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Planning Statement

The Lakes Estate, Bletchley

On behalf of Milton Keynes Council

Date: April 2020

Document reference: YMK-MKR-HTA-P-Planning Statement



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The Lakes Estate Planning Statement

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1.0 Executive Summary

- 1.1 This Planning Statement is submitted in support of a hybrid planning application for the comprehensive redevelopment of the Lakes Estate, Bletchley (hereafter referred to as the 'site'). The planning application has been prepared on behalf of Milton Keynes Council.
- 1.2 Milton Keynes Council's aspiration for the site is to transform the current estate which was originally designed in the 1970's for the then 'Motor Age' to bring it to a more prosperous future in the 'Sustainable Age'. This vision has been set out so this significant project can contribute to the three overall aims of the Milton Keynes Council: to be a place of opportunities, to be an affordable place and to be a healthy place.
- 1.3 The hybrid application seeks to secure outline consent for development relating to the future phases, securing details of layout, scale and means of access, whilst reserving matters to do with appearance and landscaping.
- 1.4 Detailed planning permission is sought for Phase A of the application. This proposes 308 new homes, 160sqm flexible retail floorspace (Use Class A1-A5), 613sqm community hub floorspace (Use Class D2), 220sqm light industrial floorspace (Use Class B1c), 200sqm for a nursery (Use Class D1) and an energy centre, an energy centre and estate-wide environmental improvements which form a suite of public realm and landscaping enhancements.
- 1.5 Outline permission is sought for Phase B of the application. This encompasses access, layout and scale for Area B of Serpentine Court which will provide approximately 281 new homes and 756sqm of flexible retail floorspace (Use Class A1-A5). Details relating to appearance and landscaping are reserved.
- 1.6 The process of preparing these development proposals has been community-led, building upon the work done by residents as part of the Lakes Estate Neighbourhood Plan which allocated land at a number of infill sites for new housing. The design team have engaged in extensive public consultation and worked collaboratively with Milton Keynes Council (MKC) officers, specialists and local businesses to create proposals which will improve and enhance the wider estate.
- 1.7 Collectively, all phases of the development, including the detailed and outline applications will deliver 589 homes, 1,136sqm of retail re-provision, 613sqm of community uses, 200sqm for a nursery and a new energy centre.
- 1.8 Overall, the proposals will deliver a wide range of planning and regeneration benefits in terms of redeveloping Serpentine Court and providing much needed high-quality housing elsewhere in the estate, a good proportion of which will be affordable and family housing. The estate-wide environmental improvements will act as a catalyst for the continued improved of the estate.

2.0 Introduction

- 2.1 This Planning Statement has been prepared by HTA Design LLP to support a hybrid planning application submitted to Milton Keynes Council (MKC). It seeks to provide new homes on four infill sites for existing residents and create a new local centre and homes as part of the comprehensive redevelopment of Serpentine Court. The application also proposes the re-provision and improvement of existing retail and commercial uses, as well as a suite of estate-wide enhancements to public realm with new play facilities, landscaping improvements and high-quality walking and cycling routes.

Development Description and Scope of Application

- 2.2 The hybrid planning application seeks consent for the following:
- (1) Detailed consent for the development of 'Phase A' adjacent to Serpentine Court to provide 308 new residential dwellings (Use Class C3), 160sqm flexible retail floorspace (Use Class A1-A5), 613sqm community hub floorspace (Use Class D2), 220sqm light industrial floorspace (Use Class B1c), 200sqm for a nursery (Use Class D1) and an energy centre, and the development of the four sites at Drayton Road, Stoke Road, Land off Burnmoor Close and Melfort Drive to provide new residential homes (Use Class C3), estate-wide public realm and landscape improvements, new and reconfigured car parking and cycle parking.
- (2) Outline consent for the demolition of Serpentine Court, and the redevelopment of 'Phase B' of Serpentine Court to provide 217 new residential dwellings (Use Class C3), an extra care facility providing 64 homes (Use Class C2), 756sqm of flexible retail floorspace (Use Class A1-A5), car parking, cycle parking and associated landscaping.
- 2.3 Phase A is illustrated in Figure 1. Estate-wide environmental improvements are sought under Phase A of this application forms the areas marked Area C within Figure 1.
- 2.4 As part of Phase A of the existing Serpentine Court will be demolished and replaced with residential development to provide a total of 116 new residential homes (Use Class C3) and 1,193sqm of non-residential space.
- 2.5 Prior to the demolition of Serpentine Court, existing residents will be relocated to one of four resettlement sites. 192 new homes are proposed through the development of these four infill sites:
1. Drayton Road (34 new homes);
 2. Stoke Road (90 new homes);
 3. Land off of Burnmoor Close (6 new homes);

4. Melfort Drive (62 new homes).

These resettlement sites were identified for development within the Lakes Estate Neighbourhood Plan and will enable residents of Serpentine Court to be rehoused on the Lakes Estate to allow for redevelopment of Serpentine Court. Phase A will be accompanied by a suite of public realm and landscape improvements on each site as well as on the wider estate, as part of an estate-wide environmental improvements package.

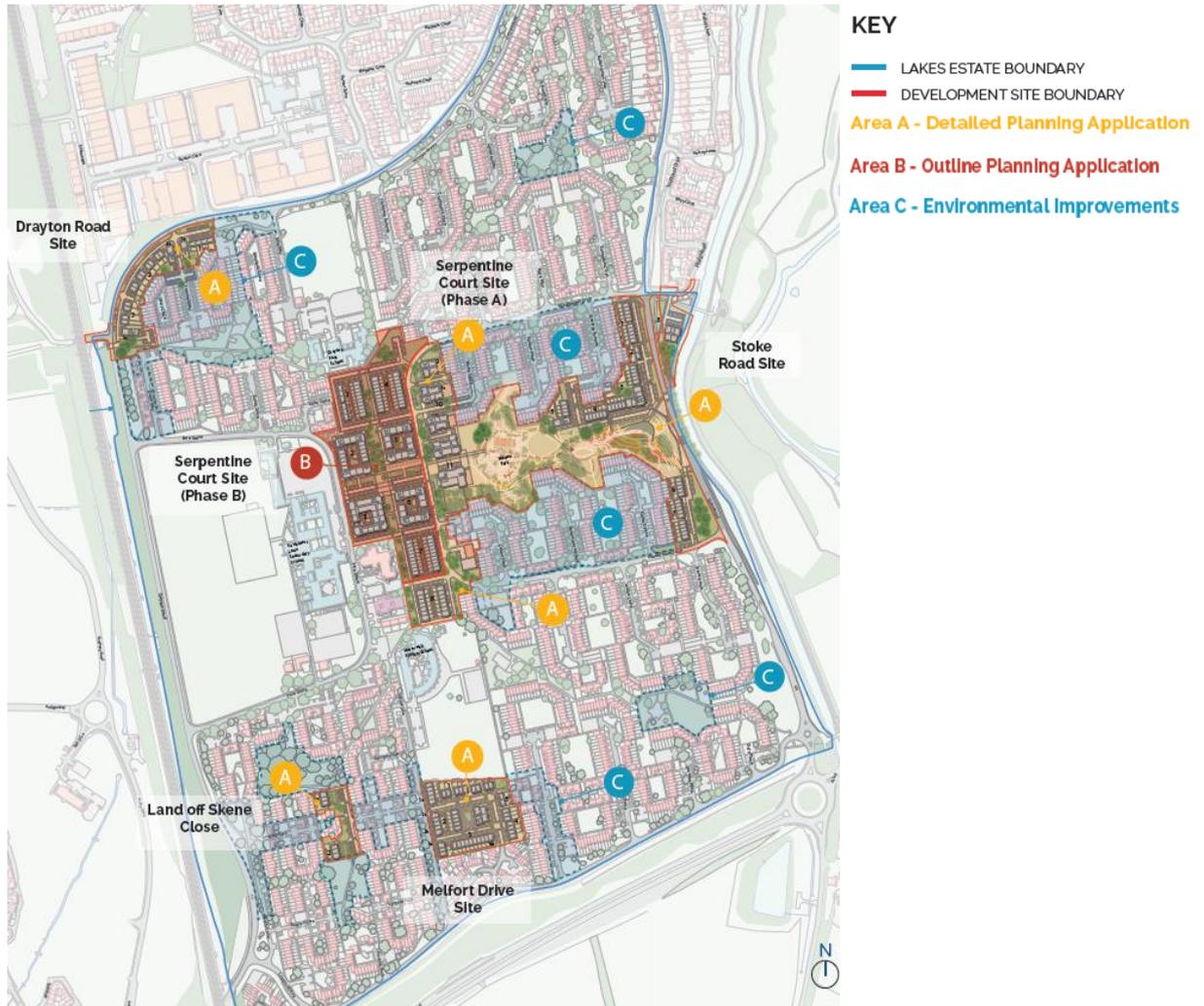


Figure 1: Outline application, detailed application and environmental improvement boundaries

- 2.6 Outline planning consent is sought for the remaining majority of the Serpentine Court application site (Area B in Figure 1) which will be Phase B of the development. This will secure details of layout, scale and means of access whilst reserving matters to do with appearance and landscaping.
- 2.7 Phase B comprises the demolition of the existing buildings at Serpentine Court, and the construction of residential development to provide a total of

217 new residential homes (Use Class C3), an extra care facility (Use Class C2) providing 64 new homes and 756sqm of retail space (Use Class A1-A5).

2.8 The scope of this application has been discussed and agreed during the pre-application process with MKC Planning Officers.

2.9 The purpose of this Statement is to assess the proposed development against relevant policies in the statutory development plan, having regard to other material planning considerations and other relevant statutory tests. It also includes a section which explains the engagement process with MKC and the public prior to the submission of the planning application.

Supporting Documents

2.10 This Planning Statement deals with the material planning issues which need to be considered through the determination process and should be read in conjunction with the supporting documents submitted as part of this application.

2.11 The range of supporting documents submitted was agreed with the case officer during the pre-application process. The supporting information provided is listed below. All documents provide details relating to both the outline application and the detailed application unless otherwise stated.

- Application Form and Certifications, by HTA Design LLP;
- CIL Additional Information Requirements Form, by HTA Design LLP;
- Covering Letter, by HTA Design LLP;
- Draft Section 106 Heads of Terms, as part of this Planning Statement by HTA Design LLP;
- Arboricultural Impact Assessment and Tree Survey, by Steve Jowers Associates Ltd;
- Daylight and Sunlight Assessment, by HTA Design LLP;
- Delivery and Service Management Plan, by ITP Ltd;
- Design and Access Statement (DAS), by HTA Design LLP, including:
 - Landscape Visual Impact Assessment;
 - Open Space Assessment.
- Drawings Package, by HTA Design LLP, including:
 - 1:2500 Site Location Plan;
 - Indicative Phasing Plan;

- Schedule of Accommodation, including number of homes and tenure mix;
- Proposed Tenure Plan;
- Topographical Survey;
- Flat and House Type Plans.
- Ecological Impact Assessment, by CSA Environmental;
- Financial Viability Appraisal exercise, by Milton Keynes Council;
- Flood Risk Assessment and Outline Drainage Strategy, by WSP;
- Geo-Environmental Preliminary Risk Assessment, by WSP;
- Planning Statement (including Affordable Housing Statement), by HTA Design LLP;
- Statement of Community Involvement, by HTA Design LLP;
- Sustainability Assessment, by HTA Design LLP;
- Transport Assessment, by ITP Ltd;
- Framework Travel Plan, by ITP Ltd; and
- Tree Survey, by Barton Hyett.

2.12 It was agreed with the case officer during the pre-application process that an Outline Construction Management Plan could be secured by condition.

2.13 A copy of the Drawing Schedule detailing all plans and drawings submitted in support of the application is provided.

Structure of the Report

2.14 The Statement is divided in the following sections:

- Section 3.0 - Background to proposals
- Section 4.0 - Description of the site and surroundings;
- Section 5.0 - Description of the proposed development;
- Section 6.0 - Outline of pre-application consultation;
- Section 7.0 - Outline of relevant national, regional and local planning policy and guidance;
- Section 9.0 - Assessment of planning assessment of proposals; and
- Section 8.0 - Summary and conclusions.

3.0 Background to the Proposals

- 3.1 The proposals build upon a significant body of work that has been developed in collaboration with residents of the estate and Milton Keynes Council over a number of years. The proposals stem from development sites first identified within the Lakes Estate Neighbourhood Plan, which is a part of the development plan for Milton Keynes. This was a grassroots resident-led initiative which explored opportunities to provide new homes on the estate.



Figure 1: Development Opportunity sites identified within the Lakes Estate Neighbourhood Plan (Source: Milton-keynes.gov.uk)

Approach to Regeneration

- 3.2 Milton Keynes Council's objective is to undertake the regeneration of its existing estates to contribute to a net increase in the number of affordable homes over the Local Plan period (2016-2031). The Council's strategy is to first and foremost deliver new homes that are affordable and improve the

condition of the estates. Housing estates are to be brought forward by the Council's regeneration programme, Your:MK, subject to local referendum. Your:MK is a partnership between Milton Keynes Council and Mears Group to manage the delivery of the Council's new build and regeneration function.

Background to the Lakes Estate Neighbourhood Plan

- 3.3 The Lakes Estate Neighbourhood Plan was prepared by the Lakes Estate Regeneration Steering Group and the Lakes Estate Neighbourhood Plan Task and Finish Group. The Steering Group and Task and Finish Group were both appointed by Bletchley and Fenny Stratford Town Council who were the qualifying body for the preparation of the neighbourhood plan. The plan was developed over a period of four years before adoption by Milton Keynes Council in October 2015.
- 3.4 The plan was developed over a period of four years and was adopted by Milton Keynes Council in October 2015.
- 3.5 It aimed to work with the local Lakes Estate residents to allow them to plan collaboratively and proactively in the face of the existing and future challenges for the Estate. This includes residents having some control over where development goes, what it looks like and who it would be for. It helped to highlight which aspects the community would want to conserve and retain, and which aspects people wished to see improved.
- 3.6 The proposals within this application have built on the aspirations from this grass roots, residential led plan to create deliverable transformation and enhancements across the Estate.

4.0 Site and Surroundings

Location

- 4.1 The site comprises the land and buildings within the Lakes Estate, situated in the ward of Bletchley East. The estate is located to the south of Milton Keynes, approximately 7km south from the city centre; the existing community considers itself part of Bletchley. It is bounded by the residential homes within Water Eaton to the north, with Bletchley beyond this, the Grand Union Canal to the east and the new development coming forward at Eaton Leys (see paragraph 4.26 within Section 4 for further details of these proposals), the A4146 to the south and the West Coast Mainline Railway and the relatively recent residential development at Newton Leys to the west.
- 4.2 The entire estate is approximately 104ha, however not all of it is proposed to be developed under these proposals. Phase A is approximately 15.14ha, which comprises:
- Serpentine Court Phase A - 2.58ha;
 - Stoke Road - 2.7ha;
 - Drayton Road - 1.24ha;
 - Burnmoor Close - 0.45ha;
 - Melfort Drive - 1.41ha, and;
 - The estate-wide environmental improvements, which cover 6.76ha.
- 4.3 The area of developed land within Phase A excluding the areas for the estate-wide environmental improvements is approximately 8.38ha.
- 4.4 Phase B comprises 4.01ha of land which currently forms the majority of Serpentine Court as existing.
- 4.5 The primary existing land use on the Lakes Estate is residential. However, the estate also includes a small number of local retail and commercial uses within Serpentine Court towards the centre of the estate. There are also a number of other uses on the estate, which include:
- Three schools - Drayton Park School, Sir Herbert Leon Academy and Water Hall Primary School;
 - The Spotlight community centre;
 - The Warren community centre & nursery and youth centre;
 - Leon Leisure Centre;
 - A pharmacy;

- A launderette;
- A post office.



Image 1: Aerial view of the site from the south-west

- 4.6 The Lakes Estate contains 2,245 homes at present. 2011 Census data estimates an average household size in the ward of 2.25 people per household, suggesting a total population living on the estate of approximately 5,055 people.

Lakes Estate Design

- 4.7 The Estate was originally conceived as an ‘overspill’ estate to alleviate the poor living conditions of those living in London after the Second World War. The land which the Lakes Estate was built on was previously owned by two local charities. The original estate was constructed in the late 1960s and early 1970s, being completed in the mid-1970s.

- 4.8 The estate is divided into four quarters of low-density two-storey housing set in a 'Radburn'-style layout around Serpentine Court, which forms the 'central superblock'. The 'Radburn' design principles were realised through the homes being built to higher specifications than was normal at the time. This included larger room sizes, flat roofs to maximise views of the Grand Union Canal to the east and Aylesbury Vale to the south and blow air central heating. Serpentine Court comprises of 6-storey slab blocks of flats, and the remainder of the Estate is generally formed of low-rise 2-storey 'Radburn' style houses.
- 4.9 These design principles have led to the emergence of a number of challenging issues on the estate over time; it created areas of public space which were difficult to maintain and there are stretches of 'dead' frontages which do not provide natural surveillance as they are not overlooked by the homes. This also contributes to residents not having a sense of ownership over these spaces, leading to them being further underutilised and subject to crime and vandalism.
- 4.10 Such issues are evident within the Lakes Estate, which is also located within the most deprived 10% of areas in England. Approximately 49% of children in the Estate live in poverty, and unemployment is significantly higher than the national average.

Local Context and Character

- 4.11 The surrounding area predominantly contains low rise, low density residential uses to the north and west, with open green space to the south and east beyond the A4146 and the Grand Union Canal respectively. These residential homes are generally 1-2 storeys, however there are taller 3-4 storey blocks of flats within Newton Leys, and some 3-storey non-residential buildings to the north of the estate associated with the Premier Academy. Drayton Road, which bounds the site to the north, and Stoke Road, which bounds the site to the east, are both fronted by residential homes of 2 storeys.
- 4.12 In terms of access to open space, the estate itself has a wide range of external amenity space which varies in terms of scale and character. The key areas and types of space include Warren Park, the diagonal pedestrian routes through to the four corners of the estate from Serpentine Court, the communal green squares and paths fronting the homes, and the green verges which act as buffers between homes and roads through the estate.
- 4.13 The area is reasonably well served in terms of convenience retail provision through a large supermarket within the Newton Leys development to the west of the estate as well as Bletchley town centre and Milton Keynes further north. Within the estate, the retail offer is weak given that all retail uses except for one shop have shut down.

- 4.14 There are a number of schools and community uses both within the estate and to the north which also serve Bletchley, Water Eaton and Fenny Stratford.

Connectivity

- 4.15 The Estate benefits from a good level of public transport access, which provide access to a wide range of employment, retail and leisure uses within Milton Keynes and the surrounding area. This is primarily through the bus network, which operates several high-frequency routes through the Estate to a range of destinations including Milton Keynes, Bletchley Railway Station, Wolverton, Newton Leys and Newport Pagnell. There are a number of bus stops within the Estate.
- 4.16 Bletchley Railway Station is located approximately 1.4km north-west of the Estate (around a 24-minute walk), and is on the West Coast Main Line, Marston Vale line West London Route. Rail services operate to a range of destinations including London Euston, Clapham Junction, Milton Keynes, Crewe and Bedford. Future rail connectivity will improve significantly with the completion of the East-West Railway, which will link Oxford to Cambridge via Bedford and Bletchley through high-speed rail services.
- 4.17 The Estate also has a good level of walking and cycle connectivity within itself and to the local area. There is an extensive network of pedestrian routes and footpaths which promote permeability and north-south connectivity. National Cycle Network 6 (which connects Derby and Luton) also runs through the Estate, intersecting with Cycle Route 51 (which connected Harwich to Cambridge and Oxford). There are also a number of routes which are part of the Milton Keynes Redway System ('Redways'), which are shared-use paths for cyclists and pedestrians. Due to the lack of vehicle permeability East-West through the estate, walking and cycling are more convenient for journeys within the estate to avoid convoluted car journeys.
- 4.18 Further detailed information on public transport access, walking and cycle accessibility can be found within the Transport Assessment prepared by ITP.

Planning Designations

- 4.19 The site is covered by a number of planning designations as set out within the borough's adopted policies maps, as illustrated in Figure 3.

