



For and on behalf of
Central Milton Keynes Town Council

Planning Application Review of Application Ref: PLN/2025/0703

Campbell Park Northside, Phases 2-5, Central Milton Keynes

**Prepared by
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APPENDICES

Appendix 1 Policies

1.0 INTRODUCTION

- 1.1 This Planning Application Review considers a planning application at Campbell Park Northside Phases 2-5, off Silbury Boulevard (“the Application Site”) on behalf of Central Milton Keynes Town Council (“CMKTC”).
- 1.2 The application reference is PLN/2025/0703 and the development description is:

“Outline permission (all matters reserved) for residential development, for a maximum of 1,850 dwellings inclusive of up to 300 later living units (use class C2/C3), up to 300 student accommodation units (sui generis), up to 1 ha of self-build land and up to 2,800 sq. m of non-residential floorspace (use class E and F)”
- 1.3 The application has been submitted by Made it Together and Urban Splash. Glenbrook are acting as the agents.
- 1.4 This Appraisal considers the application proposals and associated documents and their compliance with the adopted Neighbourhood Plan and Milton Keynes City Council’s adopted and emerging policy. This will include matters such as the proposed uses, the Illustrative Masterplan, and the adjacent Phase 1 application, which was refused, and the compliance with policies on principle and design. The review of the highways and transport aspects of the application will be light touch but a more detailed review by suitably qualified specialists can be requested, if required.
- 1.5 Consideration will also be given to any conditions which CMKTC may wish to propose as part of any future consultation response.

2.0 APPLICATION SITE

- 2.1 The Site lies to the south of Portway H5 and to the north of Silbury Boulevard with Campbell Park to the south. The Site is allocated as part of HS5 and is adjacent to the Phase 1 application which was refused (reference 24/01612/FUL) based on harm to heritage assets (namely Campbell Park) based on the Conservation Officer's remarks, despite the planning officer's report recommending approval.
- 2.2 The Site is currently a series of vacant plots which extend from Overgate in the East, excluding the Alliance Automotive Group building on Eskan Court/Pilgrim Street, and up to Adelphi Street in the West, excluding the existing development on Adelphi Street. There is scrub vegetation on the Site and a band of hedgerows interspersed with trees running East-West which is known as Common Lane. The Site extends to the south of Portway (excluding the sub-station) and to the north of Silbury Boulevard. There is a change in topography across the site sloping downwards from the northwest to southeast. Within the Site there blocklets which are defined by laid out roads, pathways and some mature planting between the northern and middle blocklets (Common Lane).
- 2.3 The latest application includes the parking areas and pavements which are already laid out to the south of the Site and abuts Silbury Boulevard. Skeldon Gate runs through the Site North to South. There is significant mature planting along Skeldon Gate and Portway which predominantly obscures any view of the site from those roads although there are clear views of the Site when viewed from the bridges over the MK redways. There is also mature planting along Silbury Boulevard, however there are more glimpsed views due to the number of vehicular and pedestrian entrances on to the Site from Silbury Boulevard.
- 2.4 There is existing development to the north of the Site on the northern side of H5 Portway in the area known as Downs Barn. The existing Adelphi Street development is highly visible from the site. This development is mainly 3 storeys in height and comprises modern homes many of which have first floor balconies, however these face internally into that development. Adelphi Street provides a barrier between the Site and the existing housing.
- 2.5 To the south lies Campbell Park. The Site can be seen from the fringes of Campbell Park, but once in the Park the topography means that there are currently very few opportunities to see the undeveloped Site from within the Park.

3.0 HERITAGE

- 3.1 There are no heritage assets on the site.

Surrounding Area

Campbell Park

- 3.2 Campbell Park is a Grade II listed Park and Garden. It was listed on 18th August 2020 and the list entry reads as follows:

“Reasons for Designation

The landscape of Campbell Park is included on the Register of Parks and Gardens at Grade II for the following principal reasons:

Historic interest

**Date and rarity: the park is one of the largest to be laid out in England in the C20 and C21 and takes influences from C18 and C19 landscapes and fuses them into a contemporary design;*

** Architectural / Archaeological interest: the design respects the natural landscape and the industrial archaeology of the Grand Union Canal but also forms a point of transfer between the city centre built on a grid pattern and the wide, natural landscape beyond. Its strong geometric forms are offset by a central pastoral landscape and the park is ‘magnificently generous and on the right scale for the city’ according to Pevsner and Williamson;*

** Social history: the design is representative of the pioneering spirit of Milton Keynes, taking pride in forging a dynamic city from a disparate group of people, who came together to establish their community in a new environment.*

Design interest

** Designers: the site represents the inspiration of Derek Walker, Stuart Moss crop and Andrew Mahaddie in designing a park which was to match the claims of Milton Keynes as ‘The Beautiful City’, and the detailed refinement and implementation by Neil Higson of that outline design;*

** Planning: the park forms a central feature in the unique plan of Milton Keynes, Britain’s most successful Post-War new town;*

** Planning: the incorporation of planting and planning to encourage biodiversity on this scale, from this date, and in the centre of a developing city, is notable;*

** Features: the site combines natural and artificial topography to produce an outstanding unified design, including earth moving, water features, the Grand Union Canal, a cricket pitch and an open-air auditorium and incorporates a series of sculptures from the 1990s onwards by noted artists;*

