

CMK Town Council's Response to Planning application PLN/2025/0703: 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). Campbell Park Northside Phases 2-5

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 it is referred to DCC or DCP for determination.

Meanwhile, if the Case Officer wishes to discuss the reasons for our objections, and any potential amendments to the application and/or conditions that might be imposed, please contact the Town Council before the application is determined.

Overview

Firstly, the Town Council would wish to query whether dealing with an outline planning application of this size whilst also accepting a full application for Phase One (which forms part of the overall scheme as articulated in the Campbell Park Development Brief (CPDB)) is an appropriate way of addressing the site as a whole. Alternatively, the whole of Campbell Park North should be subject to a Hybrid application with the whole site in outline and a detailed application for Phase 1. This would enable consultees to consider the whole development against the parameters established in the approved brief (CPBD 2019). It is noted that a number of the principles within the adopted Development Brief do not appear to have been followed.

The Town Council has sought advice from **DLP** planning consultants, and their full report accompanies this objection, references within the following relate to specific paragraphs within the report.

CMK Town Council **OBJECTS** to the above application for the following planning reasons:-

Numbers of dwellings and height

The number of dwellings proposed across the five phases of development is unclear and varies between 1502 and circa 2200. The D&A states that the Illustrative Masterplan is based on up to 1502 homes, which is in line with the Plan:MK Policy DS2. The current application for phases 2-5 states that 1850 dwellings are planned for this location. Adding the current 397 dwellings applied for within the Full application for Phase One (which may be reduced) this effectively means that the proposed dwellings have risen from 1502 to 2247. This increase in density by stealth clearly represents an over-development of the site. (*Ref DLP para 8.4*).

The emerging MK City Plan 2050 designates Campbell Park as a low to mid rise development area within its Tall Buildings Strategy. This clearly states that the flanks of Campbell Park should limit development to 6 storeys. Within the Outline planning application there are a number of areas projected to reach 9 storeys. It is appreciated that the emerging MK City Plan 2050 is at an early stage but this is a clear indicator of the direction of travel on building heights in the area. *(Ref MKCity Plan Reg18 draft page 55 figure 5, 'Tall Buildings Strategy')*.

The Council has already determined that the detailed application for Phase 1 of Campbell Park North should be refused citing "The proposal would result in moderate level harm to the Grade II Listed Campbell Park. The proposal is contrary to Policy HE1 of Plan: MK and paragraph 215 of the NPPF". We contend that this decision should be a consideration in assessing this outline application which proposes a number of blocks up to 9 storeys in a more prominent position related to the central area of Campbell Park.

Additionally, the applicant's refusal to give consideration to the CMKAP Policy G9 with regard to building in excess of 8 storeys, and the adopted CPDB's guidance on density and taller building locations is of concern. *(Ref DLP 8.10-8.12)*.

Proposed 'at-grade' crossing at Skelton Gate

The Town Council strongly objects to the 'at grade' crossing proposals at the Skeldon Gate roundabout. It is unclear whether this proposal will also incorporate closure of underpass access. The CPDB is very clear that Skeldon Gate is an important vehicular route and that pedestrian accessibility should be physically prevented to discourage pedestrians and cyclists from crossing the Gate 'at grade'. The proposals are contrary to both the CPDB and CMKAP G1 and with the increased usage of these Redway crossings as the development is built the proposal will create a danger. There should be no acceptance of the removal of the current segregated underpass crossings of Silbury Boulevard, Skeldon Gate and Over Gate. *(Ref DLP 8.16)* which is contrary to both the CMKAP and CPDP which require crossings of grid roads to be segregated and in the context of the overall grid road network the gates are considered to be grid roads. The proposed narrowing of Skeldon Gate is contrary to policy, "Classic CMK Infrastructure Policy" CMKAP Policy G1.

This proposal and the lack of clarity regarding the underpass is of great concern to the Town Council, who have requested a more detailed analysis of the proposals that the proposals will have on traffic, pedestrian and cycling movements in the wider area from its planning consultant, which will form the basis of the further submission to be lodged shortly.