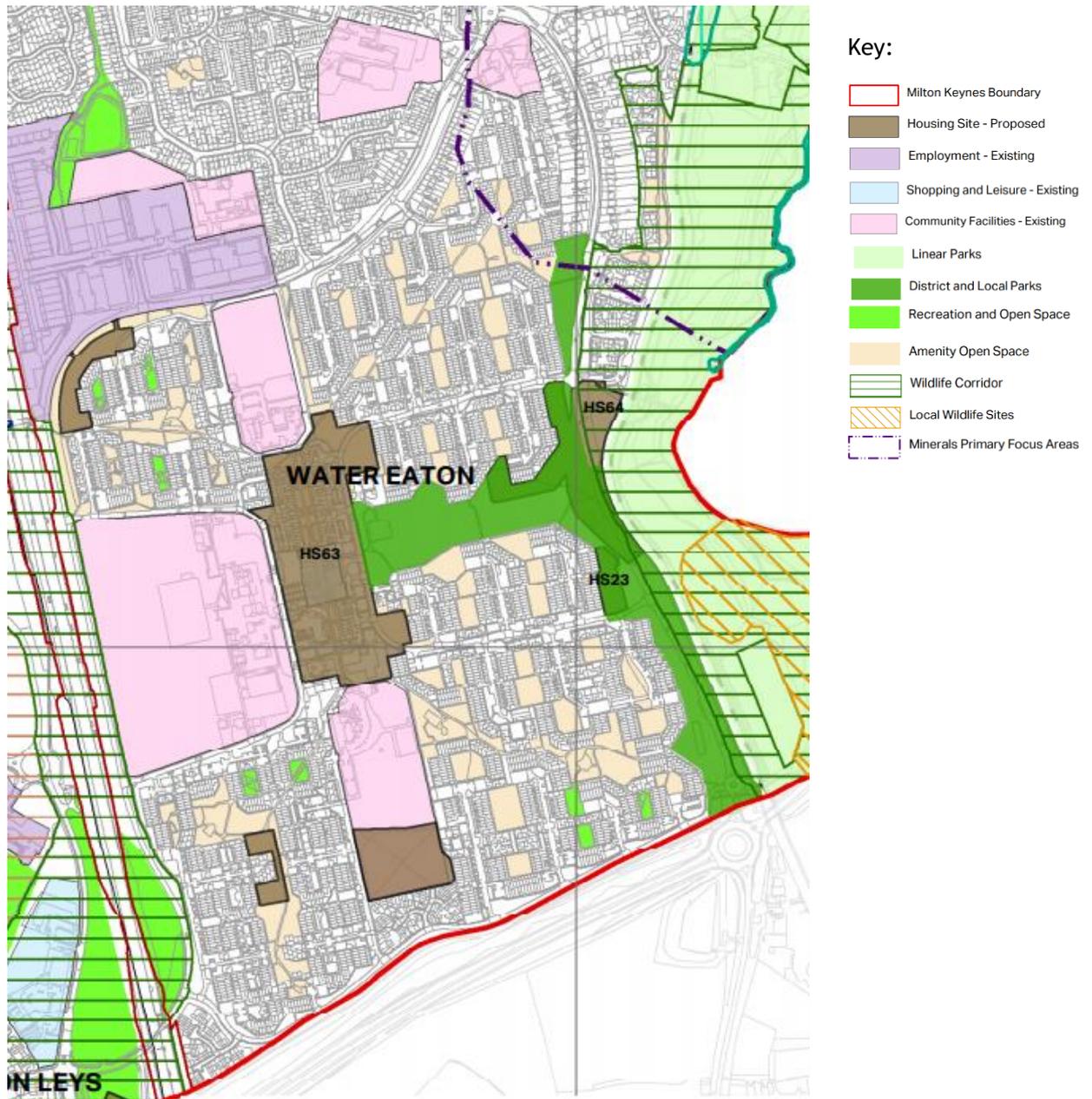


Figure 3: Plan:MK Planning Designations (Source: Milton-keynes.gov.uk)

- 4.20 The majority of the land which falls within the remit of both the outline and detailed applications (see Figure 1 within Section 2) is designated as proposed housing sites. This includes the four infill sites which form a part of the detailed application, however as illustrated in Figure 3 the western section of the Stoke Road development site falls within the District and Local Parks designation. This is where the existing land currently forms a part of Warren Park. There is a need to deliver new homes on the estate before the demolition of Serpentine Court, as proposed within Phase B of the development.
- 4.21 All three schools and their associated land are designated as existing community facilities. In addition, many of the amenity spaces across the

estate - including the internal residential courtyard areas - are designated as amenity open spaces, and more specific areas of outdoor leisure are designated as recreation and open spaces.

4.22 The Environment Agency’s flood map for planning shows the site lies within Flood Zone 1, which represents a ‘low risk’ of fluvial and tidal flooding as illustrated within Figure 4. In regard to surface water flooding, the majority of site is ‘very low’ risk. However, some areas towards the Stoke Road development site, which are closer to the Grand Union Canal, are of ‘high’ and ‘medium’ risk. This is shown in Figure 5. A Flood Risk Assessment and Outline Drainage Strategy has been prepared which contains further detail on the assessment of flood risk to the site and how this will be mitigated.

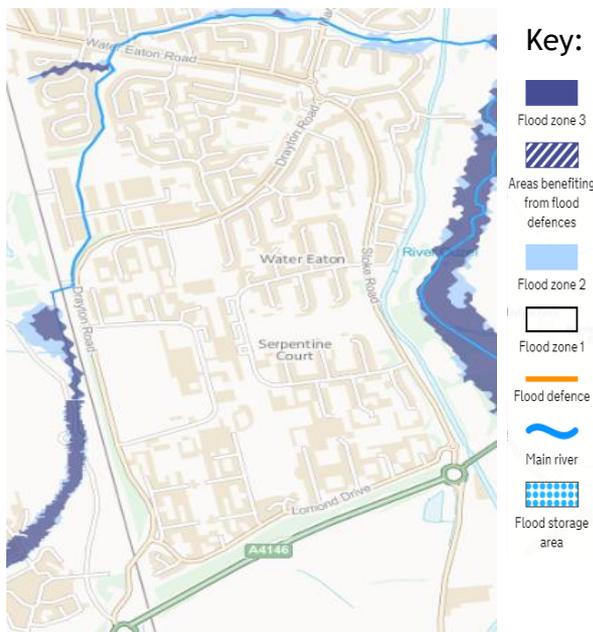


Figure 4: Flood Map for Planning (Source: flood-map-for-planning.service.gov.uk)

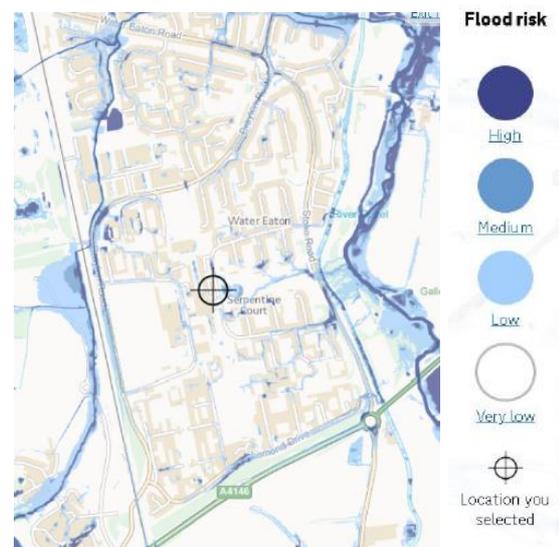


Figure 5: Risk of Flooding from Surface Water Map (Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>)

4.23 The Estate is not within or adjacent to a Conservation Area (the closest being the Bletchley Conservation Area, which is over 1km away from the site at the nearest point), however there is a listed building (Sycamore Farmhouse) which falls within the site ownership boundary towards the north-eastern tip of the site. This building is part of a cluster of listed buildings, as illustrated within Figure 6, but the others are not within the site boundary. These are located a substantial distance from the proposed development sites and will not be affected.

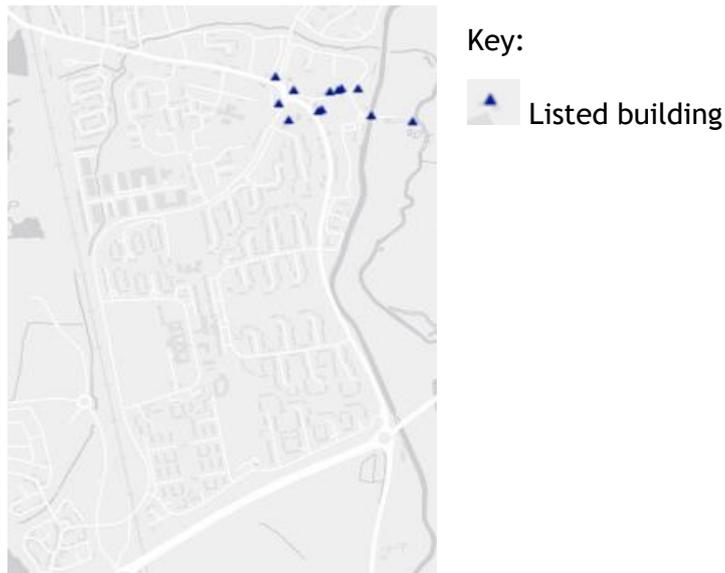


Figure 6: National Heritage List - Map (Source: historicengland.org.uk)

Planning History

- 4.24 There have been no recent planning applications for major residential development on the Estate. There have been a number of planning applications related to installation of windows, and reconfiguration of existing bridges, stairs and ramps on the existing estate. These are not deemed to be of significance for the proposed development on the estate.

Relevant Development Proposals Nearby

- 4.25 There are a number of applications which have come forward on nearby sites, in summary as follows:
- To the east:

Site Address:	Land At Eaton Leys, Galley Lane, Little Brickhill, Milton Keynes
Application Description:	Outline planning application with all matters reserved for a residential-led development including up to 1,800 dwellings, distributed between Aylesbury Vale and Milton Keynes as follows: Within Milton Keynes; the development of up to 600 dwellings, a local centre to include retail and a community centre, a health centre, land reserved for a one 1 form of entry primary school, associated highway infrastructure including one proposed vehicular accesses with the A4146, one proposed pedestrian and cycle bridge crossing the river Ouzel, multi-functional public open space, informal amenity space, children's play space, open space incorporating the scheduled monument, surface water attenuation and strategic landscaping, and

	associated services and utilities infrastructure. Within Aylesbury Vale; the demolition of all existing farm buildings (except farmhouse) and the development of up to 1,200 dwellings, one 2 forms of entry primary school, associated highway infrastructure including one proposed vehicular accesses with the A4146, one proposed pedestrian and cycle bridge crossing the river Ouzel, multi-functional public open space, informal amenity space, children's play space, playing fields, allotments, surface water attenuation and strategic landscaping, and associated services and utilities infrastructure.
LPA Application Reference:	15/01533/OUTEIS. Most recent application is a Reserved Matters application (site wide, approval of access, appearance, landscape and layout), planning ref: 19/01412/REM, approved January 2020.
Application Status:	Approved June 2015. Reserved matters and a number of planning conditions applications have been approved.

Figure 7 below contains an extract from the approved illustrative masterplan for the Eaton Leys development site, including the proposed foot/cycle bridge over the Grand Union Canal which will land on Phelps Road, which is within very close proximity to the junction between Stoke Road and Windermere Drive.

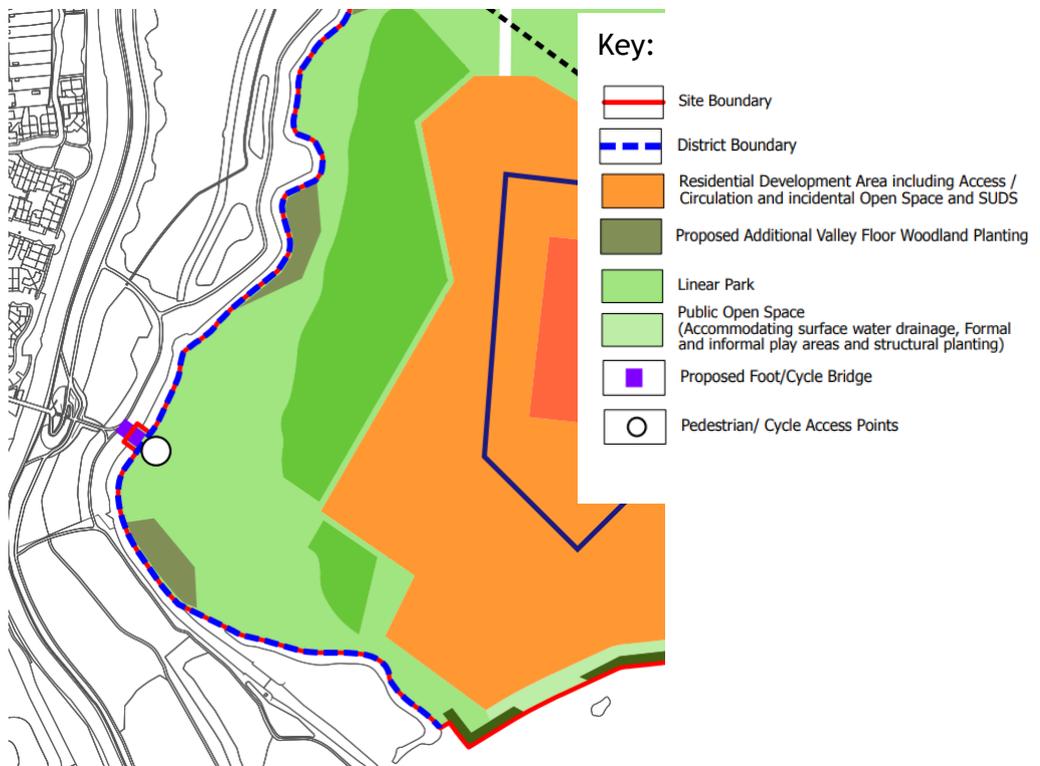


Figure 7: Eaton Leys illustrative masterplan (Source: Milton-keynes.gov.uk)

- To the south-west:

Site Address:	Land Known As Newton Leys, West of Railway, South of Bletchley Landfill Site, Drayton Road, Bletchley, Milton Keynes
Application Description:	Proposed Mixed Use Development (Outline Application), Comprising Housing (up to 1650 Dwellings), Employment Areas, Shops, a Combined School, Community Facilities, New Park, Playing Fields, Hotel or Leisure Facility And Associated Infrastructure for Foul and Surface Water Drainage and Other Services Including Access Roads and Parking (along with related proposals in Aylesbury Vale District) and accompanied by an Environmental Statement.
LPA Application Reference:	02/01337/OUT, Extended by 13/00888/OUTEIS. Most recent Reserved Matters application (for Phase 7a) is 19/01331/REM, approved September 2019.
Application Status:	Initial phases are complete and occupied. Later phases are under construction, with reserved matters applications for the last phases to be submitted.

Environmental Impact Assessment (EIA) Screening Opinion

4.26

A Screening Opinion request was submitted to the Council by WSP on 4 June 2019 to confirm that the emerging proposals would not constitute EIA development. A decision was issued on 28 June 2019 confirming that, although the proposals fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2015, it is not necessary to submit an Environmental Statement. A copy of this letter has been submitted as part of this application.

5.0 Proposed Development

- 5.1 Full details of the proposed development are provided within the Design and Access Statement and Detailed Drawings. The following section sets out the key principles the proposals within the outline planning application and detailed planning application in turn.

Detailed Application: Residential Accommodation

- 5.2 The Detailed Application development sites will create a gross total of 308 new build homes. The residential development sites identified within the overall detailed planning application boundary can be broadly categorised as infill development, along with the redevelopment of Serpentine Court.

- 5.3 This residential development will be comprised of:

- The development of Area A of Serpentine Court, providing 116 new homes;
- A gross total of 192 new homes provided across a total of four infill development sites (detailed in paragraphs 2.8 in Section 2).

Housing Mix

- 5.4 Table 1 sets out a summary of the proposed mix of dwellings proposed as part of the Detailed Application:

Dwelling Size	Total	Percentage (%)
1-bedroom	90	29.2
2-bedroom	108	35.4
3-bedroom	102	33.1
4-bedroom	6	1.9
5-bedroom	2	0.6
TOTAL	308	100%

Table 1: Detailed Application Proposed Housing Mix

- 5.5 Table 2 summarises the proposed mix of dwelling sizes by tenure within the detailed application:

Dwelling Size	Affordable Rented	Private Sale	TOTAL
1-bedroom	76	14	90
2-bedroom	81	27	108

3-bedroom	53	49	102
4-bedroom	6	0	6
5-bedroom	2	0	2
TOTAL	218	90	308

Table 2: Detailed Application Proposed Tenure Split

- 5.6 Of the new family-sized homes, approximately 55% are affordable rented.
- 5.7 The proposed homes will be a mix between affordable rented and private sale homes, with 71% being affordable and 29% being private. The 90 private sales homes are all contained within the Stoke Road development site, with the homes on the remaining infill sites and Serpentine Court being affordable rented.
- 5.8 A total of 29 of the 308 homes proposed are designed to be Building Regulations Part M4(3) compliant. This comprises of 24 (11%) of the affordable homes, and 5 (5.5%) of the private homes in excess of the standards contained within Plan:MK.
- 5.9 As stated within paragraph 2.5 of this Statement, there are four infill sites on the site where detailed planning permission is sought for residential development. These four sites will be resettlement sites for the residents of Serpentine Court prior to its demolition as part of Phase B, the outline application.
- 5.10 Full details on the dwelling mix for each individual development site and individual block can be found within the submitted Schedule of Accommodation prepared by HTA Design.

Detailed Application: Non-Residential Uses

- 5.11 Within the detailed application, 1,193sqm of non-residential space is proposed in addition to the new housing. This is comprised a community hub (Use Class D2, 613sqm); a chicken shop (Use Class A5; 70.3sqm); a pharmacy (Use Class A1, 90.2sqm); a nursery (Use Class D1, 200sqm), and 220sqm of light industrial space (Use Class B1c). An energy centre is also proposed towards the south of Windermere Drive, which will be approximately 166sqm.

Detailed Application: Estate-Wide Environmental Improvements

- 5.12 In addition to the residential development proposed, a suite of environmental improvements to key areas across the estate (as highlighted in Area C within Figure 1 in Section 1 and discussed in further detail in the DAS prepared by HTA Design). The gross total of the area to improved is 6.76ha. The improvements will comprise areas beyond the boundaries of the development sites, but within that of the wider estate in the Council's

ownership. They are summarised below, and explained in further detail in the DAS prepared by HTA Design and the Transport Assessment prepared by ITP:

- A suite of ecological and biodiversity-related improvements to enhance the amenity and ecological value of these retained open space;
- Proposals for new walking and cycle routes within and beyond the estate, which will help with site permeability and connectivity;
- Improvements to bus stops to help ensure they are fit-for-purpose and provide a safe, pleasant environment for people to wait. This is anticipated to contribute to an increase in bus patronage;
- Highway and footway resurfacing where roads and footpaths are of a poor quality which may discourage use. The formalisation of existing car parking courts is also proposed to help rationalise these spaces and encourage more efficient use.

5.13 These estate-wide environmental improvements are proposed with a key aspiration to encourage modal shift away from single-occupant private car use to more sustainable and active modes of transport, in line with transport policies on local and national levels. The improvements also seek to improve the wider environment of the estate through a range of biodiversity interventions to improve the quality of existing open spaces throughout the estate.

Detailed Application: Access, Servicing and Parking

5.14 Vehicular access is proposed from Windermere Drive, through seven new site access points. As with the outline application, there are a number of new junctions proposed, which have been designed with consideration to adopted Milton Keynes standards as well as the Manual for Streets. Separate access will be provided for the energy centre, which will be serviced on an infrequent basis.

5.15 424 car parking spaces are proposed for the 308 new homes, which represents a ratio of 1.38 spaces per home. 29 of these spaces will be disabled car parking spaces, 10% will have active EVCPs, and 90% will have passive EVCPs. For the non-residential uses, 62 shared car parking spaces will be available, with 7 additional spaces for the B1c floorspace.

