charging points see policy CT6 D.'

2.2.9 Policy HN1 Housing Mix and Density.

'Part D of this policy refers to a net density of 150-250 dwellings per hectare in the area covered by the Central Bletchley Prospectus. Part E notes "where no or low levels of parking are proposed, to achieve densities that help realise wider strategic objectives, they will be required to demonstrate the site has good accessibility to frequent public transport services to public transport nodes, district/town/local centres, schools and employment areas.'

2.2.10 Policy HN2 Affordable Housing.

Proposals for 11 or more homes should provide 31% of those homes as affordable housing. Proposals that provide greater than 31% of homes as affordable housing will be strongly supported. However, proposals consisting of 50% or more affordable housing will only be supported provided that they would maintain (or help create) a mix of housing tenures and therefore a mixed and sustainable community within the wider neighbourhood the proposal is situated in.

2.2.11 Policy INF1 Delivering Infrastructure.

A new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:

1. Already in place; or,
2. There is a reliable mechanism in place to ensure that infrastructure, facilities and resources will be delivered in the most appropriate places and at the earliest opportunity, to the required minimum high standards demanded by this Council and its partners. This might include improvements for highway schemes such as bus and rail provisions and enhancement for walking and cycling facilities, or the provision of improved and better connected green infrastructure, local health, shopping and recreational facilities.

2.2.12 Policy NE4 Green Infrastructure

A The network of green infrastructure throughout the Borough will be protected, extended and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change. This is in accordance with the vision and principles (and the large-scale zone maps of Green Infrastructure Opportunity(39)) set out by the Buckinghamshire and Milton Keynes NEP.

B Development proposals will provide new green infrastructure or, if it is not possible, will contribute to the enhancement and strengthening of existing green infrastructure to provide wellbeing benefits to people through access to nature.

C Development proposals will ensure that existing ecological networks are identified and wherever

possible maintained to avoid habitat fragmentation, and that ecological corridors, including watercourses, form an essential component of their green infrastructure provision to support habitat connectivity.

D Green infrastructure protection, improvements and creation must be prioritised in locations where it can deliver most benefits. It should be multi-functional to deliver as many ecosystem services as the site requires, for example flood mitigation, access to nature (wellbeing benefits), plants for pollinators, carbon sequestration, and habitat for wildlife.

2.2.13 Policy CC1 Public Art

A. The provision of public art and cultural activity can not only enhance the environment but also create a wide variety of other important benefits such as:

1. Improving the quality of life for local people.
2. Creating a local distinctiveness and a sense of place.
3. Enriching the cultural life of Milton Keynes and raise its profile.
4. Providing a focus and stimulus for tourism.

B. A minimum of 0.5% of the gross development cost of proposals for 11 or more dwellings or non-residential development of 1,000 sq m or more should, subject to viability, be allocated towards cultural wellbeing. This includes public art that enhances the cultural offer and appearance of the development, its surroundings and Milton Keynes as a whole, and engaging local residents throughout.

2.7.14 Developers should explore the potential for providing public art as part of their proposals. This could be about Bletchley Park but does not necessarily mean Alan Turing and other options should be explored (i.e. history of computing, LGBT rights, women's role in WWII, etc) which would form part of a wider arts initiative within Bletchley and Fenny Stratford. Developers will need to engage with the relevant parish and Council teams early in the design process.

2.2.135 Policy SC1 (Sustainable Construction)

This sets out the Council's requirements for sustainable construction, with further detail provided within the forthcoming Sustainable Construction SPD 2021.

2.2.16 Milton Keynes has a unique selling point around its design and therefore its Design Policies are key to inform any proposal. These include:

Policy D1: Designing a High Quality Place, Policy D2: Creating a Positive Character Policy D3: Design of Buildings, Policy D4: Innovative Design and Construction and Policy D5: Amenity and Streetscene.

## West Bletchley Neighbourhood Plan

2.2.17 The West Bletchley Neighbourhood Plan was made part of the Development Plan in March 2019.

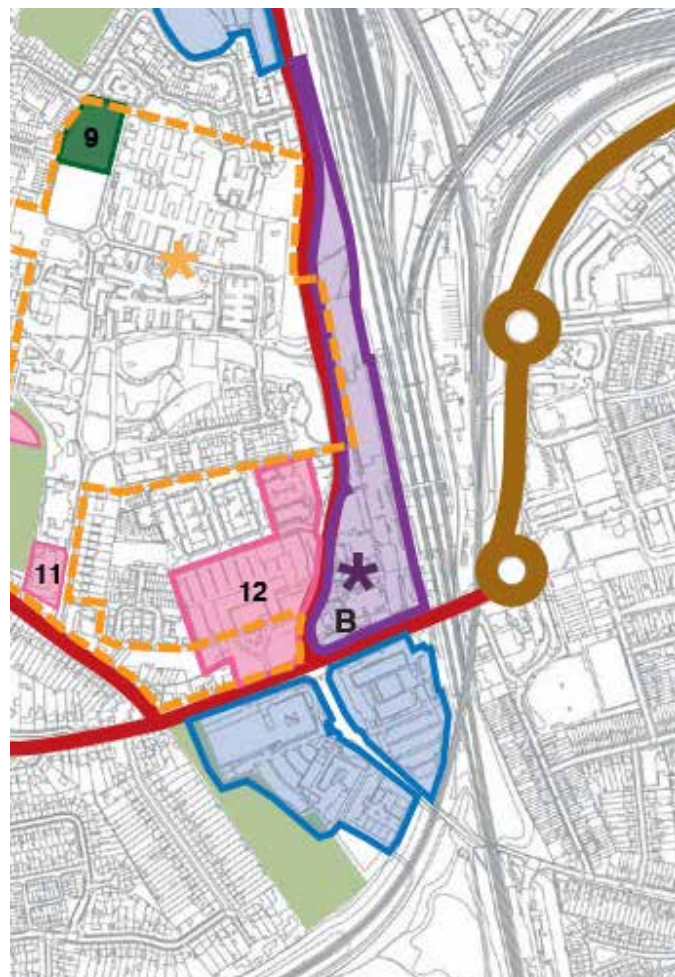
2.2.18 The plan identifies the opportunity to enhance the Station Area (see Figure 5 below). Importantly, it identifies that there is a new catalyst for change. “East-West rail services will be re-instated on a stretch of the old ‘Varsity Line’ between Oxford and (initially) Bedford through Bletchley and eventually on to Cambridge, within a few years. New station platforms are to be constructed on the eastern side of the station. Bletchley will therefore be at the centre of an axis between two of Britain’s most successful and famous universities and fastest growing economies. This provides a renewed impetus to respond to the improved accessibility to both improve the existing station and station forecourt / square, and bring sites alongside the station forward for new development that responds to the superb enhanced accessibility of our area.” (Pg 30).

2.2.19 Policy BS1 (Station Regeneration) states “Regeneration of existing buildings and land alongside Bletchley Station, as identified in Figure 5, will be supported where it improves the travelling public’s experience including new station-related retail and café uses.”

2.2.20 Policy BS2 (Station Accessibility) states “Improvements to pedestrian, cycle and public transport access between the station and surrounding areas, including the town centre and Bletchley Park, will be supported.”

2.2.21 Policy BS3 (Station Quarter Development) states “Redevelopment of land and uses within the Station Quarter Opportunity Area , as identified in Figure 5, will be supported where the development is comprehensive and provides a sensitive and balanced mix of uses that can include residential, high quality workspaces, hotel, conference centre/ facilities, café/restaurant/local retail uses, visitor interpretation/facilities and public spaces, and is consistent with the approved development and design brief.”

2.2.22 Policy BS4 (Station Quarter Development and Design Brief) states “Major development proposals will only be supported where they are consistent with an overarching Development and Design Brief for the Opportunity Area, as defined on Figure 5.”



- Retaining and Creating New Employment**  
Policies E1-E3
- Station Quarter**  
Policies BS1-BS4
- Renewing Our Local Shopping Centres**  
Policies LSC1-LSC4  
1. Melrose Avenue Shopping Centre  
2. Whaddon Way Shopping Centre
- Protecting and Developing Community Facilities**  
Policies C1-C2 (See list opposite)
- Ensuring our Streets are Safe and Accessible**  
Policies SSA1-SSA3
- Conservation Area Boundary**

Figure 5: Proposals Map from West Bletchley Neighbourhood Plan (extract only)

## 2.3 National Planning Guidance

### National Planning Policy Framework

2.3.1 The National Planning Policy Framework (updated in July 2021) promotes sustainable development that meets 3 overarching objectives:

1. Economic - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places
2. Social - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing
3. Environmental - including making effective use of land and moving to a low carbon economy (para 8)

#### Section 7: Ensuring the vitality of town centres

Recognise that residential development often plays an important role in the vitality of town centres and encourage residential development on appropriate sites (para 86f).

#### Section 8: Promoting healthy and safe communities

Development should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with - for example, through mixed use developments and active street frontages (para 92a)

To provide the social, recreational and cultural facilities and services the community needs, development should include shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments (para 93)

#### Section 9: Promoting sustainable transport

Development should be focused on locations which are sustainable through limiting the need to travel and offering a genuine choice of transport modes. (para 105).

#### Section 11: Making effective use of land

Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (para 120c)

Promote and support the development of under-utilised land and buildings (para 120d)

Para 124. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

#### Section 12: Achieving well-designed places

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 sets out six criteria that development proposals should meet. These included their function, appearance, layout, landscaping, character, sense of place, mix, uses, health, and well-being.

#### Section 14: Meeting the challenge of climate change, flooding and coastal change

Supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. (Paragraphs 152 to 173).

#### Section 15: Conserving and enhancing the natural environment

Paragraph 174 requires development to contribute to and enhance the natural and local environment. This includes sites with biodiversity value. Proposal should minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Part e) states ‘preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraphs 179-182 set out the requirements regarding habitats and biodiversity.



## National Design Guide

2.3.2 The National Design Guide (updated in January 2021) was created to ensure beautiful, enduring and successful places are delivered. It outlines 10 characteristics of well designed places.

1. Context - enhances the surroundings
2. Identity - attractive and distinctive
3. Built Form - a coherent pattern of development
4. Movement - accessible and easy to move around
5. Nature - enhanced and optimised
6. Public Spaces - safe, social and inclusive
7. Uses - mixed and integrated
8. Homes and Buildings - functional, healthy and sustainable
9. Resources - efficient and resilient
10. Lifespan - made to last

2.3.3 Especially important in the context of this site is it advocates compact development, that lines/ addresses the adjacent streets providing active frontages, and landmarks/key buildings in appropriate place to help with legibility as well a mix of uses.



*Taken from the National Design Guide (September 2019)*

## 2.4 Central Bletchley Urban Design Framework SPD

- 2.4.1 The Central Bletchley Urban Design Framework SPD was adopted in March 2022. The SPD will capitalise on the significant opportunities flowing from the enhanced connectivity and accessibility, enabled by EWR, through the provision of guidance which promotes holistic and inclusive renewal within Central Bletchley.
- 2.4.2 It will inform landowners and potential investors about the placemaking and development opportunities within Central Bletchley which will deliver on the agreed aspirations for the area. East-West Rail will bring Oxford and Cambridge within a 40 minute train journey from Central Bletchley while London Euston is only 40 minutes away via the West Coast Mainline.
- 2.4.3 The SPD build's on the approved Central Bletchley Prospectus through the provision of further detailed land use and design guidance for opportunity areas which will provide greater clarity, certainty and speed for applicants when preparing planning applications.
- 2.4.4 The site lies within the Sherwood Drive Quarter Opportunity Area (see figure 6 below - SPD parameters plan). The Police and Fire Station is identified as an opportunity site to be redeveloped for mixed use development including an Innovation Hub

and housing. A small element of retail space could be provided in a prominent position to help generate activity and capture footfall around the existing western train entrance.

- 2.4.5 As part of the redevelopment of the Police and Fire Station Site, a pedestrian route was shown running across the site. This was included as the Innovation Hub was likely to be seen as a separate development and therefore a piece of public realm including a pedestrian route was seen as a good response for the site context.

## 2.5 Central Bletchley Prospectus

- 2.5.1 This Prospectus was approved by Milton Keynes Council in 2020.
- 2.5.2 It was produced to both highlight, and capitalise on, the significant renewal opportunities flowing from the delivery of EWR as a consequence of Central Bletchley's enhanced connectivity and accessibility.



Figure 6: Urban Design Framework Parameters Plan (Sherwood Drive and Buckingham Road Quarter)

## 2.6 Other Planning Guidance

### Supplementary Planning Guidance (SPG)/ Documents (SPDs)

- 2.6.1 The following Supplementary Planning Guidance/ Documents (SPG/SPDs) should be considered as material considerations when preparing any planning application for the site:
- Sustainable Construction SPD (2021)
  - Parking Standards SPD (2016)
  - New Residential Development Design Guide SPD (2012)
  - Affordable Housing SPD (2020)
  - Milton Keynes Drainage Strategy – Development and Flood Risk SPG (2004)
  - Planning Obligations SPD (2021)
  - Designing Dementia-friendly Neighbourhoods SPD (2022)
  - Health Impact Assessment SPD (2021)
  - Biodiversity SPD (2021)
  - Transport and Sustainable Transport SPD (2009).
- 2.6.2 MKC is currently undertaking a partial review of its parking standards, including a reduction for Private Rental (PRS) or Built to Rent (BRS) schemes in more sustainable locations such as Central Bletchley. A draft is due out for consultation on 10 August 2022.

## 2.7 Planning Assessment

- 2.7.1 This planning assessment has been prepared in the context of this Brief proposing mixed use development with housing likely being the predominant use.
- 2.7.2 The key policies to be addressed are Policies CC3 (Protection of Community Facilities) and ER2 (Protection of Employment Land).
- 2.7.3 It is the view that the requirements of relevant sections of Policy CC3 have been met because the activities provided at the Fire Station (now demolished) and the Police station had been relocated elsewhere, in the case of the fire station to the Blue Light Hub in West Ashland where there is also a police presence.
- 2.7.4 Regarding Policy ER2 it is acknowledged that the Fire and Police Station sites are shown on the Plan:MK policies map as employment land within a wider designation as a site within the Central Bletchley Prospectus Area (CBPA) where Policy SD16 applies. Policy ER2 seeks the protection of existing employment land and premises, and the proposed mixed use (with residential being the likely predominant use) as outlined within this Brief would change the primary use of the site to a non-employment use. Plan:MK would require that a proposal is in accordance with Policy ER2 to justify the loss of employment land. However, Policy BS3 of the WBNP (post adoption Plan:MK) has allocated

the Station Quarter to be redeveloped for mixed uses and similarly, the Central Bletchley Urban Design Framework (CBUDF) SPD states the first key principle for the Sherwood Drive Quarter is for the redevelopment of the police and fire station for mixed used development including an Innovation hub.

- 2.7.5 As the WBNP was made/adopted after Plan:MK, it [the WBNP] was considered to be the most up to date plan and one that carried considerable weight.
- 2.7.6 Therefore, the designations for mixed use redevelopment for the Police and Fire Station sites outlined within the WBNP and CBUDF justifies the loss of employment land and principle of change of use.

## 2.8 Planning Summary

- 2.8.1 The preceding summary of key relevant policy and other guidance outlines a favourable policy context that supports the Council's aspirations for the site.
- 2.8.2 In summary, it is a brownfield site located within a highly sustainable location likely within Plan:MK Policy SD16 which furthermore calls for the early redevelopment of the Police and Fire Station Sites.
- 2.8.3 The West Bletchley Neighbourhood Plan outlines a range of permissible uses, including residential and supporting local retail uses while the Central Bletchley Urban Design Framework SPD envisages the site to be developed for residential led mixed use development at densities up to 250dph.

# **SECTION 3:** **CONTEXTUAL ANALYSIS**



### 3.1 Introduction

3.1.1 This section describes the key characteristics of the two sites and their context. It includes location, site description, land uses, key environmental/technical aspects such as noise, topography and utilities. There is also a short summary of transport aspects and local character. The section includes the site's opportunities and constraints which have informed the key design principles in the next section.

### 3.2 Location

3.2.1 The sites are located on the western edge of Bletchley town centre, adjacent to Bletchley Station. They are in a mixed use area with Milton Keynes College to the west, the famous Bletchley Park to the northwest, mainly employment uses to the south, whilst to the east is the West Coast Mainline. The sites are located within a commercial/institutional arc between the town centre and residential suburb of West Bletchley to the west.



Figure 7: Site Location



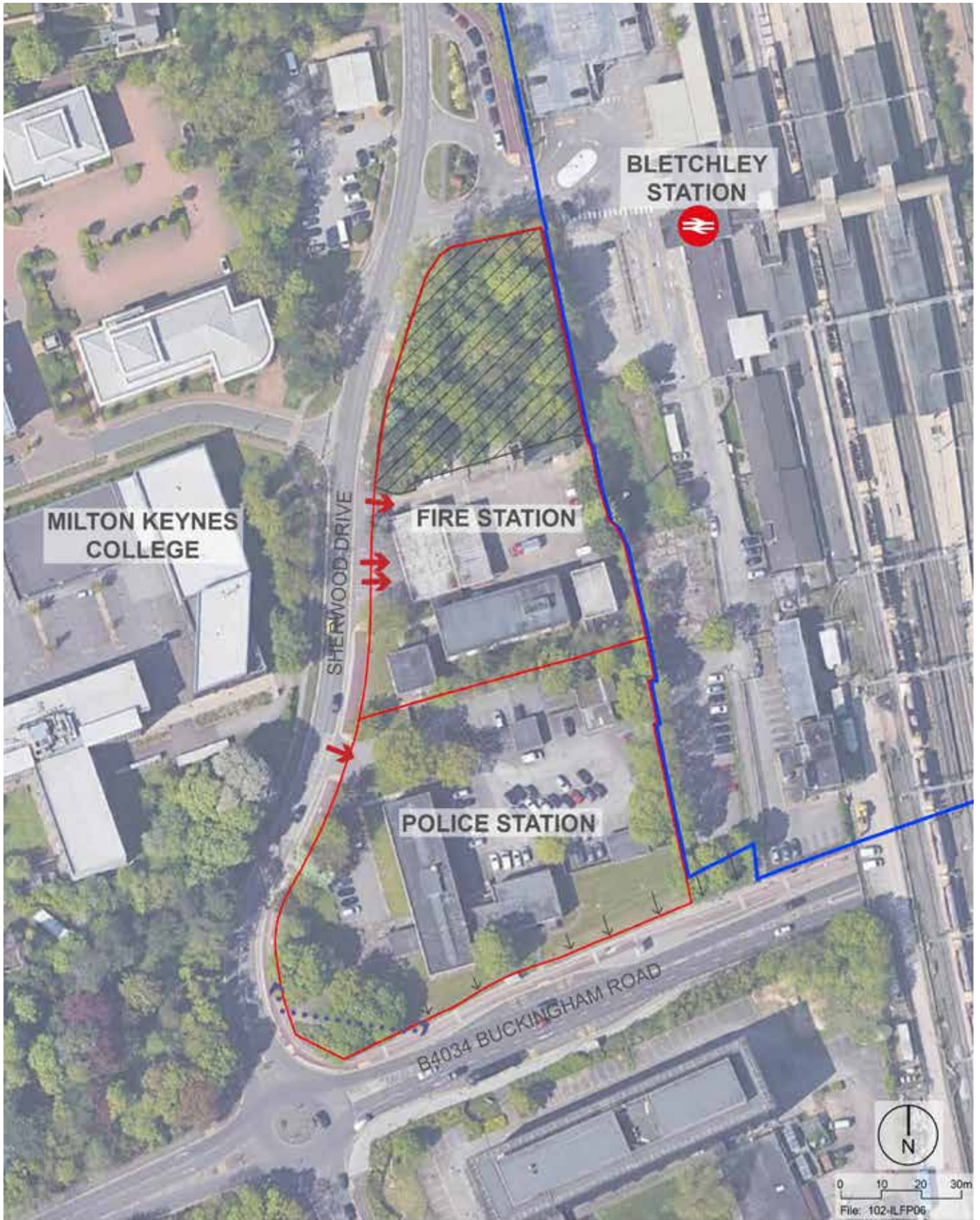


Figure 8: Site Plan



### 3.3 Site Description

- 3.3.1 The Police Station site occupies approximately 0.68 Ha (1.68 Ac) whilst the Fire Station is 0.57 Ha (1.41 Ac), giving a combined area of 1.25 Ha (3.09 Ac). Note that the site area given for the fire station is lower than the area on the Land Registry title (0.63 ha) as it is assumed that the site boundary would only extend to the edge of the pavement.
- 3.3.2 The Police Station comprises a two-storey L-Shaped building in a modernist style (see Figure 8 and photos). There is a car park to the rear, which includes a few ancillary buildings, and a small car park by the front entrance. There are several trees within and around the edges of the site, including mature specimens.
- 3.3.3 The Fire Station site, which was cleared in 2021, originally comprised a group of modernist style buildings set within a landscape framework. They included a garage for the fire tenders, accommodation block/offices, tower, training area, and car park. The original basement under the accommodation block remains in situ as demolition was completed to ground slab level only.
- 3.3.4 The northern half of the fire station site contain trees and shrubs and is designated as a woodland tree preservation order (TPO). Trees are also present along the site's boundaries. There is a ditch running north-south within the wooded area.
- 3.3.5 Each site takes access off Sherwood Drive. For the Fire Station, the access area is quite large in order to provide access to each fire tender whilst there is a separate access to the yard at the back. There are pedestrian connections to both sites from Sherwood Drive. Both facilities have secure rear compounds.



(Copyright Bing Maps)

*Bird's Eye View of Sites from south*



*View inside former Fire Station site looking towards Buckingham Road (top) and front of former Thames Valley Police Station*





- Site Boundary
- Area covered by the Urban Design SPD
- ⚓ Stations (EWR Buildings Under Construction)
- ⋯ Pedestrian Route from Station to Centre
- - - Cycle Route (Redway) near site
- 🚌 Bletchley Bus Station
- 🚗 Car Parks
- ① Police Station: Now Vacant
- ② Fire Station: Buildings Demolished
- ③ WMT Staff Building
- ④ WMT Parking Area for Drivers
- ⑤ Signal Box
- ⑥ Vacant Area
- ⑦ Station Parking and Drop-off
- ⑧ Pedestrian Bridge for Platforms (extension to EWR Transfer Building under construction)
- ⑨ CEMEX Plant
- ⑩ Brunel Centre
- ⑪ Former Sainsbury's supermarket
- ⑫ Wilko
- ⑬ Brunel Roundabout
- ⑭ Stephenson House
- ⑮ Area with Permission Mixed Use Scheme
- ⑯ Office Building Recently Converted in Housing
- ⑰ Santander Training Centre
- ⑱ Extent of Proposed IoT Building
- ⑲ Former Cricket Pavilion Building

File: 102-ILFP04

Figure 9: Site Context Plan



### 3.4 Description of Surrounding Area

- 3.4.1 In terms of the immediate surroundings, the area to the east comprises car parking (rail related and public), metal fencing, an overgrown area which previously housed a building, a telecom mast, staff accommodation, a signal box and Bletchley Station. There is an unattractive and poorly surveilled pedestrian link running in between the parking areas and Network Rail buildings, which links the station with Buckingham Road and then on to the town centre.
- 3.4.2 To the south, the land drops down to Buckingham Road beyond which lies a five-storey former office building which is currently being converted into apartments. Sherwood Drive runs along the western edge, with Milton Keynes Colleges Bletchley Campus on the western side of Sherwood Drive. The College's new Institute of Technology faces the former Fire Station.
- 3.4.3 Adjacent to the Police Station on the corner of Sherwood Drive and Buckingham Road is the former, now overgrown cricket pavilion site. It is heavily landscaped and fenced off from public access. The Central Bletchley Urban Design Framework SPD however identifies it is as an opportunity site to be restored as a small publicly accessible pocket park together with a small amount of housing.
- 3.4.4 The area to the north of the fire station contains rail-related uses such as the station entrance, pick up/drop-off (PUDO) and two-storey car park. There is also a hire car firm opposite the station entrance.
- 3.4.5 MKDP and MKC have held meetings with Network Rail, East West Rail and the station operator (London Northwestern Railway) about the land immediately to the east of the site (see Appendix A for ownership/lease arrangements). There is an opportunity to improve the environmental quality and functionality of this area although the Signal Box building needs to remain. Network Rail are currently exploring the options for this area and will continue to meet with MKDP and MKC.



View south along footpath with overgrown area to right and Signal Box on left



View south along Sherwood Drive with former Fire Station behind temporary fencing



View towards former Fire Station site (buildings now demolished) from entrance to MK College

### 3.5 Landscape and Environmental

#### Topography

3.5.1 A topographic survey has been completed on the two sites and shows that there is a gradual fall from north to south, with a more significant drop along the southern edge, down to Buckingham Road (see photo below).

#### Trees and Vegetation

3.5.2 There are a number of trees within the site and along the adjacent streets, which contribute towards the character of the area. A tree survey has been completed on the sites by Andrew Belson (see extract in Appendix B) and this includes details about the condition of the trees. The northern part of the Fire Station site is covered by a Woodland Tree Preservation Order made in 2010.

#### Ecology

3.5.3 A Preliminary Ecological Appraisal was completed by Ecology by Design in October 2021. The Baseline Habits Map is shown in Appendix C. The Executive Summary provides a list of key findings and recommendations for additional surveys regarding bats. There is a recommendation for improving the biodiversity value of the site, which may require offsetting.

#### Flood Risk

3.5.4 The sites do not lie in any flood zone and are hence classified as Flood Zone 1. According to the Government website, parts of the site have a low-medium risk of flooding from surface water.

#### Noise

3.5.5 The site lies close to the West Coast Mainline and proposed route of the new route for East-West Rail. Therefore, consideration will need to be given to the impact of noise on the future residents and users of the development, including amenity spaces. There will also be noise from Buckingham Road.

### 3.6 Utilities

3.6.1 A utilities report on the site has been prepared by Atkins (see extract in Appendix D) and is available upon request. These have not been added to constraints plan and the developer will need to carry out their own assessments of the existing services to ascertain their implications for development and whether they act as constraints, particularly the sewers crossing the site.



*The more steeply sloping part of the site along its southern boundary*



*Trees within northern part of former Fire Station with station entrance on left*



### 3.7 Land Uses

3.7.1 The sites are located in a mixed use area which is typical of an edge-of-centre location (see Figure 10). To the east lies Bletchley town centre which contains a range of high street businesses. Its western end is defined by Brunel Shopping Centre, with a range of local and national businesses, and the retailer Wilko.

3.7.2 The western side of the railway lines comprises mainly educational, government and commercial uses, typically offices. Situated in between these two areas are predominantly transport related uses such as the station, ancillary buildings, car parks, car hire firm, and a CEMEX plant which is served by the adjoining railways. Extending outwards, the uses comprise mostly housing, with predominantly Victorian terraces to the east and inter-war suburbs to the west. Other notable uses include the bus station, higher-density apartments in Stephenson House and the educational/tourism at Bletchley Park to the northwest.

3.7.3 Some of the older commercial areas are now in residential use. For example, Caspian View, the former office block to the south is currently being converted to residential uses as is the land north of the bus station currently being redeveloped into 184 dwellings and community uses (Bletchley View).



Former office building to south of site being converted into apartments (Caspian View)

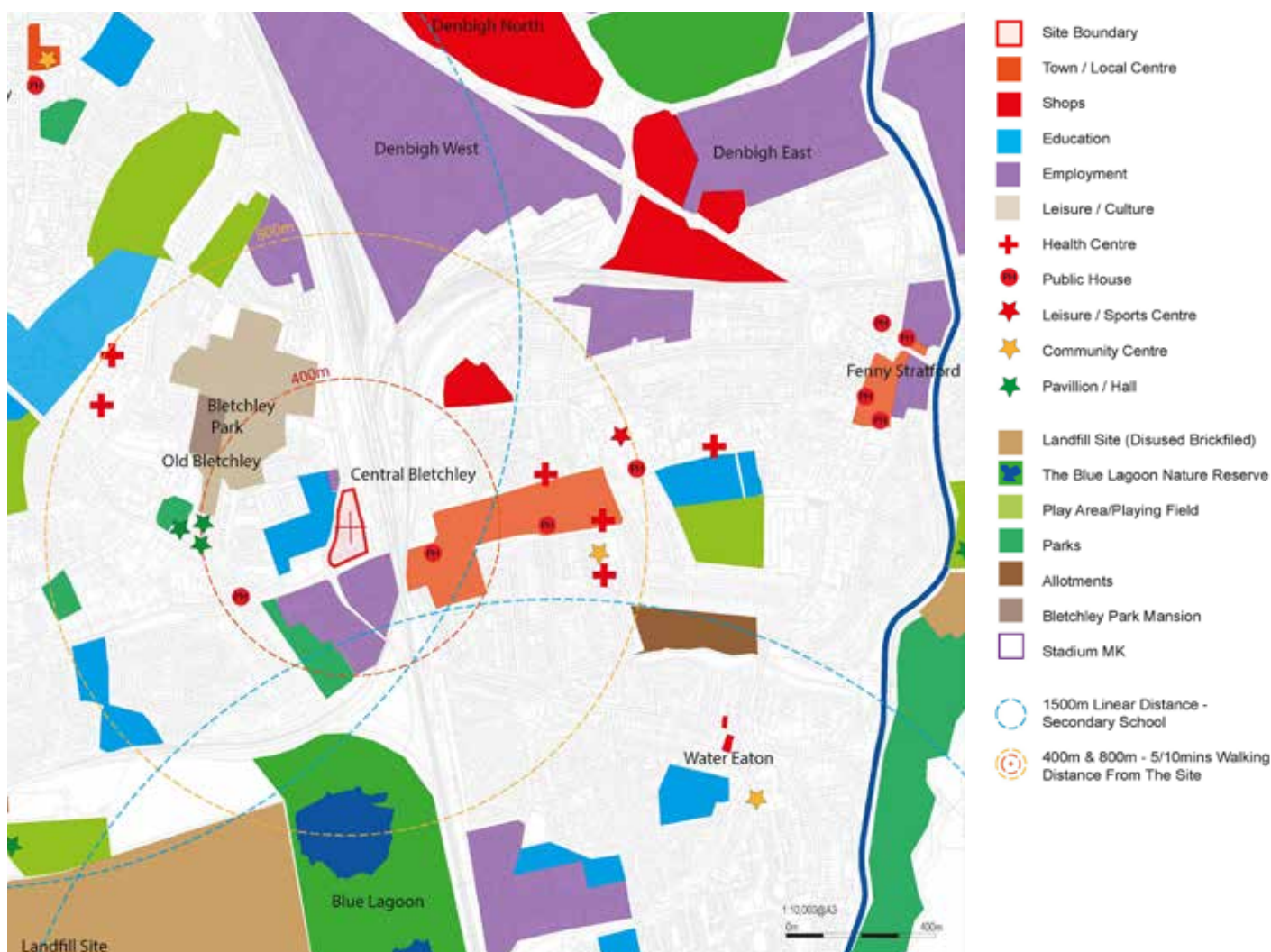
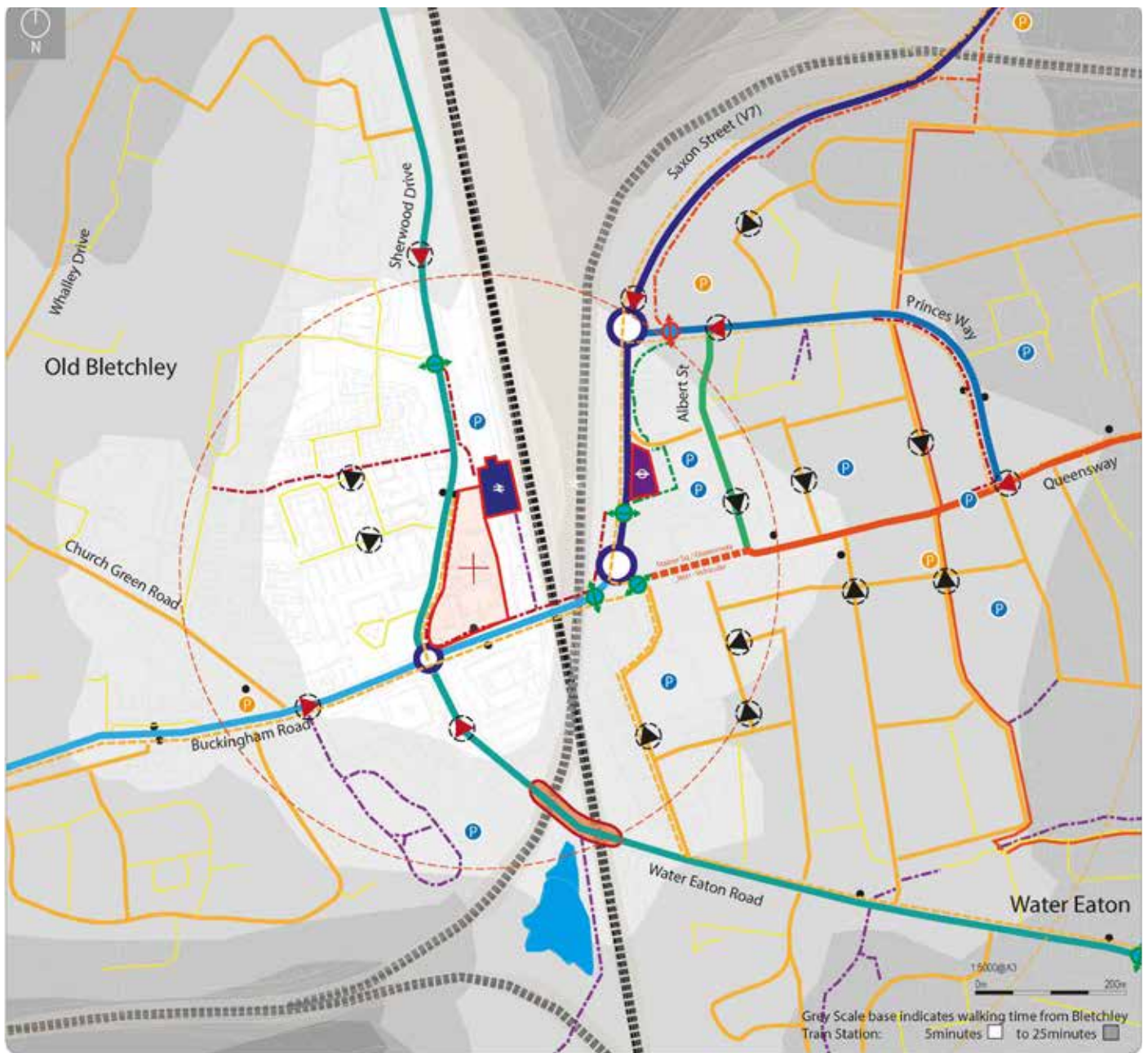


Figure 10: Land Use Plan

(Plan based upon p21 of Urban Design SPD)



Grey Scale base indicates walking time from Bletchley Train Station:  
 5minutes to 25minutes

- |   |   |  |
|---|---|--|
| Site Boundary   | Existing Vehicular Access Point   | Bus Route                                |
| Saxon Street, V7 Grid Road<br>Dual Carrageway (Primary Distributor) | Strategic Access Point  | Footpath                                 |
| Queensway   | Railway Line - West Coast Main Line   | Leisure Route (Pedestrian / Cycle Route) |
| Princess Way  | Railway Line - East West Rail   | Redway (Pedestrian / Cycle Route)        |
| Buckingham Road   | Railway Station   | Redway Super Route                       |
| Sherwood Drive / Water Eaton Rd                                     | Bus Terminus  | National Cycle Route (Route 6)           |
| Albert Street   | Traffic Signals -Constrained Road Width<br>(Water Eaton Drive, under the railway) | Pedestrian Road Crossing Points          |
| Local Distributor   | Bus Stop  | Poor Pedestrian Crossing Points          |
| Local Access Road   | 400m from site (5 mins walking)   | Parking (public)                         |
|   | 800m from site (10 mins walking)  | Parking (customer only)                  |

(Plan based upon p24 of Urban Design SPD)

Figure 11: Movement Network



## 3.8 Access & Transport

### Vehicular

- 3.8.1 The sites are located at the junction of Buckingham Road and Sherwood Drive (see figure 11). The B4034 Buckingham Road is a busy main road running into and around Bletchley town centre. Each site is accessed from Sherwood Drive which connects onto the roundabout along the B4034 Buckingham Road.