Other matters

Retail

Whilst the Town Council welcomes the proposals for a local centre, the presence of this along the highway would, it is felt, create a 'choke point' with delivery and shopping customers causing issues on Silbury Boulevard and Skeldon Gate. It is felt that 'corner shop', small local centres at either end of the development integrated within the housing would be a far better option. For retail development of this scale there should be a full retail analysis to justify development of this scale demonstrating the likely demand and potential impacts on other surrounding retail outlets which would alleviate any concerns about conflict with (and possible objections from) Centre:MK (*Ref DLP 8.7 clarifies this point further*).

Weather protection

The CMKAP Figure 10 sets out the expectations for weather protection north-south on the site. This does not appear to have been considered in the Illustrative Masterplan, and should be secured by condition. (*Ref DLP 8.32*).

Common Lane

It is essential that the 'Common Lane' route through the development is fully protected and not breached by development. It needs to be maintained as a public right of way throughout its length in perpetuity. This is contrary to Page 21 of the D&A which states that it will be incorporated into shared gardens "provid(ing) a pedestrian route **for residents**" (our emphasis). A condition will be required to ensure permeability for all on this route. (*Ref DLP 8.17-22*).

The existing mature hedgerow on Common Lane contains a considerable number of mature trees which need to be protected with adequate tree protection measures. This applies to all existing trees on the site and this should be secured by condition.

Self-build, student and elderly accommodation

Councillors have a concern that vague residential uses are being proposed. There needs to be greater justification and evidence of the need for student accommodation and housing for older people. We are concerned that this is another avenue to increase density and height by stealth as these uses may prove unviable and be converted to standard residential uses.

Councillors object to the inclusion of student housing in the outline mix of uses as there is no justification for it and it is not an appropriate location.

Councillors would support some housing for later living but the quantum of units proposed should be justified by an analysis of demand in this location.

There is no clarity on where and how the self-build units will be located. Also, self-builds tend to be standard housing detached family houses, not blocks of flats, thus putting further pressure on the remainder of the site with higher densities and height to enable this space to be successfully used for that purpose and projected density volumes met. This should be conditioned. *(Ref DLP 8.8).*

There is no evidence that student accommodation is required at this juncture, and, given the lack of proximity, current or proposed, of higher education within the vicinity, this does not seem to be a practical use of space within this development. *(Ref DLP 8.5).*

Delivery and access

A comprehensive delivery/access plan should be produced to enable an understanding of how fast food/Amazon etc deliveries can be made within the development and how the retail centre is to be serviced and how car parking for customers is to be accommodated *(Ref DLP 8.41).*

Adelphi Street

Councillors are concerned about the proposals causing damage to the residents of Adelphi Street through loss of daylight and sunlight and overlooking. The Planning statement states that lower densities will be located near to the Adelphi Street dwellings. However, this does not correlate with the Illustrative Masterplan or the daylight/sunlight study provided within the application. Clarity on these points will be required *(Ref DLP 8.13 & 8.33).*

Sports and leisure

In a development of this size it is expected that sports and leisure facilities should be provided within the scheme. These would be a combination of MUGAs and small play areas located close to each residential area. No reference to this provision is made throughout the application, or in the Illustrative Masterplan. This needs to be addressed, as the overall size of the development exceeds many of the surrounding estates, which have this provision in-built. *(The MKCC Play Area Action Plan 2025-2035 provides detail).*

Car Parking

The Illustrative Masterplan indicates that the existing parking along Silbury Boulevard will be retained. This is public parking and is used by the public and serves Campbell Park. There is no reference as to how the parking needs of the residential development will be met, therefore councillors would expect that the parking standards applicable to new suburban residential developments outside CMK are applied *(Zone 2 in the SPD2023)*. None of the existing public parking along Silbury Boulevard should be designated for residents only, therefore all new housing should have its own dedicated parking adjacent to the dwellings in accordance with the SPD. *(MKCC Adopted Parking Standards 2023).*