5.16 Improvements to a number of bus stops within the land contained in this Phase are also proposed as part of the estate-wide environmental improvements. This will improve the levels of natural surveillance and feelings of safety when using them, which is anticipated to help increase bus patronage across the site as a viable, more sustainable alternative to private car use.

- 5.17 Cycle parking will be provided for all residential homes within the detailed and outline phase within a store/shed within the rear garden of the property. For apartment blocks, there will be a dedicated ground floor cycle store. Cycle parking has been provided at a ratio of one per house and one per flat. Short-stay cycle parking has been designed as two separate styles: there will be 18 external covered spaces for the staff of the non-residential uses, and 62 spaces within public realm for visitors to the residential uses within prominent, visible locations.
- 5.18 A new east-west Redway is proposed which will connect Stoke Road to Serpentine Court Phase B to Stoke Road, and provide a route to a new school to the east of the Estate within the Eaton Leys development site. An improved east-west green route through Warren Park is also proposed. This will intersect with the north-south Redway proposed within Phase B of Serpentine Court (part of the outline application), helping to improve cycle connectivity within the estate. Further details on the Redway proposals are contained within the Transport Assessment prepared by ITP.
- 5.19 In relation to servicing, all service vehicles will use dedicated loading bays. Access for refuse and servicing vehicles will be restricted and only emergency vehicles will be able to travel beyond the bollards. All emergency and refuse vehicles will be able to manoeuvre within this site in accordance with maximum reversing distances, and there are refuse stores for residents to place refuse to ensure walking and drag distances are acceptable.
- 5.20 Further information on the car and cycle parking proposed, as well as tracking for emergency vehicles, is contained within the Transport Assessment prepared by ITP.

Detailed Application: Landscaping, Open Space and Trees

- 5.21 Within the detailed application, it is proposed to improve the condition and offer of Warren Park through the introduction of a dedicated walking and cycle route as well as quieter footpaths, play spaces for children of all ages, and enhanced ecologically rich areas linking in with integrated sustainable drainage systems (SuDS). The improved Warren Park will provide attractive, natural routes between Stoke Road and the local centre at Serpentine Court.
- 5.22 In addition, the proposed estate-wide environmental improvements include improvements to open spaces at the four corners of the site. These are proposed alongside strengthening the diagonal connections through the site. These are discussed in further detail within the estate-wide environmental improvements section above, and within the DAS.
- 5.23 Alongside the proposals to improve green spaces and the connections to them, the houses associated with the development sites at Drayton Road, Stoke Road and Melfort Drive will have their own private rear gardens providing generous green space.

- 5.24 The proposals under the detailed application seek to retain a high number of the existing trees on the site, which have been assessed as being in reasonable condition and suitable for retention. Alongside the new landscaped areas and improved green spaces, there will be no net biodiversity loss and a net biodiversity gain for the hedgerow as detailed within the Ecological Impact Assessment prepared by CSA Environmental. The measures which will be implemented to help the trees during construction are outlined within the Arboricultural Impact Assessment prepared by Steve Jowers Associated Ltd, with further detail to be secured by planning condition.

Outline Application: Residential Accommodation

- 5.25 The outline application comprises of the development associated with Phase B of Serpentine Court. This involves the relocation of existing residents to new homes within the four infill sites, built as part of Phase A, the demolition of the existing buildings, and the subsequent construction of new buildings to re-provide the existing 199 homes, and 92 additional new residential homes. As part of this new housing provision, an extra care facility is proposed which proposes 64 1-bedroom and 2-bedroom homes (39 1-bed room and 25 2-bedroom; 61% and 39% respectively).

Outline Application: Non-Residential Uses

- 5.26 The outline application also seeks 756sqm of flexible retail space (Use Class A1-A5, which is to be contained within new retail units in Serpentine Court. Occupants for these units are yet to be confirmed, but at this stage they include a hair/nail salon (Use Class A1, 107.2sqm); a convenience store (Use Class A1, 378sqm); a dentist (Use Class D1, 82sqm); an ethnic grocer (Use Class A1, 82sqm) and a flexible retail space whose occupier is yet to be confirmed (Use Class A1-A5, 107.2sqm).

Outline Application: Access, Servicing and Parking

- 5.27 Vehicular access will be gained from Windermere Drive and Fern Grove. There will be four new access points onto Windermere Drive, which will provide east-west connectivity from between Fern Grove and Windermere Drive. There will be a number of new junctions and roads, which have been designed with consideration to adopted Milton Keynes standards as well as the Manual for Streets.
- 5.28 For the 281 new homes proposed within the outline application, 270 parking spaces will be provided with 10% being active EVCPs and 90% being passive EVCPs. For the non-residential uses, 20 shared car parking spaces will be available.
- 5.29 Cycle parking will be provided for all residential homes, which will be located within a store/shed within the rear garden of houses. For apartment blocks, there will be a dedicated cycle store on the ground floor

of each building. Cycle parking has been provided in accordance with the adopted standards for each land use. Short-stay cycle parking for visitors to the residential and non-residential uses will be provided in prominent, visible locations within the public realm around the local centre. 22 spaces are proposed in total.

- 5.30 A new north-south Redway is also proposed through this phase. This will intersect with the east-west route of the Redway proposed within Phase A of Serpentine Court (part of the detailed application), helping to improve cycle connectivity within the estate. Further details on the Redway proposals are contained within the Transport Assessment prepared by ITP.
- 5.31 In relation to servicing, all servicing vehicles will use the dedicated loading bays along the streets. Along with refuse and emergency vehicles, all servicing vehicles will be able to safely enter, navigate and exit this part of Serpentine Court in forward gear. For refuse collections, most of the refuse points are within drag distances apart from those within the apartment blocks. This is in order to retain the pedestrianised north-south link and avoid the removal of existing mature trees here. For these buildings, there is a separate dedicated refuse collection point for residents to take refuse to which is within acceptable walking distance for them, as well as refuse operatives.
- 5.32 Further information on the car and cycle parking proposed, as well as tracking for emergency vehicles, is contained within the Transport Assessment prepared by ITP.

Outline Application: Landscaping, Open Space and Trees

- 5.33 An enhanced north-south green link, the Serpentine Court Central Spine, will run in-between the new apartment blocks from Drayton Park School to the north, towards Water Hall Primary School. This will provide open green space which can be used by a wide range of people, including the school pupils, as well as others who may use the link to access the new local centre and its retail offer. There will also be an east-west section of this link, providing a green connection from Sir Herbert Leon Secondary School in the west towards Warren Park, along the new local centre.
- 5.34 The Central Spine will benefit from new tree planting alongside the retention of existing trees as part of its wider landscape, to help foster existing and emerging natural habitats and biodiversity.
- 5.35 The internal courtyards of the new residential perimeter blocks within this Phase will also provide open green space, however these will be private spaces for use by residents.

6.0 Pre-application Consultation

- 6.1 As part of the process of engagement, the applicant entered into pre-application discussions with the Local Planning Authority (LPA) to facilitate a collaborative partnership approach to developing the scheme proposals. The design team have engaged with Council Officers within Planning, Highways, Urban Design, Drainage, Landscape, Trees and the Lead Local Flood Authority (LLFA). Meetings took place on the following dates:
- 07/08/18;
 - 16/10/18;
 - 29/03/19;
 - 07/05/19;
 - 25/07/19;
 - 31/10/19.
- 6.2 Table 3, below, sets out the planning considerations which the design team received feedback on, and summarises the amendments made in response. This should be read alongside the relevant section of the submitted DAS prepared by HTA Design. Further assessment of how the proposed design approach in response to each of the relevant issues below is included within the planning assessment section (Section 8).

Planning Issue	LPA Feedback and Proposed Approach
Affordable housing	<p>LPA Feedback: Officers explained that the affordable housing threshold of 31% includes the re-provision of existing homes. The Council is expecting an increase in the total number of social housing homes.</p> <p>Proposed Approach: The level of affordable housing has been maximised, whilst balancing the need to propose a deliverable application. Within Phase A, the level of affordable housing is 71%, and within Phase B the level is 29.9%. Overall, across both phases the level of affordable housing provision is 51.3%. Further information is contained within the Affordable Housing Statement, which forms a sub-section of this Statement.</p>
Views and Townscape	<p>LPA Feedback: Landscape Officers noted that proposals need to consider the views across to the Brickhills.</p> <p>Proposed Approach: The approach towards testing key views was raised with Officers during the pre-application stage, who agreed that a light-touch assessment as tabled in the pre-</p>

	<p>application meeting could be provided. This assessment is included as a part of the DAS.</p>
Car parking	<p>LPA Feedback: Officers requested supporting information to justify the shortfall in proposed car parking spaces against MKC standards. In particular, officers suggested that the impact of car parking provision on viability would be a key consideration, and further supporting evidence on this should be provided.</p> <p>Proposed Approach: The level of car parking has been informed by significant research and investigation into existing and future car use, the existing and proposed level of public transport access and the improvements to walking and cycling accessibility which form part of the estate-wide environmental improvements. The proposed car parking level balances parking provision with active frontages, avoiding the creation of large areas of hardstanding, and creating new areas of green space for the enjoyment of existing and future residents. It takes into account improvements to access and sustainable transport modes and balances viability/deliverability considerations. Further details are contained within the Transport Assessment as well as Section 7 of this Statement.</p>
Public consultation	<p>LPA Feedback: Officers explained that the existing residents on the estate should be consulted regularly by the design team.</p> <p>Proposed Approach: An extensive approach to consultation has been undertaken through a wide range of events, workshops and exhibitions. There was also a ballot for Serpentine Court residents in November 2018, where following an overall turnout of 84% of residents the option for full redevelopment received over 93% of the vote. There have also been a number of public exhibitions which have been attended by members of the Serpentine Court Steering Group (SCSG). There was also a trip for residents to another regeneration scheme in Barnet in October 2019. Further details on the specific events, including a timeline, is included within the Statement of Community Involvement.</p>
Existing and proposed retail offer	<p>LPA Feedback: Officers noted that it should be confirmed if the existing shops on the estate were going to continue operating or being closed down, and the possibility of including them within the proposals should be explored.</p> <p>Proposed Approach: A number of existing shops have closed, and others are struggling due to lack of demand and competition from retail uses outside of the estate. The design team and applicant have engaged with existing commercial and retail occupiers, and the existing open shops are proposed to be re-provided. This is detailed further within the DAS.</p>
Landscaping and	<p>LPA Feedback: Officers explained that the design team should</p>

<p>Open Space</p>	<p>consider the location of underground services, car parking and street lighting when proposing trees and green verges to ensure that conflict is minimised. The landscape designs also need to consider ecology and biodiversity, with biodiversity being maximised to achieve a net biodiversity gain (using the Warwickshire metric calculation).</p> <p>Proposed Approach: The landscape proposals have maximised the opportunity to create new areas of ecological value across the site. The proposals will deliver significant benefits for wildlife in the form of additional habitats and biodiversity enhancement and accords with relevant legislation and Plan:MK. Additional details are contained within the DAS, Ecological Impact Assessment and Section 8 of this Statement.</p>
<p>Trees</p>	<p>LPA Feedback: Tree Officers confirmed that the estate currently suffers from the past approach to tree planting, where ‘the wrong trees were planted in the wrong place’. Diversity amongst new younger stock would be welcome.</p> <p>Proposed Approach: The design team have worked with specialist arboriculturalists and the Council’s Tree Officers to ensure that the proposals retain as many healthy, suitable trees as possible and that new trees are appropriate for the site and its pedology. The proposed tree planting proposals are explained further within the DAS.</p>
<p>Warren Park</p>	<p>LPA Feedback: Landscape Officers noted that the park is currently too large and should be broken down to more ‘human’ scale. Officers also explained that the proposed mixed-uses within the Park were welcomed and would be supported, particularly where they encourage activity and community use.</p> <p>Proposed Approach: The proposals for Warren Park will improve its ecological and amenity value through the use of innovative and creative landscaping and planting, alongside the new routes through the Park. It will feature multi-functional spaces for different ages groups and abilities, including play space for children and activities for teenagers, and the proposed events space. This is detailed further within the DAS. Trees and green areas proposed are cognisant of services.</p>
<p>Public Transport Access</p>	<p>LPA Feedback: Officers suggested that the submission documents should discuss how sustainable modes of transport would be encouraged. This includes considering proximity to Bletchley Train Station, which will benefit from services along the forthcoming East-West Railway.</p> <p>Proposed Approach: This Statement, as well as the Transport Assessment and Framework Travel Plan, have all taken into account the proposed improvements to public transport access</p>

	<p>within the site and to Bletchley Station, which is very close to the site. The Redways and new pedestrian and cycle routes have also been designed with this in mind to help facilitate the uptake of sustainable modes of transport and modal shift away from private vehicle use. The Transport Assessment contains detailed information on existing and future bus provision, as well as cyclist and pedestrian connectivity which is of a good quality within and beyond the site, to a number of destinations and amenities. It also contains information on the positive impact that the East-West Railway will have.</p>
Security and sense of safety	<p>LPA Feedback: Officers noted that maintenance of public spaces is an existing issue on the estate, and any proposals would need to consider how spaces are maintained and overlooked. Officers suggested that the design team liaise with the Council’s Secure by Design Officer.</p> <p>Proposed Approach: The paths to the rear of gardens will be secure, as well as the paths to the rear of new houses and those which are back-to-back. Rear alleyways have been designed with consideration to width, light, viability, security and entrances and exits to ensure that these spaces can be used safely and meaningfully. Further detail is contained within the DAS.</p>
Highways layout/hierarchy	<p>LPA Feedback: Transport Officers explained that the hierarchy of streets and street layout needs to be considered in line with adopted MKC standards. The number of vehicle crossovers with Redways should be minimised.</p> <p>Proposed Approach: The proposed highways, footways, junctions and associated areas have been carefully designed in consultation with MKC Highways and relevant guidance, including MKC planning policy and the Manual for Streets. Particular consideration has been given to the hierarchy of streets, as explained within the Transport Assessment. The number of vehicle crossovers with Redways has been minimised to ensure a pleasant cyclist experience.</p>
Cycling and cycle routes, including Redways	<p>LPA Feedback: Transport Officers explained that cycle routes within and beyond the site need to be made clear. The preference is for new cycle ways to meet Redway standards instead of being a ‘leisure’ route. The route to Eaton Leys should be investigated.</p> <p>Proposed Approach: the proposed cycle routes and Redways connect with the existing routes within the site and connect to routes beyond the red line boundary, improving cycle access to key amenities within reasonably cycling distance of the site including Bletchley town centre and Milton Keynes. Cycle routes which are not Redways have been designed to include the key features of Redways where possible. The Redway through</p>

	Warren Park through to Stoke Road could potentially provide a link to Eaton Leys. Further information is contained within the Transport Assessment.
Drainage and Flood Risk	<p>LPA Feedback: Officers noted that proposals should incorporate SuDS into green spaces to provide multiple benefits and be mindful of the impact of varying site levels on water runoff. They also highlighted that ponds and basins should be located at the lowest part of the site. Drainage Officers expressed a preference for above ground SuDS, and for restorative work to be undertaken to Water Eaton Brook. Drainage Officers also noted that tree and drainage strategy should be looked at together to avoid instances of the strategies conflicting. The highways officer also noted restrictions for roads to be adopted by MKC.</p> <p>Proposed Approach: As explained further within the DAS, Arboricultural Report and Flood Risk Assessment and Drainage Strategy, the approach to SuDS has been tailored across the sites with above ground SuDS being maximised, where possible. The design proposals have considered tree and drainage proposals in tandem so as to minimise any instances of conflict, alongside consideration for underground services and car parking. In Warren Park, SuDS will feature in Warren Park through a new pond. In relation to Water Eaton Brook, this has been assessed by Drainage specialists at WSP who have identified that the Brook is in a good condition but may benefit from restoration work. This mitigation is proposed as part of the development proposals and is explained further within the Flood Risk Assessment and Drainage Strategy.</p>
Construction	<p>LPA Feedback: Design Officers explained that innovative methods of construction should be explored, including modular construction and pre-fabrication.</p> <p>Proposed Approach: Sustainable construction methods have been explored from an early stage of the design process, and an element of modular construction is proposed to be incorporated into the proposed development across the sites.</p>

Table 3: LPA Pre-Application Engagement Summary

Resident Consultation

- 6.3 An extensive programme of resident consultation on has been undertaken relating to this application over an extended period, beginning in September 2017. This combined workshops, resident consultation exhibitions (including a final exhibition of the proposed application in January 2020), as well as a trip to another regeneration scheme in London for residents of the estate. The consultation process has been supported by

regular newsletters updating residents of progress on the plans for the estate.

- 6.4 A range of views have been expressed during the consultation process, with over 84% of Serpentine Court residents being involved in consultation. Further details on the specific events, including a timeline, is included within the Statement of Community Involvement and DAS.

Development Review Forum

- 6.5 A Development Review Forum meeting took place on 01.07.19 which considered the forthcoming proposals. The purpose of this meeting was to allow stakeholders - both within the Council and in the public - an opportunity to input into the proposals and ask questions.

- 6.6 Feedback from the stakeholders in attendance were as follows:

- The proposals to improve the landscape within the estate were welcomed, in particular the connections between Fern Grove and Windermere Drive and the greening of the diagonal links to the corners of the estate from Serpentine Court;
- Sufficient space and provision should be made for existing local businesses to help support the economic regeneration of the estate as well as the social and housing regeneration;
- High-quality community space for existing residents should be provided;
- EVCPs should be provided in line with MKC standards;
- The SuDS in Warren Park should be multifunctional, being of use to people as well as biologically diverse. It was also suggested that the topography of the surface water pond within the Park should not be too steep.
- Adequate provision for elderly people should be provided.

7.0 **Planning Policy Considerations**

- 7.1 A full policy review has been undertaken as part of the preparation of this application and key policy considerations are identified at the end of this Chapter. The analysis of how the proposal relates to the key policies is set out in Section 8.

Relevant Policies

- 7.2 Having regard to the statutory development plan, the following sections detail planning policies relevant to the Council's consideration of the proposed development.

Statutory Development Plan

- 7.3 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. At the present time, the Statutory Development Plan comprises:

- Plan:MK (March 2019); and,
- Site Allocations Plan (July 2018).
- The Lakes Estate Neighbourhood Plan (October 2015).

- 7.4 There are a number of relevant Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) documents. These are listed in paragraphs 7.14 and 7.15 of this Statement.

National Planning Policy & Guidance

- 7.5 The Government's national planning policies are set out in the National Planning Policy Framework (NPPF, latest revision February 2019) and the supporting National Planning Policy Guidance (NPPG). The NPPG highlights that local planning authorities may only depart from development plan policy where material considerations indicate that the plan should not be followed (Paragraph: 013, Reference ID: 21b-013-20150327).

- 7.6 The key principle at the heart of the NPPF is a presumption in favour of sustainable development. For decision-making, this means 'approving development proposals that accord with the development plan without delay' (paragraph 11). The NPPF encourages local planning authorities to look for solutions rather than problems and that decision-takers at every level should seek to approve applications for sustainable development where possible (paragraph 38).

- 7.7 Paragraph 8 confirms that the planning system has three overarching objectives to achieving sustainable development, which will help deliver the homes, businesses, infrastructure and thriving local places that the country needs. To achieve this, at the heart of the NPPF is a presumption in favour of sustainable development. Housing applications will be one of the types which should be considered in the context of the presumption.
- 7.8 The NPPF's focus is on achieving sustainable development and in practice this includes, amongst others, replacing poor design with better design; improving the conditions in which people live; and widening the choice of high-quality homes. The Core Planning Principles of the NPPF include the need for sustainable economic development to deliver the homes, infrastructure and local places the country needs; using land effectively including previously developed land (brownfield land); managing patterns of growth to make the fullest use of public transport, walking and cycling and seeking high quality design and a good standard of amenity for all existing and future occupants of buildings and land.
- 7.9 Chapter 11 of the NPPF explains that planning policies and decisions should promote the most effective use of land including previously developed (brownfield) land, provided that it does not conflict with other policies within the NPPF or cause harm to a designated site of importance for biodiversity.
- 7.10 Chapter 15 of the NPPF sets out the planning decisions should contribute to and enhance the natural and local environment through a number of means. These include protecting and enhancing valued landscapes (paragraph 170(a)) and minimising the impacts on and providing net gains for biodiversity (paragraph 170(d)).
- 7.11 The NPPF also encourages transport issues to be considered from the earliest stages of development proposals through the provisions within Chapter 9. This is to allow for opportunities to realise the potential of existing and future infrastructure to be realised, as well as changing transport technology and usage (paragraph 102(a)). Early discussions on the transport-related elements of development also allow for opportunities to promote walking, cycling and public transport to be identified and pursued (paragraph 102(c)).