** Documentation: printed and manuscript background information exists for the design and financing of the parks in Milton Keynes, including autobiographical accounts by two of the designers, and gives a clear indication of the evolution of the plan for Campbell Park and its various alternative schemes (see SOURCES).*

Survival:

** the scheme as laid out in the master plan of 1980 has been little altered. When a feature such as the large, circular pond has been replaced by the Milton Keynes Rose, the new feature respects the spirit and form of the original.*

Group value:

** the park has group value with the Shopping Building, Midsummer Boulevard, which shares its sense of scale and generous use of space, and the Central Library, Silbury Boulevard (both Grade II)."*

- 3.3 The Listing, unusually, also contemplates future developments and their impact on Campbell Park as a heritage asset:

"Setting: the park forms the eastward extension of the town centre. The sites to the north and south were intended for high-value projects that would provide a worthy frame to the park but are still only partly developed. However, there is a major project in progress in the south-east corner of the park by the canal."

"VIEWS

"There are views west to the city with its skyline of modern buildings, and dramatic long views to the north-east and east across the river valley (though the river and Willen Lake are concealed by a road bridge). Views northwards are deliberately restricted by banking and the landscaping of the City Gardens, and to the south by trees (the Woodland Ridge). The effect may change dramatically once the land here is developed."

- 3.4 The connectivity between Campbell Park and the Canal, Tree Cathedral, Peace Pagoda and Willen Lake are also noted within the listing.

- 3.5 Within the listing the following sculptures/public art is listed:

- The Belvedere
- Milton Keynes Rose
- Cave
- Armillary Sphere
- Animals in War
- War Veteran
- Chain Reaction
- Circle Dance
- Head
- Gnomon (Shadow Caster)

- Onwards and Upwards

3.6 It is noted that *“many of the sculptures are tall and provide prominent features in the landscape as well as being works of art. Their scale and setting are reminiscent of obelisks, urns or figurative sculpture in C18 landscape design”*.

Other Heritage Assets in the Surrounding Area

3.7 The Shopping Building is Grade II listed, and the Central Library is also Grade II listed.

4.0 RELEVANT PLANNING HISTORY

Surrounding Area

- 4.1 The Application on land at Campbell Park Northside Phase 1, Overgate, Milton Keynes reference 24/01612/FUL was for:

“The construction of 397 residential apartments (use class C3), a canalside cafe (use class E), and a new pedestrian and cycle link through the site to connect the existing redway network with associated landscaping, drainage, access, parking and infrastructure. EIA development”

- 4.2 The application for Phase 1 was designed to integrate with this Phase 2-5 application and therefore the design principles are common across the phases.

- 4.3 The application was refused by the Planning Committee on 29th April 2025 for the following reason:

“The proposal would result in less than substantial harm, at the moderate level, to the Grade II Listed Register Park and Garden (Campbell Park). The public benefits arising are not considered to clearly and demonstrably outweigh the harm caused by the scale and massing, resulting in an incongruous, dominant, and isolated feature within key views and the experience of the lower park. The proposal is contrary to Policy HE1 of Plan:MK and Paragraph 215 of the National Planning Policy Framework (NPPF).”

- 4.4 This was contrary to the Case Officer's recommendation which was for approval despite the Conservation Officer's objection. The Planning Committee's reason for refusal follows the Conservation Officer's objection.

5.0 PROPOSALS

5.1 The proposals under application PLN/2025/0703 are in outline and are for:

- a maximum of 1,850 dwellings inclusive of up to 300 later living units (use class C2/C3), up to 300 student accommodation units (sui generis),
- up to 1 ha of self-build land
- and up to 2,800 sq. m of non-residential floorspace (use class E and F)”

5.2 The Illustrative Masterplan needs to be read in conjunction with the “Land Use and Maximum Building Heights Parameters Plan”. This denotes that there will be 5 different heights of development:

Type	Maximum Storeys	Location
Commercial and community	2	East and West of the Skeldon Gate/Silbury Boulevard roundabout
Mixed use (residential with ground floor commercial and community) including access, landscaping and associated infrastructure	4	Middle of each block.
Mixed use (residential with ground floor commercial and community) including access, landscaping and associated infrastructure	6	Perimeter blocks along Silbury Boulevard (set back by the car parking) and Portway and north of Alliance Automotive Building (other than those elements included below)
Mixed use (residential with ground floor commercial and community) including access, landscaping and associated infrastructure	9	East and West of Skeldon Gate from the north of the proposed commercial and community use, one half block west of the Skeldon Gate/Portway roundabout, one half block adjacent to Portway west of the overpass.
Public realm and highways infrastructure including landscaping and associated infrastructure	N/A	Along Silbury Boulevard other than the commercial and community units and incidental through the site.

6.0 PLANNING POLICY

6.1 The relevant Development Plan for the Site comprises the following policy documents:

- Plan: MK 2016-2031
- CMK Alliance Plan 2026 (“the CMKAP”)