### Public Transport

- 3.8.2 The sites are very well served by public transport. They are next to Bletchley Station with regular services to London Euston and Milton Keynes Central. The new East West Rail service will add further destinations, including Oxford and Bedford. There are also bus stops along Buckingham Road and Sherwood Drive whilst the town's bus station lies immediately on the eastern side of the railway line and is within easy walking distance.

### Walking and Cycling

- 3.8.3 The sites are well connected to existing footpath and cycle networks with a redway running along their southern and western boundaries. There are no footpaths crossing the site although there is an informal desire line crossing the southwest corner. There are pavements along both sides of Buckingham Road and Sherwood Drive which then links into the station and College.
- 3.8.4 There is a poor quality pedestrian link providing the shortest walking distance between the town centre and train station. It includes steep steps providing access onto Buckingham Road.



Access into Police Station (Footpath/Cycle link in front) with secure rear compound and turning for car parking to right.



View of Brunel Roundabout with transfer building for East West Rail under construction

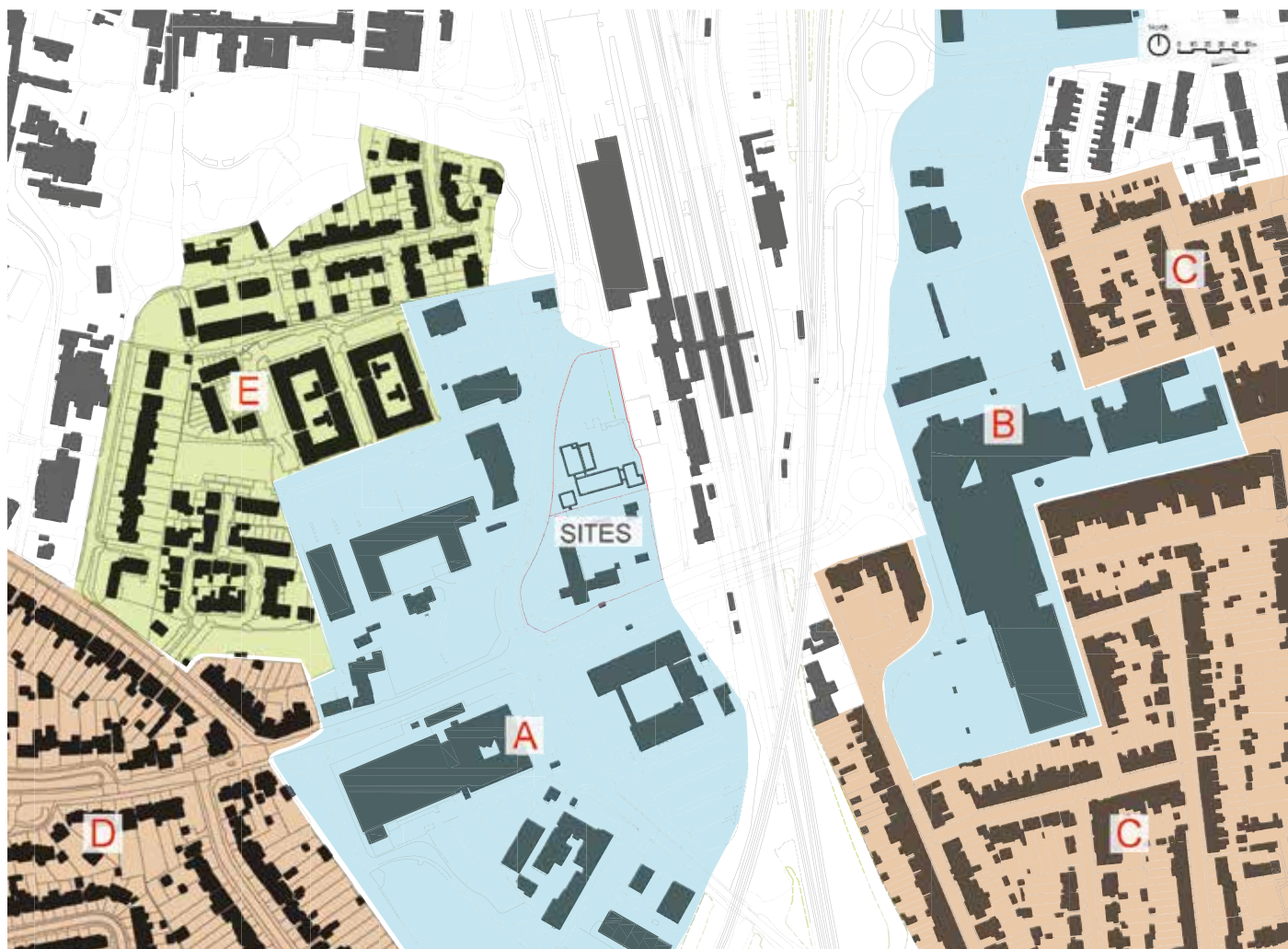


Bletchley Station entrance and car park with edge of former Fire Station site on right

### 3.9 Local Character

- 3.9.1 The site and surrounding area comprises mostly modern, stand-alone type buildings set back from the adjoining streets, which have a sylvan character. The buildings have a similar orientation, running perpendicular to Buckingham Road.
- 3.9.2 Figure 12 below is a figure/ground plan of the area and shows the variety across this edge-of-centre location. The area around the site has a coarser grain, which reflects the modernist principles, whilst the Victorian centre and inter-war suburbs have a finer grain.

- 3.9.3 In terms of heritage assets, there are no listed buildings on or next to site although there is a conservation area to the southwest of the police station.
- 3.9.4 In terms of activity, Buckingham Road is a busy main route into and out of Bletchley and beyond, whilst the station and College create activity along Sherwood Drive and the footpath to the east.



- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #c8a28d; border: 1px solid black; margin-right: 5px;"></span> Fine Grain</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #c8e6c9; border: 1px solid black; margin-right: 5px;"></span> Medium Grain</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #bbdefb; border: 1px solid black; margin-right: 5px;"></span> Coarse Grain</li> </ul> | <ul style="list-style-type: none"> <li><b>A</b> Mostly Commercial or Educational Buildings</li> <li><b>B</b> Large Footprint buildings, including Brunel Shopping Centre, with mostly commercial uses</li> <li><b>C</b> Mainly Victorian terraced housing and town centre</li> </ul> | <ul style="list-style-type: none"> <li><b>D</b> Mostly Inter-War Housing</li> <li><b>E</b> More modern housing created through infill or regeneration of other uses</li> </ul> |
|---|--|--|

Figure 12: Figure/Ground Plan





The area fronting onto Brunel Roundabout comprising Victorian buildings and back of The Brunel Shopping Centre



Mercury House - a 1980s office building, designed by Milton Keynes Development Corporation and currently being converted into apartments



View across Brunel Roundabout looking towards Queensway/town centre. Modernist Brunel Shopping Centre is on right with more recent Wilko store in the middle and the 10 storey residential block of Stephenson House on left

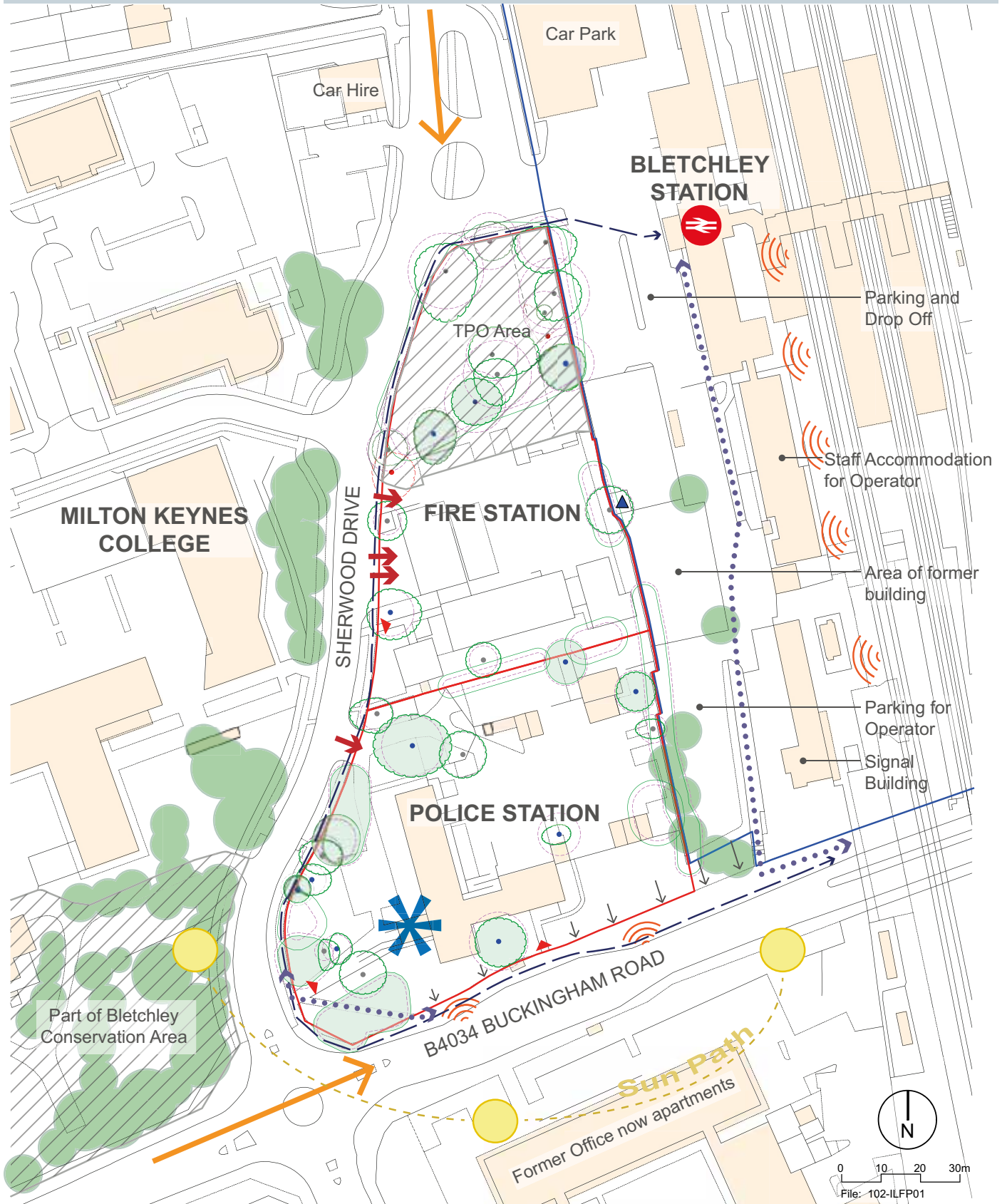
(Copyright Google Streetview)



Typical Victorian terrace alongside town centre



MK College buildings at the entrance with more recent four-storey apartment buildings in the distance



- |                               |                        |                                 |
|-------------------------------|------------------------|---------------------------------|
| Site Boundary                 | Potential Landmark     | Trees and Root Protection Zones |
| Buildings                     | Important View         | Better Quality Trees            |
| Network Rail/Operator land    | Vehicular Access       | Category B                      |
| Planning Designations         | Pedestrian Access      | Category C                      |
| Pedestrian Route              | Slope Down             | Category U (to be removed)      |
| Footpath/Cycle Route (Redway) | Source of Noise        |                                 |
|                               | Telecom Mast (offsite) |                                 |

Figure 13: Opportunities and Constraints Plan



### 3.10 Opportunities and Constraints

3.10.1 The key opportunities and constraints are set out in Figure 13 and summarised below.

1. There is an opportunity to redevelop this site for mixed use development which could include high-density housing, a hotel, café, restaurant, or local retail uses.
2. There is an opportunity for a landmark building and/or new frontages along Buckingham Road.
3. The proposal should consider the impact upon the existing trees and plant new trees and vegetation. There could be an opportunity to develop within the Woodland TPO, provided it can be justified in planning policy terms, or to use the area for another function.
4. The scheme must consider noise from the railway lines, station area and main road.
5. Access can be taken from Sherwood Drive using one or two connections, subject to achieving satisfactory geometry, visibility splays and separation.
6. There is an opportunity to improve safety of the pedestrian route to the station, situated to the east, by providing natural surveillance.
7. Some of the underground utilities could affect the layout, especially the foul water sewers which could be expensive to move.

3.10.2 Developers will need to provide their own opportunities and constraints plan as part of the design process in order to demonstrate a good understanding of the site and its context.



*Opportunity for new landmark building on southwest corner of site, set back behind existing trees.*



*Southern part of site where the existing trees could be treated as a constraint. There is also the potential to add additional trees and vegetation.*

# **SECTION 4:** **DESIGN PRINCIPLES**

## 4.1 Introduction

- 4.1.1 This section sets out guidance and requirements to be taken into account by the developer and their design team. They have been informed by good urban design practice, policy guidance (including the Central Bletchley Urban Design Framework SPD), alongside a thorough understanding of the site and its context. The development proposals need to provide a clear design framework to include the key objectives and a concept. This could include assessing more than one option and the reason for proposing the final scheme.
- 4.1.2 High density developments require careful design, particularly those in complex built up areas. The Architect will need to think creatively, have experience designing these typologies and incorporate lessons from other precedents.
- 4.1.3 The design and layout will need to be imaginative in response to the noise conditions, shape of the site and adjoining station environment, whilst making the most of key views.
- 4.1.4 The key considerations are set out on the Design Principles Plan in Figure 14 and described in the following section. The Plan only identifies those key principles which are important to delivering the overall vision of the scheme and need to be adhered to, allowing significant design creativity with other design elements of the scheme. This section should be read alongside the development plan and other material considerations, including the New Residential Development Design Guide SPD, and the NPPF. The guidance here relates to this particular site and hence does not include all the standard urban design principles to be followed.

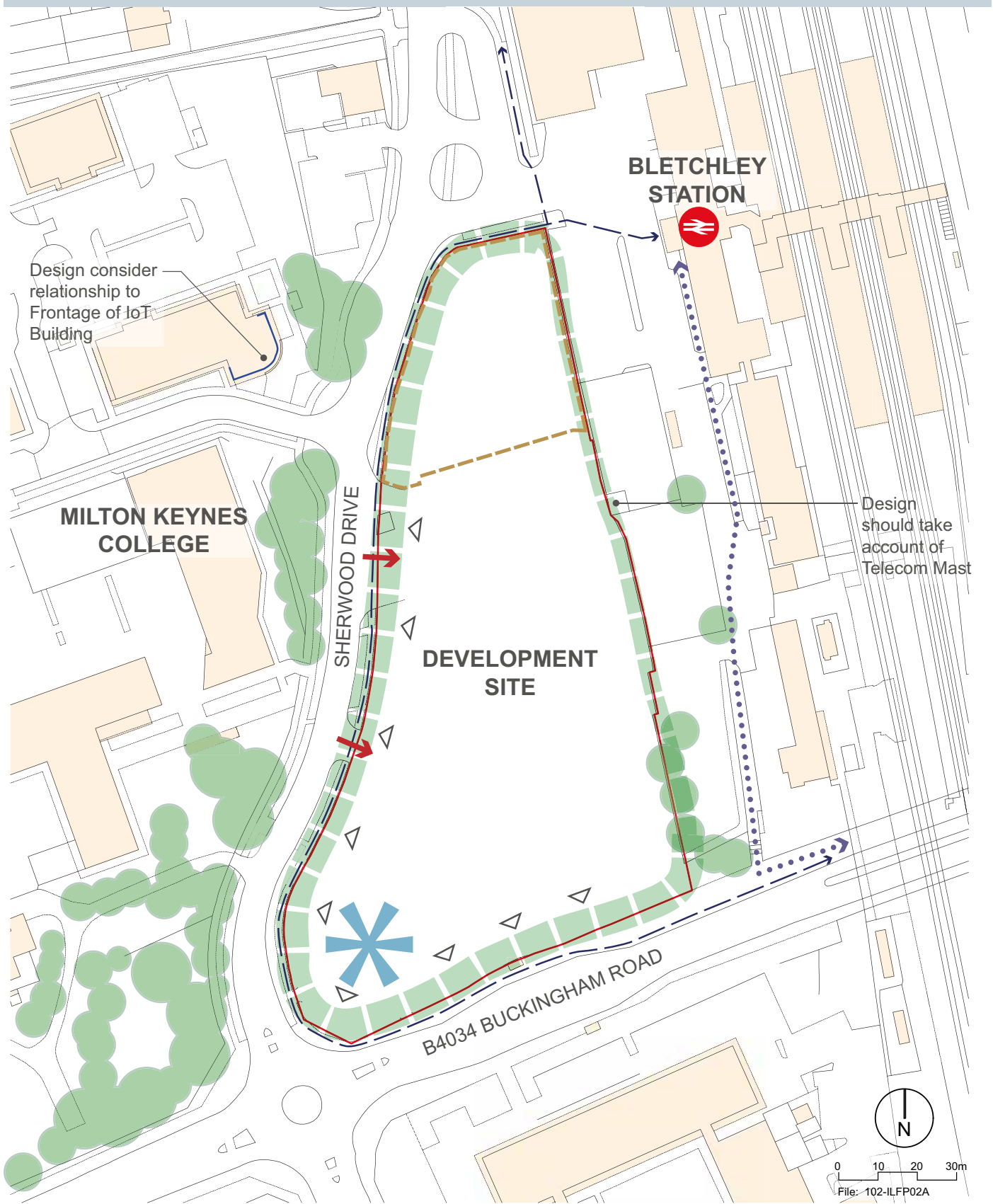
## 4.2 Land Use and Housing Mix

- 4.2.1 As set out in planning policy, the site is suitable for mixed use development which could include housing, a hotel, café, restaurant, or local retail uses.
- 4.2.2 The proposal should accord with planning policy in terms of density and housing mix.
- 4.2.3 The provision of high-quality affordable homes and move-on social housing for young people, potentially in conjunction with YMCA, should be explored as part of the mix of uses proposed for the site.
- 4.2.4 Consideration should also be given to whether the site could be suitable for an element of specialist older persons housing as part of the overall mix of development.

## 4.3 Layout

- 4.3.1 Development should aim to provide an attractive and strong frontage onto Buckingham Road and Sherwood Drive, increasing surveillance onto them. Doors, entrances and primary habitable room windows should also be focussed on these two streets.

- 4.3.2 The approach should also provide some surveillance of the existing footpath to the east of the site but given the unattractive and uncertain future of the Network Rail owned land immediately to the east of the site, this edge can be designed as a secondary frontage in comparison to the Sherwood Drive and Buckingham Road frontages. The layout should clearly avoid direct views towards the telecom mast.
- 4.3.3 A key consideration is the approach towards the existing trees. There is a requirement to retain trees and vegetation around the edges of the site in order to protect the character of the adjoining streets and provide an attractive setting for the buildings, no to mention the environmental benefits. It is possible to propose development within the TPO area provided it can be justified in planning terms. If this area is not built upon then the developer needs to decide what to do with the area. This includes its function, future ownership, boundary treatment, and relationship to the surrounding area, particularly the station entrance and car park.
- 4.3.4 New trees and vegetation should be provided, including along the site's boundaries although the aim is not to screen the buildings. Where trees are removed the 'green edge' should be enhanced through new planting within the private defensible space along Sherwood Drive and Buckingham Road in particular.
- 4.3.5 A landmark building and/or strong frontage should be provided along the Buckingham Road edge, a busy approach into the town centre, as well as being visible from the adjoining railway lines. It needs to be carefully designed to have a presence, respond to the road/junction whilst avoiding adverse impact upon the other parts of the development in terms of shade.
- 4.3.6 The layout should ensure that the adjoining public realm is overlooked and there is a clear distinction between public and private realms. Key frontages should be maximised although it may not be possible to provide them along the entire periphery because of the width of the block depth. Therefore, the focus should be on key principles which are to provide passive surveillance in the southeast corner, parts of the eastern side, improving the look and feel of the pedestrian link to the station, and Sherwood Drive. The College generates activity but the buildings provide limited natural surveillance and even then only during opening times. The layout should obviously avoid direct views towards the telecom mast.
- 4.3.7 The Council will seek to design out opportunities for crime and anti-social behaviour following best practice guidance in 'Secured by Design'. Most importantly, the layout of the development should avoid the creation of areas of public realm that are 'leftover' and not overlooked by any development, as they can become areas of anti-social behaviour. Furthermore, there should be no ambiguous space in terms of ownership.
- 4.3.8 Where residential exists at ground floor there needs to be private defensible green space included along the Sherwood Drive and Buckingham Road



- Site Boundary
- Area Covered by TPO
- ✳ Potential Landmark
- Green Edge
- Existing Trees Outside Site Boundary
- ⋯ Pedestrian Link to Station
- Footpath/Cycle Path (Redway)
- ➔ Potential Access Point(s) for vehicles
- Key Frontages

Figure 14: Design Principles Plan



frontages. The designer needs to consider the relationships between the building, its function and the boundary with the back of the redway.

- 4.3.9 The design needs to think carefully about the type of non-residential use, its location and relationship with the housing. For example, any café/convenience store would need to take access off Sherwood Drive and provide space for parking and servicing.
- 4.3.10 The layout will need to consider noise from the railway line and roads. This could be in the form of site layout or floor plans. The design will also need to consider the impact upon the amenity space and accord with any maximum noise levels (and preferably be well below them). A noise survey will be required early on in the design process to ensure that noise levels are acceptable (this will need to include assumptions about East West rail). The approach will need to ensure that any non-residential uses do not disturb residential amenity.
- 4.3.11 Underground services will also need to be considered, particularly the sewers.

#### 4.4 Density and Building Heights

- 4.4.1 The development should aim for a density of 150-250 dwellings per hectare as set out in Policy SD16 of Plan:MK. The precise amount of development will need to consider site constraints, context, car parking standards and viability. Given the density target and market considerations, the most likely type of housing will be one and two-bedroom apartments.
- 4.4.2 There is a degree of flexibility for heights given the site's context and buildings could range from 4-10 storeys. The Architect should also consider the relationship with the new Technology building.
- 4.4.3 Any apartment complex will need to provide suitable amenity space between the buildings. If the amenity space is provided above the car parking, the designer will need to give careful consideration to the quality of the amenity space, relationship with the surrounding homes and the access points. Suitable distances between buildings are set out in the Residential Design Guide SPD.
- 4.4.4 The designer will need to explain how solar orientation has been taken into account in terms of natural light, shelter and solar gain. This relates to the external amenity space as well as the interiors.

#### 4.5 Landscape and Open Space

- 4.5.1 Landscaping and vegetation can play an important role in integrating apartment buildings into their context. They can serve to soften hard materials, help with the transition from public to private, provide visual interest, and deliver ecological / environmental benefits. The following principles and advice should be taken into consideration:
- Opportunities to include green infrastructure as part of the proposed building, either in the form of

a green roof, roof garden, growing spaces, green walls, balconies and/or planters, can provide amenity landscape at various levels of a building design.

- The edges of the development need to be carefully considered to retain and/or create a green edge around the site where it forms part of the character of the area. The aim is to keep the area facing Buckingham Road and Sherwood Drive in particular 'open' and green, but it needs to be defensible, with clear public /private boundaries.
- All proposals must be accompanied by a plan illustrating indicative landscape principles for the site and how the design deals with the interface with the adjoining streets.

#### 4.6 Architectural Approach

- 4.6.1 The buildings should be designed with a contemporary architectural style to help create a strong identity and sense of place. The approach should be selective in terms of materials, chosen for their appropriateness to the site and its context.
- 4.6.2 The building entrances need to be legible and welcoming. Stairwells within the building should be flooded with natural light whilst access into any rear amenity space needs to be well designed and located to preserve amenity.

#### 4.7 Residential Amenity

- 4.7.1 The residential uses should deliver a good standard of amenity in terms of privacy, sunlight, daylight and noise. The scheme will need to provide suitable amenity space, such as shared courtyard/garden, balconies, small patios inside the site (with low fenced off area for any ground floor flats) and roof gardens. The amenity space for a higher-density scheme needs to be carefully designed especially if lies on a parking area.



*Example of clearly defined pedestrian access with semi-private approach into each building.*

4.7.2 If balconies are included, they will form a key elevation detail and will need to be carefully designed. They can often be too small and/or appear 'stuck on'. Balconies must be an integral part of the design and consider privacy, useable space, and climate. On this particular site, the design will need to consider noise from the railway, the sun path, the trees being retained, and the relationship with the effect of any taller building along the southern boundary.

## 4.8 Access and Movement

### Vehicles

4.8.1 Vehicular access will need to be from Sherwood Drive. The preference is for one or two access points at most, to limit the potential conflict with pedestrians and cyclists using the Redway. Due consideration will need to be given to the building line position to ensure there is adequate visibility of both cyclists and pedestrians using the Redway from any emerging vehicles.

### Pedestrians and Cyclists

- 4.8.2 The building entrances need to be designed with amenity and activity in mind. The number and location of entrances should help animate and activate the street whilst avoiding having too many apartments buildings served off a single entrance.
- 4.8.3 The informal pedestrian route across the southwest corner of the site could be closed off and the area returned to grass/vegetation with defensible space and better quality trees retained. This should create an attractive public realm, clear public/private distinction whilst removing future maintenance liabilities.
- 4.8.4 The development should consider the existing Redway that runs along the edge of the site and provide a safe and convenient link into the required cycle parking area.



*An attractively designed contemporary design where the building and landscape setting work together*

### Car Parking

- 4.8.5 Underground or undercroft parking should have a high standard of security with automated access controls. Car parking should be designed to be unobtrusive and place close attention to the links between the car parking areas and dwellings in terms of security and access. In line with Plan: MK Policy HN1E a case could be made for provision of parking below current standards. Note that these standards are currently being consulted upon with lower requirements for Build to Rent types of development.
- 4.8.6 Any undercroft parking should not have an adverse impact upon the surrounding area, especially Buckingham Road or Sherwood Drive. Those that do face onto the street should be either screened or have enhanced architectural features or landscaping to ensure that the ground floor provides interest. The developer should aim to provide at least one space for a car club. There needs to be a electric vehicle charging point for every car.

### Cycle Parking

- 4.8.7 Cycle parking can be provided in apartments, provided the space is in addition to the Nationally Described Space Standards. It requires level access and an adequately sized lift. Communal bike stores may be provided externally, in basement car parks or in freestanding structures. These should be as near as possible to the entrance for convenience, and both the store and the bike stands should be lockable. In addition to the provision of parking for both residents and/or staff, and consistent with MK:Plan Policy CT10, there will also be an expectation to provide some cycle parking within the public realm, for visitors.
- 4.8.8 The cycle parking should be well-lit, with a sense of personal safety and be included in any CCTV set up. External cycle parking should be overlooked by dwellings and/or active frontages and should not be screened.



*Example of an integrated parking solution (Vizion Development, CMK) where the car park entrance is kept to a minimum and designed as part of building facade*

## 4.9 Servicing and Utilities

- 4.9.1 The layout and design of the building(s) shall accommodate requirements and access for servicing, waste storage and collection and utilities equipment. Methods of dealing with, and integrating servicing, waste storage and collection shall reflect the town centre location and form part of the building envelope, with no separate enclosures. Service yards and parking entrances should be integrated into the design and should not dominate any elevation. Servicing/delivery vehicles should be able to enter the site and park clear of the highway with space provided to subsequently turn and exit the site.
- 4.9.2 Servicing arrangements should minimise any adverse impact upon the street scene or residential amenity. It may be better to locate the servicing needs together to minimise their impact possibly alongside car parking for any non-residential use which could sit alongside Sherwood Drive rather than be within any block. The design needs to take account of the size of refuse collection vehicles and waste collection systems to ensure that their turning requirements do not compromise the layout or change the design at a later stage in the process.
- 4.9.3 Where Anglian Water requires the diversion of, or any other works to, adopted sewers within the site, the developer is responsible for all works and costs incurred in meeting their requirements. The sewers shall be constructed in accordance with the current edition of 'Sewers for Adoption' irrespective of their future adoption status.
- 4.9.4 Here, the designer will need to take account of the existing utilities as per the plan in this document, especially the sewers. Some of the sewers run across a similar area in the southern part of the site and hence this could be a reason for retaining them.
- 4.9.5 The developer should speak to utilities providers and Network Rail in order to see if any new or re-directed underground services should take account of future development elsewhere. For example, if the sewers are redirected there could be benefits of installing a larger pipe to accommodate capacity for say new staff accommodation or possible student housing.
- 4.9.6 All new developments should be 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 life cycle of their developments. All the necessary information for developers is on the Openreach website.

## 4.10 Sustainable Design

- 4.10.1 Milton Keynes has a history of pioneering approaches to sustainable design new technologies and aspires to be the greenest city in the world. Our local plan - Plan:MK - commits to continue the borough's dedication to high environmental standards, green urban landscapes and being 'different by design'.
- 4.10.2 Alongside this are the Council's objectives of being carbon neutral by 2030 and carbon negative by 2050. Therefore, proposals for the site should look to meet or surpass the sustainable standards laid out in Policy (SC1) of Plan MK and the subsequent Sustainable Construction SPD. As such development should be aiming for a BREEAM rating of Outstanding (>85%) level of certification which requires implementing innovation across all aspects of the project. Policy SC1 from Plan:MK and the Sustainable Construction SPD set sustainability standards that will have to be considered as part of the overall design process.

## 4.11 Ecology

- 4.11.1 Policy NE3 of Plan:MK on Biodiversity Enhancement has the objective of achieving positive gains for biodiversity in the design of new development. All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floor space in excess of 1000 sqm (in the case of other development) will be required to incorporate proposals to enhance biodiversity.
- 4.11.2 New buildings provide many opportunities for wildlife with benefits for biodiversity and the building occupiers. Specialist boxes or spaces are available (for example bird/bat bricks, swallow nest cups and sparrow terraces). Elements such as climbing plants can create habitat and enhance the visual appearance of buildings, as well as providing cooling, insulation and microclimate moderation. The developer will also need to consider the findings of the ecology report

## 4.12 Flooding and Drainage

- 4.12.1 When making planning applications it is essential that, to get the best results, the integration of water and SuDS options are considered early in the site evaluation and planning process, not just at the detailed design stage. Full consideration of SuDS at the pre-application and outline stage is important to ensuring surface water management is fully integrated into the development, leading to an effective drainage design, providing multiple benefits and with costs considered from the outset.
- 4.10.2 Further guidance and information can be found in the "Milton Keynes Council Surface Water Drainage; Local Guidance for Planning Applications", which is available on the Council's website.





# APPENDIX A: OWNERSHIP PLAN





# APPENDIX B: TREE CONSTRAINTS PLAN

No.	Tree ID	Tree Name	Species	Health	Notes	Action
2.5	T.1	...	...	Reasonable	...	Fell and replace
5	T.2	...	...	Reasonable	...	No work required
12	T.3	...	...	Poor	...	...
16	T.4	...	...	Poor	...	...
7	T.5	...	...	Reasonable	...	...
8	T.6	...	...	Reasonable	...	...
9	T.7	...	...	Reasonable	...	...
10	T.8	...	...	Reasonable	...	...
11	T.9	...	...	Reasonable	...	...
13	T.10	...	...	Reasonable	...	...
14	T.11	...	...	Reasonable	...	...
15	T.12	...	...	Reasonable	...	...
17	T.13	...	...	Reasonable	...	...
18	T.14	...	...	Reasonable	...	...
19	T.15	...	...	Reasonable	...	...
20	T.16	...	...	Reasonable	...	...
21	T.17	...	...	Reasonable	...	...
22	T.18	...	...	Reasonable	...	...
23	T.19	...	...	Reasonable	...	...
24	T.20	...	...	Reasonable	...	...
25	T.21	...	...	Reasonable	...	...
26	T.22	...	...	Reasonable	...	...
27	T.23	...	...	Reasonable	...	...
28	T.24	...	...	Reasonable	...	...
29	T.25	...	...	Reasonable	...	...
30	T.26	...	...	Reasonable	...	...
31	T.27	...	...	Reasonable	...	...
32	T.28	...	...	Reasonable	...	...
33	T.29	...	...	Reasonable	...	...
34	T.30	...	...	Reasonable	...	...
35	T.31	...	...	Reasonable	...	...
36	T.32	...	...	Reasonable	...	...
37	T.33	...	...	Reasonable	...	...
38	T.34	...	...	Reasonable	...	...
39	T.35	...	...	Reasonable	...	...
40	T.36	...	...	Reasonable	...	...
41	T.37	...	...	Reasonable	...	...
42	T.38	...	...	Reasonable	...	...
43	T.39	...	...	Reasonable	...	...
44	T.40	...	...	Reasonable	...	...
45	T.41	...	...	Reasonable	...	...
46	T.42	...	...	Reasonable	...	...
47	T.43	...	...	Reasonable	...	...
48	T.44	...	...	Reasonable	...	...
49	T.45	...	...	Reasonable	...	...
50	T.46	...	...	Reasonable	...	...
51	T.47	...	...	Reasonable	...	...
52	T.48	...	...	Reasonable	...	...
53	T.49	...	...	Reasonable	...	...
54	T.50	...	...	Reasonable	...	...
55	T.51	...	...	Reasonable	...	...
56	T.52	...	...	Reasonable	...	...
57	T.53	...	...	Reasonable	...	...
58	T.54	...	...	Reasonable	...	...
59	T.55	...	...	Reasonable	...	...
60	T.56	...	...	Reasonable	...	...
61	T.57	...	...	Reasonable	...	...
62	T.58	...	...	Reasonable	...	...
63	T.59	...	...	Reasonable	...	...
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83	T.79	...	...	Reasonable	...	...
84	T.80	...	...	Reasonable	...	...
85	T.81	...	...	Reasonable	...	...
86	T.82	...	...	Reasonable	...	...
87	T.83	...	...	Reasonable	...	...
88	T.84	...	...	Reasonable	...	...
89	T.85	...	...	Reasonable	...	...
90	T.86	...	...	Reasonable	...	...
91	T.87	...	...	Reasonable	...	...
92	T.88	...	...	Reasonable	...	...
93	T.89	...	...	Reasonable	...	...
94	T.90	...	...	Reasonable	...	...
95	T.91	...	...	Reasonable	...	...
96	T.92	...	...	Reasonable	...	...
97	T.93	...	...	Reasonable	...	...
98	T.94	...	...	Reasonable	...	...
99	T.95	...	...	Reasonable	...	...
100	T.96	...	...	Reasonable	...	...