Milton Keynes Planning Policy & Guidance

- 7.12 The development plan for the site consists of Plan:MK, which was adopted in March 2019.
- 7.13 This document set out the detailed policies to guide future development, whilst identifying the local needs which should be addressed.
- 7.14 In addition, there are a number of adopted SPDs and SPGs published that will be of relevance to any planning applications on the estate:

- Affordable Housing SPD (March 2013);
- Parking Standards SPD (January 2016);
- Planning Obligations for Education Facilities SPG (November 2004, updated December 2005);
- Planning Obligations SPG for Leisure, Recreation and Sports Facilities (January 2005);
- Residential Development Design Guide (April 2012);
- Social Infrastructure Planning Obligations SPD (September 2005);
- Sustainable Construction SPD (April 2007).

7.15 There are also a number of draft emerging SPDs of relevance that were consulted on between May and July 2019, following adoption of Plan:MK. These include:

- Draft Affordable Housing SPD (May 2019);
- Draft Planning Obligations SPD (May 2019).

7.16 Comments on both SPDs are being considered by MKC Officers and where appropriate, incorporated into the final versions which will be subsequently adopted by the Council's Cabinet. As of March 2020, there is no detailed information on the timeline for adoption of these SPDs which is publicly available.

Plan:MK (March 2019)

7.17 Plan:MK contains the policies and guidance for development proposals for the borough until 2031. The provision of housing occupies a central position in the Plan and is identified as a strategic objective.

7.18 The policies from Plan:MK which are deemed relevant are:

- Policy DS2 - Housing Strategy
This policy states that Plan:MK will deliver a minimum of 26,500 net dwellings across the borough of Milton Keynes over the period 2016-2021, equating to 1,766 dwellings per annum. One of the methods of delivering this number of homes is through exploring regeneration options in and around Bletchley.
- Policy SD1 - Place-Making Principles for Development
This policy sets out the place-making principles which development would need to consider. These include promoting good physical and mental health as well as a safe environment; encouraging new residential development which overlooks streets and public spaces; and the use of innovative transport solutions to maximise the opportunities provided by sustainable modes of transport to deliver an alternative to the use of private vehicles.

- Policy HN1 - Housing Mix and Density
 This policy explains that major development will be expected to provide a mix of tenure, type and size of dwellings. This should reflect the Council's housing need and market demand, the need for different household types and avoids the overconcentration of certain types of residential development in one area. The policy also explains that where reduced car parking levels are proposed, development will need to demonstrate that the site has good accessibility to frequent public transport nodes, district/town/local centres, schools and employment uses.
- Policy HN2 - Affordable Housing
 This policy states that developments are expected to provide 31% housing as affordable housing, with 25% for rent in a range up to 80% market rent, including 5% at a level broadly equivalent to Social Rent. The affordable housing tenure mix should also include 6% shared ownership homes, based on a range of 25% - 40% equity share.
- Policy HN3 - Supported and Specialist Housing
 This policy states that development proposals which incorporate suitable supported housing and C2 bed spaces 'will be strongly supported'. This is subject to a number of criteria which require that they are located in an area with easy access to facilities and public transport, would not result in an over-concentration of that type of accommodation in the area and that local primary health care providers can sustainably accommodate the increase in demands associated with the occupiers of this type of housing.
- Policy HN4 - Amenity, Accessibility and Adaptability of Homes
 This policy requires that all new residential homes should meet the Nationally Described Space Standards and demonstrate good internal and external design that can accommodate different needs and can be adapted over time to accommodate changing needs. It also states that proposals for 11 or more dwellings should design at least 60% of homes to be built to Building Regulations Part M4(2) standards, and at least 5% of new private market homes and 10% of new affordable homes should be built to Building Regulations Part M4(3) standards.
- Policy CT2 - Movement and Access
 This policy states on-site car parking layouts should be provided in line with Milton Keynes Parking Standards SPD (January 2016). The SPD sets out a zoned approach to applying car parking standards. The estate is located within Zone 3, where higher car parking levels with less restraint are anticipated. Proposals diverging from standards will need to be supported by appropriate evidence.
- Policy CT10 - Parking Provision
 Policy CT10 provides detail on parking provision in conjunction with Policy CT2. It states that all development must meet the Council's

parking standards unless mitigating circumstances dictate otherwise. The policy also sets out that parking areas should be designed with consideration for safety, circulation and appearance, and that all residential, retail and employment uses should provide electric vehicle charging points (EVCPs). All uses are provided with charging although it is not 1:1. We have designed this in line with the advice from officers at pre-app balanced with the need to resident's priorities (residents did not highlight this as a priority, but other issues - which are addressed through the estate environmental improvements), cost (to make the scheme viable/deliverable) and consider placemaking principles (a higher proportion of EVCPs would require a far higher proportion of electric substations - which require significant land take, as well as presenting challenges around providing active / natural surveillance in the low density landscape).

- Policy NE3 - Biodiversity and Geological Enhancement
The requirement for development proposals to maintain and protect biodiversity and result in a measurable net gain in biodiversity where possible, is set out within this policy. Any negative impacts can be offset through improvements, preferably on-site.
- Policy L2 - Protection of Open Space and Existing Facilities
This policy sets out that a loss of public open space will be refused, unless a range of criteria can be met, including demonstrating the land is surplus to requirements and the loss would be replaced by equivalent or better provision.
- Policy D1 - Designing a High-Quality Place, Policy D2 - Creating a Positive Character, Policy D3 - Design of Buildings
These policies set out the criteria for assessing high-quality places and buildings. Criteria 5 explains that soft and hard landscaping continue the green character of Milton Keynes and enhance the quality of the public realm. Street trees and planting in particular have an important role in softening the streetscape and ensuring that the public realm is not dominated by hardstanding, including car parking.
- Policy D5 - Amenity and Street Scene
This policy sets out a range of criteria, including that new development should ensure satisfactory levels of daylight and sunlight within buildings and open spaces, as well as ensuring a reasonable degree of privacy to existing living spaces and not overbearing upon existing buildings and open spaces.
- Policy ER11 - Protection of Local Shops, Post Offices, Banks and Public Houses
This policy explains that planning permission will be refused for changes of use which involve the loss of an existing shop, post office, bank and pub unless all means of retaining the use have been explored and the

Council is satisfied that the existing use is no longer commercially viable.

- Policy ER13 - Non-Retail Uses in Local Centres Within the City

This policy sets out that planning permission will be granted for non-retail uses in local centres within the city if at least one general convenience store will remain in the centre, and if the proposed use would not have an adverse impact on the amenity of neighbouring properties or the surrounding area.

7.19 Other relevant policies from Plan:MK which are considered to be relevant include:

- Policy FR1 - Managing Flood Risk
- Policy FR2 - Sustainable Drainage Systems (SuDS) and Integrated Flood Risk Management
- Policy L3 - Change of Use of Amenity Open Space
- Policy NE5 - Conserving and Enhancing Landscape Character
- Policy D7 - Canalside Development
- Policy CC2 - Location of Community Facilities
- Policy CC3 - Protection of Community Facilities
- Policy SC1 - Sustainable Construction
- Policy SC3 - Low Carbon and Renewable Energy Generation

The Lakes Estate Neighbourhood Plan

7.20 The Lakes Estate Neighbourhood Plan was adopted in October 2015 as part of the development plan for Milton Keynes. It sets out the community led vision for change within this area, as well as development opportunity sites

7.21 The Lakes Estate Neighbourhood Plan aimed to work with the local Lakes Estate residents to allow them to plan collaboratively and proactively in the face of the existing and future challenges for the Estate. These issues include population growth particularly in older people, ageing buildings and areas of poor-quality public realm which had given way to issues of antisocial behaviour and misuse.

7.22 The plan area includes a small area of Water Eaton to the north, where it became evident through the consultation process that a number of residents there had an affinity with the Lakes Estate and wanted to be included in the preparation of the plan.

7.23 The proposals within this application represent the key outputs from this grass roots, residential led plan.

7.24 The vision that the Neighbourhood Plan sets out for the Lakes Estate is as follows:

“Over the plan period up to 2026, the community and stakeholders of the Lakes Estate will seek to develop and enhance its built and natural environment respecting and enhancing, where appropriate, its existing character and identity. It will encourage appropriate housing growth, primarily for local needs and create improved facilities and services for all residents. Achievement of these objectives will enable the Lakes Estate to thrive as a sustainable and unified community”

7.25 This vision is also expressed as a plan, as illustrated within Figure 8 below:

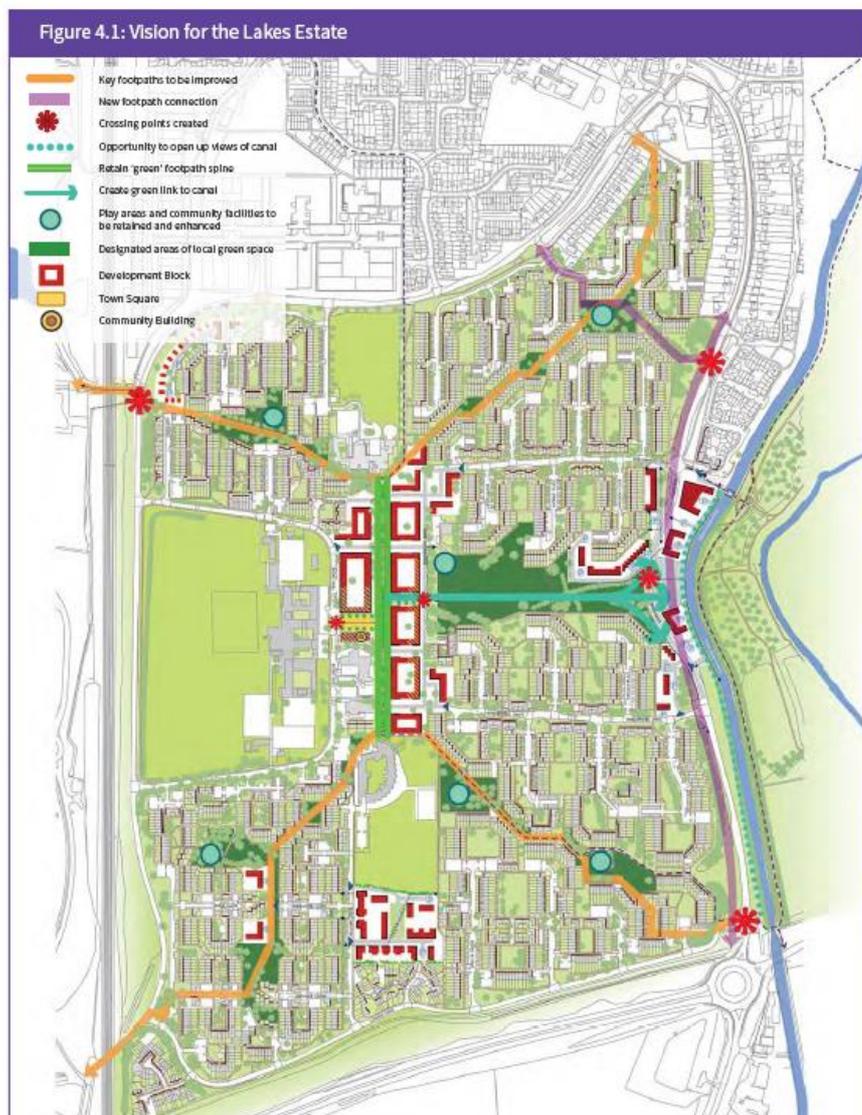


Figure 8: Lakes Estate Neighbourhood Plan vision plan (Source: Milton-keynes.gov.uk)

7.26

To help achieve this vision, the Neighbourhood Plan sets out eight development sites across the estate where new development could be delivered to contribute positively to the character of the estate and help meet the aspirations of the local community and MKC. These are illustrated within Figure 9 below:

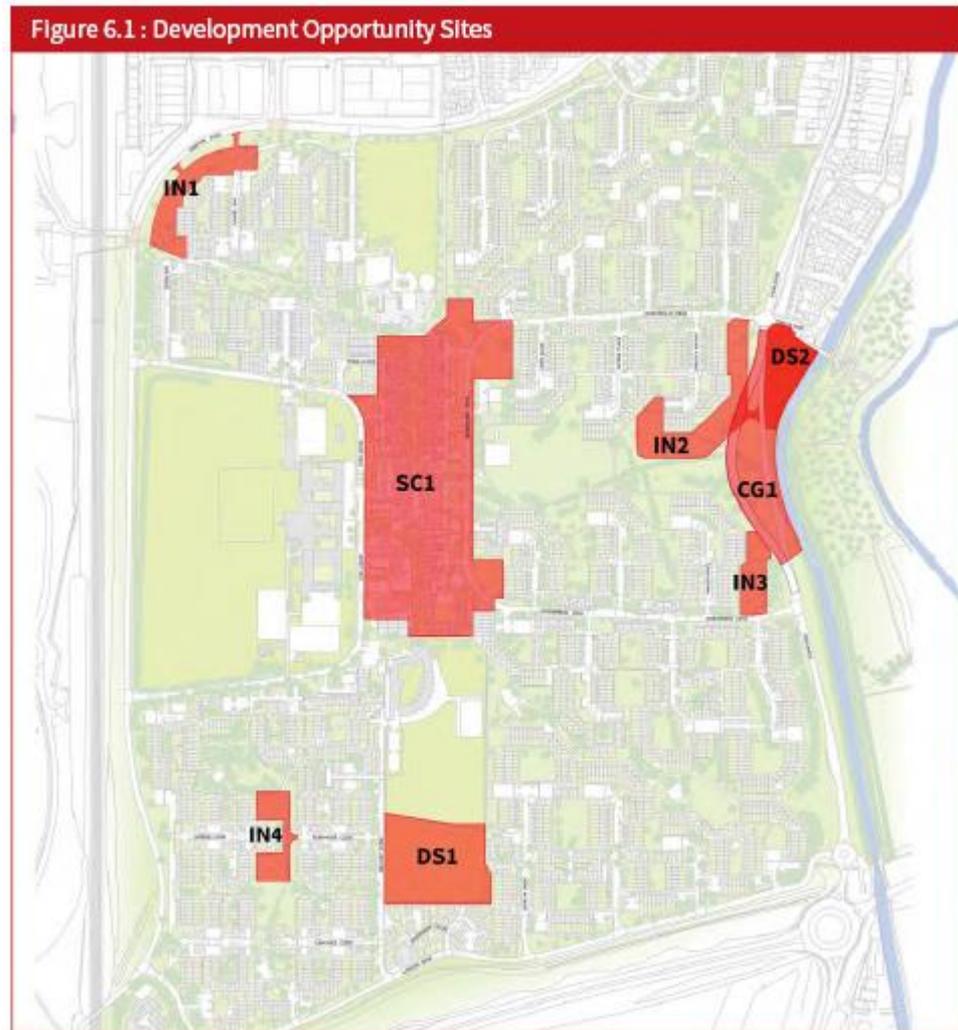


Figure 9: Lakes Estate Neighbourhood Plan Development Opportunity Sites Plan

7.27

The associated detailed development opportunity policies do not set out specific quanta of development/homes that would be expected in each location. However, these policies do set out indicative heights that would be considered acceptable. These are summarised within Table 4 below. Other wider urban design objectives for each site are also set out within the neighbourhood plan, such as where active frontages, or improved access is required.

Site	Indicative Height set out within policy
Development Opportunity Site	
DS1 - Land South of Water Hall School	2-3 storeys (3 storeys to define corners)
DS 2 - Triangle land south of Phelps Road adjacent to the Canal	Should not exceed 4 storeys
Small-scale Infill sites	
IN1 - North Western Verge, Drayton Road	2-3 storeys (3 storeys to define corners)
IN2 - Land at Northern Windermere Drive	2-3 storeys (3 storeys to define corners)
IN3 - Land at Southern Windermere Drive	2-3 storeys (3 storeys to define corners)
IN4 - Land at Skene Open Space	2-3 storeys (3 storeys to define corners)
Serpentine Court Redevelopment	
SC1 - Serpentine Court	Should comprise a minimum of 220 homes. Should not exceed 4 storeys in height
Gateway Opportunity	
CG1 - Canal Gateway	Should not exceed 4 storeys in height

Table 4: Lakes Estate Neighbourhood Plan Development Site Indicative Heights

- 7.28 As part of the evidence base to inform and support the Lakes Estate Neighbourhood Plan, a viability assessment was undertaken to assess the financial viability of the proposed policies. This is a key planning consideration which is given substantial weight, because developments which are not financially viable cannot be relied upon to deliver the additional homes which are required: housing delivery is a high priority for the government.
- 7.29 The high-level assessment which was undertaken indicated that the development identified as a result of the neighbourhood planning process was unlikely to be adequate to fund the redevelopment of Serpentine Court alone. For this, other sources of funding would need to be identified and committed to the Estate.
- 7.30 Similar to many estate regeneration projects across the country, it is anticipated that the redevelopment of the existing housing will be cross subsidised through the sale of private market homes built on the estate, as a result of increasing its density. The evidence base as it stands indicates that the proposed building heights in the Neighbourhood Plan are not financially viable. This therefore provides significant justification for diverging from the precise storey heights as set out in the Neighbourhood Plan subject to other considerations such as the acceptability of the urban design approach.

7.31 In addition, both local and national planning policies have been altered since the adoption of the Lakes Estate Neighbourhood Plan. They now assign limited weight to policies such as those which restrict storey heights and which conflict with other planning priorities within local and national policy.

Supplementary Planning Documents & Guidance

Affordable Housing SPD (March 2013)

7.32 This SPD provides guidance on the proportion of affordable housing which is expected from residential development, including the Council’s preferred tenure mix and approach to delivery. It sets out a borough wide target that 30% of homes should be affordable for residential developments of 11 homes or more, consisting of 25% for rent in a range up to 80% market rent, including 5% at a level broadly equivalent to social rent, and 5% shared ownership homes based on a range of 25% - 40% equity share.

7.33 The affordable housing target within Plan:MK is 31% of new homes. This local plan target will supersede the target set out in the SPD.

7.34 Policy HN2 of Plan:MK as well as the emerging Affordable Housing SPD (May 2019) maintain a similar approach towards the provision of affordable housing, however they require that the 5% of shared ownership homes be increased to 6%.

Parking Standards SPD (January 2016)

7.35 This SPD details the car and cycle parking requirements for all new types of development, including guidance on design and layout as referred to in Policies CT2 and CT10 of Plan:MK. It sets out a zone-based approach to map out parking standards across the borough.

7.36 As mentioned in paragraph 7.18 of this Statement, the site is located within Zone 3 (urban areas). Figure 10 below sets out the car parking requirement for residential uses.

C3 - Residential Dwellings (per unit)	
• 1 bedroom dwellings	1+0.33 unallocated
• 2 bedroom flat	1+0.75 unallocated
• 2 bedroom dwellings	2+0.25 unallocated
• 3 bedroom dwellings	2+0.5 unallocated
• 4+ bedroom dwellings	2+0.5 unallocated

Figure 10: Extract from the Parking Standards SPD - Zone 3 Residential Car Parking Standards

7.37 In addition to the above standards, the SPD also sets out expected car parking levels for non-residential uses, which is set out in Table 6 below. Servicing for shops will also need to be considered.

Use Class	Expected car parking standard set out within 2016 SPD
D1 (community use)	1 space per 30 sqm
A1 (non-food shops)	1 space per 20 sqm
A1 (food shops)	1 space per 14 sqm

Table 5: Residential Development Design Guide (April 2012) - Non-Residential Use Car Parking Standards

7.38 In terms of design, the SPD sets out standards for how car parking should be laid out and designed for residential development. The hierarchy of preference is as follows:

- On-plot at front or side of buildings;
- On-street to the front of buildings;
- Car parking courts.