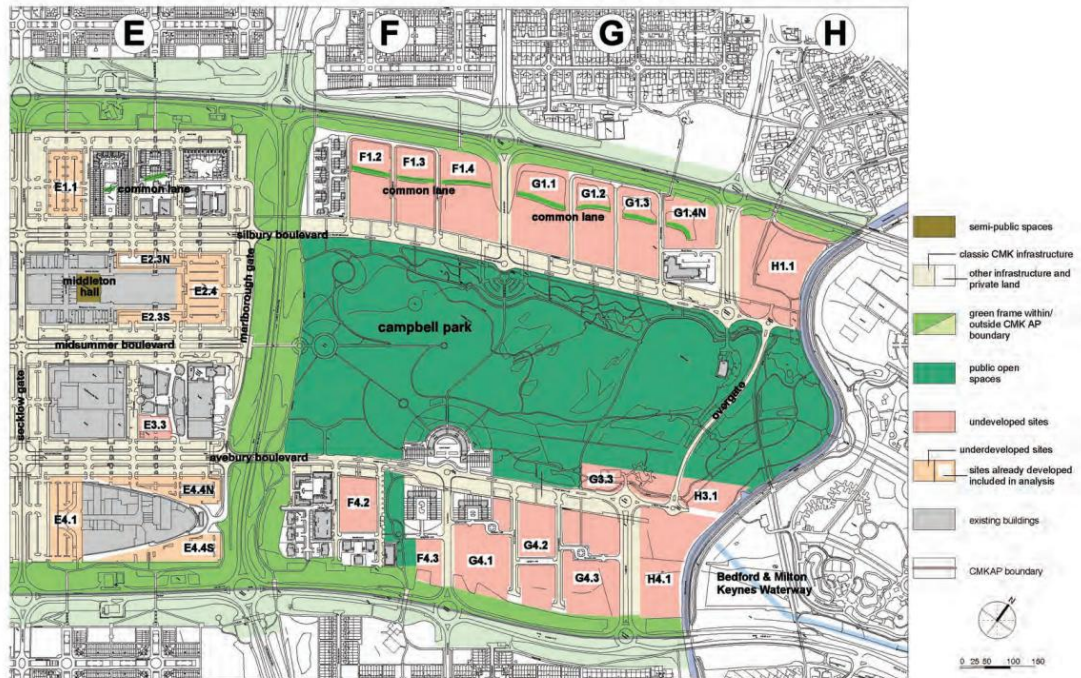
6.2 The Plan: MK was adopted after the CMKAP and therefore where there are conflicts it takes precedence.

6.3 There are also several Supplementary Planning Documents (“SPD”s) relevant to this application:

- Campbell Park Development Brief 2019 (“the CPDB”)
- New Residential Design Guide SPD 2012
- Planning Obligations SPD 2021
- Parking Standards SPD
- Health Impact Assessment SPD
- Biodiversity SPD
- Sustainable Construction SPD
- Transport and Sustainable Transport SPD
- Designing Dementia-friendly Neighbourhoods SPD 2022.

6.4 Nationally the National Planning Policy Framework 2024 (“the NPPF”) and the Planning Practice Guidance (“the PPG”) apply to the application.

6.5 Under the CMKAP the Site comprises all of block F and most of block G, specifically blocklets F1.2, F1.3, F1.4, G1.1, G1.2, G1.3 and G1.4N. The Common Lane runs through each blocklet approximately one third of the block from Portway.



6.6 Relevant policies are listed in Appendix 1.

7.0 CONSULTEE COMMENTS RECEIVED TO DATE

MKCC Countryside Officer

- 7.1 There is the potential for Great Crested Newts being present on site and therefore affected by the proposed development. Guidance has been provided on how to deal with this issue.

Natural England

- 7.2 No objection.

MKCC Lead Local Flood Authority

- 7.3 Outdated flood mapping has been used and there are new standards for sustainable drainage systems which were published in June 2025. Discharge into the Grand Union Canal is proposed. The LLFA requires further information on the required volume of attenuation and the preliminary SuDS (Sustainable Urban Drainage System) Proposals making sure that they are up to date with the most recent Illustrative Masterplan and clearly annotated to demonstrate the volume available in each feature and ensuring that the provisional location of underground storage crates does not conflict with buildings.

Historic England

- 7.4 Declined to comment.

Canal and River Trust

- 7.5 Requested a contribution for the Canal towpath and for discussions regarding discharge into the Canal to take place as early as possible.

Bedford Group of Drainage Boards

- 7.6 No comment outside of the Board's district.

Public Comments

- 7.7 So far three members of the public have commented stating:
- Concerns over the maximum height of 9 stories potentially affecting the privacy of existing residents
 - A condition on noise to ensure on-plot noise mitigation measures based on an updated noise survey
 - Supporting the medium heights of buildings and being symmetrical as being more in keeping with MK.

8.0 ANALYSIS

Principle and Quantum

8.1 The proposals are for

- 1,850 dwellings of which:
 - Up to 300 later living units C2/C3
 - Up to 300 Student accommodation units sui generis
 - 1 ha self build land
- 2,800 sqm of non-residential floorspace (Use classes E and F).

8.2 Plan:MK Policy DS2 allocates Campbell Park Northside, of which the Site forms the significant majority, for circa 1,500 dwellings (table 4.3). This supersedes the CMKAP proposal for a major development of strategic significance (paragraph 7.45) as per paragraph 099 Reference ID: 41-099-20190509 of the Planning Practice Guidance as the MK: Plan was adopted after the CMKAP.

8.3 The Planning Statement sets out that should fewer later living or fewer student accommodation units be delivered then more C3 housing would be delivered on the site.

8.4 The Design and Access Statement at Section 6.1, however states that the Illustrative Masterplan is based on up to 1502 homes in total and a mix of 25% houses and 75% apartments – including family housing, later living, student, self-build and affordable homes and a range of densities of 100-200 dwellings per hectare. Whether the Site can deliver the 1,850 dwellings proposed whilst adhering to policy should be demonstrated in the Illustrative Masterplan and Parameters otherwise the application should be refused. If this cannot be demonstrated, then given that it is in excess of the 1,500 dwellings in the allocation this quantum of development may be overdevelopment of this site and unacceptable harm to the residents on Adelphi Street – discussed further below. However, the density is in accordance with the CMKAP Policy G10. The effect of this in relation to Adelphi Street is considered below.

