



CMK Town Council's submission re: Application 23/01739/FUL - Erection of up to 450 residential apartments (use class C3); a mobility hub; ground floor retail and leisure floorspace (use class E); and associated landscaping, drainage, access, parking and infrastructure (EIA development) for Campbell Park North Phase 1 Overgate Campbell Park Milton Keynes

CMK Town Council objects to the application on the material planning grounds cited below. If, notwithstanding our objections, Officers are minded to approve the application, we request that, as a major scheme, it is referred to the Planning Committee for determination, being contrary to policy.

Summary

The principle of the site being developed as a housing-led scheme, rather than as mixed-use development as required by previous development plan policy, is established by Plan:MK (2019). The site forms part of Campbell Park Northside (Site HS5) which is allocated for housing as set out in the Plan:MK proposals maps. The proposed residential use is therefore considered to be established in principle and is acceptable in those terms. However, in all other respects, the scheme needs to comply with the current development plan, that for consideration of development in Campbell Park Northside, comprises Plan:MK and the CMK Alliance Business Neighbourhood Development Plan (the CMK Alliance Plan). Whilst the applicant claims that the application complies with the development plan, detailed examination of the application shows that in respect of a raft of policies it does not.

CMK Town Council therefore requests that the application be **refused** due to the controversial nature of the proposals, which it considers to be in material conflict with both Plan:MK and the CMK Alliance Plan, particularly in respect of:

- Policy D1 of Plan:MK, having regard to the scale and nature of development proposed; and
- Policy CMKAP G9 of the CMK Neighbourhood Plan that requires that buildings over eight storeys **must** offer outstanding economic and social benefits to CMK and Milton Keynes as a whole.

A scheme that is essentially just a housing scheme (however good) cannot reach the bar of being considered exceptional. The mix needed to meet that bar requires something special.

Additionally the proposed development is neither in accordance with Policies D2, D3 and D7 of Plan:MK, and Policies G3, G4, G7, G9 and G10 of the CMK Alliance Plan, nor with relevant national policy.

The Grand Union Canal is not the River Thames and neither are the flanks of Campbell Park grid square 'Docklands'.

Planning context and detailed considerations

Plan:MK explains that: -

'The CMK Alliance Business Neighbourhood Development Plan celebrates CMK's distinct design, architecture and heritage alongside promoting its "emerging role as the centre of a prosperous and growing region, through greater and more diverse development..."
Plan:MK seeks to echo these sentiments in planning for the future of CMK. The flanks of Campbell Park will be developed for largely residential (C3) uses with other mixed uses appropriate to a residential area; these could include A1 (Shop Uses) to meet local needs, A2 (Financial and Professional Services uses), A3 (Restaurants and Cafes), A4 (Drinking Establishments), A5 (Hot Food Takeaways) B1 (Business uses), C1 (Hotels) and D1 uses including uses such as a health centre and a day nursery and D2 uses including such uses as gyms and areas for indoor or outdoor sports and recreation.'

Impact on the character of the area

Plan:MK Policies D1, D2 and D3 seek to ensure development proposals contribute positively to the surrounding local environment and character, and that buildings are of an appropriate scale in relation to the surrounding built environment, reflecting the aims of Section 12 of the NPPF and the NDG, as well as the New Residential Design Guide SPD.

Additionally, Plan:MK Policy D7 (Canalside Development) requires applications to demonstrate how new buildings should present active frontages to the canal and be in keeping with local character in terms of scale, design and materials, with the objective of ensuring Canalside development supports an improvement to the enjoyment of the waterway and surrounding area. The application fails to address this policy requirement.

The above is also reflected in Policies G1, G4, G7, G8, G9 and G10 of the CMK Alliance Plan.

Policy CMKAP G8 - Frontage development and historic planning guidance

It is a requirement of neighbourhood plans that they are in general conformity with the development plan current at the time of their adoption. For the CMK Alliance Plan, adopted in 2015, the development plan for CMK comprised the Core Strategy and the retained policies of the Local Plan (2005). That 2005 Local Plan explained that the design principles proposed in the Campbell Park Master Plan, prepared by Terry Farrell & Partners, has now been incorporated into the then Local Plan (Policy CC4 – Campbell Park Quarter refers).

One of the key principles contain in the Terry Farrell plan is that of frontage development. This is illustrated in the extract below of the Campbell Park Framework Master Plan, taken from supplementary planning guidance, contemporaneous with the 2005 Local Plan.

Figure 9.8 Urban Framework Plan - produced by Terry Farrell and Partners



Campbell Park Physical Mockup - produced by Terry Farrell and Partners

That principle of frontage development is reflected specifically in policy G8, requiring that:

- development is generally preferred to be in the form of perimeter development (ie frontage development) on Blocks and Blocklets facing the surrounding public realm, and private facilities such as servicing and parking yards located in the core of the development; and that
- development is to clearly define the edge of the public realm. Frontages shall be designed to appear continuous, without significant gaps.

The design policies of Plan:MK 2019 do not change this principle. Indeed, these design policies only serve to reinforce it further.

It can be seen from the extracts from the applicant's design and access statement below, that what is shown does not conform with the principles of frontage development.



Impact on Campbell Park

The site falls within the setting of Campbell Park; recognised in planning documents as being *'of national and international importance, being one of the largest and finest contemporary urban parks in Europe. It is the jewel in CMK's crown, beautifully maintained and managed'*. As a grade II registered park and garden, the Park is a designated heritage asset as defined in the

NPPF. The Park sits in Campbell Park grid square which, although formally part of Central Milton Keynes, forms a transition between the commercial, leisure and retail city centre through to the Grand Union Canal and the area beyond; the latter being characterised by development within landscaping and low height residential development.