7.39 Rear car parking courts may be undesirable, unless it can be demonstrated they are conveniently accessible for homes and have adequate surveillance. Tandem car parking would be expected to provide 1 additional on-street car parking space for every 2 dwellings with tandem parking. Garages are not considered to count towards car parking spaces.

7.40 The cycle parking standards set out in the SPD are as follows within Table 6.

Size of Dwelling	Visitor Cycle Parking	Resident Cycle Parking
1B or 2B	12 spaces per 40 units	1 space per unit
3+ B		2 spaces per unit

Table 6: Parking Standards SPD (January 2016) - Cycle Parking Standards

7.41 Cycle parking standards do not vary across the borough, but development proposals which diverge from these standards will need to provide evidence and justification for this.

Residential Development Design Guide SPG (April 2012)

7.42 This SPG sets out the expected design standards for residential development in Milton Keynes to ensure that new homes are delivered to a high quality. This guidance is relevant to small-scale infill development as much as it is to larger scale development.

- 7.43 It provides detailed guidance on the existing character of Milton Keynes and its surrounding areas, before discussing the ‘structure’ of a place, referring to the pattern and arrangement of development considering streets, buildings, open space and landscaping. Section 3 of the SPG sets out key design principles which should be considered - these include:
- Development being based on a permeable movement framework which places pedestrians and cyclists at the top of a hierarchy, and private vehicle users at the bottom;
 - Co-location of uses to reduce the amount of car parking;
 - Buildings being arranged in a perimeter block format to create private internal amenity spaces and passive overlooking to streets, and;
 - The use of taller building elements to mark gateways and key corners as well as helping with wayfinding and reinforcing the street hierarchy.
- 7.44 In relation to communal amenity space, the SPG suggests that the minimum area for usable communal space is 50sqm, plus 5sqm for every home for developments which proposed more than 5 dwellings.
- 7.45 The SPG also suggests that private gardens should be provided where family housing is proposed, and gardens should be a minimum of 10m deep. There are no prescriptive local existing or emerging standards with respect to balcony sizes, but they should provide enough space to accommodate a small table and two chairs.
- 7.46 In relation to children’s play space, the SPG sets out minimum sizes for Local Play Areas (0.2ha, or 0.35ha is surrounded by housing) and Neighbourhood Play Areas (0.6ha). This suggests that minimum sizes will need to be higher in areas of higher density family housing.

Social Infrastructure Planning Obligations SPD (September 2005)

- 7.47 This SPD identifies the main requirements for infrastructure and facilities which are required as a consequence of development in Milton Keynes. It also sets out the financial contributions for infrastructure and facilities associated with new development, which will be sought by the Council. This includes for healthcare, libraries and waste.

Sustainable Construction SPD (April 2007)

- 7.48 This SPD contains guidance on how the Council would have applied the obsolete Policy D4 (Sustainable Construction) of the Milton Keynes Local Plan, which has been replaced by Policy SC1 of Plan:MK. The SPD, alongside Policy SC1, sets out a sustainability checklist for residential and non-residential development and sets out guidance on preparing a Sustainability Appraisal and how to calculate the level of carbon neutrality of a proposed development. The SPD strongly encourages new development to be as energy efficient as possible, referring to PassivHaus design principles.

- 7.49 It also explains how new developments could achieve carbon savings through contributions into a carbon offset fund. This is calculated at £200 (index-linked) per tonne of carbon. This fund will be spent on carbon reduction measures with a lifespan of at least 20 years equivalent to the increased carbon output from the new development.

Milton Keynes' Need for Housing

- 7.50 There is an acute need for housing in Milton Keynes and Bletchley. The borough's population is predicted to grow to approximately 500,000 people by 2050 (paragraph 4.6, Plan:MK 2019) which is around 54% higher than in 2019. This will put increasing pressure on the borough to provide new housing.
- 7.51 The need for residential development is reflected in Plan:MK (2019) which sets out a spatial planning framework for the long-term development of the borough for the next 10 years. The importance of providing new homes to meet the need identified in the borough is one of the strategic objectives set out in Plan:MK.
- 7.52 Redevelopment of Serpentine Court and the development of the four infill sites will contribute 390 much needed homes to the provision of homes within the borough, in line with the annual target of 1,767 homes per year from 2016-2031.

Strategic Housing Market Assessment (February 2017)

- 7.53 The Strategic Housing Market Assessment (SHMA) forms a key part of the evidence base for Plan:MK, on which the borough bases its housing targets both with respect to the mix of housing and quantum over the period 2016-2031. The findings of the SHMA in relation to housing mix have been extracted to illustrate an appropriate mix for the sites which is generally in accordance with Plan:MK, where this document is slightly more up to date than the SHMA. The Council will seek to achieve the mixes are set out in Plan:MK.
- 7.54 The SHMA has estimated housing need in Milton Keynes is 1,767 householders per annum, and the need for affordable housing - which has been calculated separately from total housing need - is 547 householders per annum.
- 7.55 The size of new homes required differs for affordable and market housing based on housing need. For market housing, 1% of new homes should be 1-bedroom, 12% should be 2-bedroom, 56% should be 3-bedroom, 25% should be 4-bedroom and 6% should be 5-bedroom. For affordable homes, 10% should be 1-bedroom, 4% should be 2-bedroom, 38% should be 3-bedroom, 9% should be 4-bedroom and 2% should be 5-bedroom.

Housing Delivery in Milton Keynes

- 7.56 The borough's most recent Five-Year Housing Land Supply Monitoring Report (2019/20-2023/24) provides the most up to date record of housing delivery in Milton Keynes.
- 7.57 The borough's assessment is based in the total number of dwellings completed, which includes affordable and marker housing together rather than separately. In the 2018/19 monitoring year, the borough delivered its housing requirement for the first time in ten years. However, this surplus of 14 homes did not compensate for the shortfall of 772 homes which has accrued since the start of the plan period.
- 7.58 Overall, the borough has achieved approximately 85% of its housing target since the start of this period.

8.0 **Planning Assessment of the Proposal**

8.1 This Section of the Planning Statement assesses the key planning considerations for both the Phase A detailed application proposals and the Phase B outline application proposals in light of the planning policies referred to in Section 7 of this Statement, as well as other relevant material planning considerations.

8.2 The planning assessment addresses each of the key planning considerations in turn starting first with an assessment of the issues in relation to the Phase A detailed planning application sites; followed by a planning assessment relating to the Phase B outline planning application.

Key Planning Considerations

8.3 The key considerations in assessing the proposed development have been established through discussions with the Local Planning Authority during pre-application meetings and wider consultation with residents. They are considered to include:

- Principle of Development in Proposed Locations;
- The Quantum of Residential Development;
- Affordable Housing Statement;
- Mix of Dwelling Sizes;
- Design and Layout;
- Heritage and Townscape Impacts;
- Re-provision of Non-Residential Uses;
- Open Space and the Proposed Design of Landscaped Areas, including Warren Park;
- Children’s Play Space;
- Highways and Transport Considerations;
- Quality of Accommodation;
- Accessibility and Inclusive Design
- Trees and Vegetation;
- Ecology and Biodiversity;
- Energy and Sustainability;
- Flood Risk Assessment and Sustainable Drainage Systems;
- Contamination;
- Noise; and,
- Section 106 Planning Obligations and Community Infrastructure Levy.

Principle of Development in Proposed Locations

- 8.4 The principle of development on the estate to provide new homes was initiated by residents of the estate through the process of creating the Lakes Estate Neighbourhood Plan. All five of the sites proposed for residential development were identified within that document.

Need for Housing

- 8.5 In order to assess the acceptability of the proposed development, it is necessary to have regard to relevant national, regional and local plan policies. Paragraph 8 of the NPPF (2019) highlights the importance of sustainable economic development, including the construction of housing.
- 8.6 Planning policy support for new residential development is outlined in Plan:MK and is underpinned by the NPPF's commitment to significantly boost the supply of homes and use land effectively, including previously developed sites (i.e. 'brownfield' sites). Therefore, the development of this application site to provide a gross total 589 new homes is firmly supported by national, strategic and Milton Keynes' planning policies.
- 8.7 There is an acute need for homes in Milton Keynes. The population is predicted to grow by approximately 54% by 2050 (paragraph 4.6, Plan:MK 2019). The borough has a minimum housing delivery target of 1,767 new homes per annum, and the most recently published Five Year Housing Land Supply Monitoring Report (2018/19) indicated there is a shortfall of 772 homes in the plan period since it began in 2016. The pressing need for additional homes both in Milton Keynes and across its surroundings is therefore clear.
- 8.8 Paragraph 7.25 of Plan:MK explains that planning authorities should plan for a mix of housing based on current and future demographic trends and needs, including older people and people with disabilities. The Council's SHMA recommends that around 1,200 extra-care (Use Class C2) bed spaces were required over the plan period to allow for a suitable choice to help meet the varying needs of an ageing population for more specialist housing. Paragraph 7.26 states that the provision of such housing would also help meet the housing need for other groups, such as those with physical or mental health issues, whose needs are not factored into the demand for specialist housing within the SHMA. Policy HN3 states that development proposals which incorporate suitable supported housing and C2 bed spaces 'will be strongly supported'.
- 8.9 The Estate is not allocated for housing delivery within Plan:MK, however the adopted Lakes Estate Neighbourhood Plan allocates Serpentine Court and the four infill sites for residential development (see Figure 2). This

demonstrates the suitability of the locations across the Estate for residential development

- 8.10 Through the design process, the site allocation boundaries have been amended slightly in response to physical site constraints and to facilitate better enhancement of the interface between the new development and existing open spaces. The boundaries were also amended to respond to technical design constraints, such as providing an appropriate building layout, minimising any impact on neighbouring amenity and adjacent residential occupiers, and to ensure adequate vehicular access and visibility splays where required.
- 8.11 Development in the proposed locations will contribute a net total of 82 new much needed homes as part of the outline application, including the supported extra-care homes. The development will also contribute a gross total of 308 new homes as part of the detailed application, to contribute to the provision of homes in the borough, in line with the annual target.
- 8.12 Furthermore, considerations surrounding viability also need to be taken into account when assessing the quantum of development proposed. It is critical that the existing number of homes on the Estate are re-provided as part of any redevelopment proposals, as well as delivering on the development aspirations of local residents as set out in the Lake Estate Neighbourhood Plan. The renewal of the Estate along with the suite of estate-wide environmental improvements will help improve the quality of housing and the environment for existing residents and encourage new residents to move onto it. The uplift in the number of homes on the Estate and introduction of private market tenures will help to ensure that the deliverability of the wider renewal is viable and can be delivered sustainably. The rationale behind the uplift in homes is explained further within this section, as well as within the Design and Layout section of this assessment.

Suitability of Proposed Development Locations

- 8.13 Extensive work has been undertaken by the design team and the Council assessing the quality of the estate, and the application sites. The analysis has highlighted a number of existing conditions on the estate that contribute to a poor-quality built environment, including a large number of blank and inactive frontages, as well as areas which are not overlooked or benefit from natural surveillance. The proposed development would contribute to the enhancement of each of the development sites within the site application boundary, as well as the wider Estate through the proposed suite of estate-wide environmental improvements.
- 8.14 The Lakes Estate Neighbourhood Plan identifies and allocates the four infill development sites as development sites (see Figure 7). Our proposals have identified these sites as suitable for resettlement of existing Serpentine

Court residents. This will enable the residents to be rehoused on the Estate whilst the redevelopment of Serpentine Court is underway. The infill sites currently comprise underutilised grassed areas which are mostly surrounded by existing residential development. They make a negligible contribution to the character of the estate and are not functional as good quality open spaces. The proposed development of these areas would constitute an enhancement of the Estate.

- 8.15 The proposals have been presented to Milton Keynes' Development Review Forum, as detailed within Section 6 of this Statement. The housing proposals, and the improvements to landscape across the estate were well received and generally supported.
- 8.16 The introduction of private tenures and supported extra-care housing into a primarily social rented Estate supports the Council's aim to ensure there is a wide choice of tenure, type and size of homes, and avoids the overconcentration of affordable housing on the estate. This will help to create a sustainable, inclusive and mixed community in accordance with the aspirations of Plan:MK Policy HN1.
- 8.17 The above confirms that the proposed locations of development for new residential homes of the proposed tenures, sizes and types is supported by planning policy.

Affordable Housing Statement

- 8.18 Planning policy at all levels of the planning system supports the delivery of housing - in particular affordable housing - due to the well documented shortage and the continuous need for more varied types of dwellings of different sizes and tenures.
- 8.19 The delivery of new housing for sustainable communities lies at the heart of the strategic objectives of the Council. The NPPF also makes a commitment to ensure an increase in creation and delivery of a wide range high quality homes, especially affordable housing, in order to create 'sustainable, inclusive and mixed' communities.
- 8.20 The availability and affordability of housing remains an issue for the residents of the borough. The SHMA and Plan:MK recognise that there is a significant unmet housing need in the Borough, and that the demand for social housing is high and increasing. Specifically, there is a need for more two-bed and larger family-sized social rented homes. Plan:MK states that the aim over the period 2016-2031 is to build 8,200 affordable homes. This equates to 30.9% of the total Objectively Assessed Need (OAN) for housing, the figure for which stands at 26,500. The Council has previous records of under-delivery of housing, especially affordable housing, as outlined in paragraph 7.57 of this Statement. Since the start of the plan period, a shortfall of 772 homes has accrued. Therefore, the need for affordable

housing is acute and any proposals which would increase the supply of affordable housing should be supported.

- 8.21 Policy HN2 of Plan:MK requires the provision of 31% affordable housing from proposals of 11 or more homes. Clause (B) of this policy provides further detail on the affordable housing tenure split. The Council will seek to deliver an affordable tenure split of 25% for rent at a range of levels up to 80% of market rent, including 5% at a level equivalent to social rent, and 6% shared ownership.
- 8.22 Clause (D) of Policy HN2 states that the Council will have regard to the current viability of development, including land values and other development costs. Where it can be demonstrated that the provision of affordable housing in accordance with the Council's thresholds would deem the scheme unviable, a flexible approach will be undertaken whereby the tenure mix and extent of other site-specific planning obligations will be reviewed, followed by the proportion of affordable housing.

Phase A Detailed Planning Application

- 8.23 71% of the proposed homes within the detailed application will be in affordable tenures, which will be provided as social rented accommodation. Social rented accommodation will be located within Serpentine Court Phase A and the development sites at Melfort Drive, Drayton Road and Burnmoor Close. Private market accommodation will be located on the Stoke Road site.

Phase B Outline Planning Application

- 8.24 30% of the proposed homes within the outline application will be in affordable tenures, which will be provided as social rented accommodation. These homes will be located alongside the private market homes in Serpentine Court Phase B, and the 64 extra care homes within this phase of development.
- 8.25 Combined, the phases will deliver a total of 51.3% of affordable housing. This will all be delivered as socially rented rather than a portion as shared ownership homes, to ensure that all affordable homes can be re-provided, with additional uplift. This has also been balanced with the need to maximise the number of private sale homes to help cross-subsidise the estate renewal.
- 8.26 Overall, this provision of just over half of all homes proposed within both the detailed and outline applications to be affordable not only achieves but exceeds significantly the target set out in Policy HN2 of Plan:MK and the Affordable Housing SPD.

Mix of Dwelling Sizes

8.27 Policy HN1 of Plan:MK states that the borough will meet its strategic objectives by requiring larger residential proposals “to provide a wider mix of tenure, type and size of affordable and market dwellings, and a range of net densities across the development”. Paragraph 7.3 of Plan:MK sets out that there are a number of documents which should be used to inform the mix of housing; these include the Council’s SHMA, the Affordable Housing SPD as well as any site or area specific development frameworks. The Plan, having considered this, sets out a recommended mix of housing type and size for the borough, as follows:

Type	Size	Affordable Housing (8,200 homes)	Market Housing (18,300 homes)
Flat	1 bed	10%	1%
	2 bed	9%	1%
House	2 bed	33%	11%
	3 bed	38%	57%
	4 bed	9%	25%
	5 bed	3%	6%
		100%	100%

Table 7: Recommended housing mix within the OAN (Source: Milton-keynes.gov.uk)

8.28 The supporting text to Policy HN1 suggests that the appropriate mix of housing will be influenced not only by planning policy, but also by site-specific factors, wider trends and current information on households with specific needs. It states that this policy therefore adopts a flexible approach whereby proposals will be considered on a case-by-case basis.

Phase A Detailed Planning Application

8.29 The Phase A detailed application proposed housing size and tenure split is shown below as percentages in Table 8.

Size	Affordable Homes		Private Market Homes	
	Quantum	Percentage	Quantum	Percentage
1-bedroom flat	76 (incl. 16 wheelchair accessible)	34.9%	14 (incl. 1 wheelchair accessible)	15.6%
2-bedroom flat	58 (incl. 4 wheelchair accessible)	26.6%	25 (incl. 4 wheelchair accessible)	27.8%
2-bedroom house	23	10.6%	2	2.2%
3-bedroom flat	4 (all wheelchair accessible)	1.8%	0	0
3-bedroom house	49	22.5%	49	54.4%
4-bedroom house	6	2.8%	0	0
5-bedroom house	2	0.9%	0	0
TOTAL	218	100%	90	100%

Table 8: Summary of proposed residential dwelling mix on the Lakes Estate as part of Phase A Detailed application

- 8.30 The dwelling size mix proposed as part of the detailed application will offer a range of dwelling sizes from 1-bedroom flat to 5-bedroom house. There will be 29.2% 1-bedroom homes across affordable and market tenures. For private tenures this will be 15.6%. Though this is greater than the borough-wide housing mix recommendation for private accommodation, this is considered to meet an identified need for smaller accommodation as per a recent estate-specific Housing Survey (see below).
- 8.31 The proposed housing mix also takes into consideration the physical site constraints. The majority of 1-bedroom homes will be provided in ‘Phase A’ of Serpentine Court, where homes are being built on the park edge in order to facilitate resettlement of existing residents. The housing mix also responds to the numerous physical site constraints, such as the need to minimise construction on open space, as well as the associated car parking required for larger housing, and the land take required by this. Moreover, the urban design rationale seeks to create greater density at the heart of the estate, to help create a vital centre and sustain non-residential uses. A greater proportion of smaller accommodation is therefore considered to be appropriate in this setting.

8.32 The largest proportion of homes will be 3-bedroom houses, for which there is a large demand in both affordable and private tenures. The proposed quantum broadly aligns with the OAN recommendations, with some divergence in affordable housing tenures to address existing residents' identified housing need.

8.33 Within the affordable housing tenures, the housing mix has been derived from the Housing Needs Survey that was undertaken recently. The survey identified where existing Serpentine Court residents were currently living in accommodation that was not suitable for their needs. The proposed development addresses the discrepancy. The proposed housing size mix in affordable tenures has therefore been carefully tested to address a bespoke assessment of existing residents' needs, rather than a generic borough-wide policy.

Phase B Outline Planning Application

8.34 The Phase B outline application proposed housing size and tenure split is shown in Table 9 below. These figures exclude the extra care accommodation homes (Use Class C2), which are outlined separately in Table 10.

Size	Affordable Homes		Private Market Homes	
	Quantum	Percentage	Quantum	Percentage
1-bedroom flat	4 (all are wheelchair accessible)	3%	0	-
2-bedroom flat	42 (4 are wheelchair accessible)	31.6%	64 (10 are wheelchair accessible)	76.2%
2-bedroom house	6	4.5%	0	0
3-bedroom flat	36	27.1%	20	23.8%
3-bedroom house	35	26.3%	0	0
4-bedroom house	10	7.5%	0	0
TOTAL	133	100%	84	100%

Table 9: Summary of proposed residential dwelling mix on the Lakes Estate as part of Phase B Outline application

8.35 The dwelling size mix proposed as part of the outline application will offer a range of dwelling sizes from 1-bedroom flat to 4-bedroom house. There will be 3% 1-bedroom homes. The largest proportion will be 2-bedroom

flats, for which there is a large demand in both affordable and private tenures. Overall, there is a high amount of family housing proposed, at 46.5% across both tenures but with the majority of family housing being offered in affordable tenures.