8.5 Although a general need for student accommodation has been identified within the Plan:MK Policy SD3 is somewhat unclear as to whether it is suitable on this Site. Under Plan: MK Policy HN8 it needs to be demonstrated that the Site is in a sustainable and appropriate location for students to travel sustainably to their courses. It also needs to be demonstrated under Policy HN8 that the proposals for student accommodation would integrate well with the wider community on this Site and that there would not be significant adverse impacts on

other residents. CMKTC may wish to consider whether it supports student accommodation on the site on that basis that the proposals for student accommodation on this Site could be contrary to Policy SD3 and in light of the lack of details on the current need for student accommodation, the accessibility to higher and further education institutions from the Site and evidence that there would be no significant adverse impact on the wider community, as required by NH8. However no such information has been included in the application contrary to NH8.

- 8.6 Policy SD3(A) states that the MKCC will seek to accommodate homes, offices, retail, higher education uses (including student accommodation), food, drink and hotel, support services, green infrastructure and biodiversity within the Central Milton Keynes area. Policy SD3(B) specifies that for this Site: *“Blocks F1.2-F1.4, G1.1-G1.3, G1.4N and H1.1 on the northern side of Campbell Park will be developed for largely residential purposes together with other mixed uses appropriate to a residential area”*.
- 8.7 It seems reasonable that a local centre in Use Classes E and F would be an appropriate mixed use for a residential site, and this is included in the CPDB and CMKAP G6. It appears that under Policy ER10 an assessment should be undertaken to demonstrate to what extent this will compete with the Shopping Centre and Primary Shopping Area. Policy ER10 states for proposals for retail and leisure development that on *“sites that are not specifically allocated for such uses”* an impact assessment should be carried out. While Policy SD3 states that MKCC will seek to provide new retail space within Central Milton Keynes it does not specifically allocate it on this site. CMKTC may wish to raise that an impact assessment of the retail and leisure proposals should be undertaken by the Applicant and submitted to MKCC under Plan: MK Policy ER10. It would also be prudent for a condition to be attached to any consent with regard to the Local Centre to ensure that the impact assessment is adhered to, to protect the primary shopping area, also under policy ER10 of the Plan: MK.
- 8.8 From the information provided it is unclear how the self-built plots would integrate into to overall Site, given the typologies proposed in the Illustrative Masterplan and the Strategic Design Code which appear to be taller blocks and terraced housing. Further information should be provided on how this can be fulfilled and a condition secured.
- 8.9 The principle of residential is considered acceptable on this Site. However, the amount of residential in the proposal has not been demonstrated to be appropriate, an

impact assessment is required for the E and F use class development, and it also needs to be considered whether CMKTC considers student accommodation is appropriate on this Site.

8.10 ***Heights and Layout***

The Applicant's Planning Statement states that there is no adopted MKCC policy or guidance that restricts the height of development in Milton Keynes or proposes a suitable height for development in certain locations (paragraph 6.24). Policy G9 of the CMKAP is not cited and has not been taken into account, however the CMKAP forms part of the adopted Development Plan and is a valid policy consideration. The adopted design brief also includes guidance on density and the locations of taller buildings. This has not been considered as part of the application.

8.11 The CPDB proposes lower density housing north of the Common Lane Hedgerow. The design proposals have the lower density housing the middle of the site with the highest density (9 storeys) along Portway. The CPDB does note that there is a desire to maximise the number of residents who are able to overlook the park so some taller buildings will be sought on the southern edge to frame the park and some taller buildings further away which the Illustrative Masterplan does achieve.

8.12 Policy G9(e) requires buildings over 8 storeys above natural ground level to offer outstanding economic and social benefits to CMK and Milton Keynes and avoid any adverse impact including overshadowing and restricting daylight in the public realm and in adjacent developments or adjacent developments by overlooking.

8.13 Paragraph 6.78 of the Planning Statement states that lower densities will be located near to the Adelphi Street dwellings and that limits on heights and distances will be secured by the parameters plan. It concludes that *"the proposal will not impact the privacy of the existing occupiers, nor will the proposed development cause any overshadowing or loss of daylight"*. However, this does not correlate with the Illustrative Masterplan, or the Daylight/Sunlight study provided as part of the application. Clarity should be given on this point before determination of the application.

8.14 There are adverse impacts caused by the development on and off site (including by the 6 storey buildings). It is a question for CMKTC whether the economic and social impacts are outstanding, however it is likely that this bar has not been met as it is very high.

Highways and public rights of way

- 8.15 The Proposals use the existing Grid roads and street layout. The proposals also use the existing car parking on the south of the Site. There are some proposed amendments to Skeldon Gate and to Common Lane.

Skeldon Gate

- 8.16 The CPDB considers the potential for a grade separated crossing between the Blocks F and G, however, the proposals are for Skeldon Gate to be narrowed and to provide an At Grade crossing. The CPDB is very specific in stating at paragraph 5.3.4 that Skeldon Gate is an important vehicular route passing through the site and that pedestrian accessibility to/from Skeldon Gate should be physically prevented to discourage pedestrians crossing the Gate at grade and to avoid vehicles stopping to pick up/drop off directly from the Gate. Pedestrian routes should focus on the existing redways which should be updated as per the CPDB. The proposals are contrary to the CPDB and to the CMKAP G1 which seeks to preserve the MK infrastructure.