**Appendix B: Tree Constraints Plan**

**Blenheim Fire Station - North**

**Information Only**

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**GSS Architecture**

**Blenheim Fire Station - North**

**Tree Constraints Plan**

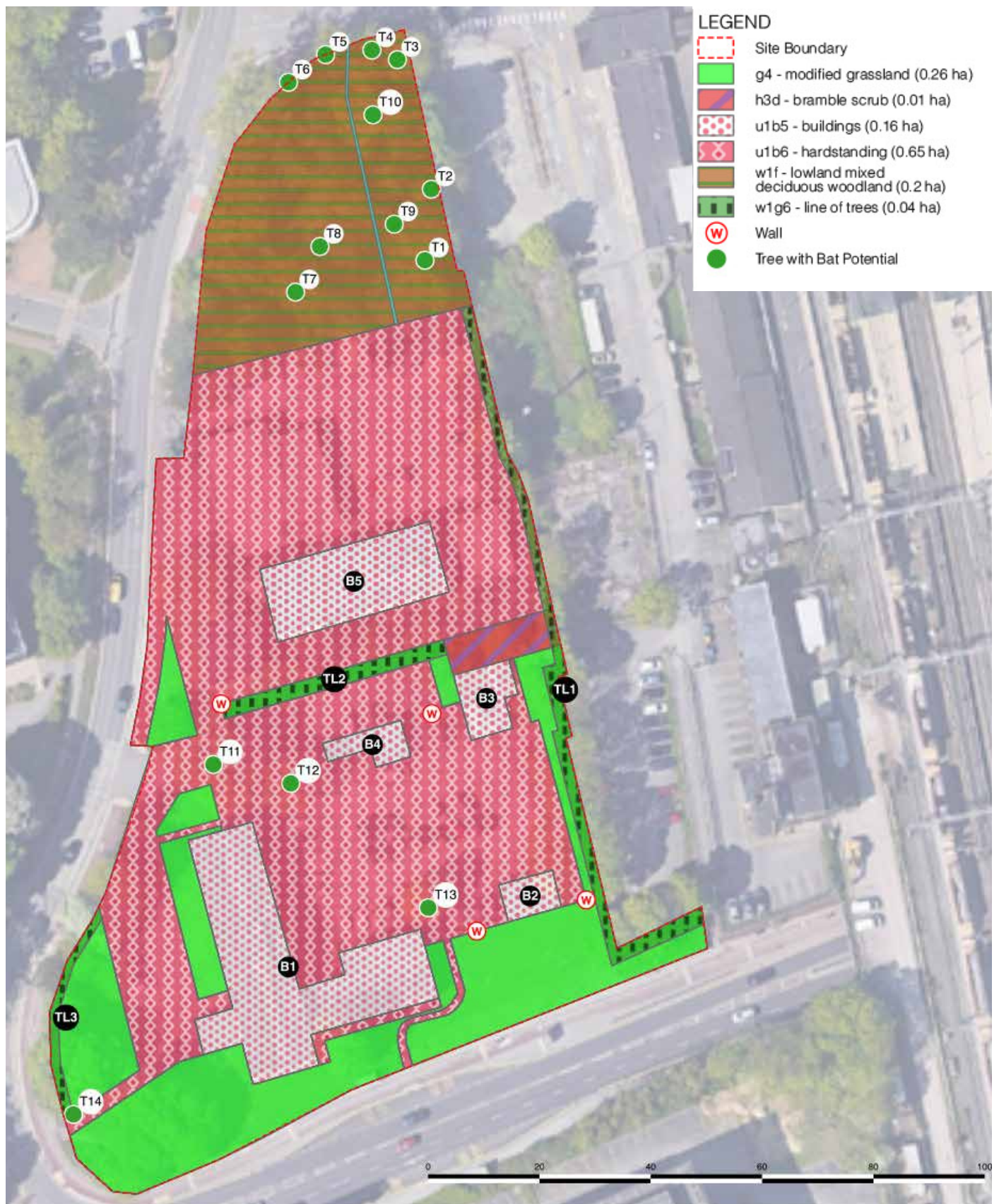
Date	Checked	Reviewed	Date
12/01/2023			

Job No. 1200  
 Scale: 1:500  
 Sheet Size: A3  
 Revision: 01





# APPENDIX C: PHASE 1 ECOLOGY MAP





## APPENDIX D: UTILITIES PLAN



*NOTE: This is a low quality PDF from the CAD plan which is available from MKDP upon request.*





## APPENDIX E: ADDITIONAL PLANNING POLICIES

### Additional Plan:MK Policies

- Policy SD1 (Place-making principles for Development)
- Policy ER10 (Assessing Edge of Centre and Out of Centre Proposals)
- Policy ER16 (Hotel and Visitor Accommodation)
- Policy HN3 (Supported and Specialist Housing)
- Policy HN4 (Amenity, Accessibility and Adaptability of Homes)
- Policy CT2 (Movement and Access)
- Policy CT 3 (Walking and Cycling)
- Policy CT5 (Public Transport)
- Policy CT6 (Low Emission Vehicles)
- Policy CT9 (Digital Communication)
- Policy EH6 (Delivery of Health Facilities in New Development)
- Policy EH7 (Promoting Healthy Communities)
- Policy FR1 (Managing Flood Risk)
- Policy FR2 (Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management)
- Policy NE2 (Protected Species and Priority Species and Habitats)
- Policy NE3 (Biodiversity and Geological Enhancement)
- Policy L4 (Public Open Space)
- Policy D8 (Mains and Telecommunications Services)
- Policy CC3 (Protection of Community Facilities)
- Policy SC2 (Community Energy Networks and Large-Scale Renewable Energy Schemes)
- Policy SC3 (Low Carbon and Renewable Energy Schemes)



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# Compare Results

Old File:

**Development Brief Bletchley Fire and Police Stations Rev H.pdf**

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**114**

Text only comparison

## Content

**22** Replacements

**38** Insertions

**54** Deletions

## Styling and Annotations

**0** Styling

**0** Annotations

[Go to First Change \(page 1\)](#)

# Former Fire Station and Police Station, Bletchley

## Draft Development Brief



[www.milton-keynes.gov.uk/udla](http://www.milton-keynes.gov.uk/udla)

November 2022




This document has been prepared by Milton Keynes Council's Urban Design and Landscape Architecture Team and Milton Keynes Development Partnership who own the land.

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Document Status:	Draft
Revision:	I
Author:	Various
Checked by:	GC 
Authorised by:	
Issue Date:	November 2022

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# **SECTION 1:** **INTRODUCTION**

## 1.1 Background

1.1.1 This Development Brief sets out the guidance and design principles for the redevelopment of the former Police Station and Fire Station sites in Bletchley, a strategically located development opportunity next to Bletchley Station (see fig 1 & 2). It should be read in conjunction with planning policy documents, including Plan:MK and the West Bletchley Neighbourhood Plan, alongside guidance documents, such as the Central Bletchley Urban Design Framework Supplementary Planning Document (SPD).

1.1.2 Milton Keynes Council (MKC) and the landowner Milton Keynes Development Partnership (MKDP) have high aspirations for these two strategic sites. They can help contribute to an attractive, vibrant, prosperous and well-designed Central Bletchley providing a good quality of life for residents, workers, shoppers, as well as being seen as a destination for visitors. It will offer sustainable lifestyle options and choices fit for the 21st century that is alternative but complementary to much of the Milton Keynes offer.

### **Bletchley & Fenny Stratford Town Deal**

1.1.3 In November 2019 the Government published a prospectus detailing how it was planning to manage a £3.6 billion national fund to support towns to build prosperous futures, known as the Towns Fund.

1.1.4

The delivery of East West Rail and Bletchley's enhanced connectivity at the heart of the Government's flagship Ox-Cam Arc, the proposed development of South Central Institute of Technology at Milton Keynes (MK) College, transformation at Bletchley Park and a number of vacant sites with redevelopment potential located near to Bletchley Station all combined to provide a favourable context for a Towns Fund bid. Consequently, in December 2019, alongside a decision to approve publication of the Central Bletchley Prospectus, MKC confirmed that Bletchley would be the focus of Milton Keynes' Towns Fund bid.

1.1.5

Informed by an extensive stakeholder engagement process, the Bletchley & Fenny Stratford Town Investment Plan, seeking £25 million to progress and deliver nine projects, was completed and submitted to government in October 2020. The Government's Town Fund investment offer was received in March 2021 and a Town Deal in the sum of £22.7 million was formally agreed the following month.

1.1.6

Redevelopment of the former Fire and Police Station site is a key project within the Bletchley & Fenny Stratford Town Deal programme. Utilising Town Deal 'accelerated capital project' funding Milton Keynes Development Partnership has already overseen the demolition of the Fire Station and associated site remediation, thereby helping to de-risk development of the Fire and Police Station sites.



**Figure 1: The Site**

## 1.2 Bletchley

- 1.2.1 Bletchley is situated on the southern edge of Milton Keynes which is strategically located within the Oxford-Cambridge Growth Arc (See figure 2) where a population of 410,000 and 50,000-90,000 new jobs are proposed by 2050 with the provision of 30,000-35,000 new homes in addition to the 25,000 already planned.
- 1.2.2 The site is located in a key strategic location within Central Bletchley adjacent to the railway station (see figure 3). The development opportunity comprises the former Fire Station and Police Station in Central Bletchley (see figure 1). Both emergency services have been relocated to the Blue Light Hub in West Ashland.
- 1.2.3 The sites are owned by Milton Keynes Development Partnership (a company wholly owned by Milton Keynes Council). The land ownership is set out in Appendix A and shows two parcels of land although they can be treated as one site. For simplicity the land west of the Fire Station site has been altered on the drawings in this document.

- 1.2.4 Large parts of Bletchley will be undergoing significant change in the near future with investment by the public and private sector. An important driver behind this change is East West Rail, which will deliver new and improved services into the heart of Bletchley, and right next to the site. The Oxford to Bletchley stage is currently under construction with trains due to run between Oxford and Milton Keynes by 2025, with the Bletchley service potentially opening in 2024. Consultation and design work on the links to Bedford and Cambridge is currently underway. Bletchley Station will be revamped whilst there are also plans to provide a new station entrance on the eastern side of the railway, next to Saxon Street, in order to better connect with the town centre.
- 1.2.5 Public money is also being invested at the National and local level. The Towns Fund will help stimulate renewal, deliver a new Innovation Centre, provide land for a new bus station, and change/improve Saxon Street as part of the proposed eastern entrance. MK College Group continues to invest in its Bletchley Campus with a Government grant helping to establish its South Central Institute of Technology (SCIoT)

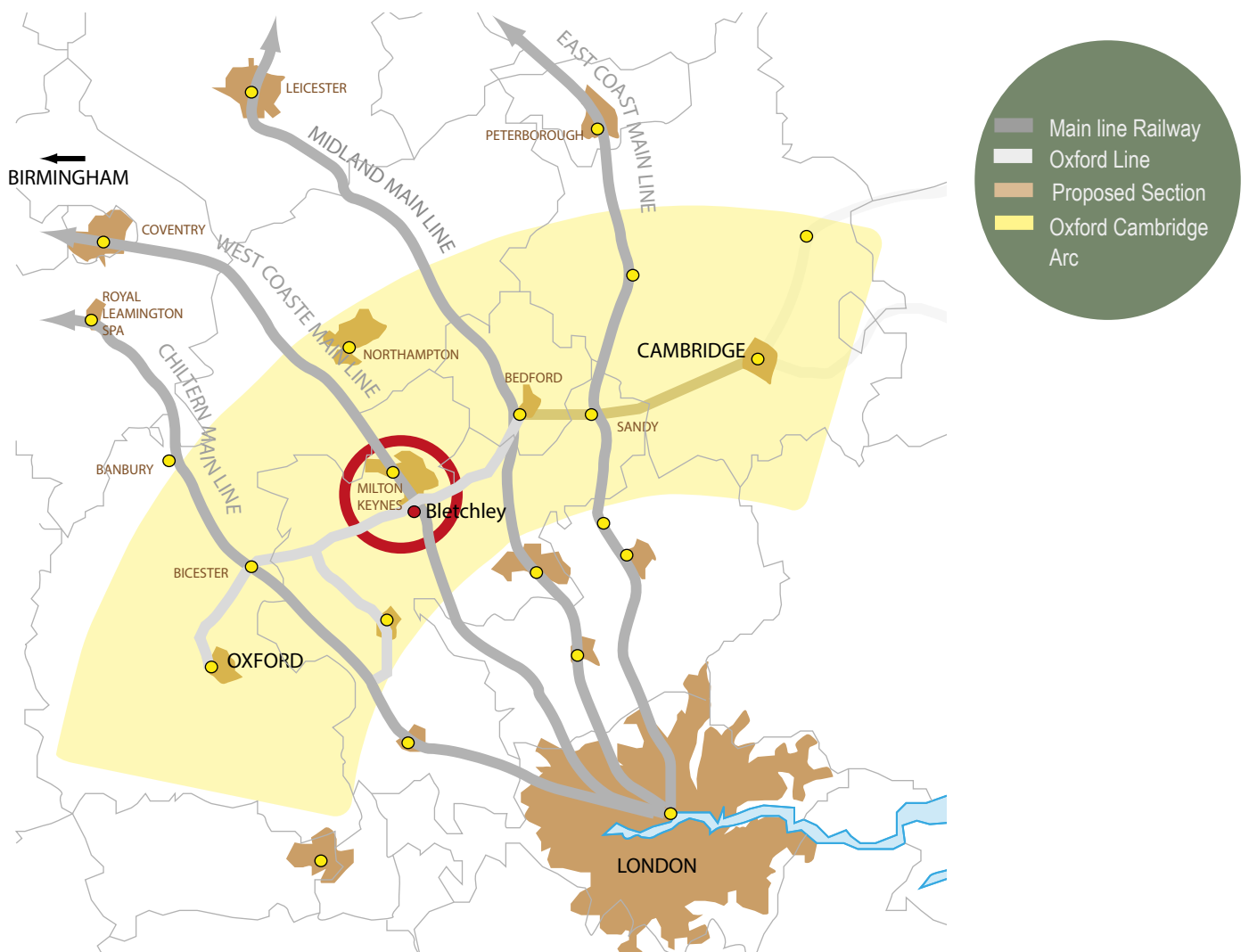


Figure 2: Bletchley location within the Oxford-Cambridge Growth Arc

opposite the Fire Station on Sherwood Drive. Work has recently commenced on this project.

1.2.6 MKDP is also making further acquisitions in the area. In January 2022, MKDP acquired Brunel Shopping Centre, the former Sainsburys' Car Park and Wilko to help deliver the Town Deal. The private sector is also investing. Examples include Caspian View, an office to residential conversion to 112 apartments to the south of the site, and Bletchley View, a new-build development of 184 dwellings just north of the Bus Station, which has recently commenced.

1.2.7 The recent development activity, new rail infrastructure, public/private funding, recently adopted SPD and forthcoming sale of the former Fire and Police Station sites will all combine to create momentum for the renewal of Bletchley.



Figure 3: Site Location





Figure 4: Site Boundary

### 1.3 Purpose of the Development Brief

- 1.3.1 The purpose of this document is to provide planning guidance and key design principles that should underpin any proposal and which will result in a high quality placemaking led scheme. The outlining of key design principles only, means that the Brief isn't seen as stifling the creativity of developers regarding more detailed design.
- 1.3.2 The Brief provides planning and design guidance applicable for the development which will aid the development process. It provides clarity and certainty to developers such that if they adhere to the principles contained within the Brief which reflect Council (MKC), and other local stakeholder expectations for the site, and respect the requirements of MKC planning policy, their proposals will likely be seen favourably by the Local Planning Authority.
- 1.3.3 The Brief has been prepared to help deliver on the policies relating to Central Bletchley in Plan:MK as well as the Central Bletchley Urban Design Framework SPD, and the West Bletchley Neighbourhood Plan.
- 1.3.4 The Development Brief has been commissioned, not by the Planning Authority, but rather by the landowner and it has not been subject to all the statutory requirements that a planning document would have to undergo. The Brief has, however, been prepared to accord with current national and local Planning Policy, and will be subject to formal public consultation. In addition, it will be submitted for approval by MKC Cabinet and, if approved, will become a material consideration in helping determine planning applications albeit with limited weight.
- 1.3.5 Once approved by Milton Keynes Council Cabinet, the guidance contained within the Brief will assist with the marketing of the site by MKDP.

### 1.4 The Vision

- 1.4.1 The aim is to create an attractive new development within an landscape framework, with a strong sense of place, which is based upon a thorough understanding of the context.
- 1.4.2 The scheme will be built at a high density, reflecting its sustainable location and planning policy. There will be new and distinctive frontages along Sherwood Drive and Buckingham Road, improving the quality of these streets and the approach into the town centre.
- 1.4.3 The main use is most likely to be residential, although planning policy allows other uses which would help increase vitality whilst benefitting from being adjacent to the town centre, MK College, and the excellent rail links, which will be improved by East West Rail.

### 1.5 Structure of the Brief

- 1.5.1 The Brief is divided into four sections:
  - Section 1 outlines the purpose of the brief, as well as its location and ownership.
  - Section 2 describes the planning policy context.
  - Section 3 provides a site analysis of the site itself and the surrounding area. A thorough understanding of this will have an important bearing on the key design principles and parameters.
  - Section 4 outlines the key design and development principles that should inform any development proposals.

# **SECTION 2:** **POLICY CONTEXT**



## 2.1 Introduction

2.1.1 This section of the Brief outlines the key relevant planning policies that underpin the brief and inform the development proposals for the site.

## 2.2 Development Plan

### Plan:MK

2.2.1 Plan:MK was adopted in March 2019 and forms part of the Development Plan guiding future planning applications. Key policies are set out below with additional text in Appendix E.

2.2.2 Policy SD16: Central Bletchley Prospectus Area provides the strategic policy for the area within which the former police and fire stations lie. Part A.5 refers to 'Exploring options for the early redevelopment of the Police and Fire Station sites'. Policy SD16 states:

'Development within the Central Bletchley Prospectus Area will be guided by the following principles:

1. The density of residential development to be 150-250 dwellings per hectare.
2. Improved pedestrian connections and legibility.
3. Improved public realm.
4. Refurbishment and/or redevelopment of key sites and buildings.
5. Exploring options for the early redevelopment of the Police and Fire Station sites.
6. Exploring the potential of existing infrastructure to help enable and unlock residential-led mixed use development opportunities.
7. Further improve the quality of pedestrian routes to and from Bletchley Station.
8. Development should not preclude the delivery of an 'eastern entrance' to Bletchley railway station.
9. The development will provide green infrastructure in line with Policy NE4, providing wellbeing benefits through access to nature.'

2.2.3 The key relevant planning policy within Plan:MK for the site is as follows:

#### Policy DS1 Settlement Hierarchy

'The provision of new homes and jobs will take account of the settlement hierarchy set out in Table 4.2. The majority of development will be focussed on and adjacent to, the existing urban area of Milton Keynes at the locations specified in Table 4.2 and in the context of Central Bletchley from selective infill, brownfield, regeneration and redevelopment opportunities.'

2.2.4 Policy ER2 Protection of Existing Employment Land and Premises. This policy seeks the protection of existing employment land. The Police and Fire Stations Sites are designated on the Plan:MK Policies Map as 'Existing Employment'.

2.2.5 Policy CC3 Protection of Community Facilities. This policy seeks the protection of existing community facilities of which the Police and Fire Station sites are such uses. Loss of community facilities will only be supported where :

1. There is no longer a need for the facility for any type of community use, and this has been robustly evidenced by research and consultation; or
2. An acceptable alternative facility can be provided elsewhere

2.2.6 Policy DS2: Housing Strategy Plan: MK will deliver a minimum of 26 500 net dwellings across the Borough of Milton Keynes over the period 2016-2031. The policy states that new housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes as well as the 3 key settlements, and will be delivered by a range of interventions, including no10: "Regeneration opportunities around the centres of Wolverton and Bletchley."

2.2.7 Policy DS4 Retail and Leisure Development Strategy, Part D. In Bletchley, this section of the policy refers to Milton Keynes Council preparing a Central Bletchley Prospectus to facilitate and promote mixed-use development around Bletchley Station and the intensification of development at sustainable locations with good access to public transport hubs, building on the opportunities created by the development of East-West Rail and the work undertaken in the Bletchley 'Fixing the Links' project.

2.2.8 Policy CT10 Parking Provision

'A. Development proposals should meet the following parking requirements:

1. All development should meet the Council's full parking standards, unless mitigating circumstance dictate otherwise.
2. On-site parking should not be reduced below the Council's full expectations if this would increase additional pressure in off-site parking that could not be resolved by on-street parking controls.
3. Parking areas should be well designed in terms of safety, circulation, appearance and assist access by pedestrians and cyclists.
4. All residential, retail and employment uses should provide electric vehicle charging points (EVCPs) in accordance with the current Milton Keynes Parking Standards, and provide a forward thinking approach. For locations of rapid and fast charging points see policy CT6 D.'



2.2.9 Policy HN1 Housing Mix and Density.

'Part D of this policy refers to a net density of 150-250 dwellings per hectare in the area covered by the Central Bletchley Prospectus. Part E notes "where no or low levels of parking are proposed, to achieve densities that help realise wider strategic objectives, they will be required to demonstrate the site has good accessibility to frequent public transport services to public transport nodes, district/town/local centres, schools and employment areas.'

2.2.10 Policy HN2 Affordable Housing.

Proposals for 11 or more homes should provide 31% of those homes as affordable housing. Proposals that provide greater than 31% of homes as affordable housing will be strongly supported. However, proposals consisting of 50% or more affordable housing will only be supported provided that they would maintain (or help create) a mix of housing tenures and therefore a mixed and sustainable community within the wider neighbourhood the proposal is situated in.

2.2.11 Policy INF1 Delivering Infrastructure.

A new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:

1. Already in place; or,
2. There is a reliable mechanism in place to ensure that infrastructure, facilities and resources will be delivered in the most appropriate places and at the earliest opportunity, to the required minimum high standards demanded by this Council and its partners. This might include improvements for highway schemes such as bus and rail provisions and enhancement for walking and cycling facilities, or the provision of improved and better connected green infrastructure, local health, shopping and recreational facilities.

2.2.12 Policy NE4 Green Infrastructure

A The network of green infrastructure throughout the Borough will be protected, extended and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change. This is in accordance with the vision and principles (and the large-scale zone maps of Green Infrastructure Opportunity(39)) set out by the Buckinghamshire and Milton Keynes NEP.

B Development proposals will provide new green infrastructure or, if it is not possible, will contribute to the enhancement and strengthening of existing green infrastructure to provide wellbeing benefits to people through access to nature.

C Development proposals will ensure that existing ecological networks are identified and wherever

possible maintained to avoid habitat fragmentation, and that ecological corridors, including watercourses, form an essential component of their green infrastructure provision to support habitat connectivity.

D Green infrastructure protection, improvements and creation must be prioritised in locations where it can deliver most benefits. It should be multi-functional to deliver as many ecosystem services as the site requires, for example flood mitigation, access to nature (wellbeing benefits), plants for pollinators, carbon sequestration, and habitat for wildlife.

2.2.13 Policy CC1 Public Art

A. The provision of public art and cultural activity can not only enhance the environment but also create a wide variety of other important benefits such as:

1. Improving the quality of life for local people.
2. Creating a local distinctiveness and a sense of place.
3. Enriching the cultural life of Milton Keynes and raise its profile.
4. Providing a focus and stimulus for tourism.

B. A minimum of 0.5% of the gross development cost of proposals for 11 or more dwellings or non-residential development of 1,000 sq m or more should, subject to viability, be allocated towards cultural wellbeing. This includes public art that enhances the cultural offer and appearance of the development, its surroundings and Milton Keynes as a whole, and engaging local residents throughout.

2.7.14 Developers should explore the potential for providing public art as part of their proposals. This could be about Bletchley Park but does not necessarily mean Alan Turing and other options should be explored (i.e. history of computing, LGBT rights, women's role in WWII, etc) which would form part of a wider arts initiative within Bletchley and Fenny Stratford. Developers will need to engage with the relevant parish and Council teams early in the design process.

2.2.135 Policy SC1 (Sustainable Construction)

This sets out the Council's requirements for sustainable construction, with further detail provided within the forthcoming Sustainable Construction SPD 2021.

2.2.16 Milton Keynes has a unique selling point around its design and therefore its Design Policies are key to inform any proposal. These include:

Policy D1: Designing a High Quality Place, Policy D2: Creating a Positive Character Policy D3: Design of Buildings, Policy D4: Innovative Design and Construction and Policy D5: Amenity and Streetscene.

## West Bletchley Neighbourhood Plan

2.2.17 The West Bletchley Neighbourhood Plan was made part of the Development Plan in March 2019.

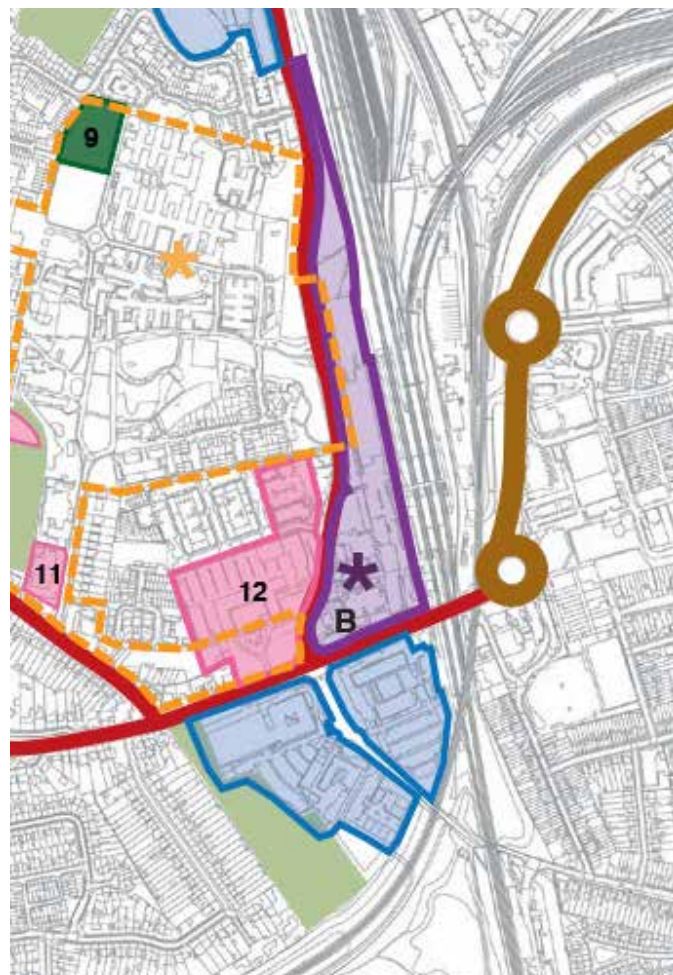
2.2.18 The plan identifies the opportunity to enhance the Station Area (see Figure 5 below). Importantly, it identifies that there is a new catalyst for change. “East-West rail services will be re-instated on a stretch of the old ‘Varsity Line’ between Oxford and (initially) Bedford through Bletchley and eventually on to Cambridge, within a few years. New station platforms are to be constructed on the eastern side of the station. Bletchley will therefore be at the centre of an axis between two of Britain’s most successful and famous universities and fastest growing economies. This provides a renewed impetus to respond to the improved accessibility to both improve the existing station and station forecourt / square, and bring sites alongside the station forward for new development that responds to the superb enhanced accessibility of our area.” (Pg 30).

2.2.19 Policy BS1 (Station Regeneration) states “Regeneration of existing buildings and land alongside Bletchley Station, as identified in Figure 5, will be supported where it improves the travelling public’s experience including new station-related retail and café uses.”

2.2.20 Policy BS2 (Station Accessibility) states “Improvements to pedestrian, cycle and public transport access between the station and surrounding areas, including the town centre and Bletchley Park, will be supported.”

2.2.21 Policy BS3 (Station Quarter Development) states “Redevelopment of land and uses within the Station Quarter Opportunity Area, as identified in Figure 5, will be supported where the development is comprehensive and provides a sensitive and balanced mix of uses that can include residential, high quality workspaces, hotel, conference centre/facilities, café/restaurant/local retail uses, visitor interpretation/facilities and public spaces, and is consistent with the approved development and design brief.”

2.2.22 Policy BS4 (Station Quarter Development and Design Brief) states “Major development proposals will only be supported where they are consistent with an overarching Development and Design Brief for the Opportunity Area, as defined on Figure 5.”



- Retaining and Creating New Employment  
Policies E1-E3
- ★ Station Quarter  
Policies BS1-BS4
- Renewing Our Local Shopping Centres  
Policies LSC1-LSC4  
1. Melrose Avenue Shopping Centre  
2. Whaddon Way Shopping Centre
- Protecting and Developing Community Facilities  
Policies C1-C2 (See list opposite)
- Ensuring our Streets are Safe and Accessible  
Policies SSA1-SSA3
- - - Conservation Area Boundary

Figure 5: Proposals Map from West Bletchley Neighbourhood Plan (extract only)

## 2.3 National Planning Guidance

### National Planning Policy Framework

2.3.1 The National Planning Policy Framework (updated in July 2021) promotes sustainable development that meets 3 overarching objectives:

1. Economic - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places
2. Social - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing
3. Environmental - including making effective use of land and moving to a low carbon economy (para 8)

#### Section 7: Ensuring the vitality of town centres

Recognise that residential development often plays an important role in the vitality of town centres and encourage residential development on appropriate sites (para 86f).

#### Section 8: Promoting healthy and safe communities

Development should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with - for example, through mixed use developments and active street frontages (para 92a)

To provide the social, recreational and cultural facilities and services the community needs, development should include shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments (para 93)

#### Section 9: Promoting sustainable transport

Development should be focused on locations which are sustainable through limiting the need to travel and offering a genuine choice of transport modes. (para 105).

#### Section 11: Making effective use of land

Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (para 120c)

Promote and support the development of under-utilised land and buildings (para 120d)

Para 124. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

#### Section 12: Achieving well-designed places

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 sets out six criteria that development proposals should meet. These included their function, appearance, layout, landscaping, character, sense of place, mix, uses, health, and well-being.

#### Section 14: Meeting the challenge of climate change, flooding and coastal change

Supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. (Paragraphs 152 to 173).

#### Section 15: Conserving and enhancing the natural environment

Paragraph 174 requires development to contribute to and enhance the natural and local environment. This includes sites with biodiversity value. Proposal should minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Part e) states ‘preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraphs 179-182 set out the requirements regarding habitats and biodiversity.



## National Design Guide

2.3.2 The National Design Guide (updated in January 2021) was created to ensure beautiful, enduring and successful places are delivered. It outlines 10 characteristics of well designed places.

1. Context - enhances the surroundings
2. Identity - attractive and distinctive
3. Built Form - a coherent pattern of development
4. Movement - accessible and easy to move around
5. Nature - enhanced and optimised
6. Public Spaces - safe, social and inclusive
7. Uses - mixed and integrated
8. Homes and Buildings - functional, healthy and sustainable
9. Resources - efficient and resilient
10. Lifespan - made to last

2.3.3 Especially important in the context of this site is it advocates compact development, that lines/ addresses the adjacent streets providing active frontages, and landmarks/key buildings in appropriate place to help with legibility as well a mix of uses.



*Taken from the National Design Guide (September 2019)*



## 2.4 Central Bletchley Urban Design Framework SPD

- 2.4.1 The Central Bletchley Urban Design Framework SPD was adopted in March 2022. The SPD will capitalise on the significant opportunities flowing from the enhanced connectivity and accessibility, enabled by EWR, through the provision of guidance which promotes holistic and inclusive renewal within Central Bletchley.
- 2.4.2 It will inform landowners and potential investors about the placemaking and development opportunities within Central Bletchley which will deliver on the agreed aspirations for the area. East-West Rail will bring Oxford and Cambridge within a 40 minute train journey from Central Bletchley while London Euston is only 40 minutes away via the West Coast Mainline.
- 2.4.3 The SPD build's on the approved Central Bletchley Prospectus through the provision of further detailed land use and design guidance for opportunity areas which will provide greater clarity, certainty and speed for applicants when preparing planning applications.
- 2.4.4 The site lies within the Sherwood Drive Quarter Opportunity Area (see figure 6 below - SPD parameters plan). The Police and Fire Station is identified as an opportunity site to be redeveloped for mixed use development including an Innovation Hub

and housing. A small element of retail space could be provided in a prominent position to help generate activity and capture footfall around the existing western train entrance.

- 2.4.5 As part of the redevelopment of the Police and Fire Station Site, a pedestrian route was shown running across the site. This was included as the Innovation Hub was likely to be seen as a separate development and therefore a piece of public realm including a pedestrian route was seen as a good response for the site context.

## 2.5 Central Bletchley Prospectus

- 2.5.1 This Prospectus was approved by Milton Keynes Council in 2020.
- 2.5.2 It was produced to both highlight, and capitalise on, the significant renewal opportunities flowing from the delivery of EWR as a consequence of Central Bletchley's enhanced connectivity and accessibility.



Figure 6: Urban Design Framework Parameters Plan (Sherwood Drive and Buckingham Road Quarter)

## 2.6 Other Planning Guidance

### Supplementary Planning Guidance (SPG)/ Documents (SPDs)

- 2.6.1 The following Supplementary Planning Guidance/ Documents (SPG/SPDs) should be considered as material considerations when preparing any planning application for the site:
- Sustainable Construction SPD (2021)
  - Parking Standards SPD (2016)
  - New Residential Development Design Guide SPD (2012)
  - Affordable Housing SPD (2020)
  - Milton Keynes Drainage Strategy – Development and Flood Risk SPG (2004)
  - Planning Obligations SPD (2021)
  - Designing Dementia-friendly Neighbourhoods SPD (2022)
  - Health Impact Assessment SPD (2021)
  - Biodiversity SPD (2021)
  - Transport and Sustainable Transport SPD (2009).
- 2.6.2 MKC is currently undertaking a partial review of its parking standards, including a reduction for Private Rental (PRS) or Built to Rent (BRS) schemes in more sustainable locations such as Central Bletchley. A draft is due out for consultation on 10 August 2022.

## 2.7 Planning Assessment

- 2.7.1 This planning assessment has been prepared in the context of this Brief proposing mixed use development with housing likely being the predominant use.
- 2.7.2 The key policies to be addressed are Policies CC3 (Protection of Community Facilities) and ER2 (Protection of Employment Land).
- 2.7.3 It is the view that the requirements of relevant sections of Policy CC3 have been met because the activities provided at the Fire Station (now demolished) and the Police station had been relocated elsewhere, in the case of the fire station to the Blue Light Hub in West Ashland where there is also a police presence.
- 2.7.4 Regarding Policy ER2 it is acknowledged that the Fire and Police Station sites are shown on the Plan:MK policies map as employment land within a wider designation as a site within the Central Bletchley Prospectus Area (CBPA) where Policy SD16 applies. Policy ER2 seeks the protection of existing employment land and premises, and the proposed mixed use (with residential being the likely predominant use) as outlined within this Brief would change the primary use of the site to a non-employment use. Plan:MK would require that a proposal is in accordance with Policy ER2 to justify the loss of employment land. However, Policy BS3 of the WBNP (post adoption Plan:MK) has allocated

the Station Quarter to be redeveloped for mixed uses and similarly, the Central Bletchley Urban Design Framework (CBUDF) SPD states the first key principle for the Sherwood Drive Quarter is for the redevelopment of the police and fire station for mixed used development including an Innovation hub.

- 2.7.5 As the WBNP was made/adopted after Plan:MK, it [the WBNP] was considered to be the most up to date plan and one that carried considerable weight.
- 2.7.6 Therefore, the designations for mixed use redevelopment for the Police and Fire Station sites outlined within the WBNP and CBUDF justifies the loss of employment land and principle of change of use.

## 2.8 Planning Summary

- 2.8.1 The preceding summary of key relevant policy and other guidance outlines a favourable policy context that supports the Council's aspirations for the site.
- 2.8.2 In summary, it is a brownfield site located within a highly sustainable location likely within Plan:MK Policy SD16 which furthermore calls for the early redevelopment of the Police and Fire Station Sites.
- 2.8.3 The West Bletchley Neighbourhood Plan outlines a range of permissible uses, including residential and supporting local retail uses while the Central Bletchley Urban Design Framework SPD envisages the site to be developed for residential led mixed use development at densities up to 250dph.

# **SECTION 3:** **CONTEXTUAL ANALYSIS**



## 3.1 Introduction

3.1.1 This section describes the key characteristics of the two sites and their context. It includes location, site description, land uses, key environmental/technical aspects such as noise, topography and utilities. There is also a short summary of transport aspects and local character. The section includes the site's opportunities and constraints which have informed the key design principles in the next section.