8.36 The proposed housing size mix has also taken account of the housing typology proposed on the site, and the desirability of this within the market. In order to achieve sufficient densities to re-provide all existing social housing and to help cross-subsidise the delivery of new homes, the outline application component 'Phase B' is primarily comprised of flatted accommodation. The housing mix for this component has therefore factored in the suitability of family housing in flatted accommodation, without access to private gardens. The majority of homes will be for private sale. Therefore, Milton Keynes Council have also considered the desirability of 3B+ flats for private sale, and must consider the saleability of proposed homes, and the impact sales rates will have on the deliverability of the overall development. As noted above in relation to the detailed application, at the rejuvenated centre, the borough-wide housing mix aspirations have also been balanced against the need to provide adequate car parking, to create sufficient density to sustain the new local centre, and to minimise the building footprints and therefore maximise the provision of open space.

8.37 The extra care accommodation provides mostly 1-bedroom accommodation (61%). The remaining 39% are 2-bedroom extra care homes which may be suitable for couples to move into. This is set out in Table 10 below.

Size	Quantum	Percentage
1-bedroom flat	39	61%
2-bedroom flat	25	39%
TOTAL	64	100%

Table 10: Summary of proposed extra care (Use Class C2) dwelling mix on the Lakes Estate as part of Phase B Outline application

8.38 The proposed layouts and housing mix of both the sites within both the detailed Phase A application and the outline Phase B application are constrained by a number of factors which has informed the proposed housing mix. The factors influencing the housing mix include the need to re-provide certain types of existing homes (particularly 2-bedroom flats), and to try and provide the size of dwellings which residents have expressed a preference for (including 1-bedroom homes) throughout the extensive consultation process, and the need to ensure high quality internal environments within the proposed homes. Other considerations which have been designed into the proposed housing mix include the need to include a diverse range of tenures and home sizes to ensure mixed and inclusive communities and to meet a variety of household needs.

- 8.39 There is also a need to maximise the number of private sale homes to help cross-subsidise the Estate renewal, which encompasses the comprehensive redevelopment of Serpentine Court and the suite of estate-wide environmental improvements. The proportion of larger family homes has been maximised as much as possible given the above constraints, and a good proportion of these larger homes are allocated within the social rented tenure where the need is greater than in the private market.
- 8.40 Whilst the proportion of homes proposed is not equivalent to the proportion set out in Plan:MK, the provision of different sized dwellings as part of both the detailed and outline planning applications will be able to deliver a suitable range of sizes across all tenures. This includes the provision of extra care accommodation and wheelchair accommodation across both affordable and private tenures to ensure that a diverse range of housing and specialist needs can be met on the Estate.
- 8.41 The detailed application forming Phase A proposes a higher level of affordable housing than the outline application for Phase B. This is to frontload the delivery of affordable housing and ensure that the existing affordable housing in Serpentine Court can be re-provided on the Estate. Further detail on the proposed housing mix and split of the outline application will be confirmed in the future as part of the reserved matters application, however the overall affordable housing % across both phases will meet at least 51%.
- 8.42 It is acknowledged by the applicant that the housing mix proposed as part of the detailed application does not fully align with the Council's preferred housing mix as set out in Plan:MK and the SHMA. This is due to the need to re-provide homes to meet the existing housing need - assessed through an estate specific Housing Needs Survey - amongst a range of other considerations. Future phases of the development have the potential to align more closely with the Council's preferred housing mix where they would not be facing the requirement to re-provide specific types of homes.
- 8.43 Due to the constrained nature of the proposed development sites, a planning policy compliant mix is not achievable. The design emphasis has been on maximising housing delivery bearing in mind site constraints.
- 8.44 In conclusion, taking into consideration the various constraints above, the proposed housing mix for both the Phase A Detailed and Phase B Outline applications are considered to make a significant contribution to the housing needs of the borough in a mix of sizes, and address the specific housing needs of residents on the Lakes Estate.
- 8.45 Given these factors which influence the housing mix of the proposed development; the flexibility afforded by Policy HN1; and, the expectation to provide supported accommodation in line with Policy HN3, the proposed housing mix is considered to be acceptable.

Design and Layout

- 8.46 The design and layout of the existing estate results in a number of issues which have previously been discussed. The initial design brief for the proposed development within the estate sought to address these issues, alongside facilitating the delivery of new homes.
- 8.47 Policy SD1 of Plan:MK sets out the place-making principles for development, including promoting good physical and mental health, integrating with the surrounding environment and enabling a high degree of connectivity particularly for pedestrians and cyclists.
- 8.48 Plan:MK Policy D1 sets out that development proposals should respond appropriately to the site and surrounding context, and site layout should maximise the surveillance of the public realm and minimise the perception of crime. Clause (9) of this policy seeks to ensure that development proposals include a ‘variety of layouts, street types, building sizes and forms, landscapes, uses and housing tenures’ across the development. Policies D2 and D3 of the Plan set out a number of specific design criteria for assessing the quality of places and buildings.
- 8.49 Policy D4 sets out a range of criteria, including that new development should ensure satisfactory levels of daylight and sunlight within buildings and open spaces, as well as ensuring a reasonable degree of privacy to existing living spaces and not overbearing upon existing buildings and open spaces.
- 8.50 In addition to the Milton Keynes borough-wide policies referred to above, feedback from MKC Planning Officers, the Development Review Forum and the public including residents of the Estate has been taken into consideration in the design proposals. Broadly the feedback emphasised:
- The need for high-quality spacious homes to meet a range of housing needs;
 - Sensitive design considering adjacent homes and uses;
 - Good quality amenity space;
 - Improved public transport access as part of an estate-wide strategy for improvement; and,
 - Sufficient levels of car parking.
- 8.51 The following section assesses the design and layout of the proposed buildings as part of both the Phase B Outline application and the Phase A detailed application. Further detail on the design approach is contained within the submitted DAS prepared by HTA Design. The design of the open space, landscaping and public realm are discussed within a later section of this assessment.

Site Layout

- 8.52 A number of high-level site layouts were evaluated during the course of the design development which have informed the proposed layout for each of the development sites, alongside the opportunities and constraints of each site. Layouts have also been derived from iterative testing to consider the needs of residents, as well as commercial, community and educational occupiers where necessary.
- 8.53 The Council's place-making aspirations, as set out in strategic objective 14 of Plan:MK have also been taken into account where this seeks the layout and design of new development to create safe, healthy and sustainable built environment with easy access to open space, public transport and everyday facilities.
- 8.54 The layout of the sites has also responded to the existing Radburn layout of the Estate, respecting the existing structure and movement network by reinforcing key routes, clearly defining public and private space and designing clear frontages along primary roads and open spaces.
- 8.55 The Residential Development Design Guide SPG sets out a number of design criteria which development proposals should meet. These are listed in paragraph 7.43 of this Statement, and include co-locating uses to reduce the amount of car parking, using taller building elements to mark gateways and key corners as well as to reinforce street hierarchy, and the development being based on a permeable movement framework. The design of the proposed development has been carefully considered and achieved these key design objectives.

Serpentine Court Phase A

- 8.56 The layout of this site is organised into three key areas. A mix of flatted blocks and houses are proposed between Windermere Drive to the west of this site and the edge of the improved Warren Park. There is also a parcel of land to the south-east of Windermere Drive, which will provide buildings for commercial use and the energy centre, and another parcel to the south-west which provide 12 houses associated this phase.
- 8.57 Each flat block will be set within an area of open green space, and the two southernmost flat blocks front onto a new Redway into Warren Park and a landscaped public realm area from which residents will also gain access. Residents of the two blocks to the north will gain access to their residential cores from Windermere Drive, and residents of the houses here and to the south-west of the site will gain access via private entrances directly off the street.
- 8.58 The new and relocated commercial and community spaces along with the nursery are proposed to occupy the ground floor of the two southernmost

blocks. Access to these uses is proposed from entrances facing directly onto primary public space at the gateway to Warren Park.

Car parking is primarily provided on-street, however due to the constraints of the existing site layout, car parking courts are proposed in a limited number of locations. These will either be overlooked or within secure, semi-private courtyards. Cycle spaces will be stored in rear gardens for the houses, and within ground floor stores or rear amenity courtyards for the flatted blocks.

Stoke Road

8.59 The proposed layout of this site places the majority of homes along the western side of Stoke Road on Warren Park, organised in an L-shape around the existing properties on Gairloch Avenue. There are a smaller number of homes on a parcel of land further north to the east of Stoke Road, and further homes to the east of the properties on Kinloch Avenue further south on Stoke Road.

8.60 The layout of this site has been designed to provide a strong frontage onto Stoke Road to help activate this road and the north-eastern area of the Warren Park. This is achieved by placing a landmark building to the south-eastern corner of the main part of site to mark the entrance to the improved Warren Park, and improved overlooking from the new homes onto the public open space. In addition, the vast majority of residents of both the houses and flats will gain access via entrances which are either directly on Stoke Road, or on the buffer to Warren Park. The design of this site to provide a strong frontage onto Stoke Road and Warren Park will be complemented by new redway and footpath proposed within Warren Park, which will better connect Stoke Road to the new local centre at Serpentine Court.

8.61 The levels and topography for the homes to the north of the site have been elevated to maximise the amount of green frontage and buffer to the rear of the properties along Gairloch Avenue, as well as to help minimise the visual impact of the associated parking areas.

8.62 Car parking will be located within secure communal courts for the residents of the flats, and on-street for residents of the houses across all three parts of this site. Cycle spaces will be stored in rear gardens for the houses, and within ground floor stores or rear amenity courtyards associated with the flats.

Melfort Drive

8.63 The proposed site layout is formed of new housing set broadly along the perimeter of the site, with a block of flats and a new green court located in the centre of the site which will be active and well-overlooked where the majority of residential homes will have their entrances looking out onto this

open green space. This site has been designed to ensure that there is a strong frontage onto Melfort Drive to help reinforce the existing residential road, which has been achieved through entrances for the new homes facing onto this road. The car parking for this development site is designed to be on-street which will also help create activity within the site and on Melfort Drive. Cycle spaces will be stored in rear gardens for the houses, and within ground floor stores in the flat block.

Drayton Road

- 8.64 The layout of the proposed homes on this site follow its crescent-shape, which provide an excellent opportunity to provide positive overlooking to the entrance to the Blue Lagoon nature reserve and an active frontage to better address Drayton Road itself. Flat blocks will be located to the far south of the site opposite the footbridge over the railway line, as well as to the north of Tummell Way to assist with wayfinding and act as a gateway to mark the entrances into the Estate.
- 8.65 Car parking associated for residents will be located to the side of the houses and within a secure semi-private courtyard for the flat blocks. Visitors' parking will be located along two sections of the edge of Drayton Road. Cycle parking will be located in rear gardens for the houses, and within ground floor stores in the flat block.

Burnmoor Close

- 8.66 The layout of the proposed homes here forms a 'dumbbell' pattern across the land forming the site between Burnmoor Close and Burnmoor Close. They have been designed to best respond to the pattern of existing nearby housing whilst ensuring a good level of overlooking onto the improved public open space, created by setting the buildings and parking back to ensure its size is maximised.
- 8.67 Car parking here is separated into two on-street areas within proximity of both areas of housing, with cycle parking being located in rear gardens for the houses.

Serpentine Court Phase B

- 8.68 The proposed layout of Phase B of Serpentine Court comprises of seven new blocks set around a series of clearly defined new streets and avenues based along strategic routes through the Estate, which include the east-west link from Fern Grove to Windermere Drive. The proposed development within this Phase is also set along the north-to-south Central Green Spine, which will provide a high-quality landscaped route from Drayton Park School to Water Hall Primary School for pedestrians and cyclists.
- 8.69 The layout of the new homes in this Phase will reinforce the status of this area as the new local centre by aligning new streets and avenues with

terraces of houses and the courtyard flat blocks. The entrances to these homes, including the residential cores of the flats, are located along the public realm and the new routes which will maximise the level of active frontage to these areas. These will be clearly identifiable from the street and contribute to a more legible public realm as well as a feeling of welcome and safety. Furthermore, the location of residential entrances and the orientation of the new homes ensures that Warren Park and other public realm and amenity areas will be well-overlooked. The courtyards for the flat blocks, however, have been clearly defined as exclusively for the use of future residents of these blocks to ensure that there is a private amenity area for them to enjoy alongside balconies and terraces.

- 8.70 The car parking for this phase will be located primarily on-street, where it will be well-overlooked by the new homes. The parking areas have been designed with efficiency in order to maximise the number of spaces available, ensuring that key pedestrian routes - such as the Central Green Spine - can remain pedestrian-only. This should ensure that the Spine becomes an inviting, safe route for pedestrians and cyclists to use in the future. As with Phase A, the cycle parking will be located in rear gardens for the houses, and within ground floor stores in the flat blocks.
- 8.71 Overall, the proposed layouts of the sites within both the Phase A and Phase B applications deliver new development in accordance with the criteria and guidance contained within Policies SD1, D1, D2 and D3 of Plan:MK (2019).

Scale, Form and Massing

- 8.72 The proposed massing of the buildings proposed within both the Phase A detailed and Phase B outline planning applications has been carefully considered to mediate sensitively with the surrounding existing buildings on the Estate. The proposed scale and massing of the proposed buildings as part of both applications has been arrived at following comprehensive urban design analysis of the Estate and the development sites within their surrounding context. This analysis has helped form the Design Code principles which have influenced the estate-wide design approach to scale, form and massing. The detail of these Design Code principles, as well as more information on the approach towards scale, form and massing, is contained within the Design and Access Statement prepared by HTA Design.
- 8.73 The associated detailed development opportunity policies within the Lakes Estate Neighbourhood Plan (2015) do not set out specific quanta of development/homes that would be expected in each location. However, these policies do set out indicative heights. These were set out in Table 4 of this Statement.

Serpentine Court Phase A

8.74 The existing local centre at Serpentine Court is taller and has a distinct identity relative to the outer quarters of the Estate, which are a mixture of one-, two- and three-storey homes. The proposed new buildings will have a maximum height of four storeys, stepping down to two storeys for certain elements of the flat blocks, the houses and buildings accommodation the non-residential uses. The heights are considered suitable to denote the location of the local centre and are lower in height than the existing Serpentine Court.

8.75 The form of the individual buildings within this Phase have been considered holistically, as such they have been articulated and expressed to reduce their massing to consider the change in scale from other buildings by stepping down in height towards the properties to the north and east of the site. This will contribute to the built environment surrounding the new local centre at Serpentine Court and helps with wayfinding from Warren Park and Stoke Road.

Stoke Road

8.76 One of the key purposes of the proposed buildings on this development site is to provide a strong frontage onto Warren Park and Stoke Road. The form of the buildings has been designed this in mind, by placing a landmark building on the site at the corner of Stoke Road and Warren Park as identified in the wider masterplan for the Estate. The massing of the adjacent proposed buildings steps down in scale away from this focal point, providing definition to this key corner and reflecting the scale of the existing area. The buildings here are also important where they assist wayfinding by providing a gateway to the new improved park and allow for opportunities for overlooking of this key public area.

8.77 The buildings located at the corner of Stoke Road with Warren Park also provide an active frontage to the Grand Union Canal and, overall, have been carefully designed to be in keeping with the existing local character of this part of the Estate through the selection of materials and design. These considerations form key design principles in Plan:MK Policy DM5.

Melfort Drive

8.78 The approach to scale, form and massing for the buildings on this development site takes direction from the existing surrounding built environment, which comprises two-storey homes. The buildings along the perimeter of the site replicate this through a consistent height with some taller elements to the north and within the centre of the site for the flat block. This minimises any visual impact of the scale of the proposed buildings here and seeks to integrate the scale and form of the new development seamlessly into the existing context.

Drayton Road

The approach towards the proposed massing of the buildings proposed on this site is similar to that outlined above, for Melfort Drive. The existing context comprises mostly of two-storey homes, which have help guide the height of the homes proposed to be two storeys, with the flat blocks having one additional storey to assist with wayfinding into the estate from this corner.

Burnmoor Close

- 8.79 The massing and scale of the proposed buildings on this site has been considered in light of its size and proximity to existing residents and open green spaces. The proposed homes are two-storeys, except for the two end of terrace properties to the northern and southern end of the site which use a different housing typology and are three storeys. This helps to define these buildings and provides an element of overlooking onto the open spaces to provide natural surveillance whilst also respecting the scale of existing neighbouring buildings.

Serpentine Court Phase B

- 8.80 The outer quarters of the Estate are characterised by homes between one and three storeys, and the existing buildings at Serpentine Court are taller as they are distinct from the remaining Estate. This reflects its status as the local centre.
- 8.81 The scale of the proposed new build blocks has been informed by their immediate context and by the development coming forward in Phase A. The scale of the proposed buildings also relates to the street hierarchy within which they are located; adjacent to two of the key roads through the Estate via Fern Grove and Windermere Drive, but also set amongst the new east-west route which will link the two.
- 8.82 As with Phase A and a number of the infill development sites, the approach towards height and massing has taken into account the fact that there is a need to assist with wayfinding as well as ensuring adequate levels of overlooking across to public open spaces including the new Central Green Spine. The tallest elements will therefore be five storeys, and these areas of higher density will contribute to boosting activity around the new mixed-use centre as a whole. The buildings then step down in height to two and three storeys for the homes to the north and south of the site, which are adjacent to existing and proposed buildings of the same scale.
- 8.83 The height of the buildings for this Phase of Serpentine Court are marginally greater than the Lakes Estate Neighbourhood Plan has originally set out, though will be lower than the existing buildings on the Estate. As set out within the Lakes Estate Neighbourhood Plan discussion in Section 7, the indicative storey heights mentioned within the policies governing each development site are not financially viable to fund the regeneration of

Serpentine Court. Viability is a key planning consideration, and development which is found to be not viable cannot be relied upon to deliver the additional homes required by the government and Councils. Such policies restricting storey heights also have limited weight in planning terms when considered alongside national and local planning policies, and conflict with the planning priorities contained within them.

- 8.84 Given these considerations, there is significant justification to diverge from the precise building heights as suggested within the Lakes Estate Neighbourhood Plan. The proposed urban design approach has been carefully thought out and tested, and it is considered that the proposed design would improve the appearance and character of the surrounding townscape.

Density

- 8.85 Policy HN1 of Plan:MK sets out that proposals for 11 or more homes would provide a range of densities, and that this should balance making efficient use of land with respecting the existing surrounding character and context. It states that higher density development will be encouraged in locations with good access to facilities, are well-served by public transport, and where it can be accommodated through either existing or improved infrastructure.
- 8.86 The Estate is conveniently located to local services and amenities both within and outside its boundary. It has a good level of public transport accessibility, and residents will benefit from the bus stop improvements proposed as part of the estate-wide environmental improvements. The proposals also include new and improved pedestrian and cycle routes within the Estate which have been carefully considered to link to routes beyond the site boundary. Further details on these improvements and public transport access can be found within the Transport Assessment and Transport Strategy Note prepared by ITP.
- 8.87 The site is also located in an area of wider change and new development. The Estate is close to the area of the Council-led Central Bletchley Prospectus, which is situated around Bletchley railway station. The East-West Rail project will lead to a number of opportunities to intensify residential development in sustainable locations here, as suggested in Policy DS4 of Plan:MK. Adjacent to the Estate to the east is the open land forming the Eaton Leys strategic urban extension, which has outline planning permission for residential development of up to 600 new homes and associated facilities and infrastructure including a health centre and a primary school.
- 8.88 The proposals have sought to respect existing densities within the Estate and take into account other factors such as ensuring the most efficient use of the land and the need for additional housing on the Estate. Other

relevant considerations are viability and both the level of affordable housing which is to be re-provided and the affordable housing which is proposed in addition to this. The density of the proposed development is therefore considered to be appropriate.