Common Lane

- 8.17 The CPDB states that the frontages onto Common Lane are important and that this public open space will form “*an important pedestrian route and development should address the route such that it feels overlooked and safe*” (paragraph 5.3.6). The proposals however have Common Lane at the rear of development, and it is a private space not a public open space for wider pedestrian use.
- 8.18 There is a lack of clarity on the extent of Common Lane within the information provided in the Application. Within the Design and Access Statement at point 3.3 and 2.4 the hedgerow for Common Lane extends across the whole of the Site and the text on page 27 confirms this:

“...Common Lane runs through the entire site from Adelphi Street to Overgate on the east. The Common Lane hedgerow is to be incorporated into each of the shared gardens and provides a pedestrian route for residents to move through each garden.”

- 8.19 However, the Illustrative Masterplan shows two distinct portions of Common Lane one in each Block, however two buildings appear to be indicatively sited on parts of Common Lane. These would impede this connection across the Site and which lie on Common Lane (see Figure 1 below):



Figure 1: Extract from Illustrative Masterplan- Location of buildings which may be impeding Common Lane

8.20 This is contrary to Policy G3 in the CMKAP and the CPDB.

8.21 It also states on page 21 of the Design and Access Statement (PDF Page 23), that Common Lane will be private access only. On Page 27 it goes onto say:

“The Common Lane hedgerow is to be incorporated into each of the shared gardens and provides a pedestrian route for residents to move through each garden.”

8.22 Buildings should not be sited over Common Lane. A condition should be placed on any planning permission stating that Common Lane must be preserved and that no building should take place on Common Lane as per CMKAP G3. CMKTC may wish to consider if it supports Common Lane being a private pedestrian route only.

Relationship with Adelphi Street and existing development

8.23 CPDB states that contemporary buildings in a landscape setting are appropriate on the site. Paragraph 5.5.1 states that it needs a strong character, but the site is fairly isolated so there is no clear contextual design which needs to be considered.

8.24 The CPDB states that the relationship with Adelphi Street requires careful consideration. The

Illustrative Masterplan indicates that there will be tall buildings adjacent to Adephi Street, and this should be reconsidered given the impact on the relationship with Adephi Street.

Heritage

- 8.25 There will undoubtedly be an impact on the setting of Campbell Park to the north from the development of the Application Site and this is recognised in the Listing.
- 8.26 The Heritage Impact Assessment (“the HIA”) also recognises this and concludes that the assessment will affect the dramatic qualities of Campbell Park as a Registered Park and Garden as views including of the Light Pyramid and views from the Belvedere may be diluted by these new buildings.
- 8.27 The HIA states that the Light Pyramid is not listed in its own right, which is the case, but it does still form part of the setting of the Registered Park and Garden and is included in the listing for Campbell Park.
- 8.28 The long-distance views of the Site and proposals from within Campbell Park are referenced in the HIA and there is no doubt that the proposals will be visible from Campbell Park, however development of the Site with taller buildings is envisaged in the CPDB. The building heights however are above the 8 storey norm in the CMKAP G9, however one storey would likely have a minimal effect.
- 8.29 It is fair to conclude that the harm is less than substantial. The test in the NPPF and Policy HE1 of the Plan: MK is whether the public benefit outweighs the harm, and this is a matter of planning judgement for CMKTC in its response.

Amenity Space

- 8.30 A mixture of private gardens and semi-private open space is proposed across the site. The ethos of the Site from the CPDB is the concept of “living in the park” by “bringing the park into the development” and this is followed through in the Strategic Design Brief and this approach to gardens and semi-private open space would seem to adhere to this principle. The only caveat is Common Lane as mentioned above, where CMKTC may want to take a view if it is acceptable for Common Lane to be semi-private.

Active Frontages and Weather Protection

- 8.31 The Land Use and Maximum Building Heights Parameters Plan key suggests that all

buildings will have ground floor community and commercial uses. Active frontages should be secured by condition in accordance with Figure 10 of the CMKAP ensuring that active frontages are provided on the north-south axis between blocklets.

- 8.32 The MK Alliance Plan Figure 10 sets out the expectations for active frontages with weather protection on the site. These run north-south in each block. However, the Illustrative Masterplan does not make provision for weather protection along these routes. Weather protection over pavements should be secured by condition.

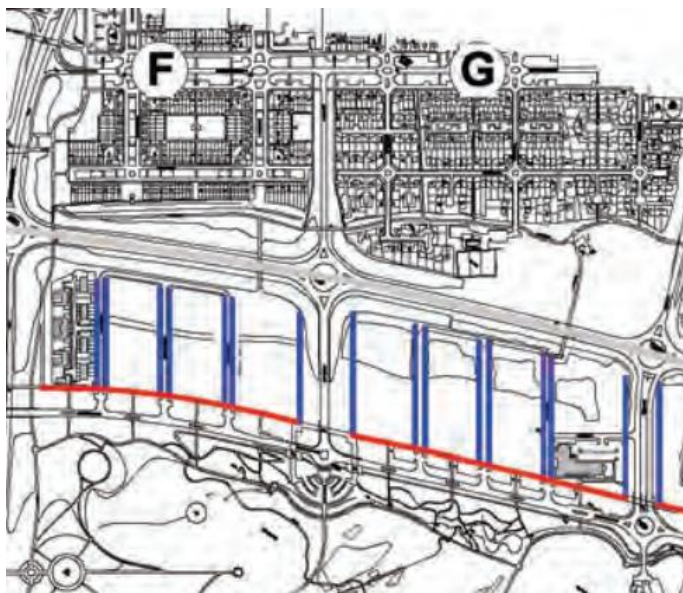


Figure 2: Detail from Figure 10 MK Alliance Plot – Blue indicating active frontages with weather protection