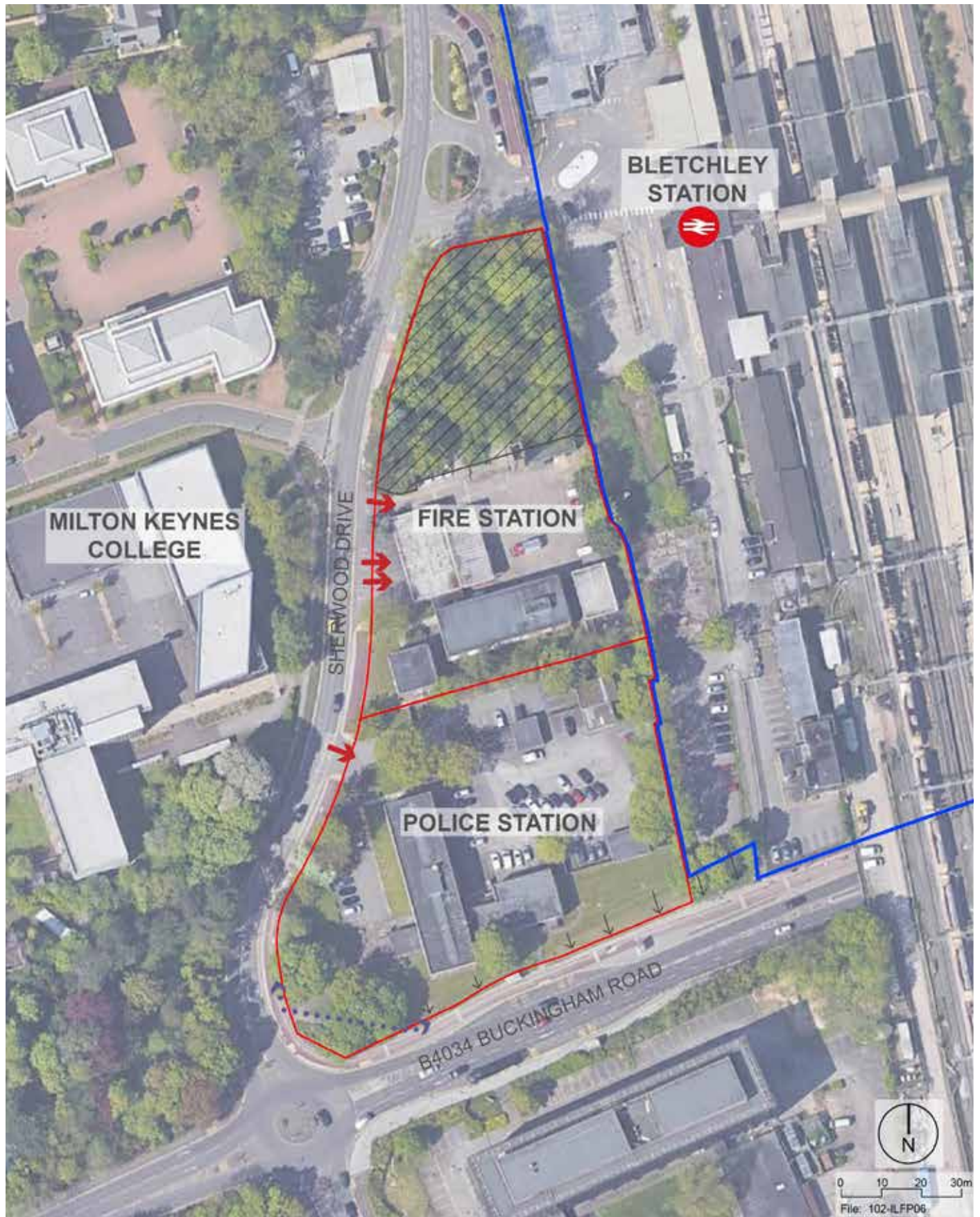
## 3.2 Location

3.2.1 The sites are located on the western edge of Bletchley town centre, adjacent to Bletchley Station. They are in a mixed use area with Milton Keynes College to the west, the famous Bletchley Park to the northwest, mainly employment uses to the south, whilst to the east is the West Coast Mainline. The sites are located within a commercial/institutional arc between the town centre and residential suburb of West Bletchley to the west.



Figure 7: Site Location





- Site Boundary
- Network Rail/Operator land
- TPO Area
- Informal Pedestrian Route
- ➔ Vehicular Access
- ↓ Slope Down

Figure 8: Site Plan



### 3.3 Site Description

- 3.3.1 The Police Station site occupies approximately 0.68 Ha (1.68 Ac) whilst the Fire Station is 0.57 Ha (1.41 Ac), giving a combined area of 1.25 Ha (3.09 Ac). Note that the site area given for the fire station is lower than the area on the Land Registry title (0.63 ha) as it is assumed that the site boundary would only extend to the edge of the pavement.
- 3.3.2 The Police Station comprises a two-storey L-Shaped building in a modernist style (see Figure 8 and photos). There is a car park to the rear, which includes a few ancillary buildings, and a small car park by the front entrance. There are several trees within and around the edges of the site, including mature specimens.
- 3.3.3 The Fire Station site, which was cleared in 2021, originally comprised a group of modernist style buildings set within a landscape framework. They included a garage for the fire tenders, accommodation block/offices, tower, training area, and car park. The original basement under the accommodation block remains in situ as demolition was completed to ground slab level only.
- 3.3.4 The northern half of the fire station site contain trees and shrubs and is designated as a woodland tree preservation order (TPO). Trees are also present along the site's boundaries. There is a ditch running north-south within the wooded area.
- 3.3.5 Each site takes access off Sherwood Drive. For the Fire Station, the access area is quite large in order to provide access to each fire tender whilst there is a separate access to the yard at the back. There are pedestrian connections to both sites from Sherwood Drive. Both facilities have secure rear compounds.



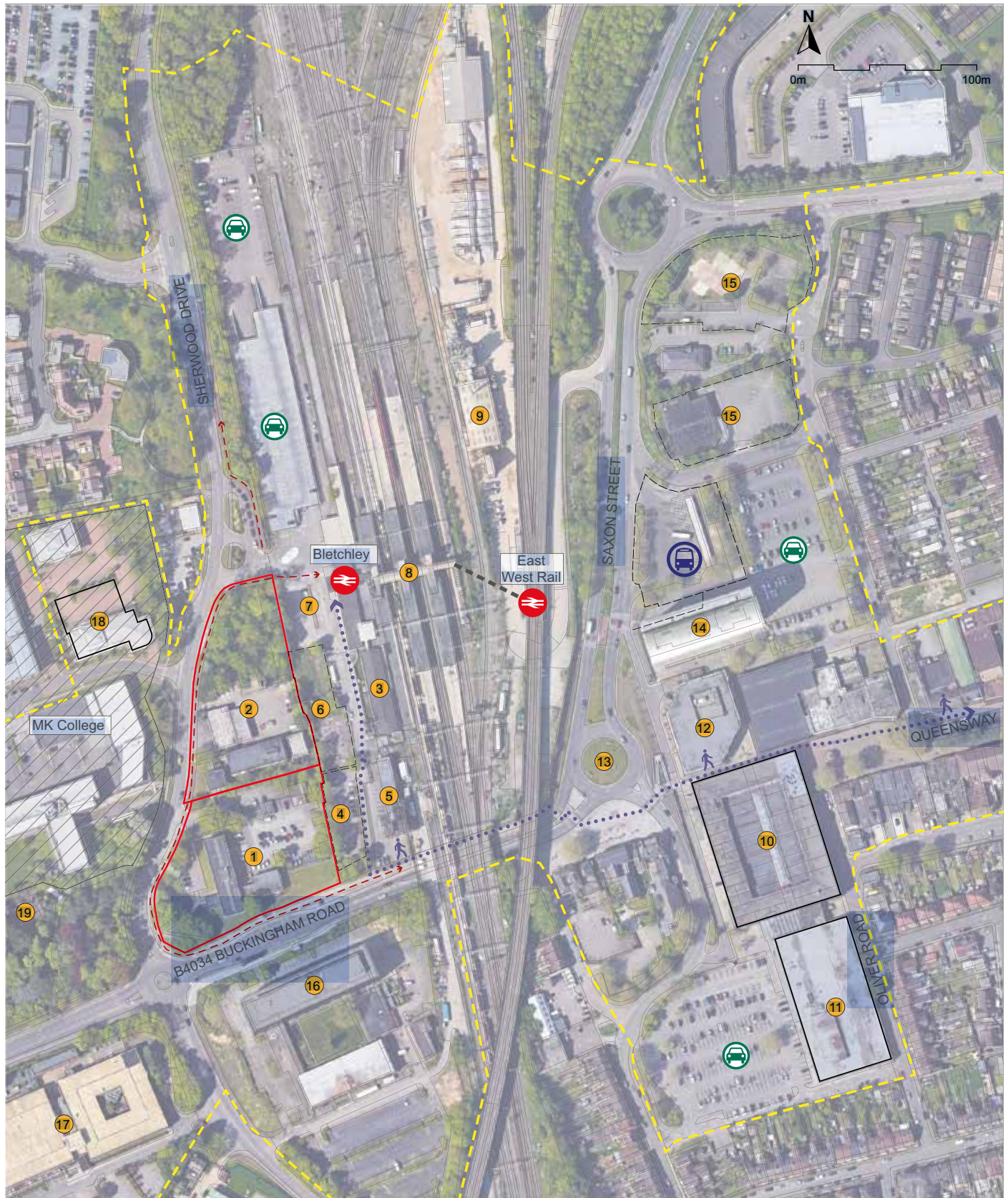
(Copyright Bing Maps)

*Bird's Eye View of Sites from south*



*View inside former Fire Station site looking towards Buckingham Road (top) and front of former Thames Valley Police Station*





- Site Boundary
- Area covered by the Urban Design SPD
- ⚡ Stations (EWR Buildings Under Construction)
- ⋯ Pedestrian Route from Station to Centre
- Cycle Route (Redway) near site
- 🚌 Bletchley Bus Station
- 🚗 Car Parks
- 1 Police Station: Now Vacant
- 2 Fire Station: Buildings Demolished
- 3 WMT Staff Building
- 4 WMT Parking Area for Drivers
- 5 Signal Box
- 6 Vacant Area
- 7 Station Parking and Drop-off
- 8 Pedestrian Bridge for Platforms (extension to EWR Transfer Building under construction)
- 9 CEMEX Plant
- 10 Brunel Centre
- 11 Former Sainsbury's supermarket
- 12 Wilko
- 13 Brunel Roundabout
- 14 Stephenson House
- 15 Area with Permission Mixed Use Scheme
- 16 Office Building Recently Converted in Housing
- 17 Santander Training Centre
- 18 Extent of Proposed IoT Building
- 19 Former Cricket Pavilion Building

File: 102-ILFP04

Figure 9: Site Context Plan



### 3.4 Description of Surrounding Area

- 3.4.1 In terms of the immediate surroundings, the area to the east comprises car parking (rail related and public), metal fencing, an overgrown area which previously housed a building, a telecom mast, staff accommodation, a signal box and Bletchley Station. There is an unattractive and poorly surveilled pedestrian link running in between the parking areas and Network Rail buildings, which links the station with Buckingham Road and then on to the town centre.
- 3.4.2 To the south, the land drops down to Buckingham Road beyond which lies a five-storey former office building which is currently being converted into apartments. Sherwood Drive runs along the western edge, with Milton Keynes Colleges Bletchley Campus on the western side of Sherwood Drive. The College's new Institute of Technology faces the former Fire Station.
- 3.4.3 Adjacent to the Police Station on the corner of Sherwood Drive and Buckingham Road is the former, now overgrown cricket pavilion site. It is heavily landscaped and fenced off from public access. The Central Bletchley Urban Design Framework SPD however identifies it as an opportunity site to be restored as a small publicly accessible pocket park together with a small amount of housing.
- 3.4.4 The area to the north of the fire station contains rail-related uses such as the station entrance, pick up/drop-off (PUDO) and two-storey car park. There is also a hire car firm opposite the station entrance.
- 3.4.5 MKDP and MKC have held meetings with Network Rail, East West Rail and the station operator (London Northwestern Railway) about the land immediately to the east of the site (see Appendix A for ownership/lease arrangements). There is an opportunity to improve the environmental quality and functionality of this area although the Signal Box building needs to remain. Network Rail are currently exploring the options for this area and will continue to meet with MKDP and MKC.



View south along footpath with overgrown area to right and Signal Box on left



View south along Sherwood Drive with former Fire Station behind temporary fencing



View towards former Fire Station site (buildings now demolished) from entrance to MK College



### 3.5 Landscape and Environmental

#### Topography

3.5.1 A topographic survey has been completed on the two sites and shows that there is a gradual fall from north to south, with a more significant drop along the southern edge, down to Buckingham Road (see photo below).

#### Trees and Vegetation

3.5.2 There are a number of trees within the site and along the adjacent streets, which contribute towards the character of the area. A tree survey has been completed on the sites by Andrew Belson (see extract in Appendix B) and this includes details about the condition of the trees. The northern part of the Fire Station site is covered by a Woodland Tree Preservation Order made in 2010.

#### Ecology

3.5.3 A Preliminary Ecological Appraisal was completed by Ecology by Design in October 2021. The Baseline Habits Map is shown in Appendix C. The Executive Summary provides a list of key findings and recommendations for additional surveys regarding bats. There is a recommendation for improving the biodiversity value of the site, which may require offsetting.

#### Flood Risk

3.5.4 The sites do not lie in any flood zone and are hence classified as Flood Zone 1. According to the Government website, parts of the site have a low-medium risk of flooding from surface water.

#### Noise

3.5.5 The site lies close to the West Coast Mainline and proposed route of the new route for East-West Rail. Therefore, consideration will need to be given to the impact of noise on the future residents and users of the development, including amenity spaces. There will also be noise from Buckingham Road.

### 3.6 Utilities

3.6.1 A utilities report on the site has been prepared by Atkins (see extract in Appendix D) and is available upon request. These have not been added to constraints plan and the developer will need to carry out their own assessments of the existing services to ascertain their implications for development and whether they act as constraints, particularly the sewers crossing the site.



*The more steeply sloping part of the site along its southern boundary*



*Trees within northern part of former Fire Station with station entrance on left*

### 3.7 Land Uses

3.7.1 The sites are located in a mixed use area which is typical of an edge-of-centre location (see Figure 10). To the east lies Bletchley town centre which contains a range of high street businesses. Its western end is defined by Brunel Shopping Centre, with a range of local and national businesses, and the retailer Wilko.

3.7.2 The western side of the railway lines comprises mainly educational, government and commercial uses, typically offices. Situated in between these two areas are predominantly transport related uses such as the station, ancillary buildings, car parks, car hire firm, and a CEMEX plant which is served by the adjoining railways. Extending outwards, the uses comprise mostly housing, with predominantly Victorian terraces to the east and inter-war suburbs to the west. Other notable uses include the bus station, higher-density apartments in Stephenson House and the educational/tourism at Bletchley Park to the northwest.

3.7.3 Some of the older commercial areas are now in residential use. For example, Caspian View, the former office block to the south is currently being converted to residential uses as is the land north of the bus station currently being redeveloped into 184 dwellings and community uses (Bletchley View).



Former office building to south of site being converted into apartments (Caspian View)

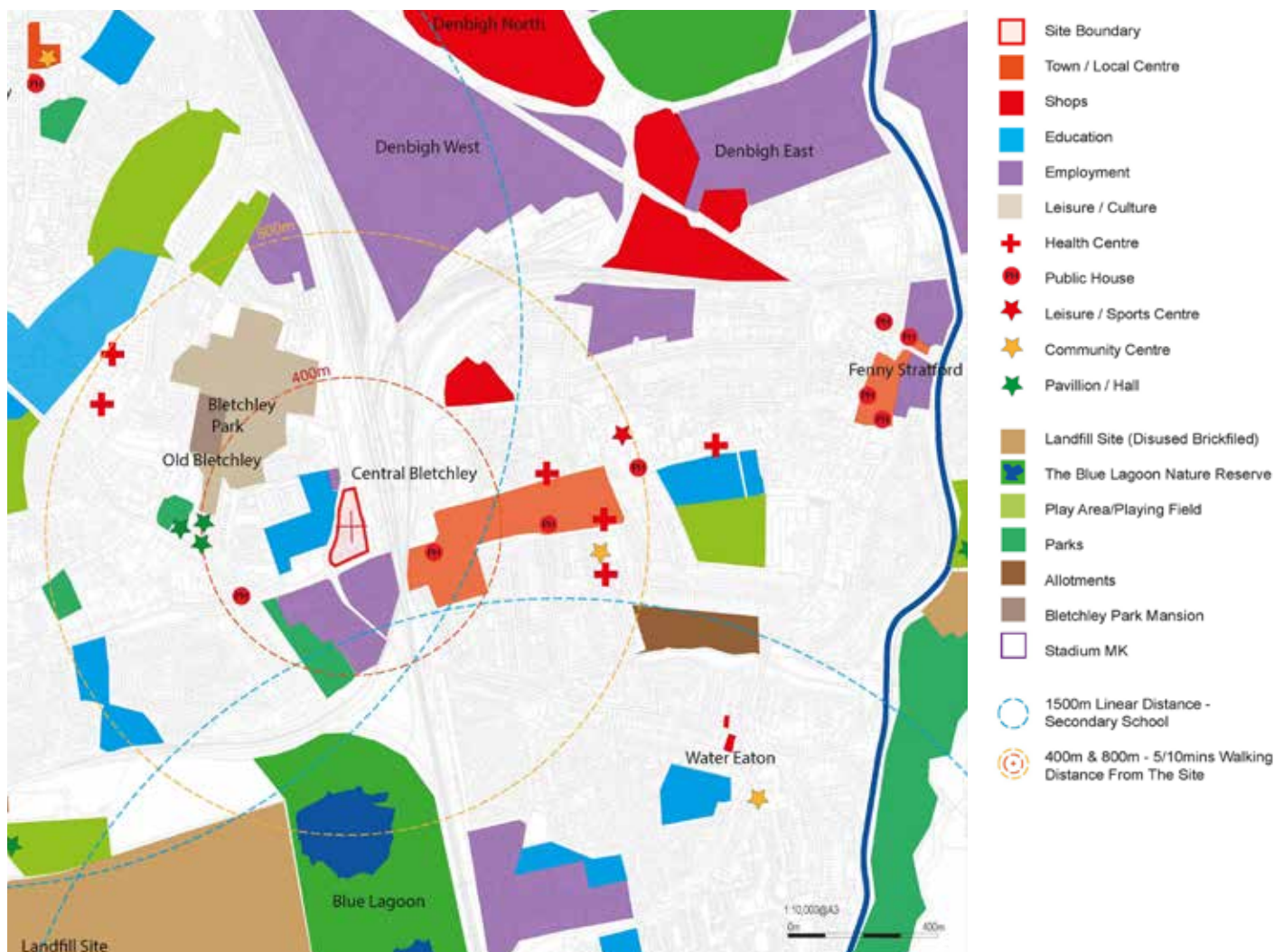
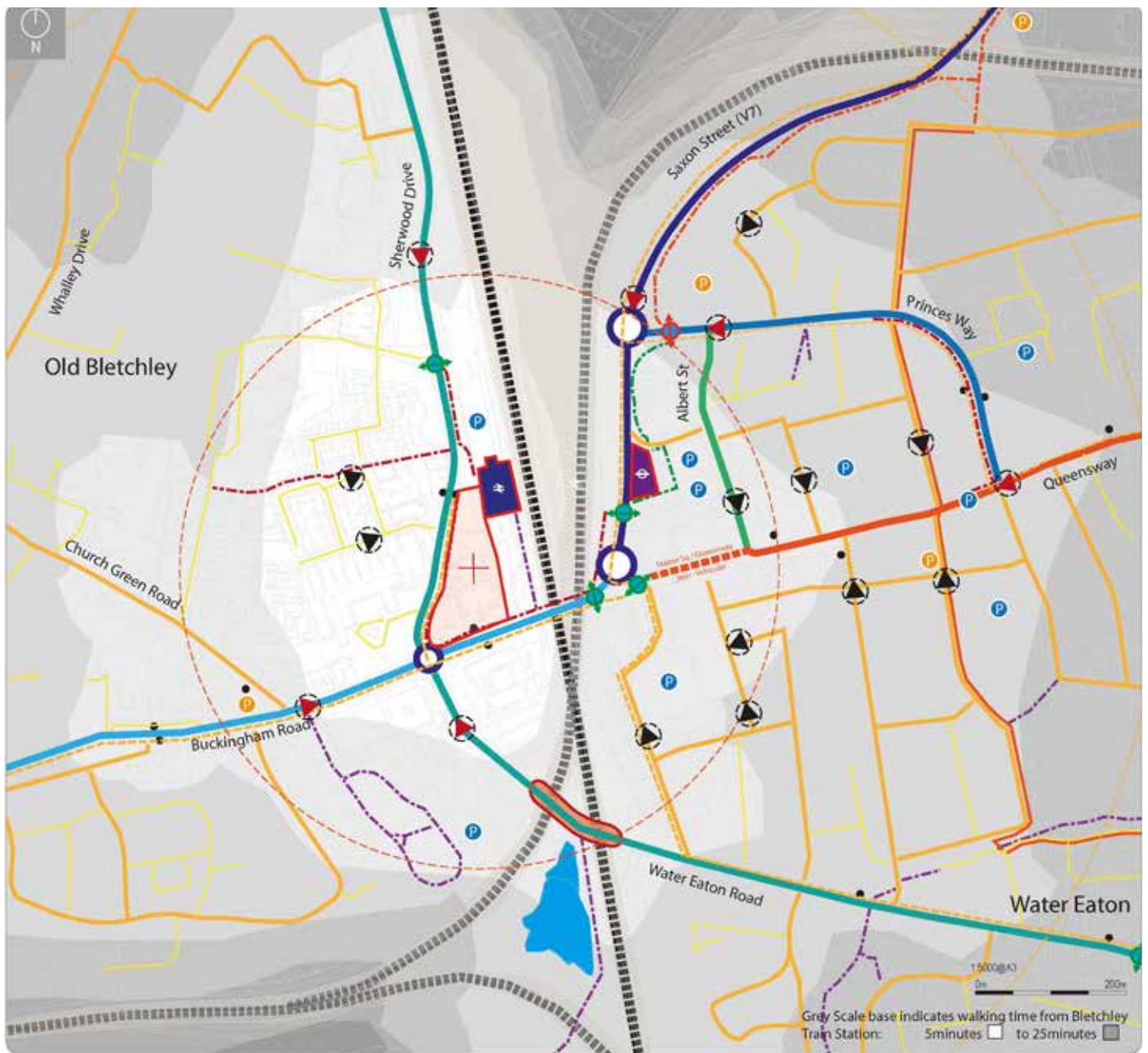


Figure 10: Land Use Plan

(Plan based upon p21 of Urban Design SPD)





- |   |   |  |
|---|---|--|
| Site Boundary   | Existing Vehicular Access Point   | Bus Route                                |
| Saxon Street, V7 Grid Road<br>Dual Carrageway (Primary Distributor) | Strategic Access Point  | Footpath                                 |
| Queensway   | Railway Line - West Coast Main Line   | Leisure Route (Pedestrian / Cycle Route) |
| Princess Way  | Railway Line - East West Rail   | Redway (Pedestrian / Cycle Route)        |
| Buckingham Road   | Railway Station   | Redway Super Route                       |
| Sherwood Drive / Water Eaton Rd                                     | Bus Terminus  | National Cycle Route (Route 6)           |
| Albert Street   | Traffic Signals -Constrained Road Width<br>(Water Eaton Drive, under the railway) | Pedestrian Road Crossing Points          |
| Local Distributor   | Bus Stop  | Poor Pedestrian Crossing Points          |
| Local Access Road   | 400m from site (5 mins walking)   | Parking (public)                         |
|   | 800m from site (10 mins walking)  | Parking (customer only)                  |

(Plan based upon p24 of Urban Design SPD)

Figure 11: Movement Network

## 3.8 Access & Transport

### Vehicular

- 3.8.1 The sites are located at the junction of Buckingham Road and Sherwood Drive (see figure 11). The B4034 Buckingham Road is a busy main road running into and around Bletchley town centre. Each site is accessed from Sherwood Drive which connects onto the roundabout along the B4034 Buckingham Road.

### Public Transport

- 3.8.2 The sites are very well served by public transport. They are next to Bletchley Station with regular services to London Euston and Milton Keynes Central. The new East West Rail service will add further destinations, including Oxford and Bedford. There are also bus stops along Buckingham Road and Sherwood Drive whilst the town's bus station lies immediately on the eastern side of the railway line and is within easy walking distance.

### Walking and Cycling

- 3.8.3 The sites are well connected to existing footpath and cycle networks with a redway running along their southern and western boundaries. There are no footpaths crossing the site although there is an informal desire line crossing the southwest corner. There are pavements along both sides of Buckingham Road and Sherwood Drive which then links into the station and College.
- 3.8.4 There is a poor quality pedestrian link providing the shortest walking distance between the town centre and train station. It includes steep steps providing access onto Buckingham Road.



Access into Police Station (Footpath/Cycle link in front) with secure rear compound and turning for car parking to right.



View of Brunel Roundabout with transfer building for East West Rail under construction



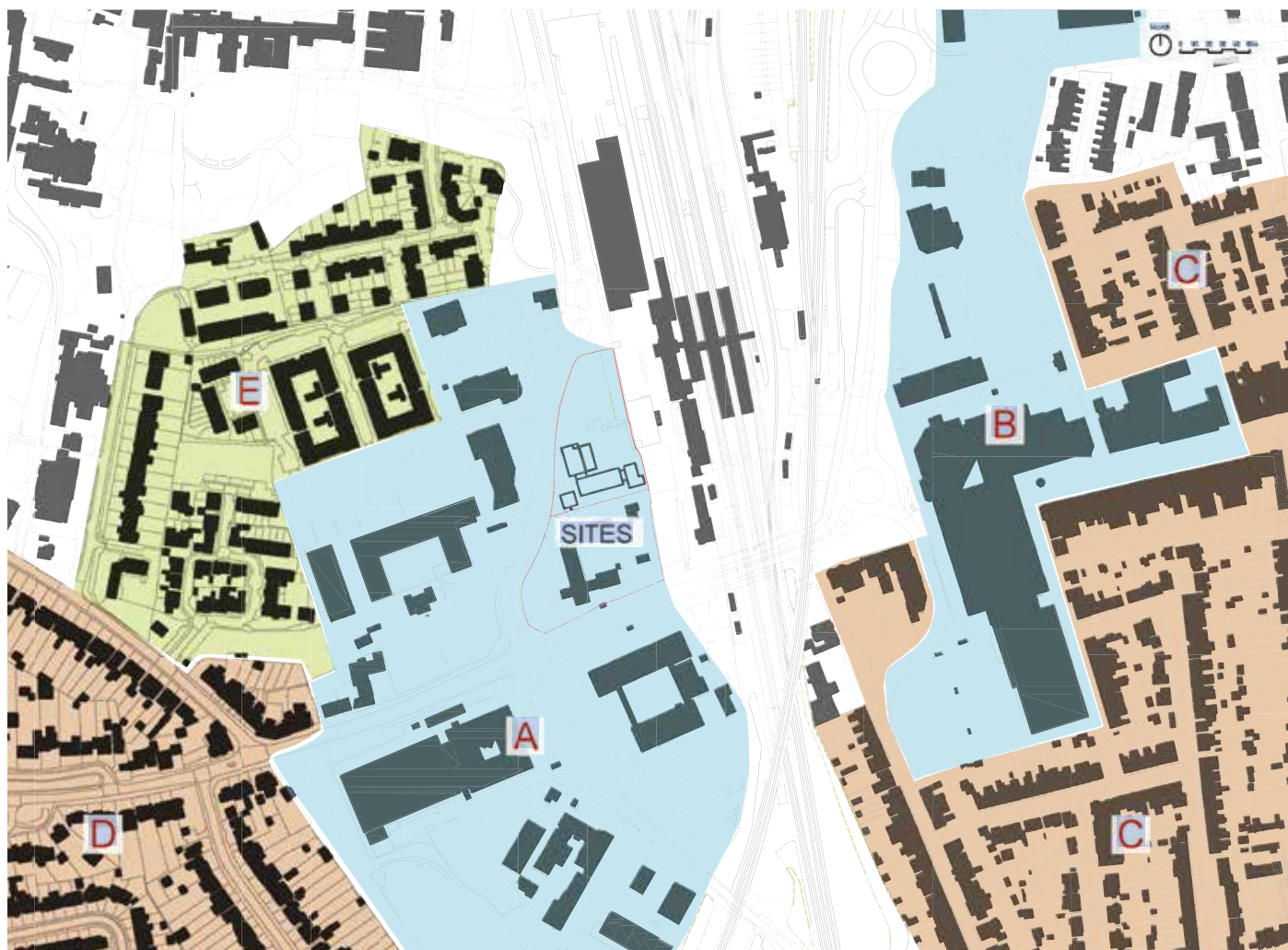
Bletchley Station entrance and car park with edge of former Fire Station site on right



### 3.9 Local Character

- 3.9.1 The site and surrounding area comprises mostly modern, stand-alone type buildings set back from the adjoining streets, which have a sylvan character. The buildings have a similar orientation, running perpendicular to Buckingham Road.
- 3.9.2 Figure 12 below is a figure/ground plan of the area and shows the variety across this edge-of-centre location. The area around the site has a coarser grain, which reflects the modernist principles, whilst the Victorian centre and inter-war suburbs have a finer grain.

- 3.9.3 In terms of heritage assets, there are no listed buildings on or next to site although there is a conservation area to the southwest of the police station.
- 3.9.4 In terms of activity, Buckingham Road is a busy main route into and out of Bletchley and beyond, whilst the station and College create activity along Sherwood Drive and the footpath to the east.



- Fine Grain
- Medium Grain
- Coarse Grain
- A** Mostly Commercial or Educational Buildings
- B** Large Footprint buildings, including Brunel Shopping Centre, with mostly commercial uses
- C** Mainly Victorian terraced housing and town centre
- D** Mostly Inter-War Housing
- E** More modern housing created through infill or regeneration of other uses

Figure 12: Figure/Ground Plan



The area fronting onto Brunel Roundabout comprising Victorian buildings and back of The Brunel Shopping Centre



Mercury House - a 1980s office building, designed by Milton Keynes Development Corporation and currently being converted into apartments



View across Brunel Roundabout looking towards Queensway/town centre. Modernist Brunel Shopping Centre is on right with more recent Wilko store in the middle and the 10 storey residential block of Stephenson House on left

Copyright Google Streetview

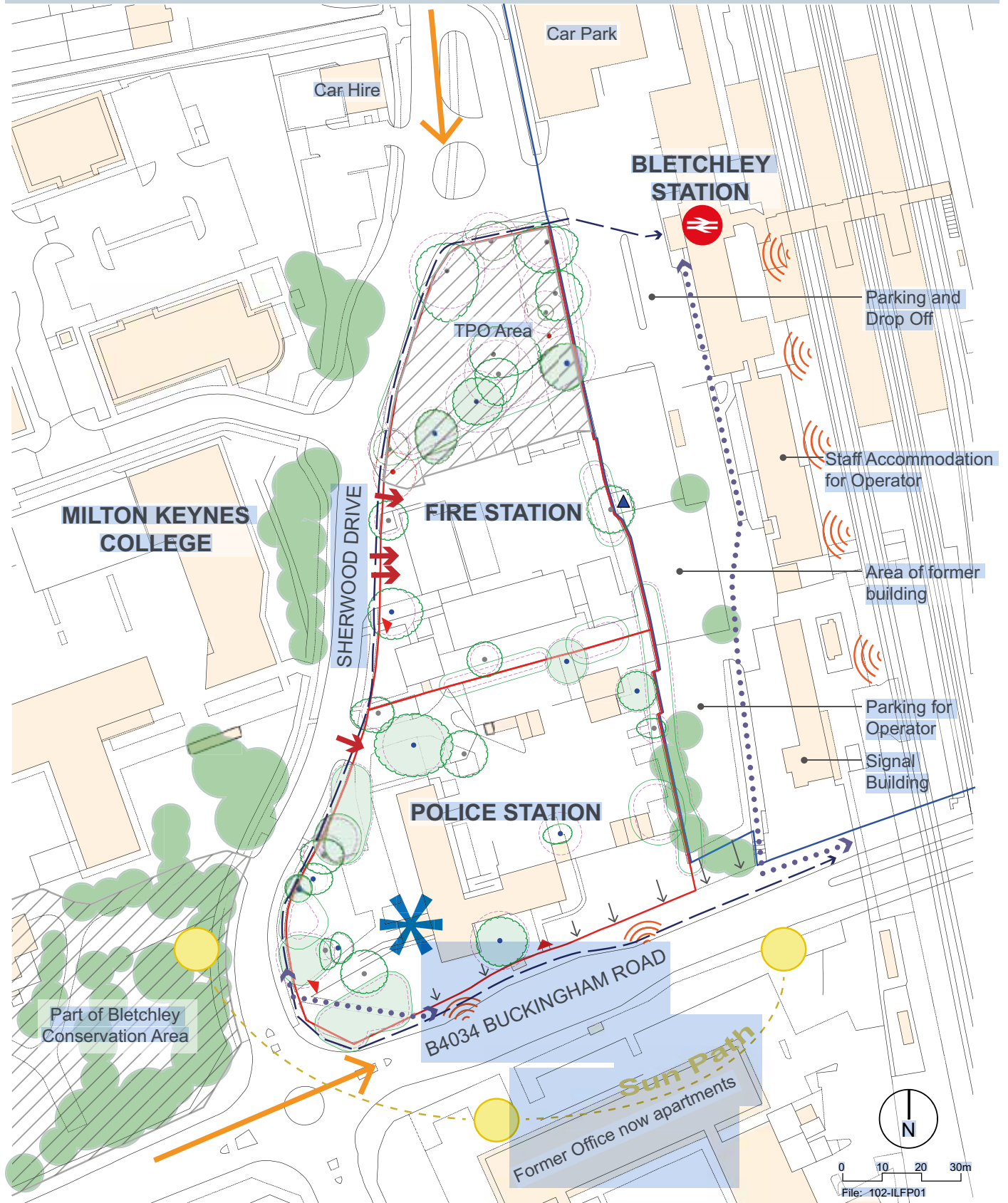


Typical Victorian terrace alongside town centre



MK College buildings at the entrance with more recent four-storey apartment buildings in the distance





- |                               |                        |                                 |
|-------------------------------|------------------------|---------------------------------|
| Site Boundary                 | Potential Landmark     | Trees and Root Protection Zones |
| Buildings                     | Important View         | Better Quality Trees            |
| Network Rail/Operator land    | Vehicular Access       | Category B                      |
| Planning Designations         | Pedestrian Access      | Category C                      |
| Pedestrian Route              | Slope Down             | Category U (to be removed)      |
| Footpath/Cycle Route (Redway) | Source of Noise        |                                 |
|                               | Telecom Mast (offsite) |                                 |

Figure 13: Opportunities and Constraints Plan

## 3.10 Opportunities and Constraints

3.10.1 The key opportunities and constraints are set out in Figure 13 and summarised below.

1. There is an opportunity to redevelop this site for mixed use development which could include high-density housing, a hotel, café, restaurant, or local retail uses.
2. There is an opportunity for a landmark building and/or new frontages along Buckingham Road.
3. The proposal should consider the impact upon the existing trees and plant new trees and vegetation. There could be an opportunity to develop within the Woodland TPO, provided it can be justified in planning policy terms, or to use the area for another function.
4. The scheme must consider noise from the railway lines, station area and main road.
5. Access can be **taken** from Sherwood Drive using one or **two connections, subject to achieving satisfactory geometry, visibility splays and separation.**
6. There is an opportunity to improve safety of the pedestrian route to the station, situated to the east, by providing natural surveillance.
7. Some of the underground utilities could affect the layout, especially the foul water sewers which could be expensive to move.

3.10.2 Developers will need to provide their own opportunities and constraints plan as part of the design process in order to demonstrate a good understanding of the site and its context.