Summary of Design and Layout Considerations

- 8.89 This analysis suggests that the design approach in urban design terms across the whole estate for new buildings, as well as the design approach for each of the individual proposed blocks, accords with the borough's design policies and guidance. The proposed development remedies a series of undesirable design elements across the Estate, and the proposed design of the buildings within both applications will be of a very high quality, as discussed above and within the submitted DAS.
- 8.90 Overall, it is considered that the delivery of this residential accommodation and associated and non-residential space is fully in accordance with the NPPF in making the most effective use of land for the provision of new homes and the re-provision of the existing homes. It is also considered that the proposed design of the new buildings is of a very high quality in accordance with the provisions of Plan:MK Policies SD1, D1, D2, D3 and D4, and that the higher density is considered to be acceptable and in line with the strategic aspirations of Policy HN1 of Plan:MK.

Heritage and Townscape Impacts

- 8.91 As part of the discussions at pre-application stage, the Council's Landscape Officers noted that proposals need to consider the views across to Little Brickhill and the Brickhill Greensand Ridge. It was agreed that a light-touch assessment could be prepared as part of the DAS, which has been prepared by HTA Design. This takes the form of a photo view towards the site and supporting landscape sections.
- 8.92 Little Brickhill and Brickhill Greensand Ridge are located approximately 3.5km east of the Lakes Estate. Currently, the estate is difficult to discern from these two points given the level of intervening development and landscape and the generally low-rise built form of the estate.
- 8.93 The proposals will result in a reduction in overall height of buildings in Serpentine Court from 6 storeys currently, to 5 storeys as proposed. In addition, the landscape proposals have been designed to create a landscape buffer along the east of the site on Stoke Road and the Grand Union Canal. This will protect views from Little Brickhill and Brickhill Greensand Ridge and ensure that they would not be adversely affected by new development on Stoke Road and Serpentine Court.
- 8.94 Alongside this strong parkland edge, the proposed tree planting across the estate will help soften any visual impact of the development and

complement the key landscape features and trees to be retained. This will have the effect of creating layers of landscape to form a natural buffer.

- 8.95 Additionally, the proposals are confined to development within the existing built environment of the estate and based on the areas already allocated within the Lakes Estate Neighbourhood Plan (see Figure 2). The building heights proposed are broadly aligned with those set out within the Neighbourhood Plan. Therefore, it is not considered that the proposed development would have an adverse impact on the identified views.
- 8.96 The Council's Landscape Officer also highlighted the importance of the SuDS strategy and the amount of space required for this. SuDS have been embraced as a positive landscape design element and make an altogether positive impact on the townscape and landscape of the estate considering the surrounding landscape character. Further detail on the SuDS strategy is contained within the Flood Risk Assessment and SuDS section of this assessment, as well as the Flood Risk Assessment and Outline Drainage Strategy prepared by WSP.

Re-provision of Non-Residential Uses

- 8.97 A Local Centre Planning Note has been prepared by Milton Keynes Property Services, who manage the existing local centre at Serpentine Court. It has indicated that approximately 60% of the existing commercial units on the Estate are vacant. Previous uses which have since closed include a bakery, pub, dry cleaners, post office and charity shops. These businesses closed due to individual business viability issues, which are detailed further in this Note.
- 8.98 The Note also explains that due to the extremely poor condition of these vacant units, the Council have not been able to actively market these units. These would not have been likely to attract interest from potential occupiers given their condition and context. The local centre at Serpentine Court has not been fully let out in since at least 2005.
- 8.99 Policy ER11 of Plan:MK sets out to protect local shops, post offices, banks and pubs, and requires that before planning permission is granted for a change of use resulting in the loss of this use, that all means of retaining the use are explored and that the Council be satisfied that the existing use is no longer commercially viable.
- 8.100 The Local Centre Planning Note indicates that the post office, which has since closed, was not viable which lead to the occupier surrendering their lease. The pub has dissolved its company twice within the past 10 years and has not been able to trade successfully on the Estate, and there has never been a bank in this location.

- 8.101 The existing convenience store on the site is proposed to be retained as part of the commercial offer within the Phase B outline planning application, though there would be an intervening period where this could not exist on the site due to the demolition of Serpentine Court and construction of Phase B. In addition, the ground floor residential use proposed is not considered to be likely to have an adverse impact on the amenity of existing residential neighbours more than non-residential uses.
- 8.102 Policy ER13 sets out that planning permission will be granted for non-retail uses in local centres if at least one general convenience store will be retained and if the proposed use would not adversely affect the amenity of neighbours or the surrounding area.
- 8.103 The proposed uses on the site as part of both the detailed Phase A application and the outline Phase B application are in compliance with the tests sets out in Policies ER11 and ER13 of Plan:MK. This includes the relocation of the existing operating shops on the estate, including the chicken shop, pharmacy, grocers, and hair salon. The proposals are therefore considered to be acceptable and would not have an adverse impact on the amenity of existing and future residents and businesses.
- 8.104 In light of this assessment the proposed non-residential uses as part of the detailed Phase A application and the outline Phase B application are considered acceptable, and in line with the requirements of Plan:MK Policies ER11 and ER13.
- 8.105 Within the Phase A detailed application site, there is 288sqm of existing non-residential space, and within the Phase B outline site there is 2935sqm of existing non-residential space.
- 8.106 The proposals include 1,193 of non-residential space within Phase A (see paragraph 5.12 for a breakdown of proposed uses), and 756sqm of non-residential space within the Phase B application (see paragraph 5.27 for a breakdown of these uses).
- 8.107 Overall, there is a reduction in commercial floorspace. However, the provisions of Plan:MK Policies ER11 and ER13 have been taken into account, above, as well as the viability and deliverability of these spaces. In addition, the impacts of the new retail offer as part of recently consented schemes such as within Newton Leys have been considered in the proposals for commercial and retail floorspace.

Open Space and the proposed design of Landscaped Areas, including Warren Park

- 8.108 The DAS prepared by HTA Design contains detail on the existing and proposed provision of open space and the design of the landscaped areas across the site as part of the development sites and estate-wide

environmental improvements. Section 8 of the DAS goes into further detail on the specific proposals to improve Warren Park.

- 8.109 Warren Park currently supports a number of functions within the local community including organised events and play space through the existing NEAP-standard play area. It also has the remnants of historic field boundaries through the form of the large hedgerow and a framework of mature trees. However, the park is under-used and offers poor connectivity across and away from the estate.
- 8.110 Policy L2 of Plan:MK sets out that a loss of public open space will be refused, unless one of the following criteria can be met. These criteria comprise:
- a) Undertaking an assessment which clearly shows the open space is surplus to requirements and the development would not have a detrimental effect on the open space, environmental, landscape character or wildlife value;
 - b) The development would significantly enhance the Open Space Network as a whole;
 - c) The loss of open space resulting from the development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location that is clearly and demonstrably acceptable to the local community or main users of the existing space; or,
 - d) The development is for other types of sports or recreational provision or ancillary development associated with the open space where the needs clearly outweigh the loss.
- 8.111 In addition, Policy L3 sets out additional criteria relevant to the assessment of open space in relation to any changes of use. Key relevant criteria include the demonstration that:
- The land does not fulfil a useful purpose in terms of its appearance, landscaping, recreation use or wildlife value; or,
 - The loss of amenity open space would not set a precedent for other similar proposals which would cumulatively have an adverse effect on the locality or the environment.
- 8.112 There is currently 144,561sqm of open space within the proposed site areas forming the detailed and outline applications. This comprises of 112,0885sqm public open space (soft) and 32,474sqm public open space (hard). The proposals will result in a reduction in this area of open space to 108,308sqm, comprising 54,562sqm public open space (soft), 49,507sqm public open space (hard) and 4,240 semi-private open space (soft). This reduction is largely due to the development of the Stoke Road infill site, which includes an area to the north-east of Warren Park, and Serpentine Court Phase A. In response to this, the proposals have been carefully

designed to improve and enhance the quality of the open spaces across the estate and Warren Park to compensate for this loss.

- 8.113 As explained in further detail within the Ecology and Biodiversity section of this Statement, the vast majority of the open space on the estate comprises low-cut grassland with little to no diversity or ecological value. The existing hedgerow is also poorly managed and has grown to be oversized and attracts anti-social behaviour.
- 8.114 The landscape proposals have maximised the opportunity to create new areas of ecological value across the site, and particularly within Warren Park. The creation of new habitats within Warren Park in particular will increase biodiversity by introducing a more varied planting palette with greater seasonality. This will deliver significant benefits for wildlife, and biodiversity enhancement and accords with relevant legislation and Plan:MK.
- 8.115 The proposals for ecology and landscape across the site areas also mean that it is possible to achieve a no-net loss of habitat diversity and a net-gain in the value of hedgerows, as detailed within the Ecological Impact Assessment prepared by CSA Environmental.
- 8.116 Overall, it is considered that the loss of open space is being replaced by much improved open space across the estate, and the proposed open space will fulfil a useful purpose in terms of its improved wildlife value. This is in line with Plan:MK Policy L2 a), and Policy L3.
- 8.117 As previously outlined in this Statement, the four infill sites which form a part of the detailed planning application as well as both phases of Serpentine Court have been allocated for development within the Lakes Estate Neighbourhood Plan. This includes the site at Stoke Road which encompasses a portion of Warren Park. It is therefore considered that the local community have demonstrated acceptance of the loss of this area of the park pursuant to part c) of Plan:MK Policy L2.
- 8.118 The improvement of open spaces across the estate extends to the connections between them, enhancing the wider open space network. The open spaces will be connected by attractive landscaped public routes to help encourage the uptake of active modes of transport. Such routes include the Central Green Spine and new east-west connection between Fern Grove and Windermere Drive. These routes through the new local centre will be major pedestrian thoroughfares with great opportunities to improve connectivity and landscape amenity value in the central part of the estate. The public realm improvements in these locations will therefore be a significant benefit to people travelling through this environment, as well as for ecology, by maximising the greenery on these routes and providing clear links to the improved open spaces across the estate.
- 8.119 The proposed landscape design also seeks to enhance the connections to routes leading away from the estate and towards other open spaces,

including those at Eaton Leys and towards the Local Nature Reserve at the Blue Lagoon. It is therefore considered that the proposals would have a positive impact on the existing Open Space Network as a whole in line with criteria b) of Plan:MK Policy L2.

- 8.120 The proposed landscape scheme also seeks to encourage greater use of the open spaces across the estate. Central to this is Warren Park, which although is a larger open space is not very well utilised. The park is not zoned into particular uses, has limited east-west or north-south connections, few formal sports or amenity facilities, and its lack of biodiversity value does not make it an attractive natural place to visit. The creation of an activity hub, as detailed within the Children's Play Space section of this assessment proposed a range of new facilities for all ages and abilities, including a neighbourhood area for play, wheels park, and new play and wildlife trails from the new local centre to Stoke Road. These proposed landscape interventions seek to significantly improve the quality and function of Warren Park.
- 8.121 Overall, these landscape proposals will have a positive impact on the character and natural value of the open space across the estate. Though there will be a reduction of open space in terms of quantum, the proposals have sought to improve and create open spaces which will be of a much higher quality and will be more likely to be engaged and connected with by residents.
- 8.122 In addition to the improvement of the existing open green spaces - in appearance and functionality - the proposals also seek to improve a number of routes across the estate through the introduction of landscaping and other environmental enhancements.
- 8.123 The proposals will improve and enhance the existing open spaces on the estate through a comprehensive package of public realm and landscaping improvements, which will be of great benefit to all residents and visitors. The proposals have been designed to enhance the landscape character and wildlife/ecology value of the open spaces, having a beneficial effect on the Council's Open Space Network as a whole. This is in accordance with Plan:MK Policies L2 and L3 and is therefore considered acceptable in policy terms.

Children's Play Space

- 8.123 The provision of play space, alongside a wider network of green infrastructure, is outlined as a key place-making principle in Policy SD1 of Plan:MK. Further detail on the design of play spaces is contained within the Council's Residential Development Design Guide SPG (April 2012).
- 8.124 The development approach for both Phase A and Phase B proposes an approach where the landscape is designed to be playable, with specific play

areas strategically located around the estate which will be enjoyed by children of all ages.

- 8.125 Central to the estate-wide play strategy will be Warren Park. This forms the green spine at the centre of the estate and is vital to the provision of play, recreation and open space for residents of the whole estate. The primary activity zone, the Activity Hub, proposes new play facilities which will be concentrated to the west of the Park, closer to the new centre at Serpentine Court. This play area will be a neighbourhood equipped area for play (NEAP) standard 'destination' play area with a wheels park (for skating and BMX activities), a multi-sport area, as well as pocket play areas forming a larger play trail through the Park and exercise trails children and adults to use.
- 8.126 The variation in topography of the park creates smaller mounds and banks which offer vantage points and resting areas for children alongside the wider landscape, which forms a natural bowl within which a theatre of activity could be observed. This could be achievable through the re-use of excavated earth.
- 8.127 In addition, the improvements in permeability and access throughout and across the estate will mean that more residents can access the Activity Hub and gain enjoyment from the new facilities proposed.
- 8.128 The much-cherished dinosaur sculpture, Leonasaurus, will be relocated within the current play area in Warren Park to form a focal point within the Activity Hub.
- 8.129 Elsewhere on the estate, the proposals seek to provide either new or improved play areas in each quarter of the Estate as part of an estate-wide play and open space strategy. These spaces have been designed to a local equipped area for play (LEAP) standard and have dual purpose where they also provide communal spaces for social gatherings. This will ensure that every young person has access to good quality play and recreation facilities pursuant to encouraging healthy and active lifestyles, improving access and interaction to nature and creating areas of community interaction. These are key elements of a number of strategic objectives as stated in Plan:MK.
- 8.130 Further detail on the Activity Hub and the play strategy proposed is contained within the DAS prepared by HTA Design.

Highways and Transport

- 8.131 Sustainable transport is a frequently stated planning principle within Milton Keynes' strategic objectives over the plan period. It is enshrined into planning policy through the provisions of Plan:MK Policy CT1, with further detail and transport-related requirements set out in Policies CT2-CT6, Policy CT8 and Policy CT0. The broad aspiration of these transport related

policies is encapsulated within the Milton Keynes Transport Vision and Strategy LTP2 2011-2031, which is centred around the aim of Milton Keynes having ‘the most sustainable transport system in the country’ by 2031. One of the ways in which this will be achieved is through expanding transport networks into new developments and regeneration areas to support more sustainable communities.

Car Parking

- 8.132 Policy CT10 provides detail on parking provision in conjunction with Policy CT2. It states that all development must meet the Council’s parking standards unless mitigating circumstances dictate otherwise. The policy also sets out that parking areas should be designed with consideration for safety, circulation and appearance, and that all residential, retail and employment uses should provide electric vehicle charging points (EVCPs).

Existing Car Parking Provision

- 8.133 To identify the parking volume across the Estate, a number of car parking accumulation surveys have been undertaken. Detailed surveys took place on Friday 14th and Saturday 15th September 2018 at Serpentine Court, and across the rest of the Estate on Friday 3rd and Saturday 4th May. Garage spaces were not counted as parking spaces, in line with the Council’s methodology set out in the Parking Standards SPD (January 2016). ITP have interrogated the data from these surveys and prepared a comprehensive analysis of all of the car parking areas across the Estate to understand existing provision and the use of car parking. This is contained within the Transport Strategy Note prepared by ITP.
- 8.134 The main finding from this analysis was that there is no significant parking pressure across the Lakes Estate. Of the 42 car parks surveyed between 7am-7pm on the survey days, only 8 car parks exceeded 100% occupancy. It is also important to note that car parking across the Estate is not for permit-holders only and is therefore open for anyone to use where most spaces are also unallocated. Altogether, the surveys recorded a total of 2,548 car parking spaces, where average occupancy peaked at 7am (71% occupied) and fell throughout the day to 57% on Saturday and 50% on Friday before peaking on Friday evening. This shows a typical commuter pattern of parking use.
- 8.135 Of the 8 car parks which exceeded 100% occupancy, 2 were over capacity by one vehicle. The Transport Strategy Note explains the reasons why the remaining 6 car parks may have been over capacity. These include their location towards the north of the estate, providing opportunities for parking closer to Bletchley Railway Station, Blue Lagoon Nature Reserve and Drayton Park School. The other car parks are located close to the community facilities and uses in Serpentine Court, and the amenities along Jersey Drive to the south-west.

- 8.136 The parking provision within and around Serpentine Court has been closely examined. The surveys have identified 208 spaces, 53% of which were occupied during peak usage on a weekday, and 42% of which were occupied on the weekend. This indicates that the existing car parks provide surplus capacity throughout the day on both Fridays and Saturdays.
- 8.137 There are also a high number of garages on the estate, which were not included in the car parking space analysis count but subject to a separate Garage Occupation Survey undertaken by ITP as part of the Transport Strategy Note. This identified that the majority of the garages are either unoccupied, rented but not used, or rented but not used as parking spaces. To understand garage occupation, ITP investigated rental and buyer information from the Council. A key finding was that of the 416 garages assessed, 217 were completely unoccupied and empty. Removing these garages could release land to be used for further landscaping and allow increased levels of natural surveillance where a number of garages block the view from lower levels of dwellings through to the street. The removal of garages could also allow for additional parking spaces at certain pinch-points across the estate.

Car Ownership

- 8.138 The Transport Strategy Note indicates that the Lakes Estate has one of the lowest rates of car ownership rates in Milton Keynes. Approximately 60% of households reported not having access to a private vehicle in the 2011 Census, which is the most recent available data set. This is in contrast to the rest of Milton Keynes, much of which exceeds the national average for car ownership. Car ownership levels on the Estate are also lower than the levels within the area of Water Eaton to the north, and Newton Leys to the south-west. This could be representative of the closer relationship the estate has with Bletchley Railway station and higher levels of bus patronage.

8.139 Proposed Car Parking Provision

- 8.140 Applying the standards within the Council's Parking Standards SPD would result in a requirement of 1,158 parking spaces based on the number of homes. These standards note that a significant over- or under-provision can be justified based on the local situation.
- 8.141 The proposals have included a provision of 687 car parking spaces for the new homes. This increases the average parking space per dwelling ratio across the estate from 1.25 spaces per dwelling (2,548 spaces across 2,043 dwellings) to 1.34 spaces per dwelling (3,235 spaces across 2,433 dwellings). These calculations do not take into account the existing usage of spaces across the estate, which has been calculated at a maximum of 0.91 spaces per dwelling (1,861 maximum occupied level of spaces across 2,043 existing dwellings). Based on this level of existing usage,

approximately 2,214 spaces would be required for the 2,433 dwellings proposed. Therefore, it is considered that the provision of 3,235 parking spaces will be more than sufficient to meet the needs of existing and future residents, as well as non-residential uses,

- 8.142 The results from the parking surveys demonstrate in more detail that there is sufficient parking available throughout the day on the estate. As explained in paragraph 8.136, occupation of the car parks around Serpentine Court (which serve residential and non-residential uses within the local centre) did not exceed 53% at its average peak. Therefore, it is considered that it is appropriate to maximise the land available for vital place-making spaces where an abundance of car parking is not required. In addition, the provision of too much parking could be detrimental to the proposed walking and cycling improvements across the site and within Serpentine Court. It could also discourage the uptake of these sustainable modes of transport, which would be contrary to the aims and objectives of Plan:MK.
- 8.143 All the proposed uses within Phase A and B of the development are provided with EVCPs, however the provision is not 1:1. This has been designed in line with the pre-application advice from Council Officers.
- 8.144 Paragraph 8.60 of Plan:MK relates to Policy CT10, which sets out the Council's approach to car parking. It states that mitigating circumstances where development does not fully meet the Council's parking standards may require that parking provision be amended to reflect specific developments and their location, including proximity to transport nodes and public transport access.
- 8.145 As explained within Section 4 of this Statement, the estate has a good level of accessibility by public transport, which comprises of a number of frequent bus routes which operate within and close to the site as well as train services from Bletchley Railway station. In the future, public transport access will improve significantly with the opening of the East-West Railway - with the first services scheduled for operation from 2024 - and the improvements to bus stops which form a part of the estate-wide environmental improvements. The overall improvement in public transport access would have the effect of reducing journey times to a wider range of destinations and workplaces, which would encourage more trips to be undertaken by these modes instead of by private vehicles.
- 8.146 In addition to these measures, the proposals also seek to improve walking and cycling routes across the estate and connect better with routes beyond the site boundaries. This will encourage the uptake of active modes of transport, which will have a positive impact in helping the Council achieve its sustainable transport vision as well as a healthier, more active population which forms a strategic objective of Plan:MK.