Sustainability

- 8.33 The Daylight Sunlight report considered the daylight and sunlight impacts and notes that there will be significant impacts on the neighbouring properties in Adelphi Street. A redesign of the Site and storey heights in this area could avoid this.
- 8.34 The report includes analysis of the proposed dwellings and states that they will all be acceptable, however, for lower-level habitable rooms in the higher buildings on the northern side of the higher buildings there is a risk that these rooms will not have sufficient light.
- 8.35 Additionally, there is no analysis of the light within the gardens and shared open spaces proposed on Site. Under Policy D5, this information should be provided and a condition to protect the daylight and sunlight into existing properties if it is deemed acceptable.

Noise

- 8.36 The Noise survey was undertaken in February 2023 and is therefore more than 2 years old. The internal noise levels should be secured by condition. It is noted that some gardens on the Illustrative Masterplan would fail external noise levels but that alternative amenity space would be available. Again, provision and access of alternatives would need to be secured by condition.

Trees

- 8.37 There is a modest amount of planting which is being removed to facilitate the development. Given that the Site is currently overgrown this may be expected to a certain extent. There are also buildings which are proposed to build over root protection areas, including for the Common Lane. The Council's Tree Officer should be encouraged to respond. We can commission further work in house on this point if it is something that the CMKTC feels strongly about.
- 8.38 In the meantime, we suggest that a comment should be made that root protection areas should be respected and not built on, particularly on Common Lane. While the Illustrative Masterplan is only indicative, once consent is given for the amount of development in the development description, the loss of trees and root protection areas may be inevitable and therefore CMKTC may wish to object on the basis that the proposals are over development of the Site on the proposed parameters.

Key Focal Area/Local Centre

- 8.39 The new hub is along the Silbury Boulevard Skeldon Gate junction in accordance with the CPDB, however as stated above CMKTC may want to consider whether it should comment that an impact assessment undertaken to ensure that the proposals do not adversely affect the Shopping Centre and Primary Shopping Area as per Policy ER10 of the Plan: MK as this site is not specifically allocated for retail or leisure.
- 8.40 The local centre relates well with the concept of living in the park and adheres to design principles set out in policy, although weather protection should be secured by condition as stated above and the crossing also needs to be considered as above.

Car Parking

- 8.41 Policy G8 states that private facilities such as servicing and parking yards should be located in the core of the development. It is not clear from the proposal where service access to the

local centre will be and this should be considered carefully as part of the detailed design.

- 8.42 The CPDB also sets out that the existing car parking on Silbury Boulevard does not provide good connectivity to Campbell Park and that this area could be reimagined: page 50 of the Strategic Design Guide mains the status quo contrary to the CPDB and this is a missed opportunity.

Flood Risk

- 8.43 It appears that the latest EA mapping has not been used as per the Local Lead Flood Authority comments, and this is contrary to the NPPF requirements. The Report states on page 2 that it dated 2024 and at paragraph 2.6 it is stated that the report is based on modelling from February 2024 by JBA for Milton Keynes Council. The flood maps for planning were updated in March 2025 and therefore this flood mapping should be used. While it would appear that there are not significant changes, it should be confirmed by the Applicant's flood consultants whether there have been any changes or not.

Strategic Design Code

- 8.44 The Strategic Design Code ("the SDC") set out the mandatory and recommended design principles for any reserved matters applications. However, the proposals are not wholly in accordance with the policies of the Plan: MK, the CMKAP or the CPDB.
- 8.45 Key omissions and contradictions are:
- Page 20 Skeldon Gate Re-Imagined: the SDC recommends narrowing Skeldon Gate contrary to the grid system of MK and proposes a new surface level pedestrian crossing. The CPDB states that new crossing should not be at grade.
 - P22 and P39 the lack of weather protection on pedestrian routes contrary to CMKAP Policy G7
 - P32 Portway- the SDC states that buildings must be between 6-9 storeys, however this is contrary to the CPDB which envisages lower density housing north of Common Lane. However, these proposals do allow a maximum number of residents to have views of Campbell Park which is in conjunction with the CPDB.
 - PP28-P32: F1.1A a 6-9 storey key building on this blocklet is considered to potentially cause harm to the existing residents of Adelphi in terms of overbearing, overlooking, loss of privacy and loss of Daylight and Sunlight.
 - P36 Street Typologies should include north-south tree lining in the mandatory section on all of the streets including the "proposed connector streets". North-south trees should be included in the Design Code along the existing streets in chapter 4 Open Space Typologies as per CMKAP G1 which provides for "tree-lined North Row and South Rows).
 - P39 Weather Protection should be mandatory in the Local Centre.