*Opportunity for new landmark building on southwest corner of site, set back behind existing trees.*



*Southern part of site where the existing trees could be treated as a constraint. There is also the potential to add additional trees and vegetation.*



# **SECTION 4:** **DESIGN PRINCIPLES**

## 4.1 Introduction

- 4.1.1 This section sets out guidance and requirements to be taken into account by the developer and their design team. They have been informed by good urban design practice, policy guidance (including the Central Bletchley Urban Design Framework SPD), alongside a thorough understanding of the site and its context. The development proposals need to provide a clear design framework to include the key objectives and a concept. This could include assessing more than one option and the reason for proposing the final scheme.
- 4.1.2 High density developments require careful design, particularly those in complex built up areas. The Architect will need to think creatively, have experience designing these typologies and incorporate lessons from other precedents.
- 4.1.3 The design and layout will need to be imaginative in response to the noise conditions, shape of the site and adjoining station environment, whilst making the most of key views.
- 4.1.4 The key considerations are set out on the Design Principles Plan in Figure 14 and described in the following section. The Plan only identifies those key principles which are important to delivering the overall vision of the scheme and need to be adhered to, allowing significant design creativity with other design elements of the scheme. This section should be read alongside the development plan and other material considerations, including the New Residential Development Design Guide SPD, and the NPPF. The guidance here relates to this particular site and hence does not include all the standard urban design principles to be followed.

## 4.2 Land Use and Housing Mix

- 4.2.1 As set out in planning policy, the site is suitable for mixed use development which could include housing, a hotel, café, restaurant, or local retail uses.
- 4.2.2 The proposal should accord with planning policy in terms of density and housing mix.
- 4.2.3 The provision of high-quality affordable homes and move-on social housing for young people, potentially in conjunction with YMCA, should be explored as part of the mix of uses proposed for the site.
- 4.2.4 Consideration should also be given to whether the site could be suitable for an element of specialist older persons housing as part of the overall mix of development.

## 4.3 Layout

- 4.3.1 Development should aim to provide an attractive and strong frontage onto Buckingham Road and Sherwood Drive, increasing surveillance onto them. Doors, entrances and primary habitable room windows should also be focussed on these two streets.

- 4.3.2 The approach should also provide some surveillance of the existing footpath to the east of the site but given the unattractive and uncertain future of the Network Rail owned land immediately to the east of the site, this edge can be designed as a secondary frontage in comparison to the Sherwood Drive and Buckingham Road frontages. The layout should clearly avoid direct views towards the telecom mast.
- 4.3.3 A key consideration is the approach towards the existing trees. There is a requirement to retain trees and vegetation around the edges of the site in order to protect the character of the adjoining streets and provide an attractive setting for the buildings, no to mention the environmental benefits. It is possible to propose development within the TPO area provided it can be justified in planning terms. If this area is not built upon then the developer needs to decide what to do with the area. This includes its function, future ownership, boundary treatment, and relationship to the surrounding area, particularly the station entrance and car park.
- 4.3.4 New trees and vegetation should be provided, including along the site's boundaries although the aim is not to screen the buildings. Where trees are removed the 'green edge' should be enhanced through new planting within the private defensible space along Sherwood Drive and Buckingham Road in particular.
- 4.3.5 A landmark building and/or strong frontage should be provided along the Buckingham Road edge, a busy approach into the town centre, as well as being visible from the adjoining railway lines. It needs to be carefully designed to have a presence, respond to the road/junction whilst avoiding adverse impact upon the other parts of the development in terms of shade.
- 4.3.6 The layout should ensure that the adjoining public realm is overlooked and there is a clear distinction between public and private realms. Key frontages should be maximised although it may not be possible to be provide them along the entire periphery because of the width of the block depth. Therefore, the focus should be on key principles which are to provide passive surveillance in the southeast corner, parts of the eastern side, improving the look and feel of the pedestrian link to the station, and Sherwood Drive. The College generates activity but the buildings provide limited natural surveillance and even then only during opening times. The layout should obviously avoid direct views towards the telecom mast.
- 4.3.7 The Council will seek to design out opportunities for crime and anti-social behaviour following best practice guidance in 'Secured by Design'. Most importantly, the layout of the development should avoid the creation of areas of public realm that are 'leftover' and not overlooked by any development, as they can become areas of anti-social behaviour. Furthermore, there should be no ambiguous space in terms of ownership.
- 4.3.8 Where residential exists at ground floor there needs to be private defensible green space included along the Sherwood Drive and Buckingham Road





frontages. The designer needs to consider the relationships between the building, its function and the boundary with the back of the redway.

4.3.9 The design needs to think carefully about the type of non-residential use, its location and relationship with the housing. For example, any café/convenience store would need to take access off Sherwood Drive and provide space for parking and servicing.

4.3.10 The layout will need to consider noise from the railway line and roads. This could be in the form of site layout or floor plans. The design will also need to consider the impact upon the amenity space and accord with any maximum noise levels (and preferably be well below them). A noise survey will be required early on in the design process to ensure that noise levels are acceptable (this will need to include assumptions about East West rail). The approach will need to ensure that any non-residential uses do not disturb residential amenity.

4.3.11 Underground services will also need to be considered, particularly the sewers.

## 4.4 Density and Building Heights

4.4.1 The development should aim for a density of 150-250 dwellings per hectare as set out in Policy SD16 of Plan:MK. The precise amount of development will need to consider site constraints, context, car parking standards and viability. Given the density target and market considerations, the most likely type of housing will be one and two-bedroom apartments.

4.4.2 There is a degree of flexibility for heights given the site's context and buildings could range from 4-10 storeys. The Architect should also consider the relationship with the new Technology building.

4.4.3 Any apartment complex will need to provide suitable amenity space between the buildings. If the amenity space is provided above the car parking, the designer will need to give careful consideration to the quality of the amenity space, relationship with the surrounding homes and the access points. Suitable distances between buildings are set out in the Residential Design Guide SPD.

4.4.4 The designer will need to explain how solar orientation has been taken into account in terms of natural light, shelter and solar gain. This relates to the external amenity space as well as the interiors.

## 4.5 Landscape and Open Space

4.5.1 Landscaping and vegetation can play an important role in integrating apartment buildings into their context. They can serve to soften hard materials, help with the transition from public to private, provide visual interest, and deliver ecological / environmental benefits. The following principles and advice should be taken into consideration:

- Opportunities to include green infrastructure as part of the proposed building, either in the form of

a green roof, roof garden, growing spaces, green walls, balconies and/or planters, can provide amenity landscape at various levels of a building design.

- The edges of the development need to be carefully considered to retain and/or create a green edge around the site where it forms part of the character of the area. The aim is to keep the area facing Buckingham Road and Sherwood Drive in particular 'open' and green, but it needs to be defensible, with clear public /private boundaries.
- All proposals must be accompanied by a plan illustrating indicative landscape principles for the site and how the design deals with the interface with the adjoining streets.

## 4.6 Architectural Approach

4.6.1 The buildings should be designed with a contemporary architectural style to help create a strong identity and sense of place. The approach should be selective in terms of materials, chosen for their appropriateness to the site and its context.

4.6.2 The building entrances need to be legible and welcoming. Stairwells within the building should be flooded with natural light whilst access into any rear amenity space needs to be well designed and located to preserve amenity.

## 4.7 Residential Amenity

4.7.1 The residential uses should deliver a good standard of amenity in terms of privacy, sunlight, daylight and noise. The scheme will need to provide suitable amenity space, such as shared courtyard/garden, balconies, small patios inside the site (with low fenced off area for any ground floor flats) and roof gardens. The amenity space for a higher-density scheme needs to be carefully designed especially if lies on a parking area.



Example of clearly defined pedestrian access with semi-private approach into each building.

4.7.2 If balconies are included, they will form a key elevation detail and will need to be carefully designed. They can often be too small and/or appear 'stuck on'. Balconies must be an integral part of the design and consider privacy, useable space, and climate. On this particular site, the design will need to consider noise from the railway, the sun path, the trees being retained, and the relationship with the effect of any taller building along the southern boundary.

## 4.8 Access and Movement

### Vehicles

4.8.1 Vehicular access will need to be from Sherwood Drive. The preference is for one or two access points at most, to limit the potential conflict with pedestrians and cyclists using the Redway. Due consideration will need to be given to the building line position to ensure there is adequate visibility of both cyclists and pedestrians using the Redway from any emerging vehicles.

### Pedestrians and Cyclists

4.8.2 The building entrances need to be designed with amenity and activity in mind. The number and location of entrances should help animate and activate the street whilst avoiding having too many apartments buildings served off a single entrance.

4.8.3 The informal pedestrian route across the southwest corner of the site could be closed off and the area returned to grass/vegetation with defensible space and better quality trees retained. This should create an attractive public realm, clear public/private distinction whilst removing future maintenance liabilities.

4.8.4 The development should consider the existing Redway that runs along the edge of the site and provide a safe and convenient link into the required cycle parking area.



An attractively designed contemporary design where the building and landscape setting work together

### Car Parking

4.8.5 Underground or undercroft parking should have high standard of security with automated access controls. Car parking should be designed to be unobtrusive and place close attention to the links between the car parking areas and dwellings in terms of security and access. In line with Plan: MK Policy HN1E a case could be made for provision of parking below current standards. Note that these standards are currently being consulted upon with lower requirements for Build to Rent types of development.

4.8.6 Any undercroft parking should not have an adverse impact upon the surrounding area, especially Buckingham Road or Sherwood Drive. Those that do face onto the street should be either screened or have enhanced architectural features or landscaping to ensure that the ground floor provides interest. The developer should aim to provide at least one space for a car club. There needs to be a electric vehicle charging point for every car.

### Cycle Parking

4.8.7 Cycle parking can be provided in apartments, provided the space is in addition to the Nationally Described Space Standards. It requires level access and an adequately sized lift. Communal bike stores may be provided externally, in basement car parks or in freestanding structures. These should be as near as possible to the entrance for convenience, and with the store and the bike stands should be lockable. In addition to the provision of parking for both residents and/or staff, and consistent with MK:Plan Policy CT10, there will also be an expectation to provide some cycle parking within the public realm, for visitors.

4.8.8 The cycle parking should be well-lit, with a sense of personal safety and be included in any CCTV set up. External cycle parking should be overlooked by dwellings and/or active frontages and should not be screened.



Example of an integrated parking solution (Vizion Development, CMK) where the car park entrance is kept to a minimum and designed as part of building facade

## 4.9 Servicing and Utilities

- 4.9.1 The layout and design of the building(s) shall accommodate requirements and access for servicing, waste storage and collection and utilities equipment. Methods of dealing with, and integrating servicing, waste storage and collection shall reflect the town centre location and form part of the building envelope, with no separate enclosures. Service yards and parking entrances should be integrated into the design and should not dominate any elevation. Servicing/delivery vehicles should be able to enter the site and park clear of the highway with space provided to subsequently turn and exit the site.
- 4.9.2 Servicing arrangements should minimise any adverse impact upon the street scene or residential amenity. It may be better to locate the servicing needs together to minimise their impact possibly alongside car parking for any non-residential use which could sit alongside Sherwood Drive rather than be within any block. The design needs to take account of the size of refuse collection vehicles and waste collection systems to ensure that their turning requirements do not compromise the layout or change the design at a later stage in the process.
- 4.9.3 Where Anglian Water requires the diversion of, or any other works to, adopted sewers within the site, the developer is responsible for all works and costs incurred in meeting their requirements. The sewers shall be constructed in accordance with the current edition of 'Sewers for Adoption' irrespective of their future adoption status.
- 4.9.4 Here, the designer will need to take account of the existing utilities as per the plan in this document, especially the sewers. Some of the sewers run across a similar area in the southern part of the site and hence this could be a reason for retaining them.
- 4.9.5 The developer should speak to utilities providers and Network Rail in order to see if any new or re-directed underground services should take account of future development elsewhere. For example, if the sewers are redirected there could be benefits of installing a larger pipe to accommodate capacity for say new staff accommodation or possible student housing.
- 4.9.6 All new developments should be 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 life cycle of their developments. All the necessary information for developers is on the Openreach website.

## 4.10 Sustainable Design

- 4.10.1 Milton Keynes has a history of pioneering approaches to sustainable design new technologies and aspires to be the greenest city in the world. Our local plan - Plan:MK - commits to continue the borough's dedication to high environmental standards, green urban landscapes and being 'different by design'.
- 4.10.2 Alongside this are the Council's objectives of being carbon neutral by 2030 and carbon negative by 2050. Therefore, proposals for the site should look to meet or surpass the sustainable standards laid out in Policy (SC1) of Plan MK and the subsequent Sustainable Construction SPD. As such development should be aiming for a BREEAM rating of Outstanding (>85%) level of certification which requires implementing innovation across all aspects of the project. Policy SC1 from Plan:MK and the Sustainable Construction SPD set sustainability standards that will have to be considered as part of the overall design process.

## 4.11 Ecology

- 4.11.1 Policy NE3 of Plan:MK on Biodiversity Enhancement has the objective of achieving positive gains for biodiversity in the design of new development. All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floor space in excess of 1000 sqm (in the case of other development) will be required to incorporate proposals to enhance biodiversity.
- 4.11.2 New buildings provide many opportunities for wildlife with benefits for biodiversity and the building occupiers. Specialist boxes or spaces are available (for example bird/bat bricks, swallow nest cups and sparrow terraces). Elements such as climbing plants can create habitat and enhance the visual appearance of buildings, as well as providing cooling, insulation and microclimate moderation. The developer will also need to consider the findings of the ecology report

## 4.12 Flooding and Drainage

- 4.12.1 When making planning applications it is essential that, to get the best results, the integration of water and SuDS options are considered early in the site evaluation and planning process, not just at the detailed design stage. Full consideration of SuDS at the pre-application and outline stage is important to ensuring surface water management is fully integrated into the development, leading to an effective drainage design, providing multiple benefits and with costs considered from the outset.
- 4.10.2 Further guidance and information can be found in the "Milton Keynes Council Surface Water Drainage; Local Guidance for Planning Applications", which is available on the Council's website.



# APPENDIX A: OWNERSHIP PLAN







# APPENDIX B: TREE CONSTRAINTS PLAN

No.	Tree ID	Tree Name	Species	Health	Notes	Action
2.5	T.1	...	...	Reasonable	...	Fell and replace
5	T.2	...	...	Reasonable	...	No work required
12	T.3	...	...	Poor	...	...
16	T.4	...	...	Poor	...	...
7	T.5	...	...	Reasonable	...	...
8	T.6	...	...	Reasonable	...	...
9	T.7	...	...	Reasonable	...	...
10	T.8	...	...	Reasonable	...	...
11	T.9	...	...	Reasonable	...	...
13	T.10	...	...	Reasonable	...	...
14	T.11	...	...	Reasonable	...	...
15	T.12	...	...	Reasonable	...	...
17	T.13	...	...	Reasonable	...	...
18	T.14	...	...	Reasonable	...	...
19	T.15	...	...	Reasonable	...	...
20	T.16	...	...	Reasonable	...	...
21	T.17	...	...	Reasonable	...	...
22	T.18	...	...	Reasonable	...	...
23	T.19	...	...	Reasonable	...	...
24	T.20	...	...	Reasonable	...	...
25	T.21	...	...	Reasonable	...	...
26	T.22	...	...	Reasonable	...	...
27	T.23	...	...	Reasonable	...	...
28	T.24	...	...	Reasonable	...	...
29	T.25	...	...	Reasonable	...	...
30	T.26	...	...	Reasonable	...	...
31	T.27	...	...	Reasonable	...	...
32	T.28	...	...	Reasonable	...	...
33	T.29	...	...	Reasonable	...	...
34	T.30	...	...	Reasonable	...	...
35	T.31	...	...	Reasonable	...	...
36	T.32	...	...	Reasonable	...	...
37	T.33	...	...	Reasonable	...	...
38	T.34	...	...	Reasonable	...	...
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95	T.91	...	...	Reasonable	...	...
96	T.92	...	...	Reasonable	...	...
97	T.93	...	...	Reasonable	...	...
98	T.94	...	...	Reasonable	...	...
99	T.95	...	...	Reasonable	...	...
100	T.96	...	...	Reasonable	...	...



**Arboricultural Constraints**

**Risk Thresholds**

The following table provides a summary of the risk thresholds for the project. The risk is assessed based on the tree's health, size, and location. The risk is categorized as Low, Medium, or High. The risk is assessed based on the tree's health, size, and location. The risk is categorized as Low, Medium, or High.

Risk Level	Health	Size	Location
Low	Reasonable	< 10m	Not adjacent to buildings
Medium	Poor	10-20m	Adjacent to buildings
High	Very Poor	> 20m	Adjacent to buildings

**Arboricultural Constraints**

The following table provides a summary of the arboricultural constraints for the project. The constraints are based on the tree's health, size, and location. The constraints are categorized as Low, Medium, or High. The constraints are based on the tree's health, size, and location. The constraints are categorized as Low, Medium, or High.

Constraint Level	Health	Size	Location
Low	Reasonable	< 10m	Not adjacent to buildings
Medium	Poor	10-20m	Adjacent to buildings
High	Very Poor	> 20m	Adjacent to buildings

**Information Only**

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**GSS Architecture**

**Blakeney Fire Station - North**

**TREE CONSTRAINTS PLAN**

Date	Checked	Reviewed	Date
12/01/2023			

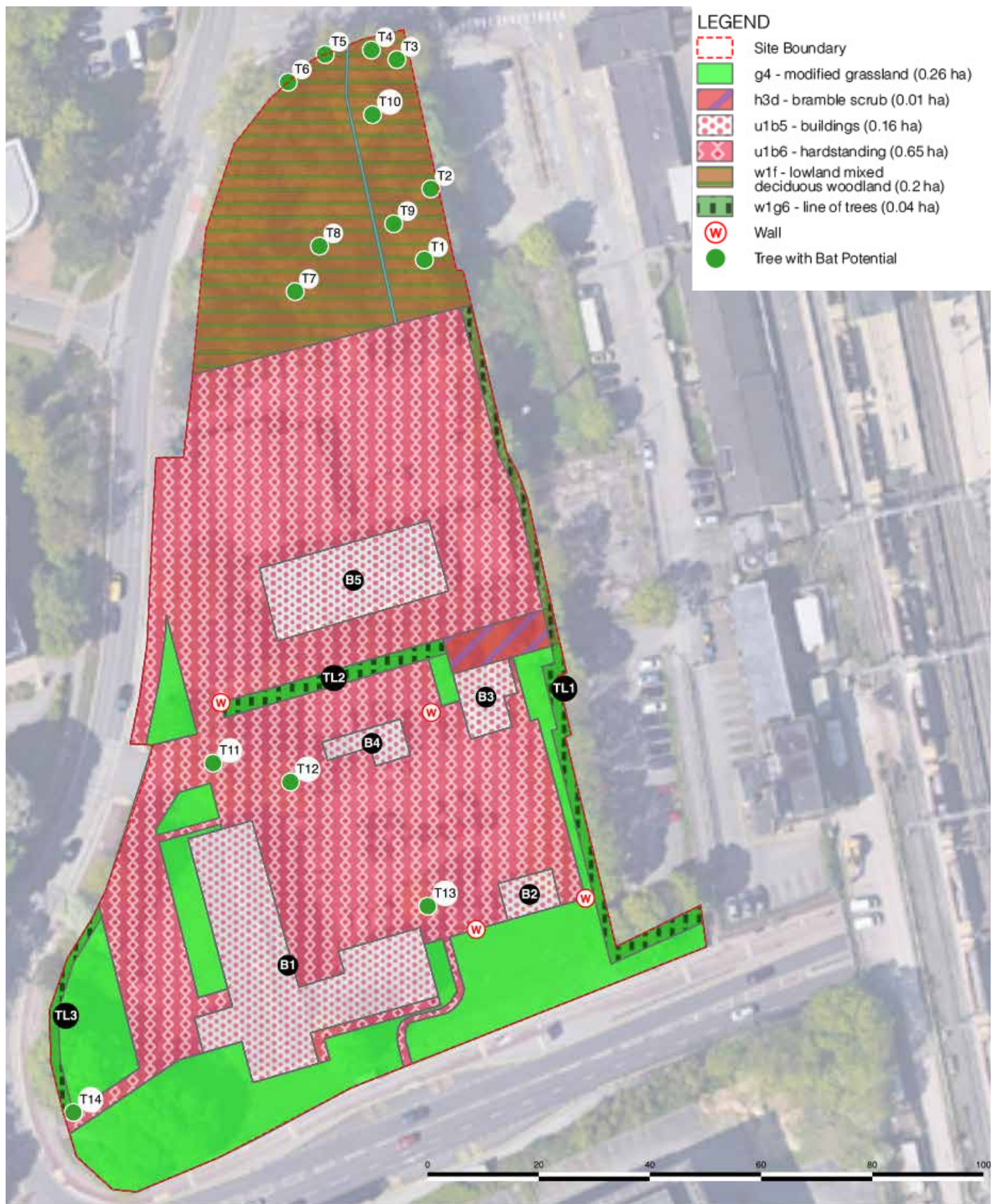
Job No. 1200 Scale 1:500 Sheet Size A3

Drawing Number





# APPENDIX C: PHASE 1 ECOLOGY MAP







# APPENDIX D: UTILITIES PLAN



*NOTE: This is a low quality PDF from the CAD plan which is available from MKDP upon request.*





## APPENDIX E: ADDITIONAL PLANNING POLICIES

### Additional Plan:MK Policies

- Policy SD1 (Place-making principles for Development)
- Policy ER10 (Assessing Edge of Centre and Out of Centre Proposals)
- Policy ER16 (Hotel and Visitor Accommodation)
- Policy HN3 (Supported and Specialist Housing)
- Policy HN4 (Amenity, Accessibility and Adaptability of Homes)
- Policy CT2 (Movement and Access)
- Policy CT 3 (Walking and Cycling)
- Policy CT5 (Public Transport)
- Policy CT6 (Low Emission Vehicles)
- Policy CT9 (Digital Communication)
- Policy EH6 (Delivery of Health Facilities in New Development)
- Policy EH7 (Promoting Healthy Communities)
- Policy FR1 (Managing Flood Risk)
- Policy FR2 (Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management)
- Policy NE2 (Protected Species and Priority Species and Habitats)
- Policy NE3 (Biodiversity and Geological Enhancement)
- Policy L4 (Public Open Space)
- Policy D8 (Mains and Telecommunications Services)
- Policy CC3 (Protection of Community Facilities)
- Policy SC2 (Community Energy Networks and Large-Scale Renewable Energy Schemes)
- Policy SC3 (Low Carbon and Renewable Energy Schemes)



[www.milton-keynes.gov.uk/udla](http://www.milton-keynes.gov.uk/udla)







# Delegated Decisions report



29 November 2022

## PROPOSAL TO EXTEND THE CURRENT E-SCOOTER TRIAL IN MILTON KEYNES UNTIL MAY 2024

Name of Cabinet Member	<b>Councillor Jenny Wilson-Marklew</b> (Cabinet member for Climate and Sustainability)
Report sponsor	<b>Paul Thomas</b> Director - Planning and Placemaking
Report author	<b>Brian Matthews</b> Head of Transport Innovation <a href="mailto:Brian.matthews@milton-keynes.gov.uk">Brian.matthews@milton-keynes.gov.uk</a> Tel: 07765 337891

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>Not in Council Plan</b>
Wards affected	<b>All wards</b>

### Executive Summary

Milton Keynes City Council launched a trial of E scooters in August 2020. This followed a local evaluation of potential benefits of deploying e scooters along with requests from Government for local areas to launch trials of licenced electric scooters to support mobility. This at a time when the UK moved out of lock down but with guidance which advised people to avoid public transport.

The trials were initially programmed to last for twelve months at which point legislation was expected to be in place to allow regulated services (should data and evidence show user / mobility benefits).

To support the trials in Milton Keynes, the Council established a collaborative stakeholder group to help identify and address concerns as they arose.

Due to continued pressure on parliamentary time, Department of Transport (DfT) have stated legislation will not be in place before 2024 and as a result, rather than halt the trials the opportunity to extend trials has been offered to all current trial areas (to 31 May 2024).

The service in MK is regarded by many as a success in supporting lower cost, sustainable mobility and the ride data suggests this has had a positive impact on people's ability to access all parts of the city using primarily our redway network. So far, we have provided approximately 1.6m journeys, with 90% being utility journeys (point to point) and have replaced an estimated 390,000 car journeys - saving 128t carbon.

However, there have been some issues particularly in the early months of the trial around poor rider behaviour, poor parking, and inappropriate speeds. Many of these issues have been addressed through scheme changes and enforcement action. But a few isolated incidents still occur, and we, like many other trial and non-trial areas have issues with illegal (non-licenced) scooters.

## 1. Decisions to be Made

- 1.1 That the continuation of the current trial of E-scooters in Milton Keynes until 31 May 2024 be approved.
- 1.2 That Cabinet consider, by the end of 2023, whether the Council would want to support the continuation of E-scooter operations beyond the trial period should appropriate legislation / regulation be in place.

## 2. Why is the Decision Needed?

- 2.1 The Council has been given the option by the DfT to extend the current set of e-scooter trials beyond the current planned end date (end November 2022). The Council could choose to end the trial now and await forthcoming legislation (programmed for Spring 2024) but this would mean a gap of 18 months without services. The decision however invites the continuation of the current operations to support users and to benefit from further data and experience from running the trial in largely 'business as usual' environment (i.e. no covid restriction and all season operations). The Council would also be better placed to influence future legislation and regulation. This would then allow the council to make a more informed decision about a long term 'permanent' scheme post spring 2024.

## 3. Benefits and Risks

- 3.1 Additional benefits of the recommended approach are that users can continue to use the E-scooter services for a mix of uses (commuting, leisure, shopping). Evidence in the summary table below and the attached **Annex** suggests that the services are popular with many users, provide a lower cost alternative and can assist in reducing car use and carbon emissions.

Table 1 - Summary Statistics - E-scooter use in Milton Keynes

Max number of scooters	<b>1,300 (spread across 3 operators)</b>
Total rides	<b>1,578,000 trips</b>
Total distance	<b>3,318,000 kms</b>
Average ride distance	<b>2.1 kms</b>
Total users	<b>30,000 (est)</b>
Car trips replaced	<b>Estimated at 350,000 – 400,000*</b>
Carbon saved	<b>128 Tonnes**</b>
Regular use	<b>87% of riders are regular users</b>

\* Replacing car trips, taxi and ride hail, from University of Salford study

\*\* based on DfT guidance on vehicle emissions per km.

### Financial

- 3.2 The are no financial implications for the Council. The cost of operation, any new infrastructure, insurance and maintenance are the responsibility of the operator. The Council’s day to day scheme management is reducing as the scheme becomes more established and therefore can be resourced from existing staff budgets.

### Reputational

- 3.3 The Council has been at the vanguard of e scooter trials and operates what data suggests is one of the most successful trials in the UK, and the only location in the UK with multi operators - multi operators gives better consumer choice and incentivises the operators into maintaining quality services because of competition being available.
- 3.4 Whilst there have been a number of issues and incidents, these have largely been dealt with by maintaining strong dialogue with the operators and addressing the issues raised by residents and stakeholders in frequent forum discussions. This has meant that issues have been addressed swiftly and the scheme evolving into a stable and well-run trial. The measures adopted through this dialogue include a reduction in speeds across Milton Keynes. Further speed reductions in Central Milton Keynes. Parking measures (e.g. all scooters need to be photographed when parked to ensure considerate parking) and area restrictions to remove scooters for certain sensitive areas.
- 3.5 The operators have brought in stronger enforcement measures for users with bans and ‘fines’ applied to users who do not follow guidance. It is estimated that 300 individual sanctions have been imposed since the trial launched.

### Operational

- 3.6 The scheme is now well established and operates in line with trial requirements set by the Council and DfT. The trial extension does not permit any increase in e scooter numbers or the introduction of any further operators.

## Risks and Mitigations

- 3.7 Without a trial extension, a number of users who rely on e scooters will be left (in the short term at least) without this mobility option. This could be mitigated if the decision was to gradually withdraw from the trial. However, this could lead to increase car use and / or using more expensive modes further increasing pressure on some household budgets at a time when perhaps cost increase would be felt the most.

## 4. Implications of the Decision

Financial	no	Human rights, equalities, diversity	no
Legal	no	Policies or Council Plan	yes
Communication	no	Procurement	no
Energy Efficiency	yes	Workforce	no

### (a) Financial Implications

There are no financial implications with this decision.

### (b) Legal and Procurement Implications

The Council operates the trial via an operational agreement with the operators. This requires (in summary) the operators to:

- use e-scooters which have the necessary approval from DfT;
- maintain timely data on operations and supply this to the Council / DfT;
- take direction from the Council to address operational issues and maintain KPI around responding to incidents/reports;
- operate only on legal routes (e.g. highway (not footpaths));
- operate at agreed lower speeds in sensitive areas; and
- enforce appropriate rider checks and operate enforcement to improve rider behaviour.

The Council has the right to give notice to operators to cease their operation should poor performance jeopardise rider and other highway users' safety, fall foul of DfT licence conditions or stop delivering the outcome the Council desires.

### (c) Legal Planning / Highways Implications

DfT have issued operator licences which provides the legal framework for e-scooter operations. E-scooters are classified as a 'motorised' vehicle therefore all vehicles need to be roadworthy, have insurance and have a rider with a driving licence. The necessary checks are undertaken by DfT prior to licences being issued.



(d) Council Plan Implications

The Council Plan has key priorities for action on Climate Change and Sustainable Mobility with the ambition to become Carbon Neutral by 2030. The scheme is demonstrating reductions in carbon by reducing car borne transport.

## 5. Alternatives

5.1 The Council could halt the trial, and under the current agreements we have with the operators ask the services to be halted within 20 working days. This would effectively mean the trial ends by the end of the calendar year. This would impact current users who benefit from the service and may lead to further growth in illegal scooter usage.

5.2 We could scale back the trial and/or only operate in certain areas. This would require the Council to consider impact on users, equity, and address 'complexities' of service areas and impact it may have on encouraging illegal users.

## 6. Timetable for Implementation

6.1 The scheme would operate under current operating conditions until 31 May 2024. It is expected national regulations will be in place in the run up to this date and the Council can take a further decision on operating any permanent services beyond this date.

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### List of Annexes

Annex E-Scooter Usage and Analysis

### List of Background Papers

None



## E-SCOOTER USAGE AND ANALYSIS

The following analysis has been undertaken by operators and based on a sample of 2500 users to determine demographic characteristics and a smaller detailed analysis through interviewing 160 users (this was validated against a larger sample of 700 users in a different area). The surveys were undertaken in 2021.

### Users

There is clearly a bias towards male users. This was apparent in the three surveys and the operators are undertaking further research into some of the barriers which may exist for female users.

Male	70%
Female	30%

Usage is predominantly by those on lower incomes. 70% of users are employed. A strong reason detected for using scooters was to reduce transport costs (45%). In excess of 70% of are earning below the UK average wage. This could be in part due to the generally younger users not reaching their full earning potential, but the analysis suggests that users may benefit from the ability to use e scooters to reduce costs.

<b>Users</b> - Income - in excess of 68% of users earn below UK average wage, 41% at or below living wage	
Earnings less than £20k	41%
Earnings between £20k and £30k	27%
Earnings between £30k an £40k	13%
70% of users are employed	

The age of users in MK is slightly younger than other areas.

This corresponds to the analysis of income - where incomes are generally lower for younger people starting out on their career. Having a viable alternative mode of transport can reduce the likelihood to opt for multiple cars in households, so can have further financial benefits along with reducing car use. Further detailed analysis would be required to confirm this trend.

Age of users - 87% are under the age of 44	
18-24	33%
25-34	30%
35-44	24%

### Reasons for using E-scooters

Respondent were asked to identify all the journey type they used scooters for, many opted for several reasons.

The primary use of scooters is for leisure. This may be influenced by the surveys being summer based. A detailed survey has been undertaken in the USA highlighting the importance of e scooters in supporting mental health issues by providing (a study conclusion) a stress free opportunity to travel and ‘enjoy’ the experience when compared to other modes which can induce stress and anxiety (congestion, reliability, pollution). Further research would be needed to confirm whether the same conclusions would hold for the UK, and that leisure trips can support a better ‘quality of life’ experience.

The next highest use commuting, where nearly 50% of journeys are for this purpose. Two further interesting outcome is the use of scooters to access public transport (primarily to get to MKs rail stations) and the recognition by a high number of users of the benefits to reduce carbon.

50%	Leisure use
47%	Use scooters for commuting
44%	To reduce carbon footprint
30%	Access public transport

Main reasons for using scooters correspond to the reasons for use by riders. Lessons may need to be learned on how more support can be given to cycling and walking.

67%	Quicker than alternative
55%	Better than cycle/walk
45%	To reduce transport costs
44%	To reduce carbon footprint



# Delegated Decisions report



29 November 2022

## EXTENSION OF THE PUBLIC SPACE PROTECTION ORDER - VEHICLE RELATED ANTI-SOCIAL BEHAVIOUR

Name of Cabinet Member	<b>Councillor Jenny Wilson-Marklew</b> (Cabinet member for Climate and Sustainability)
Report sponsor	<b>Sarah Gonsalves</b> Director - Customer and Community Services

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>Not in Council Plan</b>
Wards affected	<b>All</b>

### Executive Summary

The existing Car Cruising Public Space Protection Order (PSPO) which prohibits vehicle related anti-social behaviour is due to expire on 21 January 2023. A three-year extension to this PSPO is being sought. The full detail of the PSPO, which was put in place under section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 can be found in **Annex A** to the report.

#### 1. Decisions to be Made

- 1.1 That the Public Space Protection Order that is currently in place for vehicle related anti-social behaviour be extended for a period of three years, under section 60 of the Anti-social Behaviour, Crime and Policing Act 2014.
- 1.2 That the vehicle related anti-social behaviour, carried out in a public place has a detrimental effect on the quality of life of those in the locality; that vehicle related anti-social behaviour is, or likely to be, of a persistent nature, is or is likely to be unreasonable and justifies the restrictions imposed by the notice found in **Annex B** to the report.

## 2. Why is the Decision Needed?

- 2.1 The existing Car Cruising PSPO is due to expire on 21 January 2023. The PSPO gives the police the power to issue a fixed penalty notice (FPN) to anyone believed to have committed an offence in relation to the order. FPNs for breaches of the car cruising PSPO are issued by the police and administrated by Milton Keynes City Council, including any subsequent court action. The fine for a breach of the PSPO is currently £100, discounted to £75 if paid within fourteen days.
- 2.2 The PSPO applies to public spaces, which for the purpose of this order means any place to which the public or any section of the public has access to, on payment or otherwise, as of right or by virtue of express or implied permission.

### **Consultation**

- 2.3 The power to make the order rests with local authorities, in consultation with the police and other relevant bodies who may be affected. A full public consultation has taken place for this extension, and the following bodies / individuals have been consulted:
- Police and Crime Commissioner; and
  - Thames Valley Police.
- 2.4 A public consultation on the extension of the car cruising PSPO for a further three years ran for a period of three months (June to August). The consultation was available on the Council's website and was widely promoted on the council's social media. The posts were shared by various partners and agencies including the SaferMK account. In total, 52 email responses were received.
- 2.5 The consultation revealed a significant level of support for the proposed PSPO extension with 69% of respondents in agreement. This included support from local councillors, CMK Parish Council and Bucks Fire and Rescue Service. A document outlining analysis of the public consultation can be found in **Annex C**.
- 2.6 Four respondents were against the extension of the PSPO, citing a perceived ineffectiveness of the current order and a lack of enforcement. Thames Valley Police (TVP) have provided a supporting statement to the extension of the PSPO which can be seen in **Annex D** and demonstrates that the PSPO is enforced, albeit sometimes retrospectively or using warnings.
- 2.7 Respondents used the consultation to highlight the impact of car cruising including noise nuisance and anti-social use of motorcycles. Both of these issues are covered by the existing PSPO.