Plan:MK Policy SD3 explains that the role of Campbell Park as the main city park will be maintained, and links to the park will be improved where opportunities arise, and that the impact of development proposals on the setting of the park will be considered in the determination of planning applications for those proposals.

The founding vision for parkland in Milton Keynes and by extension, the creation of Campbell Park, The Plan for Milton Keynes: Volume 2 (March 1970) at 1334, contains the following cautionary note: -

“It will be important to prevent their qualities of spaciousness and openness being destroyed (as in the central London parks) by too many and too obtrusive buildings within their view. On the whole those buildings which need the use of the parks should be sited along their edges ... and these, and others nearby, should generally be kept low and tucked away among trees. Buildings however are needed to punctuate the scene; and existing ones such as Walton Hall and Willen Church provide instructive examples: instructive in their small scale and in their siting on rising ground. Also it will be important to maintain as much as possible the expansiveness of view”

The collective effect of the material policy requirements listed previously in the summary response above, is that building should take the form of perimeter blocks that define the edge of the public realm and the relationship with the Grand Union Canal frontage. Previous studies and subsequent supplementary guidance concluded that the maximum height of buildings should be no more than 6 storeys generally, but with taller buildings at key gateway locations of up to 8 storeys.

The application, as submitted, takes the opposite approach, with the Phase 1 site taking the form of an extension to the listed Park, into which a cluster of very tall buildings has been arbitrarily dropped in. Not only is this approach contrary to policy but it weakens the Park, which is meant to be framed by the public realm, and the buildings that front that public realm which should be designed so that they appear continuous. Such tall buildings have an overbearing presence on the listed Park and the expansiveness of views, both from in the park itself and from its flanks and flanking boulevards. The following extracts from the application illustrate the overbearing presence on the Park and on the views.



Above illustrative masterplan view from the pond near the canal looking west showing the future context



Above illustrative masterplan view from the cricket ground looking north showing the future context



Housing mix and affordable housing

Being a fully built-to-rent scheme comprising principally one and two bed flats, the proposed mix does not accord with Policy HN1, with its expectation to secure a wider mix of tenure. In CMK, as a result of prior approvals for office to residential conversions together with many planning consents for new dwellings almost all being for 1 and 2 bed flats, in excess of 5000 flats now have a planning consent. Whilst the majority of the 5000+ approvals have yet to be built, it is self-evident that potentially there is a vast over-supply of flats in CMK. Not only is this scheme contrary to policy, the argument cannot be made that, in some way, the scheme is responding to an acute shortage of this type of accommodation in CMK.

The application proposes 140 discounted market rent (DMR) units out of 450 units, to meet the policy requirement of 31% of units set out in Plan:MK Policy HN2. However, the requirements of HN2 go further than that. The response from the Council's strategic housing team clearly sets out the full requirement for residential needs, in terms of affordable housing. Hence, for affordable housing provided at DMR, rent levels (including service charges) need to be set at 80% of market rents or the local Housing Allowance rates, whichever is the lowest, as set out in the response from the Council's Strategic Housing Unit.

Car Parking

The Town Council echoes the concerns of the Parks Trust in its response dated 14 September 2023. Those concerns are not repeated here, except to say that the requirements of the Council's Car Parking SPD, for build-to-rent apartments, are based on research undertaken by the Council's consultants for city centre locations. This site, whilst technically within CMK, is now in what is a residential district, remote from major services. In such a location, the demand for parking will undoubtedly be significantly higher.

Cycling

Green Lane, the historic country lane, between Great Linford and Woolstone runs roughly centrally, north-south, through the site. Many of these former country lanes in Milton Keynes now form part of the cities' strategic Redway network. Regrettably highway rights at this site were extinguished some years ago to make way for a hotel, that whilst it received a planning consent, was never built and the consent lapsed.

Local Plan Policy CT1 promotes a sustainable pattern of development, with one of its many aims being to provide coherent and direct cycling and walking networks, to provide a genuine alternative to the car. To support such an objective, the Council has adopted a Local Cycling and Walking Infrastructure Plan. If the Council really believes in its own plan, especially where it owns the land, it could take the opportunity when developing its own site to re-establish this part of the former Green Lane, incorporating it back into the local Redway network. The Redway connection, running through the existing underpass beneath Portway H5, already exists to facilitate this.

Private nature of the proposed development

The Town Council understands that the applicant intends that the internal streets, footways and landscaping, that forms what would normally be regarded as public realm, will remain totally private. All management and maintenance of the whole site, including parking controls and enforcement will be the responsibility of a management company. Areas of highways and landscaping will not be offered to MKCC for adoption. Such an arrangement is unprecedented within CMK and the Town Council believes it to be unrepresented anywhere in the borough, certainly on this scale.

To give effect to the intended, totally private, nature of the development, were the application to receive a planning consent, the arrangements to ensure that the associated private public realm is maintained to the required standards in perpetuity will need to be encapsulated in the Section 106 Agreement. Such an agreement will also need to address arrangements for storm and foul water drainage and other services, that would normally be the responsibility of statutory undertakers. In the event of potential approval, the Town Council requires advanced notification as to how this will be achieved, together with appropriate safeguards should, for example, the management company go into liquidation.

Conclusion

There are no material considerations considered to outweigh the conflicts with development plan policy and other concerns raised. The application should therefore be refused.