- P39 Skeldon Gate reduction scheme is contrary to CMKAP.
- The SDC should make clear how the SDC parameters can work with self-builds.
- P62 and 72 Mandatory for Common Lane to be a semi-private access only- this is contrary to the CPDB.
- Page 58 Common Lane should be preserved in its entirety and buildings impeding this should be removed.
- Page 74 Redway access by way of steps which is not cycle or disability friendly
- Adherence to the Dementia Friendly Neighbourhoods SPD should be included in the SDC.

Dementia Friendly Design SPD

- 8.46 This application is in outline, however given that the proposals include up to 300 units of extra care (use class C2/C3 dwellings) a condition should be included that the detailed design must adhere to the requirements of the Dementia Friendly Design SPD.

9.0 CONCLUSION

- 9.1 The Proposals are for the development of the majority of Blocks F1 and G1 which are allocated for 1,500 residential dwellings (including the Canalside development) in the Plan: MK. There is an Adopted Design Brief – the Campbell Park Design Brief, and the CMKAP also applies to the Site.
- 9.2 The proposals are for a mixed community; however, the student accommodation needs to be carefully considered in light of Policy DS3 and Policy NH8 of the Plan: MK.
- 9.3 The quantum of development should be clarified: the Illustrative Masterplan and Design and Access Statement have been based on 1,502 dwellings not the proposed 1,850 dwellings. It is not clear, therefore, if the proposed quantum of development can be satisfactorily accommodated on the Site. Additionally, a retail impact assessment should be provided for the local centre to protect the Shopping Centre, as per Policy ER10.
- 9.4 There is a need to ensure that the most up to date technical data is used and the Flood Mapping is not the most up to date mapping contrary to the NPPF. There will be a need to update the noise data for the reserved matters applications.
- 9.5 The impact of existing properties, and proposed gardens and semi-private space must be more carefully considered as the Illustrative Masterplan, Parameters Plan, Strategic Design Code and the Daylight and Sunlight Report appear to negatively on the residential amenity of the existing properties on Adelphi Street.
- 9.6 In terms of the design the proposals seek to fulfil the concept of “living in the park” by bringing the park into the Site and the Strategic Design Code includes this ethos and there are connections via the Redways into Campbell Park. These must be accessible to all including cyclists, for families and those with disabilities.
- 9.7 There is significant planting across the Site as envisaged in the CPDB and the CMKAP, particularly along the streets and within the Site there is private and semi-private open space.
- 9.8 However, there are missed opportunities in terms of ensuring that Common Lane is accessible as a public right of way as per the CPDB, and the car parking along Silbury Boulevard has not been reimagined in the Illustrative Masterplan, Design and Access Statement or the Strategic Design Code contrary to the CPDB to deliver a less harsh frontage

to the development.

- 9.9 Active frontages are being proposed which is in accordance with CMKAP G7, however weather protection should be secured by condition, also as per CMKAP G7. The proposals, however, including the narrowing of Skeldon Gate which is contrary to the CMKAP Policy G1 “Classic MK Infrastructure Policy” which notes the importance of the Grid system. The CMKAP and CPDB also state that pedestrian crossing should not be at grade over Skeldon Gate, however the proposals include a new crossing at grade. These proposals are contrary to adopted Policy.
- 9.10 The same heritage criteria as the Phase 1 Campbell Park Northside application apply. That application was refused for the following reason: *“The proposal would result in less than substantial harm, at the moderate level, to the Grade II Listed Register Park and Garden (Campbell Park). The public benefits arising are not considered to clearly and demonstrably outweigh the harm caused by the scale and massing, resulting in an incongruous, dominant, and isolated feature within key views and the experience of the lower park. The proposal is contrary to Policy HE1 of Plan:MK and Paragraph 215 of the National Planning Policy Framework (NPPF).”*
- 9.11 The Phase 1 proposals were 6-12 storeys in height and comprised five blocks. Phase 1 and Phases 2-5 were designed together, and while those proposals were in detail, in comparison to this application which is in outline, given the design commonality is it likely that the proposals would have the same level of harm to Campbell Park. It is a question of planning judgment as to whether this is offset by the public benefits of the development.
- 9.12 Overall the principle of residential development is acceptable, however the site is not entirely in accordance with existing policies in the Plan: MK, CMKAP or the adopted Campbell Park Design Brief and there are missed opportunities to improve certain elements of the Site and there are some unacceptable impacts on existing development.

APPENDIX 1

Plan: MK Policies

- **DS1 Place-Making Principles for Development**
- **SD3 Central Milton Keynes – Growth and Areas of Change**
 - 3,535 additional new homes in the Central MK area including the Site (F1.2, - F1.4 and G1.1-G1.3, G1.4N). This area will be mainly residential with some appropriate mixed uses.
 - Access to Campbell Park will be considered.
 - The impact of development proposals on the setting of the park will be considered in the determination of planning applications for those proposals.
- **SD4 Central Milton Keynes- Connectivity**
 - The following will be supported: improvements to smart, shared and sustainability mobility, enhanced, improved and prioritisation of pedestrian/cycle routes, public open spaces and squares and green infrastructure, integration of public transport
- **ER9 Character and function of the Shopping Hierarchy**
 - Planning permission will be granted for retail and service uses to service new residential development the scale of which to cater for day to day shopping needs of the population and not draw trade from the wider area.
- **ER10 Assessing Edge of Centre and Out of Centre Proposals**
 - Retail impact assessments will be required for retail uses over 900sqm gross floorspace (paragraph 6.48) on sites not specifically allocated for such uses.
 - The impact on the existing, committed and planning public and private investment in the Primary Shopping Area will be assessed, and will the impact of the proposal on the vitality and viability of the Primary Shopping Area including local consumer choice and trade in the Primary Shopping Area.
- **ER14 New Local Centres**
 - New local centres are required in new residential developments over 500 dwellings and the majority of new dwellings should be within a 500m walking distance of a Local Centre
- **ER18 Non-Retail uses on Ground Floors in Town Centres**
 - The use classes have changed since the Policy was adopted. Instead of Use Class A there is now Use Class E.
 - The policy encourages retail use classes on the ground floor and residential (C3), professional services and office floorspace above ground floor level.
 - Deadfrontages are to be avoided
- **HN1 Housing Mix and Density**
 - The housing mix should reflect the latest evidence of housing need and market demand, needs of different household types, avoid overconcentration of certain housing types in an area. Range of net densities across the development