## **Evidence in Support of the PSPO**

- 2.8 Thames Valley Police (TVP) have provided evidence as presented in **Annex E** demonstrating the persistent and ongoing nature of car cruising incidents. There have been 158 car cruise and street racing occurrences in 2022 so far (January to October). Overall, this is a 7% increase on 2021 figures.
- 2.9 A reduction in these activities in the early part of 2021 could be attributed to the Covid-19 lockdown in January 2021. Furthermore, there may be complaints associated with anti-social use of vehicles that are not included in these figures due to how they have been recorded, for example noise nuisance is a common complaint associated with loud exhausts that may not be recorded as a car cruise or street racing incident.
- 2.10 This summer there has been targeted action from TVP which may have resulted in successful prevention of certain car cruise or street racing events. However, this level of police intervention although impactful is not sustainable over a prolonged period. Due to the continued level of activity, it is proportionate to extend this order to give officers the tools to police car meets and to deter organisers from holding events in Milton Keynes.
- 2.11 Although relatively low numbers of fixed penalty notices have been issued, the PSPO is part of a suite of powers available to tackle car cruising offences. It is not always appropriate to issue a PSPO breach where stronger powers can be used. It does give officers the power to enforce when no other offences have been committed.
- 2.12 A sample of complaints received in 2022 by the Community Safety Team and TVP are outlined in **Annex F**. The complaints demonstrate the impact of vehicle related anti-social behaviour across the city of Milton Keynes. The Community Safety Team also received a community trigger request in respect of vehicle related anti-social behaviour. Although this case did not meet the threshold at the time, this was escalated within the partnership and informed TVPs bid for additional resources.
- 2.13 Considering the evidence, the overall picture indicates that extending the order as set out in **Annex B** fits the criteria laid out in the Act. If the Order is extended, the impact on residents, visitors and businesses is expected to be positive, as it will act as a deterrent to vehicle related anti-social behaviour across Milton Keynes and continue to give police powers to issue fines to people in breach of the order.

### 3. Implications of the Decision

Financial	Y	Human rights, equalities, diversity	n
Legal	Y	Policies or Council Plan	n
Communication	Y	Procurement	n
Energy Efficiency	N	Workforce	n

#### (a) Financial Implications

The financial outlay will primarily lie with parish / town councils if they decide to put up new signage. Signage is currently used in hotspot locations however the Council and TVP may incur additional costs if new locations are highlighted and in need of signage.

FPN income is expected to be small, but all monies paid will be re-invested into Community Safety initiatives. There may be some costs associated with the prosecution of non-payment of Fixed Penalty Notices by the Council's Legal Team.

#### (b) Legal Implications

Part 4, S.59 (and specifically S67 and S75 for transition of Order) of the Anti-Social Behaviour, Crime and Policing Act 2014 relates to PSPOs. A PSPO lasts for three years and can be extended or varied before the end of that period.

Regulations under the Act govern the publication of Public Space Protection Orders after they are made. The Order must be placed on the website of the Local Authority. Signage must be placed on or adjacent to the public space to which the Order relates to enable enforcement. The sign design is shown in **Annex G**.

Failure to comply with a PSPO is a criminal offence and can be punished, on conviction, with a fine of up to £1000. However, liability can be discharged if the person guilty of the offence pays the fixed penalty notice.

#### (c) Other Implications

There are some limitations set out in the legislation regarding behaviours that can be restricted by PSPOs. Under the 2014 Act, local authorities must have regard to the freedoms permitted under **articles 10 and 11 of the Human Rights Act 1998** when drafting, extending, varying, or discharging an Order. Due regard was taken to any equality implications. There are no anticipated negative impacts to any groups of people within Milton Keynes because of the PSPO extension.



## 4. Alternatives

4.1 If the Order is not extended, it will lapse on 21 January 2023. Officers consider it reasonable to assume that vehicle related anti-social behaviour in Milton Keynes would reoccur and/or increase in frequency and seriousness if the order is not extended.

4.2 To consider the use of:

(a) **Civil Injunctions (CI)** Introduced under Part 1 of the Anti-social Behaviour, Crime and Policing Act, CIs replaced Anti-Social Behaviour Injunctions and Anti-Social Behaviour Orders in 2014. CIs are issued by the courts and can be applied for by a range of agencies, such as police, local councils, or landlords. They are designed to address specific anti-social behaviours. CIs can include both an order to stop engaging in a particular behaviour, or a 'positive requirement' to take steps to address the cause of anti-social behaviour. Breach of a CI is punishable by an unlimited fine or up to two years in prison.

(b) **Community Protection Notices (CPN)** were introduced under Part 4 of the Anti-social Behaviour, Crime and Policing Act 2014. A Community Protection Notice (CPN) is aimed to prevent unreasonable behaviour that is having a negative impact on the local community's quality of life. Any person aged 16 years or over can be issued with a notice, whether it is an individual or a business, and it will require the behaviour to stop and if necessary reasonable steps to be taken to ensure it is not repeated in the future.

Both alternatives would require significant amount of evidence before they could be used, which may be difficult to obtain in most circumstances, whereas the PSPO can be enforced instantly using a Fixed Penalty Notice if a recipient fails to comply.

(c) **Section 59** Police Reform Act 2002 c. 30 Part 4 Chapter 2 Seizure of motor vehicles. A Section 59 warning can be issued if an officer believes that a motor vehicle being used is causing, or is likely to cause, alarm, distress or annoyance to members of the public. If the motor vehicle is caught again after a warning has been issued, officers have the power to seize and remove the motor vehicle.

## 5. Timetable for Implementation

5.1 Once the Order has been authorised, the Council's Legal Team will ensure the administration of the Order is carried out before the expiry date on 21 January 2023.

5.2 Refresher training for Police Officers is ongoing to ensure up to date knowledge of the PSPO.

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## List of Annexes

Annex A	Existing PSPO documents
Annex B	New draft PSPO
Annex C	Public Consultation Analysis
Annex D	Supporting statement from Thames Valley Police
Annex E	Thames Valley Police evidence
Annex F	Select summary of complaints received in 2022 by Community Safety Team and TVP
Annex G	Photo of car cruise PSPO signage

## List of Background Papers

<https://www.legislation.gov.uk/ukpga/2014/12/part/4/chapter/2/enacted>

<https://www.gov.uk/government/publications/designated-public-place-orders-guidance>

<https://www.local.gov.uk/public-spaces-protection-orders-guidance-councils>

[Police Reform Act 2002 \(legislation.gov.uk\)](#)

## **Milton Keynes Council**

### **Anti-social Behaviour, Crime and Policing Act 2014, Part 4, Section 59**

### **Milton Keynes Public Space Protection Order 2018 Vehicle Related Anti-Social Behaviour**

This Order may be cited as the **Milton Keynes Public Space Protection Order No.1.**

This Order is made by Milton Keynes Council ("The Council") under the Anti-social Behaviour Crime and Policing Act 2014 ("the Act")

1. The land in relation to which this Order applies ("the restricted area") is that land in the area of the Borough of Milton Keynes which is:
  - a) Delineated and shown in black on the map at schedule 1 to this Order, and;
  - b) Described in schedule 2 to this Order.
2. The Council is satisfied that the 2 conditions below have been met, in that:

#### **Condition one**

- (a) Activities set out below carried out on/ in the Borough of Milton Keynes, have had a detrimental effect on the quality of life of those in the locality, and;
- (b) it is likely that these activities will be carried on in the public place and that they will have such an effect.

#### **Condition two**

- (a) That the effect, or likely effect of the activities is, or is likely to be, of a persistent or continuing nature,
- (b) is, or is likely to be, such as to make the activities unreasonable, and

(c) justifies the restrictions imposed by the Order.

3. This Order comes into force at midnight on 21<sup>st</sup> January 2020 for a period of up to 3 years thereafter, unless extended by further order made under the Council's statutory powers.

#### **Prohibition Highway and Motor Vehicle misuse**

4. Subject to paragraph 7 below any person is prohibited from congregating for the purpose of being a participant or spectator in car cruising activity; being
  - a. Driving a motor vehicle (defined at Schedule 2) at excessive speed or in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - b. Revving of the engine of a motor vehicle a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - c. While driving, sudden or rapid acceleration of a motor vehicle in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - d. Driving motor vehicles in a convoy in such a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - e. While driving a motor vehicle, racing other motor vehicles, causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - f. Leaving the engine of a stationary motor vehicle to run idle in a manner such as to cause or to be likely to cause a nuisance to persons in the locality of the restricted area.
  - g. Performing stunts using a motor vehicle in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area. Stunts include but are not limited to; Handbrake turns; drifting; wheelies; wheel spins and doughnuts (a description of each is contained in Schedule 2)
  - h. Sounding motor vehicle horns other than in accordance with the Highway Code in such a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - i. Playing amplified music from or powered by a motor vehicle causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - j. Causing obstruction on a public highway, whether moving or stationary causing or being likely to cause a nuisance to persons in the locality of the restricted area.



5. Nuisance is defined as including but not limited to any of the following consequences:

- i) Excessive noise;
- ii) Danger or risk of injury to road users (including pedestrians);
- iii) Damage or significant risk of damage to property;
- iv) Significant risk of harm;
- v) Significant public nuisance; or
- vi) Significant annoyance to the public.

6. The Council therefore under section 59 (4) prohibits:

- 1. Participating in car cruising activity as a passenger or driver of a vehicle within the area designated in the Public Spaces Protection Order
- 2. Congregating in the area to spectate cruising activity undertaken by vehicles in the area designated in the Public Spaces Protection Order.

7. An activity or behaviour which is authorised by the owner of that part of the restricted area where the activity or behaviour is taking place is not in breach of this Order.

### **Penalty**

8. It is an offence for a person without reasonable excuse—

- a) to do anything that the person is prohibited from doing by a public spaces protection order, or
- b) to fail to comply with a requirement to which the person is subject under a public spaces protection order.

A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 3 on the standard scale.

A person does not commit an offence under this section by failing to comply with a prohibition or requirement that the local authority did not have power to include in the public spaces protection order.

### **Fixed Penalty Notices**

9. A constable or a Council officer may issue a fixed penalty notice to anyone he or she has reason to believe has committed an offence in relation to this public spaces protection order.

A fixed penalty notice is a notice offering the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment of a fixed penalty to a local authority specified in the notice.

Failure to pay a fixed penalty notice may lead to prosecution

## Appeals

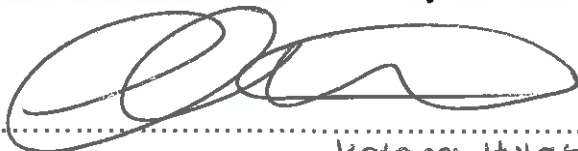
10. Any challenge to this order must be made in the High Court by an interested person within six weeks of it being made. An interested person is someone who lives in, regularly works in, or visits the restricted area. Any such interested person may apply to the High Court within 6 weeks from the date on which this Order on the grounds that; Interested persons can challenge the validity of this order on two grounds:

- a) That Milton Keynes Local Authority did not have power to make the order, or to include particular prohibitions or requirements.
- b) That Milton Keynes Local Authority did not meet one of the requirements of the legislation; for instance, consultation has not been complied with.

The right to challenge also exists where an order is varied by Milton Keynes Local Authority.

When an application is made the High Court can decide to suspend the operation of the order pending the Court's decision, in part or in totality. The High Court has the ability to uphold the order, quash it or vary it.

The Common Seal of Milton Keynes Local Authority was affixed in the presence of



.....  
Katrina Hulatt  
Head of Legal Services Principal Solicitor

.....  
Date

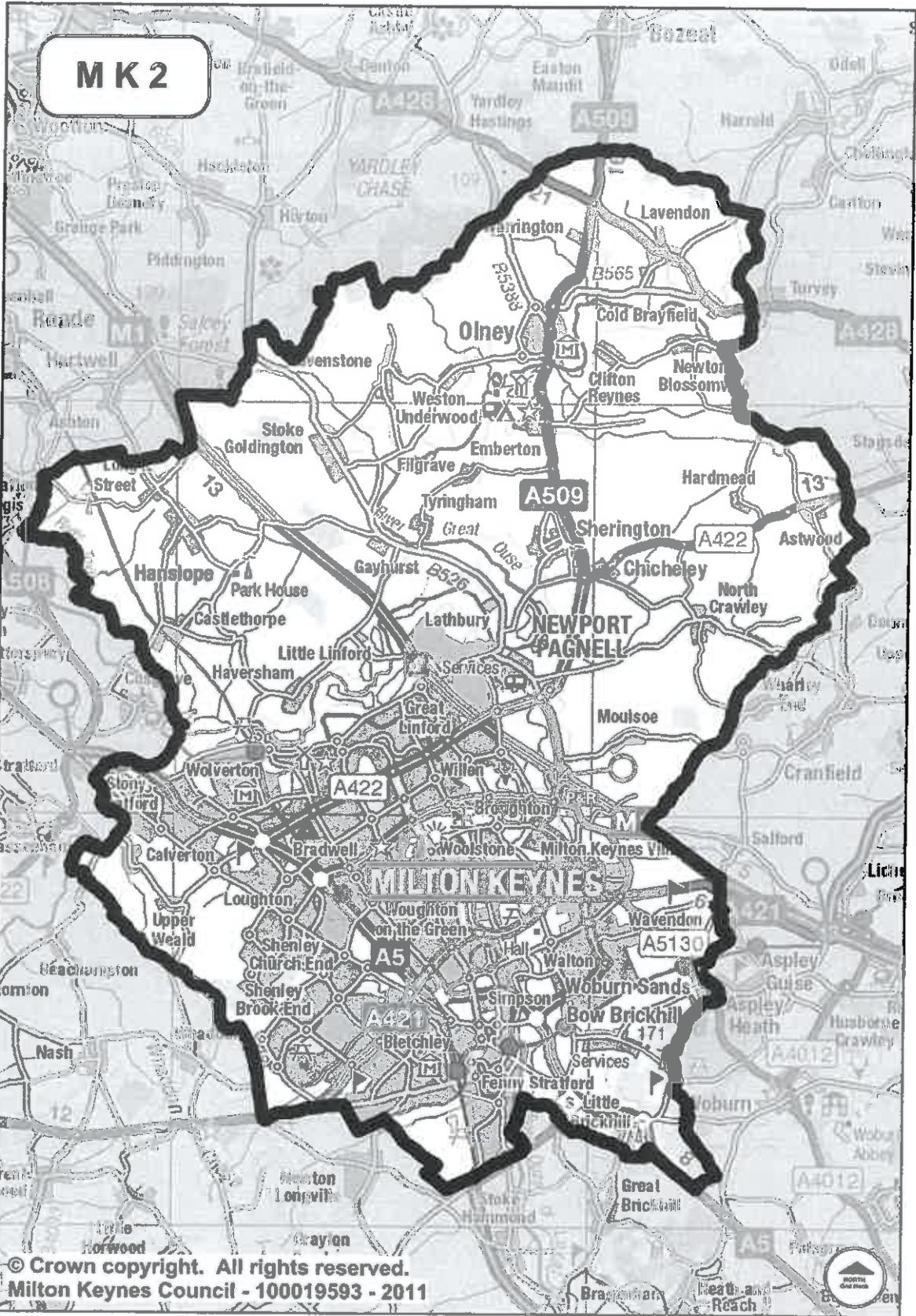


243309

**Schedule One – Restricted Area**







*[Handwritten signature]*



243309



This Order applies to any public place within Milton Keynes as shown outlined in black in the plan.

### **Schedule Two – definitions**

In this Order;

“motor vehicle” means a mechanically propelled vehicle intended or adapted for use on roads

“Drifting” means driving in such a manner as to cause the rear of the vehicle to slide

“Wheel spins” means using the accelerator to allow the wheels to spin while the car is stationary, producing noise and smoke; or accelerating at speed which causes the wheels to spin whilst failing to gain traction

“Handbrake turn” using the handbrake to bring the vehicle to an abrupt stop whilst turning the vehicle.

“Wheelies” means a manoeuvre where any vehicle is driven for a period of time with wheels not in contact with the ground

“public place” means any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. This includes but is not limited to; car parks; sports fields; playing fields; parks; recreations grounds; public highways including verges and footways; public open space land and communal land whether council owned or owned by any other landowner.

“Interested person” means an individual who lives in the restricted area or who regularly works in or visits that area.





**Milton Keynes City Council**  
**Anti-social Behaviour, Crime and Policing Act 2014,**  
**Part 4, Section 59**  
**Milton Keynes Public Space Protection Order 2018**  
**Vehicle Related Anti-Social Behaviour**

This Order may be cited as **the Milton Keynes Public Space Protection Order No.1.**

This Order is made by Milton Keynes City Council (“The Council”) under the Anti-social Behaviour Crime and Policing Act 2014 (“the Act”)

1. The land in relation to which this Order applies (“the restricted area”) is that land in the area of the Borough of Milton Keynes which is:
  - a) Delineated and shown in black on the map at schedule 1 to this Order, and;
  - b) Described in schedule 2 to this Order.
2. The Council is satisfied that the 2 conditions below have been met, in that:

**Condition one**

- (a) Activities set out below carried out on/ in the Borough of Milton Keynes, have had a detrimental effect on the quality of life of those in the locality, and;
- (b) it is likely that these activities will be carried on in the public place and that they will have such an effect.

**Condition two**

- (a) That the effect, or likely effect of the activities is, or is likely to be, of a persistent or continuing nature,
  - (b) is, or is likely to be, such as to make the activities unreasonable, and
  - (c) justifies the restrictions imposed by the Order.
3. This Order comes into force at midnight on 21<sup>st</sup> January 2023 for a period of up to 3 years thereafter, unless extended by further order made under the Council’s statutory powers.

## Prohibition Highway and Motor Vehicle misuse

4. Subject to paragraph 7 below any person is prohibited from congregating for the purpose of being a participant or spectator in car cruising activity; being
  - a. Driving a motor vehicle (defined at Schedule 2) at excessive speed or in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - b. Revving of the engine of a motor vehicle a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - c. While driving, sudden or rapid acceleration of a motor vehicle in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - d. Driving motor vehicles in a convoy in such a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - e. While driving a motor vehicle, racing other motor vehicles, causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - f. Leaving the engine of a stationary motor vehicle to run idle in a manner such as to cause or to be likely to cause a nuisance to persons in the locality of the restricted area.
  - g. Performing stunts using a motor vehicle in a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area. Stunts include but are not limited to; Handbrake turns; drifting; wheelies; wheel spins and doughnuts (a description of each is contained in Schedule 2)
  - h. Sounding motor vehicle horns other than in accordance with the Highway Code in such a manner causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - i. Playing amplified music from or powered by a motor vehicle causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  - j. Causing obstruction on a public highway, whether moving or stationary causing or being likely to cause a nuisance to persons in the locality of the restricted area.
  
5. Nuisance is defined as including but not limited to any of the following consequences:
  - i) Excessive noise;
  - ii) Danger or risk of injury to road users (including pedestrians);
  - iii) Damage or significant risk of damage to property;
  - iv) Significant risk of harm;
  - v) Significant public nuisance; or
  - vi) Significant annoyance to the public.

6. The Council therefore under section 59 (4) prohibits:
  1. Participating in car cruising activity as a passenger or driver of a vehicle within the area designated in the Public Spaces Protection Order
  2. Congregating in the area to spectate cruising activity undertaken by vehicles in the area designated in the Public Spaces Protection Order.
7. An activity or behaviour which is authorised by the owner of that part of the restricted area where the activity or behaviour is taking place is not in breach of this Order.

### **Penalty**

8. It is an offence for a person without reasonable excuse—
  - a) to do anything that the person is prohibited from doing by a public spaces protection order, or
  - b) to fail to comply with a requirement to which the person is subject under a public spaces protection order.

A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 3 on the standard scale.

A person does not commit an offence under this section by failing to comply with a prohibition or requirement that the local authority did not have power to include in the public spaces protection order.

### **Fixed Penalty Notices**

9. A constable or a Council officer may issue a fixed penalty notice to anyone he or she has reason to believe has committed an offence in relation to this public spaces protection order.

A fixed penalty notice is a notice offering the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment of a fixed penalty to a local authority specified in the notice.

Failure to pay a fixed penalty notice may lead to prosecution

### **Appeals**

10. Any challenge to this order must be made in the High Court by an interested person within six weeks of it being made. An interested person is someone who lives in, regularly works in, or visits the restricted area. Any such interested person may apply to the High Court within 6 weeks from the date on which this Order on the grounds that; Interested persons can challenge the validity of this order on two grounds:

- a) That Milton Keynes Local Authority did not have power to make the order, or to include particular prohibitions or requirements.
- b) That Milton Keynes Local Authority did not meet one of the requirements of the legislation; for instance, consultation has not been complied with.

The right to challenge also exists where an order is varied by Milton Keynes Local Authority.

When an application is made the High Court can decide to suspend the operation of the order pending the Court's decision, in part or in totality. The High Court has the ability to uphold the order, quash it or vary it.

The Common Seal of Milton Keynes Local Authority was affixed in the presence of

.....

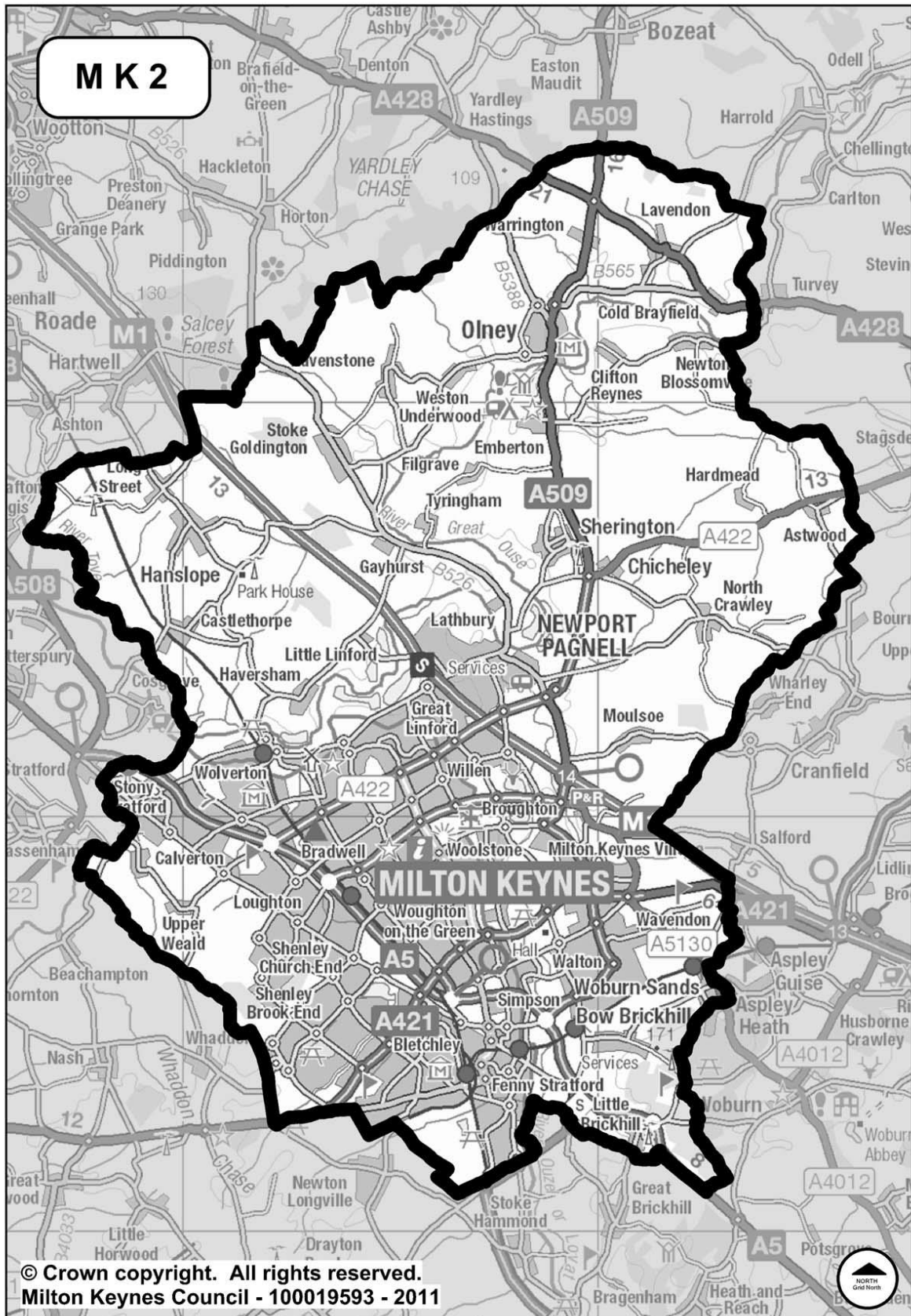
Head of Legal Services

.....

Date



Schedule One – Restricted Area



This Order applies to any public place within Milton Keynes as shown outlined in black in the plan.

### **Schedule Two – definitions**

In this Order;

“motor vehicle” means a mechanically propelled vehicle intended or adapted for use on roads

“Drifting” means driving in such a manner as to cause the rear of the vehicle to slide

“Wheel spins” means using the accelerator to allow the wheels to spin while the car is stationary, producing noise and smoke; or accelerating at speed which causes the wheels to spin whilst failing to gain traction

“Handbrake turn” using the handbrake to bring the vehicle to an abrupt stop whilst turning the vehicle.

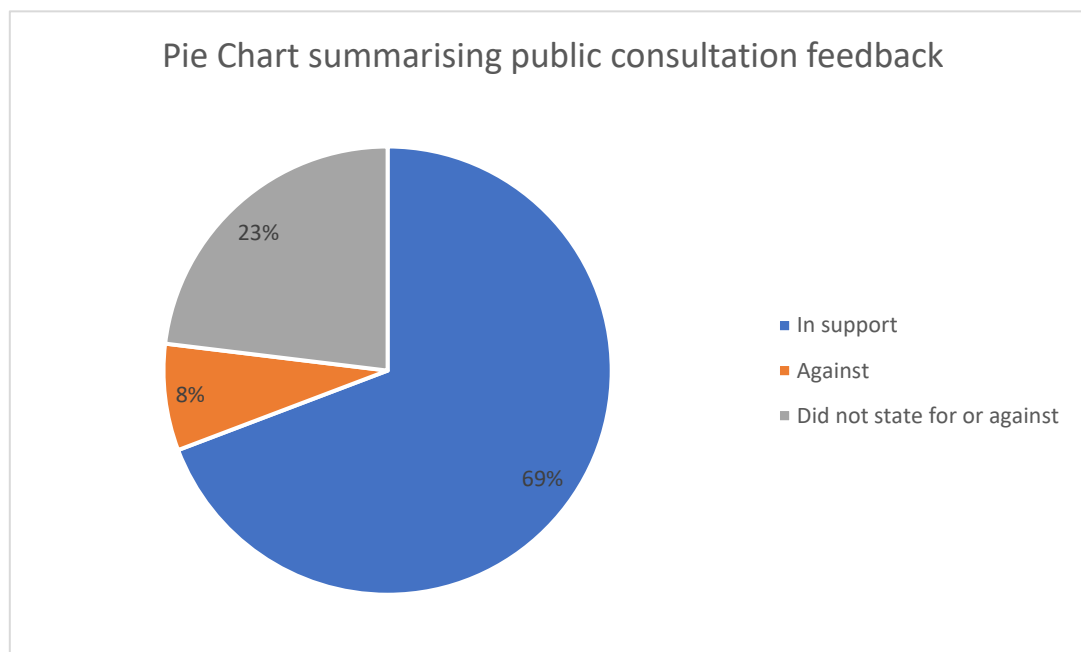
“Wheelies” means a manoeuvre where any vehicle is driven for a period of time with wheels not in contact with the ground

“public place” means any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. This includes but is not limited to; car parks; sports fields; playing fields; parks; recreations grounds; public highways including verges and footways; public open space land and communal land whether council owned or owned by any other landowner.

“Interested person” means an individual who lives in the restricted area or who regularly works in or visits that area.

## PUBLIC CONSULTATION ANALYSIS

The following chart summarises the overall feedback from the public consultation showing 69% in support of the extension, 8% against the extension and 23% who did not state whether they were for or against the extension of the order. This demonstrates a significant majority in favour of the extension of the order.

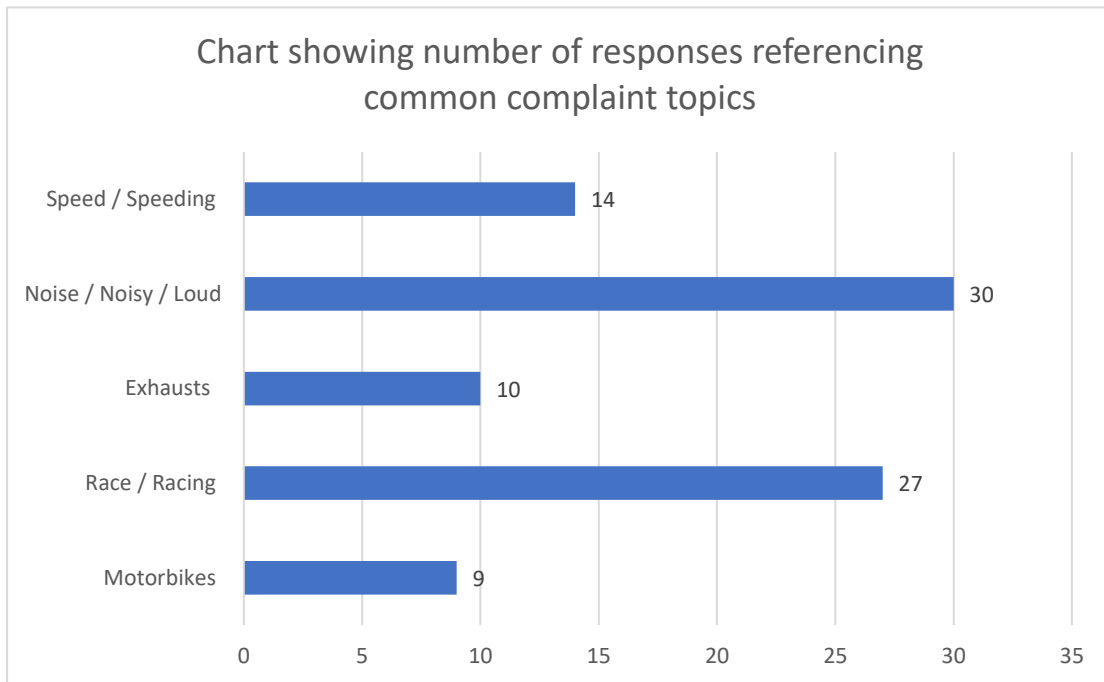


All of the 4 respondents that are against the order stated they felt the current order is ineffective. Responses stated: 'it isn't working' 'Police don't enforce it' 'TVP do nothing about it' and 'the order is it's not enforced'.

12 respondents did not explicitly state whether they were for or against the extension of this order. Instead, they used their response to report issues relating to car cruising, suggest amendments to the order or the current agency response to the issue of car cruising. 91% of these 12 responses referenced to noise nuisance from vehicle related anti-social behaviour and 42% mentioned motorbikes suggesting amendments be made to the order to address these issues.

Noise nuisance issues are covered under the PSPO with offences including, 'revving of the engine', 'sounding motor vehicle horns' and 'playing amplified music'. Nuisance is also defined as including but not limited to a number of consequences one of which is 'excessive noise'. Motorbikes are covered under the PSPO, fitting the definition of a motor vehicle being 'a mechanically propelled vehicle intended or adapted for use on roads'.

The following graph outlines common topics of complaint in relation to vehicle related anti-social behaviour and the number of responses that made reference to each:



A selection of the comments made in response to the consultation are provided below:

- 1. I write to wholly support the renewal of this Order.*
- 2. My comment is yes please extend it but please can we have some more enforcement outside CMK.*
- 3. With regards to the PSPO order I would be for extending it a further 3 years. While disturbance has improved with the order in place, I find where I live (facing the H6) noise levels on the road are still bad weekend evenings, particularly Sunday evenings when the cruise event is it's busiest at Network Rail.*
- 4. In my capacity as the Community Safety Manager at Buckinghamshire Fire & Rescue Service, I wish our continued support for the PSPO addressing car cruising related ASB to be noted...Whilst there is nothing to indicate that prohibiting these specific actions has directly impacted upon the fire and rescue service, it is reasonable to assume that if the PSPO is not renewed, there is the potential for incidents related to these actions to occur that may require a fire and rescue response.*
- 5. As a local resident I am in favour of supporting this proposal*
- 6. I fully agree with the proposed extension to the PSPO...Only a matter of time before there is a serious accident of course which our already stretched emergency services and MK General would have to deal with.*
- 7. CMK Town Council has welcomed the introduction of the car cruising PSPO and notes the successes that TVP have had in serving notices in recent weeks. The Town Council supports the extension of the current order past January 2023, as its continued existence and application will continue to*



*have a positive effect in reducing the disruption and noise pollution caused by car cruising throughout the borough.*

- 8. Continue to clamp down on Car Cruising. It's dangerous on the roads, and intimidating.*
- 9. The PSPO should continue to stop Car Cruising in the future. The PSPO has not been very effective given that we still have cars and motorbikes with noisy exhausts still speeding and racing with other vehicles. Quite often residents still hear the high pitched screaming of exhausts as vehicles and motor bikes race.*
- 10. Yes, I totally agree with extending the PSPO for a further period...I think we should do whatever we can to get them off the roads before they cause an accident, and possibly get someone killed.*
- 11. I'm very happy for the PSPO to continue for another 3 years but there has been a marked increase in motor bikes racing up and down*
- 12. I have read the PSPO and I fully support its extension.*
- 13. The PSPO needs to remain in place. The cruising cars are not only a social nuisance but also very dangerous not only to those that take part but also to innocent members of the public.*
- 14. We're all for extending any crackdown on these noisy and dangerous road users.*
- 15. I think it's a waste of public money extending this order. Make TVP take action and the money will be well spent.*
- 16. Seems like a necessary and proportionate response. The problem still occurs. I believe that the renewal of the order is appropriate. If anything it needs to be more rigorously used*
- 17. Anti-social behaviour of any sort should be severely clamped down on. It would be good to see increased penalties - as both a deterrent and as a punishment.*
- 18. I wish to express my strong support for this PSPO. The frequent and regular gatherings on the car parks neighbouring Network Rail in the Gratton Close/Silbury Boulevard often cause the redway to be blocked*



**TVP SUPPORTING STATEMENT**

I write this on behalf of Thames Valley Police.

Over the past year we have seen a growing interest in the car cruise however there has also been an increase in street racing on the dual carriage ways and perceived street racing.

Due to the nature of the vehicles involved in the car cruise and the dual carriage way/grid layout the sound from the vehicles along with the accelerating away from roundabouts can sound like racing. The road network also provides an ideal location for street racing through use of the dual carriage ways and wide central reservations for spectators. We see a number of key locations for street racing, generally on the longer stretches of dual carriage way at each corner of Milton Keynes.

The area attracts groups from other parts of the UK and is easily accessible due to the location of Milton Keynes among the road network, the area is often visited by groups which travel from Birmingham to London, stopping off at various locations along the way.

Since May 2022 TVP have issued 15 Section 59 warnings and 2 PSPO tickets through targeted activity in policing the cruise events. The majority of these have been issued through the use of CCTV capturing evidence.

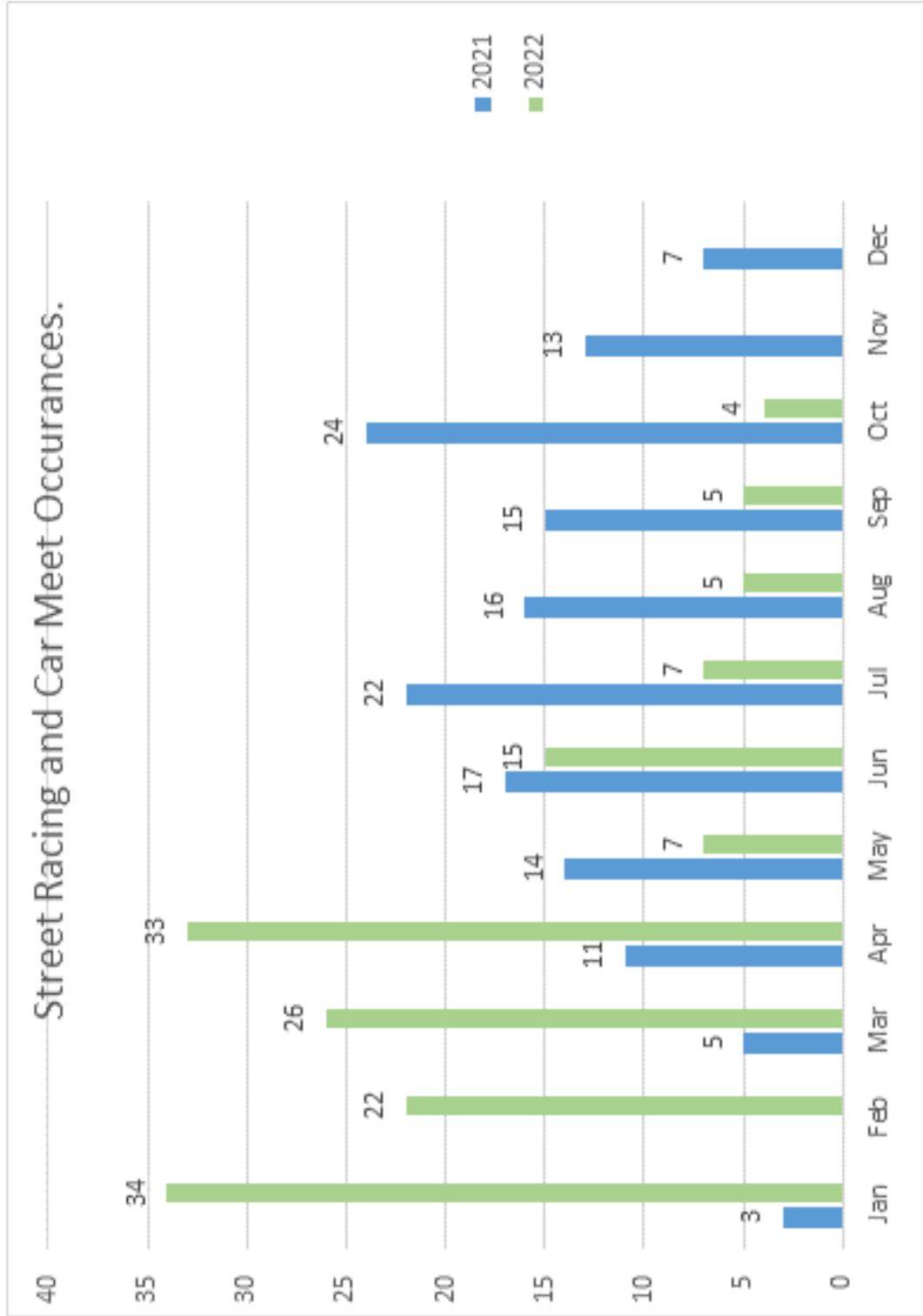
TVP fully support the extension of the PSPO to assist us in managing the cruise event and make Milton Keynes a more pleasant location to live in by reducing the disruption from antisocial use of vehicles.

Written by Sam Pearce PS6187 Neighbourhood Sergeant Milton Keynes North Sector September 2022





TVP EVIDENCE





## A SELECTION OF COMPLAINTS RECEIVED IN 2022 BY COMMUNITY SAFETY TEAM AND TVP

1. *We have been suffering all weekend with the antisocial behaviour of the racers / cruisers...It is an endless tirade of noise and mental distress. We have to work tomorrow morning but will again have no reasonable sleep due to this behaviour*
2. *Sooner or later, some innocent citizen is going to be killed by these hoodlums. The Police have both the legal backing under the PSPO and – if they put their minds to it - the resources to put a stop to all of this PDQ. Time they pulled their fingers out!*
3. *I am writing with reference to the constant racing of vehicles along sections of the H3 Monks way, Milton Keynes. These problems have been occurring every weekend for the last two years and have been gradually getting worse. The vehicles appear to be racing at speeds well in excess of 90mph. I say this as I had the misfortune of being overtaken last Friday at a speed that terrified me. Most of the vehicles seem to be fitted with aftermarket modified exhaust systems to increase the noise that they make.*
4. *The speeding of cars around Redbridge and surrounding area, and noise of cars is unacceptable there will be a serious accident happen the way they are driving, with some under the influence of drugs in Redbridge*
5. *Regular cars screeching around revving engines etc usually Friday Saturday and Sunday nights.*
6. *We have been hearing extremely loud Cars/ Motorbikes Racing past on the V6/ H3 Grid road. This happens so much throughout the month, and they will go up and down the road around 10pm-12pm+ (midnight) They have modified exhausts and ridiculously loud back firing modification to the exhaust system.*
7. *The car meet and cruising happened (is still happening) again, as is unfortunately usual in weekends, mainly centred in/around the Network Rail car park in CMK. The noise started around 6pm, becoming mostly continuous ~7pm, and by ~7:40pm it became so bad that it was impossible to continue any meaningful activity...Additionally to the 'normal' vehicle noise (revving, backfiring and driving modified cars around the nearby grid roads at full blast), there was a continuous low-frequency noise/vibration from the parking space, a mix of the sub-bass music played together with the engines' rumbling, that was penetrating the entire house.*
8. *An overwhelming number of 'boy racers' (not just the odd one or two) in cars and motor bikes are using the stretch of Bletcham Way (A4146) from Brown's Wood to the A5 flyover roundabout (Bletcham Roundabout) as a race track. The vehicles seem to have illegal sounding, backfiring exhausts with loud explosive noises, which the complete neighbourhood has to endure all hours of the day.*
9. *THIS IS NOT THE FIRST TIME THAT THIS HAS HAPPENED - THERE ARE 20 + CARS AND THEY ARE BEING VERY LOUD AND RACING AND SPEEDING AROUND THE CAR PARK. CUSTOMERS HAVE BEEN COMPLAINING TO SECURITY DUE TO THE NUISANCE AND HAZARD OF THEIR DRIVING AROUND THE CAR PARK*
10. *The inconsiderate/anti-social/illegal/ petrolheads are out on the Newport Pagnell bypass.*
11. *FOR YEARS CALLER HAS BEEN DISTURBED BY PEOPLE RACING CARS ON THE H6 AROUND WOOLSTONES/CAMPBELL PARK.*





## PHOTO OF CAR CRUISE SIGNAGE





# Delegated Decisions report



29 November 2022

## REVIEW OF TAXI LICENSING FEES AND CHARGES 2023/24

Name of Cabinet Member	<b>Councillor Paul Trendall</b> (Cabinet member for Customer Services)
Report sponsor	<b>Adele Wearing</b> Strategic Lead - Passenger Transport and Taxis
Report author	<b>Jason Agar</b> Taxi Licensing Lead <a href="mailto:jason.agar@milton-keynes.gov.uk">jason.agar@milton-keynes.gov.uk</a>

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>Not in Council Plan</b>
Wards affected	<b>All wards</b>

### Executive Summary

Each year the Taxi Licensing Service reviews its fees and charges for driver, vehicle and operator licences. Council officers propose that vehicle and operator fees be increased by 9% and driver fees be increased by 17% for 2023/24. The proposed increases were advertised in the local newspaper (MK Citizen) on 25 August 2022 and four objections were received which are set out in **Annex B**. On 2 November 2022 the regulatory committee considered these objections and then approved, in accordance with the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, the new driver associated fees as outlined in **Annex A**. The Regulatory Committee then recommended that the Executive approve the new vehicle and operator associated fees as outlined in **Annex A**.

#### 1. Decision to be Made

- 1.1 That, in accordance with the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, the vehicle and operator associated fees, as set out in **Annex A** to the report, be approved to take effect from 1 April 2023 under Section 70 of the Local Government (Miscellaneous Provisions) Act 1976.

## 2. Why is the Decision Needed?

2.1 The fees and charges ('fees') charged by the Taxi Licensing Service must be approved by Non-Executive (Regulatory Committee) and Executive (Cabinet) as set out in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000. The proposed fees are contained in **Annex A** and will be included in the general budget setting reports to Council in February 2023 which will come into effect on 1 April 2023. The general principle is that taxi / private hire licensing income is 'ring-fenced' and the cost of delivering the service is predominantly met by licensing fees (income). The taxi/private hire Council budget should not be in surplus over a three year period.

## 3. Implications of the Decision

3.1 The 'ring fenced' nature of the budget requires the Council to consider its income and expenditure over more than one year and this should be clearly evidenced. The Council is predominantly reliant on the last full year of financial data for its relevant costs, and they are set out in **Table 1**. In 2021/22 the taxi licensing budget had a deficit of £73,482 (down from £422,440 in 2020/21). This improved position was the result of:

- a significant increase in income (£122,058) generated from licence applications as a result of the Covid-19 economic recovery;
- reduced staffing costs in 2021/22 due to a combination of vacancies and no one-off costs as in 2020/21 where redundancy costs were incurred; and
- digitisation, premises and procedural changes undertaken by the taxi licensing service.

**Table 1**

	Income (£)		Expenses (£)		Net £		Net Var £
Year	Budget	Actual	Budget	Actual	Budget	Actual	Net
2014/15	662,888	505,986	597,627	718,299	-65,261	212,313	277,574
2015/16	733,888	530,053	771,544	761,470	37,656	231,417	193,761
2016/17	633,888	623,291	650,613	763,557	16,725	140,266	123,541
2017/18	633,888	555,958	710,861	558,288	76,973	2,330	-74,643
2018/19	633,888	555,291	728,260	576,671	94,372	21,380	-72,992
2019/20	523,075	596,275	671,051	647,682	147,976	51,407	-96,569
2020/21	533,537	314,417	772,695	736,857	239,158	422,440	183,282
2021/22	453,428	436,475	578,681	509,957	125,253	73,482	-51,771



### **Previous Increase**

- 3.2 In February 2021, the Council approved a 2% fee increase after considering one objection.

### **Proposed Increase**

- 3.3 The 9% fee increase for 2023/24 is in line with Council approved Income and Debt Collection Policy which states that income should be inflated by CPI and is being applied to other income streams in the Council's budgets. The additional income will cover 'on costs' to meet Council wide pressures such as staff, rent, electricity and IT etc (overheads).
- 3.4 Officers are proposing that a licensing fee increase for vehicles and operators of 9% will raise income by approximately £40k (based on current forecasting which also includes driver fee increases already approved by the regulatory committee). The 9% proposal is an average increase for vehicles and operator fees and each specific fee increase is stated in **Annex A**.

### **Objections to the Fee Increases**

- 3.5 This proposal was advertised in the MK Citizen on 25 August 2022. The Council received four objections which are attached at **Annex B** which state:
- a 9% increase is a joke when most industries are having to cut wage bills and restructure;
  - fees are too high;
  - industry still not recovered from Covid;
  - cost of living has significantly increased;
  - fuel, insurance and running costs have increased;
  - driver income has reduced;
  - drivers now working longer hours;
  - Licensing Service is the worst in the UK;
  - fees should be reduced; and
  - Head of Taxi Department should resign - cannot control department or not enough experience.

### **Comparison with other Local Authorities**

- 3.6 Up to 45% of vehicles working in Milton Keynes are licensed by other Local Authorities (including Transport for London). **Table 2** sets out what other neighbouring Councils charge in regard to vehicle and driver fees (with an additional hypothetical 9% increase) in comparison to the Council's proposal for 2023/24. Whilst Milton Keynes is generally more expensive than its neighbouring Councils, this extra income is essential in order to deal with the high number of out of town vehicles in Milton Keynes that create problems such as plying for hire, defective vehicles, no badges, obstruction, congestion and illegal parking (Station Square).

**Table 2\***

Authority	Vehicle Fee (£ per annum)	Driver Fee (£ per annum)	Total cost of both licences £	% difference under new fee proposals (2023-24)
Milton Keynes	319	90	409	
Luton	256	180	436	6% dearer than MKCC
TfL	272	110	382	7% cheaper than MKCC
West Northants	306	73	379	8% cheaper than MKCC
Buckinghamshire	196	90	286	35% cheaper than MKCC

\* Figures used are an average fee for HC and PH and do not include vehicle and driver testing as Councils use different methods.

### Fee Calculations

- 3.7 The cost of a licence is split into three categories - administration, enforcement and overhead costs. The proposed 9% increase will help cover the Council's on-costs (overheads) only and should this not be agreed then a further cost pressure will be needed. In regard to enforcement fees there is no pressure at this time to specifically increase this fee category.

## 4. Alternatives

### 4.1 That the Executive:

- (a) reject the objections and support the proposed fee increases for vehicles and operators as set out in **Annex A (recommended option)**;
- (b) partially uphold the objections and change the fee increases for vehicles and operators to a lower amount (e.g. 8%); or
- (c) fully uphold the objection(s) and reject the fee increases for vehicles and operators.

- 4.2 Options (b) and (c) are not recommended as they will result in the service being subsidised further by alternative budgets. Alternatively, the service could make further staffing cost savings however this would be counter-productive as it would lead to efficiency problems in the production and enforcement of licences.

## 5. Implications

Financial	Y	Human rights, equalities, diversity	N
Legal	Y	Policies or Council Plan	Y
Communication	N	Procurement	N
Stakeholders	Y	Energy Efficiency	N
Workforce	N	Equalities/Diversity	N

### (a) Financial Implications

The 9% increase in licensing fees for vehicles and operators is in line with the general income inflation assumptions being applied to the rest of the Council's income budgets for 2023/24. The additional income generated will be included in the general income inflation increases built into the 2023/24 budget.

### (b) Legal Implications

The power to impose fees on vehicle and operator licences is authorised under sections 70 of the Local Government (Miscellaneous Provisions) Act 1976. The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 states that section 70 is an Executive function.

The High Court in *Wakefield PH and HC Assn v Wakefield Borough Council 2018* concluded that Councils could only recover enforcement costs from 'vehicle' and 'operator' fees and not 'driver' fees. This decision dispelled the view that taxi licensing regimes could be entirely self-financed.

### (c) Policies or Council Plan

The Local Government Association issued guidance<sup>1</sup> to Councils relating to fees and stated:

- It is an accepted principle that licensed activities should be funded on a cost-recovery basis, paid for by those benefiting from the licensed activity, rather than drawing on the public purse.
- Charges must be reasonable and proportionate to the cost of the processes associated with a licensing scheme. Councils **must not use fees to make a profit or act as an economic deterrent.** (emphasis added).

<sup>1</sup> Open for Business – LGA Guidance on locally set licence fees May 2017

(d) Stakeholders

The stakeholders are licence holders and the general public who travel in licensed vehicles. All stakeholders were consulted on this proposal via statutory advertising process (**Annex A**) and can also attend Executive meetings to express their views before a decision is made.

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## List of Annexes

Annex A	Proposed Taxi and Private Hire Fees and Charges for 2023/24 and Newspaper advertisement (25 August 2022)
Annex B	Objections to Fees and Charges 2023/24

## List of Background Papers

[Regulatory Committee Report - 2 November 2022](#)

[Milton Keynes City Council Taxi Policy 2022](#)

[LGA - Locally Set Licence Fees](#)

[Taxi licensing | West Northamptonshire Council \(\[westnorthants.gov.uk\]\(http://westnorthants.gov.uk\)\)](#)

[Taxi - Transport for London \(\[tfl.gov.uk\]\(http://tfl.gov.uk\)\)](#)

[Taxis and private hire | Buckinghamshire Council](#)

[Taxi and private hire licences \(\[luton.gov.uk\]\(http://luton.gov.uk\)\)](#)



## MILTON KEYNES COUNCIL PUBLIC NOTICE

### Local Government (Miscellaneous Provisions) Act 1976 – Sections 53(2) & 70(3)

Notice is hereby given that Milton Keynes Council, in accordance with the provisions of Sections 53(2) & 70(3) of the Local Government (Miscellaneous Provisions) Act 1976, proposes to vary the following Table of Fees in respect of Hackney Carriage and Private Hire Licensing.

No	Item	Basis	2022/23	2023/24	Increase
1	Private Hire Operators Licence New 1-4 vehicles	Per Annum	312.00	340.50	9.13%
2	Private Hire Operators Licence New 5-10 vehicles	Per Annum	416.00	454.00	9.13%
3	Private Hire Operators Licence New 11*-50 vehicles	Per Annum	833.00	908.00	9.00%
4	Private Hire Operators Licence New 50+ vehicles	Per Annum	1250.00	1,363.00	9.04%
5	Private Hire Operators Licence Renewal 1-4 vehicles	Per Annum	302.00	329.50	9.11%
6	Private Hire Operators Licence Renewal 5-10 vehicles	Per Annum	406.00	443.00	9.11%
7	Private Hire Operators Licence Renewal 11*-50 vehicles	Per Annum	822.00	896.00	9.00%
8	Private Hire Operators Licence Renewal 50+ vehicles	Per Annum	1239.00	1,351.00	9.04%
9	Private Hire Operators Licence New 1-4 vehicles	5 Year	937.00	1,022.00	9.07%
10	Private Hire Operators Licence New 5-10 vehicles	5 Year	1250.00	1,363.00	9.04%
11	Private Hire Operators Licence New 11*-50 vehicles	5 Year	2500.00	2,725.00	9.00%
12	Private Hire Operators Licence New 50+ vehicles	5 Year	3749.00	4,087.00	9.02%
13	Private Hire Operators Licence	5 Year	906.00	988.00	9.05%

	Renewal 1-4 vehicles				
14	Private Hire Operators Licence Renewal 5-10 vehicles	5 Year	1219.00	1,329.00	9.02%
15	Private Hire Operators Licence Renewal 11*-50 vehicles	5 Year	2468.00	2,690.00	9.00%
16	Private Hire Operators Licence Renewal 50+ vehicles	5 Year	3718.00	4,053.00	9.01%
17	Operator licence - additional address or operator base	per annum	312.00	340.50	9.13%
18	Combined Drivers Licence - New	3 years	230.00	269.00	16.96%
19	Combined Drivers Licence - Renewal	3 years	214.00	252.00	17.76%
20	Private Hire Vehicle New	per annum	288.00	314.00	9.03%
21	Private Hire Vehicle Renewal	per annum	283.00	308.50	9.01%
22	Plate Exempt	per annum	33.10	36.10	9.06%
23	Hackney Carriage Vehicle New	per annum	297.00	324.00	9.09%
24	Hackney Carriage Vehicle Renewal	per annum	291.00	317.50	9.11%
25	Driver Assessment re-sit	n/a	104.00	113.50	9.13%
26	Replacement Licence (paper)	n/a	8.15	8.90	9.09%
27	Bracket	n/a	20.90	22.80	9.09%
28	Replacement of Plate	n/a	20.90	22.80	9.09%
29	Replacement of Drivers Badge	n/a	20.90	22.80	9.09%
30	Plate Magnet Set	n/a	36.75	40.10	9.12%
31	Vehicle Age Exemption Test	n/a	52.00	56.75	9.13%
32	Change of vehicle Registration	n/a	45.00	49.05	9.00%
33	Vehicle Transfer	n/a	41.75	45.51	9.01%
34	Second Office Fee	n/a	312.00	340.10	9.01%
35	Safeguarding Training	3 years	44.00	48.00	9.09%
36	Third-party advertising on HC/PH vehicles	n/a	102	111.20	9.02%

Should a person require a copy of this Notice please email [taxi@milton-keynes.gov.uk](mailto:taxi@milton-keynes.gov.uk) and it will be provided by email. Should a person require a Notice in person then they must make an appointment using the same email address and then attend Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Milton Keynes, MK93EJ.

Objections to the variation of fees may be made in writing to Adele Wearing, Head of Taxi Licensing & Passenger Transport, Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Milton Keynes, MK93EJ or email [taxi@milton-keynes.gov.uk](mailto:taxi@milton-keynes.gov.uk) on or before 26 September 2022.

If no objections are received by 26 September 2022 or if all objections received are withdrawn, the proposed variation of fees shall come into effect on 1 April 2023 following consideration by the Council.

If any objections are received in response to this Notice on or before 26 September 2022 and are not withdrawn, then the variation of fees shall come into effect with or without modification on 1 April 2023 following consideration of the said objections by the Council.



Adele Wearing  
Head of Taxi Licensing & Passenger Transport  
Dated: 25 August 2022





**GENERAL NOTICES**

Thursday, August 25, 2022

MK Council 22

**MILTON KEYNES COUNCIL**

**PUBLIC NOTICE**

**Local Government (Miscellaneous Provisions) Act 1976 – Sections 53(2) & 70(3)**

Notice is hereby given that Milton Keynes Council, in accordance with the provisions of Sections 53(2) & 70(3) of the Local Government (Miscellaneous Provisions) Act 1976, proposes to vary the following Table of Fees in respect of Hackney Carriage and Private Hire Licensing.

No	Item	Basis	2022/23	2023/24	Increase
1	Private Hire Operators Licence New 1-4 vehicles	Per Annum	312.00	340.50	9.13%
2	Private Hire Operators Licence New 5-10 vehicles	Per Annum	416.00	454.00	9.13%
3	Private Hire Operators Licence New 11*-50 vehicles	Per Annum	833.00	908.00	9.00%
4	Private Hire Operators Licence New 50+ vehicles	Per Annum	1250.00	1,363.00	9.04%
5	Private Hire Operators Licence Renewal 1-4 vehicles	Per Annum	302.00	329.50	9.11%
6	Private Hire Operators Licence Renewal 5-10 vehicles	Per Annum	406.00	443.00	9.11%
7	Private Hire Operators Licence Renewal 11*-50 vehicles	Per Annum	822.00	896.00	9.00%
8	Private Hire Operators Licence Renewal 50+ vehicles	Per Annum	1239.00	1,351.00	9.04%
9	Private Hire Operators Licence New 1-4 vehicles	5 Year	937.00	1,022.00	9.07%
10	Private Hire Operators Licence New 5-10 vehicles	5 Year	1250.00	1,363.00	9.04%
11	Private Hire Operators Licence New 11*-50 vehicles	5 Year	2500.00	2,725.00	9.00%
12	Private Hire Operators Licence New 50+ vehicles	5 Year	3749.00	4,087.00	9.02%
13	Private Hire Operators Licence Renewal 1-4 vehicles	5 Year	906.00	988.00	9.05%
14	Private Hire Operators Licence Renewal 5-10 vehicles	5 Year	1219.00	1,329.00	9.02%
15	Private Hire Operators Licence Renewal 11*-50 vehicles	5 Year	2468.00	2,690.00	9.00%
16	Private Hire Operators Licence Renewal 50+ vehicles	5 Year	3718.00	4,053.00	9.01%
17	Operator licence - additional address or operator base	per annum	312.00	340.50	9.13%
18	Combined Drivers Licence - New	3 years	230.00	269.00	16.96%
19	Combined Drivers Licence - Renewal	3 years	214.00	252.00	17.76%
20	Private Hire Vehicle New	per annum	288.00	314.00	9.03%
21	Private Hire Vehicle Renewal	per annum	283.00	308.50	9.01%
22	Plate Exempt	per annum	33.10	36.10	9.06%
23	Hackney Carriage Vehicle New	per annum	297.00	324.00	9.09%
24	Hackney Carriage Vehicle Renewal	per annum	291.00	317.50	9.11%
25	Driver Assessment re-sit	n/a	104.00	113.50	9.13%
26	Replacement Licence (Paper)	n/a	8.15	8.90	9.09%
27	Bracket	n/a	20.90	22.80	9.09%
28	Replacement of Plate	n/a	20.90	22.80	9.09%
29	Replacement of Drivers Badge	n/a	20.80	22.80	9.09%
30	Plate Magnet Set	n/a	36.75	40.10	9.12%
31	Vehicle An. Exemption Test	n/a	52.00	56.75	9.13%
32	Change of vehicle Reg. category	n/a	45.00	49.05	9.00%
33	Vehicle Transfer	n/a	41.75	45.51	9.01%
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Objections to the variation of fees may be made in writing to Adele Wearing, Head of Taxi Licensing & Passenger Transport, Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Milton Keynes, MK93EJ or email [taxi@milton-keynes.gov.uk](mailto:taxi@milton-keynes.gov.uk) on or before 26 September 2022.

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Adele Wearing  
Head of Taxi Licensing & Passenger Transport  
Dated: 25 August 2022





**Steven Gellard**

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**From:** [REDACTED]  
**Sent:** 09 September 2022 15:16  
**To:** Taxi  
**Subject:** [EXT]Price increase

[You don't often get email from [REDACTED], Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

**CAUTION: This email originated outside of Milton Keynes Council.  
Please be extra vigilant when opening attachments or clicking on links.  
Report spam or suspected malicious email via the REPORT MESSAGE icon above.**

Hi

A joke 9% increase when in most industries are having to cut wage bill and restructure.

**Steven Gellard**

---

**From:** [REDACTED]  
**Sent:** 09 September 2022 16:02  
**To:** Taxi  
**Subject:** [EXT]Fw: Councils proposed Increase fees and charges

**CAUTION: This email originated outside of Milton Keynes Council.  
Please be extra vigilant when opening attachments or clicking on links.  
Report spam or suspected malicious email via the REPORT MESSAGE icon above.**

Hi,

I object, fees are too high!

Regards

[REDACTED]

On Friday, September 9, 2022, 12:43 pm, Joanne Odriscoll <Joanne.Odriscoll@milton-keynes.gov.uk> wrote:

Dear Licence Holder

Please see below the Council's proposal to increase fees and charges. If you have any objections, please email [taxi@milton-keynes.gov.uk](mailto:taxi@milton-keynes.gov.uk) no later than 26 September 2022.

No	Item	Basis	2022/23	2023/24	Increase
1	Private Hire Operators Licence New 1-4 vehicles	Per Annum	312.00	340.50	9.13%
2	Private Hire Operators Licence New 5-10 vehicles	Per Annum	416.00	454.00	9.13%
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5	Private Hire Operators Licence Renewal 1-4 vehicles	Per Annum	302.00	329.50	9.11%
6	Private Hire Operators Licence	Per Annum	406.00	443.00	9.11%



**Steven Gellard**

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**From:** [REDACTED]  
**Sent:** 09 September 2022 21:55  
**To:** Taxi  
**Subject:** [EXT]Proposed increase

**CAUTION: This email originated outside of Milton Keynes Council.  
Please be extra vigilant when opening attachments or clicking on links.  
Report spam or suspected malicious email via the REPORT MESSAGE icon above.**

To whom it may concern.

I wish to object to the proposed increase to charges.

We have still not fully recovered from the effects of covid, as well as the cost of living. Also fuel costs have not gone down sufficiently. The cost of insurance and all other associated running costs of running a vehicle have increased significantly. The only thing which has decreased is our income. Most drivers are having to work longer hours, and more days.

This is not a safe system for drivers and customers.

I believe you really need to evaluate the need to increase our already high charges.

I am at a loss as to why you feel the need to increase charges.

[REDACTED]

[Get Outlook for Android](#)

**Steven Gellard**

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**From:** [REDACTED]  
**Sent:** 19 September 2022 14:38  
**To:** Taxi  
**Subject:** [EXT]about increase fees

**CAUTION: This email originated outside of Milton Keynes Council.  
Please be extra vigilant when opening attachments or clicking on links.  
Report spam or suspected malicious email via the REPORT MESSAGE icon above.**

Good morning,

I just write about the taxi fees increases. I object about fees increases. You are giving worse service ever than any other council in UK. So poorest service that out of think ever. Your fees should be more reduced than we are paying now. I think , head of taxi department who is in charge he should resign, because he cannot control taxi department or not enough experience , this is my opinion.

Kind regards,  
[REDACTED]

# Delegated Decisions report



29 November 2022

## DEVELOPMENT OF ADDITIONAL COMMUNICATION AND INTERACTION PLACES AT ST. PAUL'S CATHOLIC SCHOOL

Name of Cabinet Member	<b>Councillor Zoe Nolan</b> (Cabinet member for Children and Families)
Report sponsor	<b>Caroline Marriott</b> Head of Delivery - SEN and Disability
Report author	<b>Victoria Courtis</b> EHC Service Leader <a href="mailto:caroline.marriott@milton-keynes.gov.uk">caroline.marriott@milton-keynes.gov.uk</a>

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>5.6 To increase the number of high-quality local placements for children and young people</b>
Wards affected	<b>Woughton &amp; Fishermead / All Wards</b>

### Executive Summary

St Paul's Catholic School is a secondary school with resourced provision for children aged 11 to 18 with communication and interaction needs. Currently there are 28 commissioned places, but with 34 pupils currently accessing the provision. The proposal is to increase the number of places available in the resourced provision by 24 places in years 7 to 11. These additional places will be phased in from September 2023, with all the places expected to be required by September 2025. This increase will be possible through a dedicated three classroom block to enable the growth in the resourced provision at St Paul's Catholic School. As well as increasing the overall places of communication and interaction resourced provision, this will address a current gap in provision for young people who are able to access a mainstream curriculum but require a smaller environment with greater levels of support.

A formal consultation on this proposal was carried out between 11 February to 8 April, a period of eight weeks. Notification of the consultation was sent to a range of stakeholders associated with the school, local authority and parent and carer groups and the consultation was also available online to give stakeholders the opportunity to submit views and discuss the proposed expansion plans in principle. Of the 199 responses to the consultation, 97% agreed with the proposals on communication and interaction resources provision in Milton Keynes, which included an additional 24 places and a unit provision at St Paul’s Catholic School. The statutory consultation took place between 7 October 2022 and 7 November 2022 confirmed support for the proposal.

**1. Decisions to be Made**

1.1 That the expansion of the Communication and Interaction Resourced Provision at St Paul’s Catholic School, creating an additional 24 places and the development of a dedicated three classroom block, be approved.

**2. Why are the Decisions Needed?**

2.1 The purpose of these proposals is to ensure sufficiency of places for children and young people with Special Educational Needs who have an Education, Health and Care Plan, and in relation to this proposal ensure sufficiency of places for children and young people with communication and interaction needs which is the area of need where the data analysis shows us is the area of most demand.

2.2 To provide more choice for children who can access a mainstream curriculum but require higher levels of additional support to be successful and to enable children in Milton Keynes with Education Health and Care Plans to be able to attend a local school and be part of their communities, continuing their sense of community belonging and ensure a greater consistency of education for the children of Milton Keynes.

2.3 There is a growing demand across specialist provision in Milton Keynes and alongside this we have seen a change in the needs of children entering the social communication departments in Milton Keynes. We have a growing number of children and young people with Education, Health and Care Plans (1641 in 2015/16 which has risen to 2571 in 2021/22) and 1.7% of children and young people are educated within specialist provision, meaning approximately 17 children and young people to every 1,000 will require specialist provision and solely from growth in Milton Keynes we need to develop a minimum of 40 places per year.

**3. Implications of the Decision**

Financial	Y	Human rights, equalities, diversity	N
Legal	Y	Policies or Council Plan	Y
Communication	N	Procurement	N
Energy Efficiency	N	Workforce	N



(a) Financial Implications

The revenue implications will be to the High Needs Block of the Dedicated Schools Grant and will be built into the future years budgets as places are opened incrementally to mitigate potential pressures.

The Special Provision capital funding from the Department for Education (DfE) is to create specialist places at good or outstanding provision and/or improves facilities or develops new facilities. Local authorities are also permitted to combine the Special Provision funding with other capital funding.

(b) Legal Implications

The Council has a statutory duty to ensure that there are sufficient school places in Milton Keynes. Projects with the objective of enabling the Council to meet this duty would require funding via the Department for Education (DfE) Special Provision Capital Fund.

Local authorities are permitted to use the Special Provision funding for capital transactions which create new additional places at a good or outstanding provision and/or improves facilities or develops new facilities. Local authorities are also permitted to combine the Special Provision funding with other capital funding.

In contrast, local authorities are not permitted to use the Special Provision funding:

- to expand provision to create additional places for pupils who do not have education, health and care plans;
- to make reasonable adjustments that schools are required to fund as part of accessibility requirements (e.g. ramps or widening doorways);
- for revenue expenditure such as training or staff costs; and / or
- for maintenance work.

The DfE Special Provision Capital Fund guidance also stipulates local authorities are required to plan how they invest their allocation of Special Provision funding which includes consulting with parents and carers, schools, FE colleges and other institutions which offer special educational provision.

Any contracts for completion of the capital works shall need to be procured in compliance with procurement rules and legislation.

## 4. Alternatives

### 4.1 Do Nothing

There will not be sufficient special school places available to meet the increasing need for specialist school provision in Milton Keynes and there is a risk of increased reliance on higher cost independent provision.

If we are unable to provide appropriate places to meet children and young people's special educational need, at the right time, then we would not be able to deliver our statutory responsibilities.

## 5. Timetable for Implementation

Timetable:
4 November 2022 - statutory consultation concludes.
29 November 2022 - Delegated Decision.
January 2023 - implementation commences with recruitment and building works underway.
September 2023 - St Paul's Communication and Interaction Resourced Provision expands and dedicated three classroom block opens.

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## List of Annexes

Annex A Summary of Statutory Consultation Responses

Annex B Full Analysis of Informal Consultation

## List of Background Papers

Full details on the consultation can be found here:

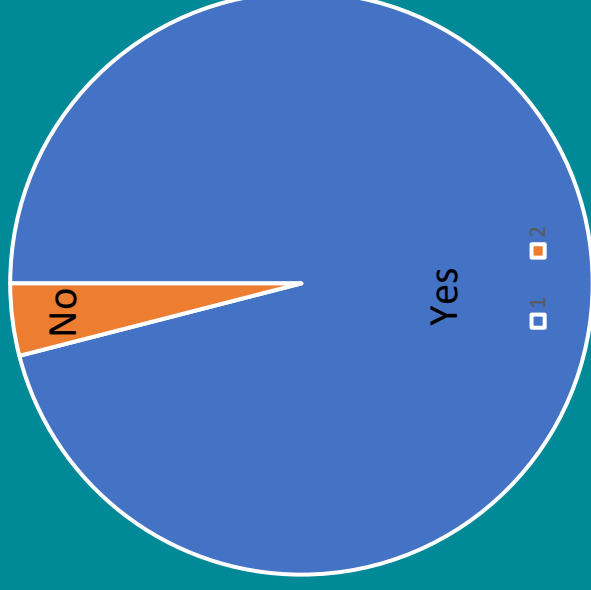
<https://www.milton-keynes.gov.uk/consultations/development-communication-and-interaction-resourced-provision-st-pauls-catholic>

# Do you support the additional places of a Communication and Interaction resourced provision at St Paul's Catholic School?

25 Responses

1 = 24 Yes

2 = 1 No



**Comments received via the views on the development of 24 additional resourced places at St Paul's Catholic School. This will be supported by a 3 classroom dedicated block.**

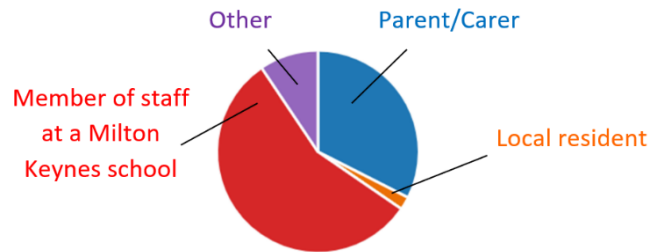
- **“This would be an excellent idea. The provision of the Communication Department at St Paul's is very good”**
- **“I agree with the proposal and strongly feel that more provision for children with communication difficulties is required”**
- **“That is very good. This will allow the children to learn in a more relaxed beautiful and more classrooms”**
- **“I agree that this is an appropriate and much needed provision”**
- **“This is a needed provision and offers further choice as well as capacity in the system”**
- **“Given the increasing level of need locally, I think that the additional resourced places proposed would make a very valuable contribution to the range of provision available to support children and young people with SEND in MK”**



### Informal Consultation Responses

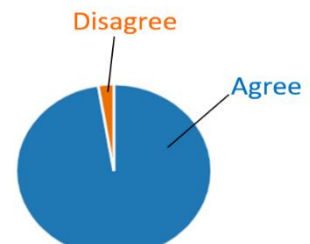
#### Quantitative Data

62 (32%) of respondents were a parent/carer, 4 (2%) were a local resident and 107 (56%) were a member of staff at a Milton Keynes school. 18 (9%) were someone else, such as (but not limited to) a member of Milton Keynes Council or Children’s Social Care. No local councillors took part.