- Consider the nature of the scheme and whether variety is feasible/appropriate e.g. sheltered housing.
 - Low or no parking proposals must demonstrate access to public transport.
 - Low open space proposals must demonstrate proposed private and/or shared outdoor amenity space is of exceptional quality and that there is a sufficient quantity of open space within a reasonable proximity to the site
- **HN2 Affordable Housing**
 - 31% of homes should be affordable (minimum).
 - 25% units should be affordable rent and 5% Social Rent. 6% Shared Ownership
 - Affordable housing should be spread across the site and be viable
- **HN3 Supported and Specialist Housing**
 - Expected on larger residential sites, commensurate to scale and nature.
 - C2 bedspaces will be strongly supported if they are in a form which is needs evident at the time, good accessibility to facilities and public transport, not and over concentration of that type of accommodation, primary health providers can sustainably support the occupiers.
- **NH8 Student Accommodation**
 - Off-campus will be supported where it is highly accessible to a main university of college campus by walking, cycling and public transport and provides sufficient on-site car parking. The development must not on its own or cumulatively have a significant adverse impact on the amenity of residents or local communities or the character of the area.
- **CT1 Sustainable Transport Network**
- **CT2 Movement and Access**
- **CT3 Walking and Cycling**
 - Lighting, wayfinding, pick up points, charging and secure parking are also important factors.
 - Improving routes within Central MK, the National Cycle Network and the Redway Super Route Network are prioritised.
- **CT5 Public Transport**
- **CT 6 Low Emission Vehicles**
- **CT8 Grid Road Network**
 - Grid network is a characteristic of MK- Council will conserve and enhance the grid system.
 - Complementary redways allows for safe and efficient movement of cyclists and pedestrians with grade separated crossings of the grid roads via bridge or underpasses.
 - D)7 points of connection can be designed in, however the overall 60m width should not prejudice future traffic systems.

- **CT10 Parking Provision**
 - Full parking standards
 - All residential, retail and employment uses should provide electric vehicle charging points.
- **EH6 Delivery of Health Facilities in New Development**
 - Health Impact Assessment required
- **EH7 Promoting Healthy Communities**
- **INF1 Delivering Infrastructure**
- **F1 Managing Flood Risk**
- **FR2 Sustainable Drainage Systems and Integrated Flood Risk Management**
- **NE2 Protected Species and Priority Species and Habitats**
- **NE3 Biodiversity and Geological Enhancement**
- **NE4 Green Infrastructure**
- **NE5 Conserving and Enhancing Landscape Character**
 - This includes locally distinctive natural and man-made features
- **NE6 Environmental Pollution**
- **HE1 Heritage and Development**
 - Permission for proposals that cause less than substantial harm to a designated heritage asset will only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme. This includes the character appearance, special interest and setting of the asset and historic environment.
- **L2 Protection of Open Space and Existing Facilities**
- **L4 Public Open Space Provision in New Estates**
 - Must align to NE4 and national standards.
- **D1 Designing a High Quality Place**
 - Development proposals as a whole should respond appropriately to the site and surrounding context.
- **D2 Creating a Positive Character**
- **D3 Design of Buildings**
 - Common character across both sides of the street
 - Tall buildings may require a Landscape and Visual Impact Assessment. Tall buildings need to demonstrate (amongst other criteria): clustering, positive

addition to the skyline, townscape and landscape including coherence, protect important views, minimise shadowing other buildings and public open space.

- **D4 Innovative Design and Construction**
 - Encourage 10% of dwellings to feature innovative design and modern methods of construction.
- **D5 Amenity and Street Scene**
 - Good levels of sunlight and daylight in buildings, open space and gardens
 - Dual aspect dwellings for ventilation
 - Reasonable degree of privacy in living and main garden areas and communal gardens should provide spaces for privacy or seclusion for residents
 - New development is not overbearing upon existing buildings and open spaces
 - Outlook and visual amenity from within buildings and garden areas should be satisfactory
- **CC1 Public Art**
- **CC2 Location of Community Facilities**
- **CC4 New Community Facilities**
- **SC1 Sustainable Construction**
- **Appendix C Open Space and Recreation Facility Provision**

Central Milton Keynes Alliance Plan (CMKAP)

9.13 The following policies apply to this application:

- G1 Classic MK Infrastructure
- G2 Local list of buildings and Public art
- G3 Retention of structural tree planting and landscaping forming part of Classic MK infrastructure.
- G4 Campbell Park and its setting
- G5 The Green Frame
- G6 Mixed Use
- G7 Active Frontages
- G8 Development Blocks and Blocklets
- G9 Design and Height of Buildings
- G10 Residential Development

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