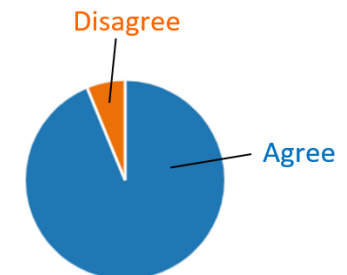
1. *Proposed development of a new primary and new secondary complex needs school with a specialism in ASC*

191 (97%) respondents agreed with this, and 5 (3%) disagreed.



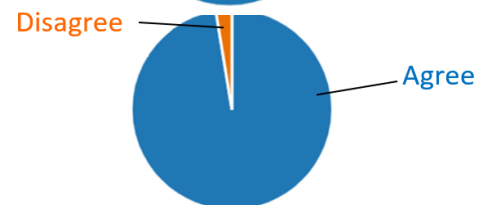
2. *Development of additional SEMH places at existing SEMH schools*

182 (94%) agreed with this, and 12 (6%) disagreed.



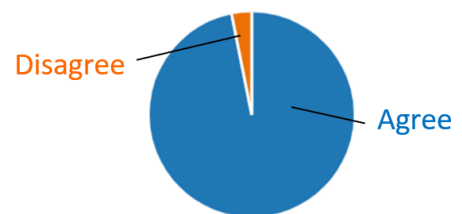
3. *Development of a high complex needs provision*

189 (97%) agreed with this, and 5 (3%) disagreed.



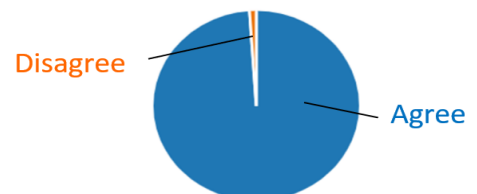
4. *Review and development of Communication and Interaction Resources Provision*

185 (97%) agreed with this, and 6 (3%) disagreed.



5. *The development of additional options for post 16 / 18 provision*

189 (99%) agreed and 2 (1%) disagreed.



## Qualitative data

### *1. Proposed development of a new primary and secondary complex needs school with ASC specialism*

#### Themes analysed (FBC): **Three major themes**

- 1. A new provision/school is needed because mainstream schools are unable to meet the needs of learners with ASC, e.g., sensory needs, social and communication needs, smaller classes.*
- 2. New provision would be welcomed as special and mainstream schools for learners with ASC are currently oversubscribed with CYP missing out on education.*
- 3. The proposed new school will need staff with specialist training, knowledge and expertise about ASC learners in order to be a success.*

Those who disagreed felt that mainstream and specialist schools should have more expertise trained staff. This group also suggested that improvements made on existing schools would prove to be a better use of funding as opposed to a new provision.

11% of the 97% agreeing said that the new provision would have to meet certain terms before agreement e.g. many stated that a brand-new building with sufficient outdoor green space should be provided as opposed to a refurbished building.

### *2. Development of additional SEMH places at existing SEMH schools*

#### Themes analysed (FBC): **Three major themes**

- 1. There is a need for additional SEMH placements due to the expansion of Milton Keynes.*
- 2. Increase in SEMH places required since COVID-19 and EBSA in CYP, additional places would be welcomed, less strain on mainstream schools.*
- 3. A need for an SEMH school in Milton Keynes rather than additional places in existing SEMH.*

The general consensus agreed that demand for meeting the needs of CYP with SEMH were high, however additional spaces may not be adequate without the capacity or infrastructure to support this as there are limitations in existing SEMH schools.

Some responses were to comment on the current situation regarding SEMH placements or other unrelated issues e.g., the unavailability of car parking in special schools.

### *3. Development of a high complex needs provision*

#### Themes analysed (LS): **Three major themes**

- 1. The needs children are presenting with are becoming increasingly complex, and as such settings are currently not meeting them.*

It was suggested that the level of need has increased at a rate faster than the level of provision, and as such educational settings are currently unable to meet the existing complex needs of CYP. Current mainstream provision faces pressures to meet complex needs without the correct expertise, support, training or equipment. Current specialist provision has limited places as is in high demand.

- 2. More specialist provision is needed in order to meet these highly complex needs.*

A need to expand provision to meet the growing demand for high complex needs provision was described. It was expected to make a 'profound difference' as children desperately require the correct provision. Some individuals suggested that high complex needs provision is equally needed in mainstream schools, and that such training and resources should be mandatory in all education systems.

- 3. New specialist provision needs to be carefully considered.*

Whilst increased high complex needs provision was agreed upon, note was made that this should be carefully planned. For instance, consideration into the type and size of facilities and/or placements is needed due to the considerable challenges these pupils present, staff must be trained to fully support needs, provision should be local and expectations of provision quality should be clearly outlined.

- 4. Review and development of Communication and Interaction Resources Provision*

#### Themes analysed (FBC): **Three major themes**

- 1. A major theme suggests that this concept will have a positive impact, however specialist support and further collaboration with wider professionals is needed.*
- 2. Further explanation of what will be developed and how this will be done? e.g., what is the timeline?*
- 3. Outreach support is welcomed as current therapies are underfunded e.g., (SLT), commitment is needed for this provision to succeed.*

Overall, the concept of reviewing and developing communication and interaction resources provision is welcomed as accommodating the needs of pupils such as 'high-functioning ASC girls' requires particular attention.

Improvements to resources along with accessibility and training 'at least to a basic level', should be provided for staff and education facilities in general.

## *The development of additional options for post 16 / 18 provision*

Themes analysed (LS): **Three major themes**

*1. Post 16/18 provision needs to be improved.*

Milton Keynes was said to not currently be 'fully meeting the needs of the 18+ community of young people', including those with and without special educational needs. Emphasis was placed on the fact that support is still required past 16 or 18 years old, as needs persist past this point. Improved provision should include a greater variety of opportunities, to cater for all interests and needs, as there are currently minimal options. Note was also made that post 16/18 provision should not be focused purely on further education.

*2. Why increased options for post 16/18 provision are essential.*

Post 16/18 provision would facilitate continued learning, teach practical life skills, help young people find meaningful careers and develop independence as well as a sense of purpose. It would smooth the transition from childhood into adulthood, which is especially useful for young people with special educational needs who may not be ready for full independence or employment at 16 or 18. Such provision is also important as pupils 'need to know that they will not be forgotten once they finish their education'.

*3. Support for parents is also needed.*

It was suggested that parents of post 16/18 year-olds also require provision in supporting their child. This should include making sure any post 16/18 provision is clearly outlined on the Local Offer.

# Delegated Decisions report



29 November 2022

## DISPOSAL OF ADDITIONAL LAND IN NEWPORT PAGNELL TO ASTON MARTIN HERITAGE TRUST FOR THE PURPOSE OF CONSTRUCTING THE ASTON MARTIN CAR MUSEUM

Name of Cabinet Member	<b>Councillor Rob Middleton</b> (Cabinet member for Resources)
Report sponsor	<b>Stuart Proffitt</b> Director - Environment and Property
Report author/s	<b>Ed Palmieri</b> Commercialisation Lead for Property <a href="mailto:Ed.Palmieri@milton-keynes.gov.uk">Ed.Palmieri@milton-keynes.gov.uk</a>

Exempt / confidential / not for publication	<b>Yes</b>
Council Plan reference	<b>n/a</b>
Wards affected	<b>Newport Pagnell South</b>

### Executive Summary

The Council took a Delegated Decision on 5 October 2021 which approved the disposal of 2.50 acres of land to Aston Martin Heritage Trust (AMHT) for the construction of a new Aston Martin Car Museum.

Since the Council's decision AMHT has requested two additional areas of land which are shown green and blue on the plan at **Annex A**.

A decision is now needed to consider the disposal of the additional green and blue land to the AMHT reflecting the terms of the Council's previous decision of 5 October 2021 which is the purpose of this report.

#### 1. Decisions to be Made

- 1.1 That the public and press be excluded from the meeting by virtue of Paragraph 3 (Information relating to the Financial or Business Affairs of the Authority) of Part 1 of Schedule 12A of the Local Government Act 1972, in order that the meeting may consider the **confidential Annex B** to the report.



- 1.2 That the draft Heads of Terms for leasing the green and blue land to Aston Martin Heritage Trust (AMHT), as contained in **Annex B**, be approved and the Council enter into the lease and any necessary agreements with AMHT to deliver the new Aston Martin car museum.
- 1.3 That authority be delegated to the Director - Environment and Property, in consultation with the Cabinet member for Resources and the Director - Finance and Resources, to agree any variations to the Heads of Terms with the AMHT as set out in this report, and agree to enter into any other necessary documents and agreements to effect the decisions made pursuant to this report, including those with other parties including Newport Pagnell Town Council.
- 1.4 That the Council approve the grant of subsidy of £220,000 to AMHT which is the cash equivalent of leasing the properties to AMHT at less than market value, subject to receipt of confirmation from AMHT.

## 2. Background

- 2.1 The AMHT is a Public Educational Charity governed by the rules for charitable incorporated organisations. The AMHT currently manages a museum and archives of Aston Martin vehicles which it regards as too small, not in the right location and with the unsuitable storage conditions. This has resulted in AMHT needing a new location that will enable it to develop new premises for the Aston Martin car museum and its archive.
- 2.2 For the construction of the car museum and archive this requires the Council's land to be developed as the museum's car park with storage and ancillary facilities. The museum itself is proposed to be built on adjoining land owned by Newport Pagnell Town Council. The two sites together make a suitable area for the AMHT to develop its car museum for which planning consent will be required.
- 2.3 The requirement for the Council's land was the subject of the Council decision of 5 October 2021 which approved making the land available to AMHT on the terms set out in **confidential Annex B**.
- 2.4 Once the AMHT has secured the land from the Council and Newport Pagnell Town Council on conditional agreements for lease it will then seek and agree funding for the next stage of detailed design and development of the car museum subject to planning consent. The AMHT is confident funding can be secured and this will be a condition in the agreement for leases for both the Council's and Town Council's land.
- 2.5 The land subject to the Council decision of 5 October 2021, comprising the Lovat Meadow former caravan park site, is shown edged red on the plan at **Annex A**. This land comprises 1.01 ha (2.5 acres) of mainly grassed areas with a circular surfaced track in the centre which has not been used for some years.

- 2.6 The additional green and blue land AMHT identified as required post the Council’s 5 October 2021 decision followed a more detailed consideration by AMHT, and in part is to link up with the adjoining land being made available by Newport Pagnell Town Council where the new car museum will be built.
- 2.7 The Newport Pagnell Town Council land being provided for the new car museum is shown edged orange on the plan at **Annex C**.
- 2.8 The green land comprises 0.9 acres and has been valued at £30,000 freehold. The blue land comprises 0.6 acres and has been valued at £15,000 freehold. The valuations were carried out in June 2022. These values would be at the upper end of a leasehold interest. Given there is often a discount for a leasehold compared with a freehold interest these freehold values are considered relevant for this report. The disposal of the green and blue land to AMHT will be a 125 year lease as per the Heads of Terms at Annex B and as set out in this report.
- 2.9 The red edged land shown at **Annex A** was valued for 5 October 2021 decision at £120,000. This value was re-assessed in June 2022 to be £175,000 which reflects land values have increased.
- 2.10 There is a footpath through the green land which runs along the southern boundary of the red edged land and within the blue land. The intention is AMHT will re-route this footpath to the northern boundary of the red edged land following discussions with the Council.

### 3. Why is the Decision Needed?

- 3.1 The disposal of the green and blue land constitutes a Key Decision under the Leader’s Scheme of Delegation.

### 4. Implications of the Decision

Financial	Y	Human rights, equalities, diversity	N
Legal	Y	Policies or Council Plan	Y
Communication	N	Procurement	Y
Energy Efficiency	Y	Workforce	Y

(a) Financial Implications

The Council will meet its own reasonable legal and valuation costs incurred in making the land disposal to AMHT.

(b) Legal Implications

The Local Government Act (LGA) 1972 s123 requires Local Authorities to obtain the best consideration reasonably obtainable in the disposal / lease of land and this applies to the lease disposal to AMHT. This is a duty to obtain an outcome. S123 does not prescribe a process by which best value is obtained. There is no specific method/route to be used to achieve best value. It is for the Local Authority to assess and come to a decision, acting reasonably considering relevant factors, disregarding irrelevant factors.

Disposals of land by Local Authorities for more than seven years for less than best consideration requires the consent of the Secretary of State.

However, the General Disposal Consent (GDC) in Circular 06/03 provides that a Local Authority may dispose of its land for more than seven years at under value up to £2M if it considers the disposal will achieve the promotion or improvement of economic, social or environmental well-being of its area provided the disposal is subsidy complaint and the land is not held as housing land or under the Town and Country Planning Act (TCPA) 1990.

The terms of the disposal of the red edged land mean AMHT will not be paying the Council a consideration and this would apply to the green and blue land. Taking into account the value of the red edged land this means the total amount of undervalue that will be given by the Council to AMHT in the disposal, with the green and blue land is assessed at £220,000. This undervalue sum is within the £2M GDC limit.

The Council is still satisfied the disposal at this undervalue to AMHT for the new car museum will achieve the promotion or improvement of economic, social or environmental well-being of its area as detailed in 5 October 2021 decision. That decision report and decision is attached at **Annex D**.

The green and blue land is not housing land under the TCPA 90.

The green and blue land is classed as public open space. Section 123 (2)(a) of the Local Government Act 1972 requires a council to advertise their intention to dispose of public open space in a local newspaper for two consecutive weeks and to consider any objections to the proposed disposal before they dispose of the land. The intention to dispose of the public open space has been duly advertised on 13 and 25 October and time was allowed up to 10 November for any comments / objections.

There were no objections / comments to the advertisement to dispose of the green and blue land.

(c) Procurement

The Council must consider whether the Public Contracts Regulations 2015 (as amended) apply to the various arrangements relating to this transaction.

Land transactions by local authorities are specifically exempted from the application of the Public Contracts Regulation under regulation 10 (1) (a), however case law has established that such transactions are still caught by procurement rules where certain conditions are attached and thereby causing them to be deemed to be public works contracts. Conditions include:

- works are required or specified by a contracting authority;

- there is an enforceable (legal) obligation on another party to carry out the works, and
- there is a pecuniary interest for carrying out the works which can be an economic benefit rather than monetary sum.

The disposal of the land to AMHT on the terms set out in this report does not satisfy the requirements of a public works contract.

(d) Subsidy

There is the need for the Council to consider and ensure it is compliant with the requirements for subsidy control under the Subsidy Control Act 2022.

The proposed amount of subsidy that would be granted to AMHT is equivalent to the assessed value of £220,000 (Section 36(5)(b)).

Under Section 36(1) of the Subsidy Control Act, this amount falls within the threshold of minimal financial assistance exemption which is specified as £315,000 over the past three financial years (counting back from the present financial year).

The Council can only grant this amount of subsidy to AMHT following compliance with the procedures set out in Section 37 of the Subsidy Act which includes requesting written confirmation from the recipient, AMHT, that the total amount of £315,000 will not be exceeded by the enterprise receiving the proposed assistance.

The Council has written to AMHT asking for confirmation the total subsidy it has been granted will not exceed £315,000 over the last three financial years, if the Council grants AMHT the subsidy of £220,000 as detailed in this report. This confirmation is awaited at the time of writing this report and will be a condition of the land disposal to AMHT on the terms detailed in this report.

As the proposed subsidy is above £100,000, the Council also has to comply with transparency requirements under Part 2, Chapter 3 of the Subsidy Act. This imposes a duty on the Council to make an entry into the subsidy database in respect of a subsidy that it gives. The subsidy database is one that is set up by or under the direction of the Secretary of State and the entry must be made by the Council within 3 months of the confirmation of decision to grant the subsidy. Any future modifications to the subsidy must also be recorded in the database.

(e) Other Implications

In accordance with the Modified Newport Pagnell Neighbourhood Plan a provision for a new cycle route within the site to connect to the existing redway routes may be required. These details need to be worked out.

(f) Policy

Newport Pagnell Modified Neighbourhood Plan June 2021.

Plan:MK.

## 4. Alternatives

### 1.1 Do Nothing

This is not the recommended option as this does not deliver the AMHT car museum and consequently will not deliver the resulting social and economic benefits.

### 1.2 Dispose of the green and blue land to AMHT with the red edged land on the terms set out in this report - this will deliver the AMHT car museum along with the resulting social and economic benefits, and is the recommended option.

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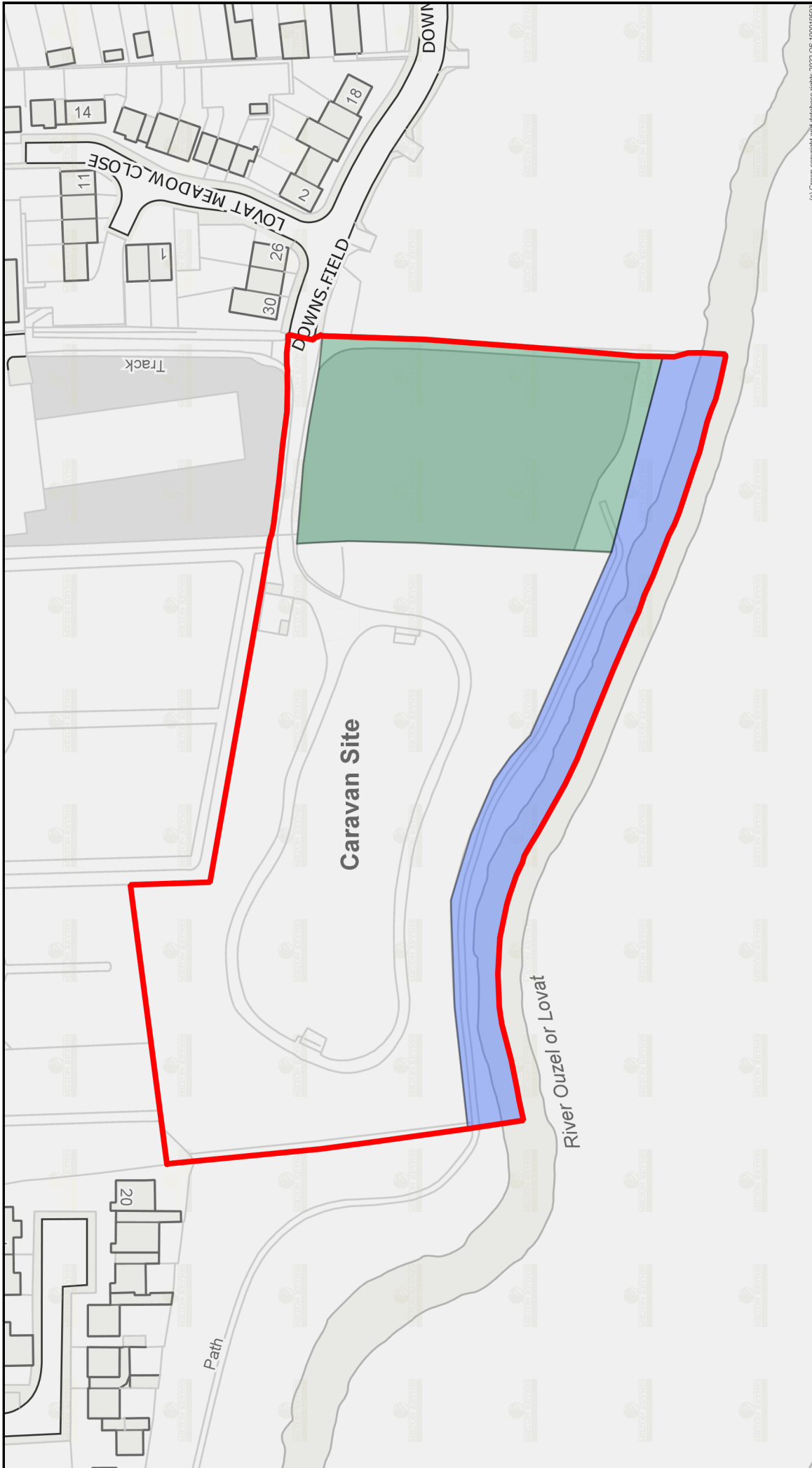
## List of Annexes

Annex A	Milton Keynes City Council land plan
Annex B	Heads of Terms with AMHT (confidential)
Annex C	Newport Pagnell Town Council land plan
Annex D	Milton Keynes City Council decision and related report of 5 October 2021

## List of Background Papers

None





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# Lovat Meadow Caravan Site & Open Space



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Printed on: 2022-04-29 14:51:34 by PFFREEMA@MKC

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# Delegated Decisions report



5 October 2021

## DISPOSAL OF LAND IN NEWPORT PAGNELL TO THE ASTON MARTIN HERITAGE TRUST TO CONSTRUCT THE ASTON MARTIN MUSEUM

Name of Cabinet Member	<b>Councillor Rob Middleton</b> (Cabinet member for Resources)
Report sponsor	<b>Stuart Proffitt</b> Director - Environment and Property
Report author/s	<b>Ed Palmieri</b> Commercialisation Lead for Property <a href="mailto:Ed.Palmieri@milton-keynes.gov.uk">Ed.Palmieri@milton-keynes.gov.uk</a>

Exempt / confidential / not for publication	<b>No</b>
Council Plan reference	<b>n/a</b>
Wards affected	<b>Newport Pagnell</b>

### Executive Summary

The Council has been approached by the Aston Martin Heritage Trust (AMHT) who want to construct the Aston Martin car museum in Newport Pagnell. The Town Council suggested the Council's unused former caravan park site off Downs Field in Newport Pagnell, known as Lovat Meadow, would be suitable to provide the car park for the new museum, with the museum being constructed on nearby allotment land owned by the Town Council. The Town Council proposes to make its allotment land available to AMHT. Aston Martin has a long and significant history with Newport Pagnell and the Aston Martin Heritage Works are still an important industry in the town.

Various discussions have taken place between all three parties and terms have been proposed to lease Lovat Meadow to AMHT in conjunction with similar lease terms for the allotment land to go hand in hand to deliver the development of the AMHT car museum.

A decision is now needed to consider the proposed letting terms for Lovat Meadow to AMHT which is the purpose of this report.



## 1 Decisions to be Made

- 1.1 That the public and press representatives be excluded from the meeting by virtue of Paragraph 3 (Information relating to the Financial or Business Affairs of the Authority) of Part 1 of Schedule 12A of the Local Government Act 1792, in order that the meeting may consider the **Confidential Annex B** to this report.
- 1.2 That the draft Heads of Terms for leasing Lovat Meadow to AMHT, as contained in **Annex B**, be approved.
- 1.3 That the Council agrees to enter into the lease and related agreements with AMHT to deliver the AMHT car museum.
- 1.4 That the Council agrees to enter into any necessary agreements with Newport Pagnell Town Council for the purposes of the lease to AMHT to deliver the AMHT car museum.
- 1.5 That the Director - Environment and Property, in consultation with the Cabinet member for Resources and the Director - Finance and Resources, be given delegated authority to agree any variations to the Heads of Terms with the AMHT as set out in the report, and to agree any other necessary documents and agreements to affect the decisions made pursuant to this report including those with Newport Pagnell Town Council.

## 2 Background

- 2.1 Lovat Meadow is a former caravan park site comprising 1.01 ha (2.5 acres) of mainly grassed areas with a circular surfaced track in the centre that has not been used for some years. The freehold is owned by the Council. The site slopes down to the River Ouzel to the south. The site is accessed via a private drive through a short extent of wooded area from Downs Field which is an adopted highway. The access strip abutting the highway is part of the site and the whole site is shown edged red on plan at **Annex A**.
- 2.2 The site is designated in Plan:MK as being within open countryside and in a wildlife corridor. The current permitted use for the site is as a caravan park (planning reference 99/01582/FUL but has not been in this use for a number of years.
- 2.3 Being adjacent to the River Ouzel the southern section of the site is in flood zones 2 and 3 limiting the use of the site to some extent and having an impact on the site's market value.
- 2.4 An independent market valuation of the site puts this at £120,000 for the Council's freehold interest assuming vacant possession, reflecting the site's attributes.
- 2.5 The AMHT is a Public Educational Charity governed by the rules for charitable incorporated organisations. The AMHT currently manages a museum and archives of Aston Martin vehicles which it views as too small and not in the ideal location and

the current storage conditions are not suitable. This has resulted in AMHT searching for a site that will enable it to develop suitable new premises for a museum and archive and in the right location.

- 2.6 The Town Council has offered AMHT its nearby allotment site (shown edged orange on the plan at **Annex C**) for the construction of the museum and archive and this requires the Council's Lovat Meadow site to be developed as the museum's car park with storage and ancillary facilities. The two sites together make a suitable area for the AMHT to develop its museum for which planning consent will be required.
- 2.7 The AMHT has developed a business plan (included at **Annex D**) which sets out the proposals for the museum. The intention is the museum will be a world class museum similar in size and reputation to other prestige car marques such as Porsche, Ferrari and Mercedes Benz.
- 2.8 The museum will focus resources on continuing links and collaborations with local education establishments - schools, university and college, and these will be rolled out as set out in the business plan. The museum will have classroom and lecture rooms to deliver its charitable objective for the advancement of education study and research relating to automotive engineering and design of the brand's car marques.
- 2.9 The educational (social) benefits from the museum's activities will include provision of teaching packs, support to apprenticeship schemes offered by Cranfield University and offering the University access to a centre of excellence for its world class automotive and business programmes. Linking to higher education the museum will also be on hand to demonstrate to school students that Science Technology Engineering and Mathematic subjects are exciting career options. The museum will have onsite resources for information on apprenticeships.
- 2.10 Other social benefits derived from the museum will be from offering an exciting and inspiring visitor attraction. The iconic world renown Aston Martin brand will offer cultural benefits by providing a place where visitors to the museum can explore and be inspired by the brand's link with the popular James Bond character. There is also potential for local collections about Aston Martin to become part of this museum providing public access to local significant museum and archive material for the first time.
- 2.11 The museum will deliver economic benefits derived from local tourism (both day and overnight visitors), direct and indirect employment and goods and services spend.
- 2.12 Once the AMHT has secured the land from the Council and Town Council on conditional agreements for lease it will then seek funding for the next stage of detailed design and development of the museum subject to planning consent. The AMHT is confident funding can be secured and this will be a condition in the agreement for leases for both the Council's and Town Council's land.

### 3 Why is the Decision Needed?

- 3.1 The AMHT has asked the Council to lease the Lovat Meadow site on the basis of nil consideration and the same has been asked of the Town Council for their allotment site. The Town Council has agreed to this in principle.
- 3.2 Such a disposal by the Council will be considered a disposal at undervalue and this needs to satisfy certain requirements to be lawful. Given the museum will deliver social and economic benefits the disposal of the Lovat Meadow site to AMHT on the proposed heads of terms is considered to satisfy these legal requirements and accordingly to be lawful. This is detailed in the Legal section.
- 3.3 Undertaking this transaction in this way secures the museum within the borough. Two other nearby authorities were options for the AHMT to secure a site.

### 4 Implications of the Decision

Financial	Y	Human rights, equalities, diversity	N
Legal	Y	Policies or Council Plan	Y
Communication	N	Procurement	Y
Energy Efficiency	Y	Workforce	Y

(a) Financial Implications

The Council will meet its own reasonable legal and valuation costs incurred in making the land disposal to AMHT. These costs will be recovered using some of the S106 monies (£149,079) from the Tickford Fields development which provides for the monies to be used in the first instance for an Aston Martin museum locally.

(b) Legal Implications

The Local Government Act (LGA) 1972 s123 requires Local Authorities to obtain the best consideration reasonably obtainable in the disposal / lease of land and this applies to the lease disposal to AMHT. This is a duty to obtain an outcome. S123 does not prescribe a process by which best value is obtained. There is no specific method/route to be used to achieve best value. It is for the Local Authority to assess and come to a decision, acting reasonably considering relevant factors, disregarding irrelevant factors.

Disposals of land by Local Authorities for more than seven years for less than best consideration require the consent of the Secretary of State.

The General Disposal Consent in Circular 06/03 provides that a Local Authority make dispose of its land for more than seven years at under value up to £2M if it considers the disposal will achieve the promotion or improvement of economic, social or environmental well-being of its area provided the disposal

is subsidy complaint and the land is not held as housing land or under the Town & Country Planning Act (TCPA) 1990.

As detailed above the disposal will lead to the promotion or improvement of economic and social well-being of the Borough. The undervalue disposal being £120,000 is within the £2M threshold. As explained below subsidy does not apply and the land is not held as housing land or under the TCPA 90. This means the disposal to the AMHT is considered to satisfy the General Disposal Consent in Circular 06/03.

A title check revealed a lease dated 18 June 1996 as being registered. The lease was for 14 years from 1 January 1996 and has since expired given the site has been vacated for some time. This lease will need to be removed from the title by application to the Land Registry.

(c) Procurement

The Council must consider whether the Public Contracts Regulations 2015 (as amended) apply to the various arrangements relating to this transaction.

Land transactions by local authorities are specifically exempted from the application of the Public Contracts Regulation under regulation 10 (1) (a), however case law has established that such transactions are still caught by procurement rules where certain conditions are attached and thereby causing them to be deemed to be public works contracts. Conditions include:

- (i) works are required or specified by a contracting authority;
- (ii) there is an enforceable (legal) obligation on another party to carry out the works; and
- (iii) there is a pecuniary interest for carrying out the works which can be an economic benefit rather than monetary sum.

Given lease disposals can satisfy the requirements of a public works contract the Council has structured the lease terms with AMHT to ensure it is not caught by procurement rules.

(d) Subsidy

There is the need for the Council to consider and ensure it is compliant with the requirements for subsidy control (formerly known as state aid). The “*State Aid*” Regime in the UK was replaced with “*Subsidy Control*” which arises from the Trade and Co-operation Agreement (TCA) entered into between the United Kingdom Government and the European Union which took effect from 1 January 2021 by virtue of the EU (Future Relations) Act 2020.

The Government has published Technical Guidance to assist Local Authorities in understanding subsidy control and to make related decisions in compliance. The most succinct explanation of this is contained within the document *“Summary Guide to Awarding Subsidies”* published by BEIS on 31 December 2020.

Subsidy under these obligations in summary is defined as financial assistance arising from public resources which confer an economic advantage on one or more economic entity and is specific in so far as it benefits certain economic actors over others in relation to the production of certain goods or services; and has or could have an effect on trade or investment between the UK and the EU. Where all these elements exist, then subsidy exists and in order for subsidy to be granted lawfully, there are 6 principles that a public body must assess the proposed subsidy against and evidence how its proposed subsidy complies with or satisfies the said principles.

The TCA provides that any subsidy(ies) with a cumulative value of more than £350,000 (the de minimis level) is / are subject to compliance with these principles. However given the lease disposal to AMHT at undervalue of £120,000 is less than the de minimis level subsidy principles do not apply so long as the AMHT has not received subsidy from other sources which leads to the de minimis level of £350,000 being exceeded in a 3 year period. The Council will ask AMHT to confirm it has not received subsidy from any other sources as a condition of the lease grant.

These principles are:

(a) Principle 1

It must pursue a specific public body objective to remedy an identified market failure or to address an equity rationale such as social difficulties or distributional concerns.

(b) Principle 2

It must be proportionate and limited to what is necessary to achieve the objective.

(c) Principle 3

It must be designed to bring about a change in economic behaviour of the beneficiary that is conducive to achieving the objective and that would not be achieved in the absence of subsidies being provided.

(d) Principle 4

It must not normally compensate for the costs the beneficiary would have funded in absence of any subsidy.



(e) Principle 5

It must be an appropriate policy instrument to achieve a public policy objective and that objective cannot be achieved through other less distortive means.

(f) Principle 6

Its positive contributions to achieving the objective must outweigh any negative effects in particular the negative effects on trade or investment between the parties.

(e) Other Implications

In accordance with the Modified Newport Pagnell Neighbourhood Plan a provision for a new cycle route within the site to connect to the existing redway routes may be required. These details need to be worked out.

(f) Policy

Newport Pagnell Modified Neighbourhood Plan June 2021.

Plan:MK.

## 5 Alternatives

- 5.1 Do Nothing - this is not recommended as this option does not deliver the AMHT museum and deliver the social and economic benefits.
- 5.2 Grant the lease to AMHT for consideration - this will require AMHT paying a sum for the lease which reflects best consideration (s123 of the Local Government Act 1972), such sum being £120,000. This is not recommended as AMHT are a charitable organisation already reliant on benefactors to fund the museum. By granting a lease to AMHT at nil consideration in support of the benefits the museum will deliver is likely to help AMHT secure necessary funding from others if the Council and the Town Council are seen to offer their lands at undervalue, albeit a small contribution to the total cost of delivering the museum.
- 5.3 Grant the lease to AMHT at nil premium - this will deliver the AMHT museum along with the social and economic benefits and is the recommended option.

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### List of Annexes

Annex A	Lovat Meadow Site Plan
Annex B	Heads of Terms with AMHT (confidential)
Annex C	Town Council Allotment Plan
Annex D	AMHT Business Plan

### List of Background Papers - None



## DELEGATED DECISION 5 OCTOBER 2021

<b>Present:</b>	Councillor Middleton (Cabinet member for Resources), Councillor Wilson-Marklew (Cabinet member for Climate and Sustainability), P Thomas (Director - Planning and Placemaking), E Palmieri (Commercialisation Lead for Property), J Povey (Strategic Lead - Transport, Policy and Planning), R Singh-Johal (Interim Head of Legal Services) and J Crighton (Committee Manager)
<b>Also Present:</b>	Councillor R Bradburn and three members of the public

Item	Decision	Decision Maker	Documents / Representations Taken into Account
Road Safety, Walking and Cycling and Smarter Travel Strategy	That the Road Safety, Walking and Cycling Smarter Travel Strategy be adopted.	Councillor Wilson-Marklew (Cabinet member for Climate and Sustainability)	Report and representations from three members of the public
Disposal of Land in Newport Pagnell to the Aston Martin Heritage Trust to Construct the Aston Martin Museum	<ol style="list-style-type: none"> <li>1. That the public and press representatives be excluded from the meeting by virtue of Paragraph 3 (Information relating to the Financial or Business Affairs of the Authority) of Part 1 of Schedule 12A of the Local Government Act 1792, in order that the meeting may consider the Confidential Annex B to the report.</li> <li>2. That the draft Heads of Terms for leasing Lovat Meadow to Aston Martin Heritage Trust (AMHT), as contained in Annex B, be approved.</li> <li>3. That the Council agrees to enter into the lease and related agreements with AMHT to deliver the AMHT car museum.</li> </ol>	Councillor Middleton (Cabinet member for Resources)	Report

**DELEGATED DECISION  
5 OCTOBER 2021**

Item	Decision	Decision Maker	Documents / Representations Taken into Account
	<p>4. That the Council agrees to enter into any necessary agreements with Newport Pagnell Town Council for the purposes of the lease to AMHT to deliver the AMHT car museum.</p> <p>5. That the Director - Environment and Property, in consultation with the Cabinet member for Resources and the Director - Finance and Resources, be given delegated authority to agree any variations to the Heads of Terms with the AMHT as set out in the report, and to agree any other necessary documents and agreements to affect the decisions made pursuant to this report including those with Newport Pagnell Town Council.</p>		

A request to call-in the decision, bearing the names of two Members of the Council, the Chair or Clerk of a Parish or Town Council, or signed by twenty residents of Milton Keynes, should be sent to the Director Law and Governance, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ, Telephone: (01908) 254195 or e-mail [sharon.bridglalsingh@milton-keynes.gov.uk](mailto:sharon.bridglalsingh@milton-keynes.gov.uk) no later than **5.00 pm on Friday 15 October 2021**. In submitting the request to the Director Law and Governance for a decision to be called-in, the requester must specify reason/reasons for calling in the decision.

A form which twenty residents of Milton Keynes may complete to request that a decision is called in can be accessed from the link: <http://milton-keynes.cmis.uk.com/milton-keynes/PublicDocuments/Call In Request Form>