- 8.147 The provision of car parking also needs to be balanced with viability and deliverability matters of the wider estate renewal. Any greater levels of car parking would require more land for hardstanding, potentially at the expense of space for new homes, landscaping, and open space. As explained previously within the Principle of Development part of this section and paragraph 8.83, viability is a key planning consideration. Development which is not viable cannot be relied upon to deliver the additional homes required by the government and the Council. As such, the uplift in the number of homes and introduction of market tenures is a critical element in ensuring that the estate renewal can be delivered sustainably. If land is used to provide additional car parking spaces above the assessed need, this may impact the number of homes which are being provided which could have adverse implications for the viability of the project, which is also understood to be a priority for the Council and of vital importance for the residents living on the estate.
- 8.148 Furthermore, the Milton Keynes Futures 2050 Commission (2016) sets out that the borough will experience significant growth into the future. It also recognises that there would be approximately a 57% increase in travel demand in peak times, with 25% of this increase being vehicle trips. However, it states that ‘the capacity of the grid road network, particularly the junctions, can only be redesigned to accommodate around half of this demand’. Minimising the level of parking and basing this provision around fully assessed need will therefore minimise any impact on local highways and junctions.
- 8.149 In relation to EVCPs, the level of provision has also considered the need to balance resident’s priorities, where they highlighted other more pressing issues which are principally addressed through the estate-wide environmental improvements.
- 8.150 Proposed EVCP provision has also taken account of the associated costs and impact on viability and deliverability, considers the relationship with wider placemaking principles. This is relevant where a higher proportion of EVCPs would require a far higher proportion of electric substations, which require significant land take, as well as presenting challenges around providing active/natural surveillance in the generally low-density landscape.
- 8.151 The level of proposed car parking provision has therefore taken account of the relevant mitigating circumstances as much as reasonably possible. Though viability and deliverability are key considerations, increasing the current ratio of car parking across the estate too much would also detract from space which could be put to better use as part of the public realm including landscaped areas, which also facilitate surface water drainage and improved biodiversity. The proposed levels of car parking have regard to the established characteristics regarding modes of travel and car ownership on the estate, as well as the potential impact of modal shift to

more sustainable modes following the proposed improvements to the walking and cycling network.

Highways

- 8.152 Within the Lakes Estate Neighbourhood Plan, it was highlighted that many of the roads and footways which serve homes are of a poor quality. The estate-wide environmental improvements therefore propose to surface the carriageway and footpaths in certain areas, as well as to formalise the parking arrangement in some areas.
- 8.153 As part of the Phase A detailed planning application, two speed limit Traffic Regulation Orders (TROs) are proposed. The first TRO seeks to extend the existing 30mph speed limit along Drayton Road to run parallel to the development site in this location, along with pedestrian and cycle crossing facilities as part of a traffic calming feature. The second TRO seeks to extend the 30mph speed limit along Stoke Road to the east of the site and will include a signalised pedestrian crossing and two informal crossings.
- 8.154 Further detail on these improvements and the TROs is contained within the Transport Assessment prepared by ITP.

Public Transport

- 8.155 Milton Keynes is set to grow significantly over the plan period, which will increase travel demand at peak times. As explained in paragraph 8.148, a significant proportion of this increase will be vehicle trips which cannot all be accommodated within the capacity of existing road and junction network. Improvements to public transport, and modal shift away from private vehicle use is therefore critical in ensuring that Milton Keynes' future growth can be facilitated sustainably and without significant adverse impacts on highways.
- 8.156 Paragraph 8.145 provides further detail on the proposed public transport improvements, which include improvements to a number of key bus stops and footway connections to them, and links to Bletchley Railway Station, which run East-West Railway services from 2024 alongside the existing frequent services.
- 8.157 Additional measures to encourage the uptake of public transport include distributing an electronic newsletter to all residents increasing awareness of sustainable modes, and to inform residents of the connections and opportunities provided by the East-West Railway.
- 8.158 More specific measures to reduce the number of journeys made by private vehicles and promote the use of public transport will be detailed within the Travel Plan, which will be secured by way of a planning condition.

- 8.159 In summary, the Lakes Estate is an appropriate location for development which is not designed around the private vehicle but instead focused around sustainable modes, by encouraging the use of public transport and for people to walk and cycle for journeys instead. These measures have been designed into the proposals to help the Council meet its strategic objectives relating to sustainable transport, sustainable growth, health and climate change which also form policy aspirations on a national level.

Cycling

- 8.160 The proposed location of the cycle parking for each development site within Phase A is discussed in Section 5. For the majority of the proposed houses, secure cycle storage is proposed to be provided as a shed within the rear garden of the property. For flats, cycle spaces will be provided as part of an internal communal store on ground level. The cycle spaces for non-residential uses is proposed to be provided through two different styles: the long-stay spaces for staff will take the form of sheltered cycle spaces, and the short-stay visitor spaces will be provided in prominent locations around the local centre with good levels of natural surveillance. For the Phase B outline application, the exact locations of the short-stay visitor cycle parking will be confirmed within the reserved matters stage.
- 8.161 The quantum of cycle parking across each site meet or exceed the standards as set out within the Council's Parking Standards SPD (January 2016). Overall, the Phase A detailed application proposals will provide 113 residential and 80 non-residential cycle parking spaces, as well as 90 on the Stoke Road development site, 62 on Melfort Drive, 34 on Drayton Road and 6 on Burnmoor Close. The Phase B outline application proposals include 288 spaces for residential use, and 22 spaces for non-residential uses.
- 8.162 Further details on cycling measures and cycle parking are contained within the Transport Assessment prepared by ITP.

Walking

- 8.163 The site is already highly walkable; however, the quality of these routes is poor in some areas where they are convoluted, run between inactive frontages or where their surrounding landscape has not been maintained to ensure a pleasant pedestrian experience. As a result, a number of existing pedestrian routes are underutilised. The existing estate is largely inward-facing, and in some instances, this has resulted in pedestrian routes along external frontages being located along unattractive walk-throughs and subways. The proposals have identified several opportunities to enhance the existing walking environment, as part of a suite of measures to encourage higher uptake of sustainable modes of transport across the site.
- 8.164 A number of key pedestrian routes are proposed to be created or improved as part of the development proposals and estate-wide environmental

improvements. These routes include those along the 'diagonals' to each corner of the existing estate, but also the new and improved Redways, Central Green Spine through Serpentine Court and routes across Warren Park to Stoke Road and beyond to Eaton Leys. Furthermore, by not providing a vehicle connection between the east and west loop roads (Fern Drive and Windermere Avenue), Serpentine Court is able to host a pedestrianised local centre.

8.165 The improvements to the walking environment also encompass new toucan and pedestrian crossings over perimeter roads around the estate. These include a new toucan crossing and two new pedestrian crossings over Drayton Road to the Blue Lagoon Nature Reserve, as well as a new toucan crossing and improvements to existing pedestrian crossings points on Stoke Road, which will help facilitate safe access to Eaton Leys for pedestrians and cyclists whilst ensuring a safe driving environment for road users.

8.166 The improvements to the walking routes also include wider improvements to the accompanying walking environment. Through designing areas with good levels of natural surveillance and incorporating soft infrastructure such as planting and lighting columns, it is envisaged that the established and new walking routes will be more frequently used. This will then encourage a greater number of users, providing both positive reinforcement of a sense of place in addition to an increase in uptake of active modes of transport.

Deliveries and Servicing

8.167 A Delivery and Service Management Plan (DSMP) has been prepared by ITP to support the non-residential uses with both the Phase A detailed and Phase B outline planning applications. The residential refuse management strategy is contained within the DAS prepared by HTA Design. Both the DSMP and relevant section of the DAS have had regard to the Council's Residential Design Guide (January 2012) and Waste Operational Procedures (2018).

8.168 The DSMP indicates that the existing layout of the site, though beneficial to pedestrians, offers little to no formal distinction between the servicing areas and residential/public parking spaces. As a result, many servicing activities are problematic where they are undertaken within the carriageway. Informal parking on vehicle access areas and roads also creates bottlenecks and restricts access for refuse vehicles.

8.169 Vehicular access to Serpentine Court will continue to take place predominantly from Windermere Drive which is aligned in between the Phase A and Phase B application areas. In relation to trip generation, though all units will be serviced at a frequency to be agreed between the unit and occupier the DSMP has provided a robust analysis of anticipated vehicle trips for each use proposed. The document also sets out a number

of management and monitoring measures which will be implemented as part of the DSMP.

- 8.170 For the residential refuse strategy, the DAS has identified through extensive public consultation that refuse collections are an estate-wide concern where there is not currently a strategy for these activities, meaning that they take place in an ad-hoc and unorganised manner. This has a negative impact on the setting of the estate and increases the strain on refuse operatives.
- 8.171 The applicant has worked with the Council's Refuse Officers on multiple occasions to better understand the concerns regarding existing collections, and to allow them to input on the proposals.
- 8.172 The key principles which have been incorporated into the design proposals include to ensure that front elevations are uncluttered and legible, refuse stores are not directly adjacent to neighbouring homes, and that a clear strategy be facilitated through a simple street network which is fair for refuse operatives and residents.
- 8.173 Within the Phase A detailed application and Phase B outline application, the refuse strategy comprises three separate elements based on the type of home proposed. For flats, integrated communal bin stores at ground level will allow direct access from the street. Houses on vehicular routes will have a secure and enclosed refuse area on plot within front gardens, and residents in houses on non-vehicular routes will store their refuse within rear gardens and take it to drop off points via ginnels. These points are within sufficient distance for refuse operatives and residents.

Summary of Transport and Highways Proposals

- 8.174 The proposed car parking level achieves a good balance between the provision of parking, avoiding the creation of large areas of hardstanding in favour of active frontages, and creating new areas of green space for the enjoyment of existing and future residents whilst taking into account improvements to access to sustainable transport modes and balancing viability/deliverability considerations.
- 8.175 Extensive improvements to public transport accessibility and the walking and cycling environment are proposed. This will encourage modal shift away from private vehicles, in line with transport planning policy on all levels, including the Milton Keynes Transport Vision and Strategy LTP2 2011-2031 and Plan:MK.
- 8.176 The applicant will also agree to providing a Construction Logistics Plan by way of a planning condition.

Quality of Accommodation

- 8.177 Standards relating to the quality of accommodation are set out within Policies HN4 and D5 of Plan:MK, as well as the Residential Development Design Guide SPG (April 2012) and national standards (i.e. Nationally Described Space Standards). The quality of accommodation is discussed in relation to the Phase 1 detailed planning application. The quality to be achieved in future phases will be assessed as part of future reserved matters applications.

Amenity Space

- 8.178 Standards for amenity space are set out within the adopted Residential Development Design Guide SPG (April 2012). This SPG suggests that private gardens should be provided where family housing is provided, and gardens should be a minimum of 10m deep. There are no prescriptive local existing or emerging standards with respect to balcony sizes, but they should provide enough space to accommodate a small table and two chairs (paragraph 4.13.7). The SPD also suggests that the minimum area for usable communal space is 50sqm + 5sqm for every home for developments over 5 homes. Further guidance is also provided within Policy D5 of Plan:MK, which indicates that external private or shared communal garden space, in its extent and design, should 'meet the reasonable needs of its user(s)'.
8.179 For the Phase A detailed planning application sites, all new homes will have access to private external amenity space. This will be provided via private gardens, balconies, or terraces. The houses have been designed with private rear gardens, and the flats will have semi-private or communal block gardens.
8.180 Rear alleyways/ginnels will provide landscaped spaces as positive semi-private amenity space for users of these houses. These ginnels will be generous in width to allow for the space to be used more meaningfully. The corresponding reduction in garden depths was agreed with Council Planning Officers at the pre-application stage.
8.181 Ginnels have been designed into the proposals where refuse access is required or where existing rear access to homes is being retained. These areas will be secure and have been proposed following extensive consultation with existing and neighbouring residents. Security has been a key consideration in their design: they have been well-defined and will be easily managed to ensure that these spaces are enjoyed by residents who will then take collective ownership of them amongst themselves.
8.182 Further information on the provision and quality of amenity space is contained within the DAS prepared by HTA Design.

Internal Space Standards

- 8.183 All the homes proposed would either meet or exceed the Nationally Described Space Standards as required by Plan:MK Policy HN4. The new homes will be functional, spacious and flexible where they could be adapted to accommodate the changing housing needs of residents into the future.

Dual Aspect Homes

- 8.184 Plan:MK Policy D5 states that all proposals should ensure that dwellings are dual aspect to enable passive ventilation, subject to any noise and air pollution mitigation measures required to make the proposal acceptable.
- 8.185 All the proposed homes on the Drayton Road, Melfort Drive and Burnmoor Close development sites will be dual aspect. On Stoke Road, all proposed homes will be dual aspect except for flat type D1, where 64% of homes achieve dual aspect. Additionally, all the homes within Serpentine Court Phase A will be dual aspect except for in flat type F1 and F2, where 67% of homes will be dual aspect and flat type E1 and E2 where 60% of homes achieve dual aspect. In summary, the majority of homes are dual aspect with no single aspect north-facing homes.
- 8.186 For all homes, including any single aspect homes, appropriate ventilation units are proposed to ensure that the internal environment of these homes can be comfortably maintained.
- 8.187 Mechanical ventilation is proposed for each home to ensure that adequate ventilation can be achieved, in line with Plan:MK Policy D5.

Daylight and Sunlight Assessment

- 8.188 Plan:MK does not set out prescriptive standards in relation to daylight and sunlight assessments and analysis. Policy D5 of the Plan, however, does state that all proposals should ensure that the 'levels of sunlight and daylight within buildings and open spaces, and garden spaces in particular, are satisfactory'. This is supported by the principles contained within the Residential Development Design Guide SPG.
- 8.189 Given the scale of the proposed development along with its proximity to potentially sensitive uses in a number of locations, a Daylight and Sunlight Assessment has been prepared by HTA Design. This Assessment has been undertaken in accordance with relevant guidance published by the Building Research Establishment (BRE).
- 8.190 The daylight analysis considered all the existing properties which are in close proximity to the development sites within the Phase A detailed and Phase B outline planning applications. The results of the final design, having undergone detailed testing and been amended to consider improvements

where possible, show that the adjacent properties pass either the 25-degree angular check or the Vertical Sky Component (VSC) analysis. This meets the requirements for limiting the impact of the proposed development on the daylight provision to existing buildings. Some reductions have been identified; however, the overall degree of impact is considered to be acceptable.

- 8.191 The impact of the proposed development on the existing surrounding buildings has also been assessed in terms of sunlight provision. This assessment tested all the south facing elevations of the existing properties facing the proposed buildings on all the Phase A detailed and Phase B outline planning application development sites. The results of this indicated that all the surrounding properties analysed achieved sunlight levels in line with the BRE's recommendations.
- 8.192 Further detail is contained within the submitted Daylight and Sunlight Assessment prepared by HTA Design. Overall, it is considered that the proposed development will ensure that the levels of daylight and sunlight within existing and proposed buildings and open spaces are satisfactory, or better.

Impact on Neighbouring Properties

- 8.193 The Local Plan does not set out prescriptive standards with respect to privacy and overlooking, but Plan:MK Policy D5 sets out a range of criteria requiring that a reasonable degree of privacy to existing living spaces is ensured, along with minimising overbearing upon existing buildings and spaces. Development should, overall, ensure there is no unacceptable impact.
- 8.194 The impacts on existing residential properties as a result of the development proposed across the Phase A detailed planning application sites has been tested, which indicates that the impacts are very minimal. Scale and massing of the new buildings has been carefully considered in relation to nearby residential occupiers. The infill development sites within Phase A have a negligible impact on surrounding homes as there are no immediately adjacent windows, and the massing is in line with existing buildings.
- 8.195 The proposed internal layout of the new homes and articulation of the windows ensures that there will be no undue overlooking between proposed and existing homes.
- 8.196 The overshadowing impacts are considered as part of the Daylight and Sunlight Assessment prepared by HTA Design. BRE guidelines have been met amongst balancing a large number of planning considerations.

- 8.197 Overall, the design approach of the proposals accords with a range of criteria set out within Plan:MK Policy D5.

Accessibility and Inclusive Design

- 8.198 Plan:MK Policy HN4 requires that proposals for 11 or more dwellings should design at least 60% of homes to be built to Building Regulations Part M4(2) standards, and at least 5% of new private market homes and 10% of new affordable homes should be built to Building Regulations Part M4(3) standards.
- 8.199 At least 60% of all affordable homes and 60% of private market homes across both Phases A and B have been designed to Part M4(2) standards.
- 8.200 Within the Phase A detailed application, there will be a total of 29 homes which will be compliant with Part M4(3) standards. This comprises of 24 wheelchair accessible homes within affordable tenures and 5 private sale homes.
- 8.201 The Phase B outline application proposes 18 of the new homes to be Part M4(3) compliant, comprising 0 wheelchair accessible affordable homes and 8 wheelchair accessible private market homes. All 64 of the extra care homes will be designed to Part M4(3) standards.
- 8.202 Overall, the number of proposed homes which have been designed to be fully wheelchair accessible in accordance with Part M4(3) of the Building Regulations meets the requirements as set out within Plan:MK Policy HN4.
- 8.203 Wheelchair accessible parking spaces are also proposed to serve the accessible homes as well as the commercial spaces. This was discussed in further detail in the Highways and Transport section of this Statement, with additional information being contained within the Transport Assessment and Transport Strategy Note prepared by ITP.
- 8.204 Further information on the detailed design of the homes proposed, including the wheelchair adaptable and wheelchair user homes, is contained within the Accessibility Statement within the DAS prepared by HTA Design.

Trees and Vegetation

- 8.205 A Tree Survey and Arboricultural Implications Assessment was carried out by Steve Jowers Associates which informed the designs for trees and landscaping across the site. Tree surveys were undertaken by Barton Hyett for the four infill sites. Altogether, these surveys categorised the trees within and adjacent to the site boundary areas of both Phases A and B of Serpentine Court, Stoke Road, Melfort Drive, Drayton Road and Burnmoor Close.

- 8.206 The site has a significant number of existing trees which are mainly found along the north-south routes and at the threshold to Warren Park. Across the site there is limited variation in species and poor levels of tree succession due to a lower number of trees being planted in recent years. Several existing trees are also too close to homes, which causes potential ground instability and subsidence given the clay soil which dominates the land.
- 8.207 There is also an existing historic hedge row which pre-dates the Estate. This has a considerable level of biodiversity value; however, it has been poorly managed and is now overgrown. Residents have highlighted that it also attracts anti-social behaviour.
- 8.208 Criteria 5 of Plan:MK Policy D1 explains that proposed soft landscaping should continue the green character of Milton Keynes and enhance the quality of the public realm. This criterion refers to trees, stating that street trees and planting in particular have an important role in softening the streetscape and ensuring that the public realm is not dominated by hardstanding, including space allocated towards car parking.
- 8.209 An Arboricultural Survey, Arboricultural Implications Assessment and Tree Protection Plan have been prepared by Steve Jowers Associated Ltd.
- 8.210 All the trees within the relevant site boundary areas have been assessed and further detail on their condition and any recommended arboricultural intervention including pruning, surgery or removal is contained within the appendices of the Arboricultural Implications Assessment. In summary, there are 39 high value trees (Category A), the majority of trees surveyed - 337 - are considered to be of moderate quality (Category B) and 167 are considered to be low quality (Category C). 34 were identified as poor quality and should be removed given their context (Category U).
- 8.211 The tree survey and arboricultural implications assessment concludes that there would be a high/moderate impact on existing trees in the short term, due to the removal of some of the trees and need to maintain others. Over the medium term, the impact is considered to be moderate/minor as replacement planting flourishes and reduces to minimal in the long term.
- 8.212 The proposals have sought to retain and integrate as many of the existing healthy trees as possible where they are in suitable locations. These include many of the Category A and Category B trees, which are of a high and moderate quality. This helps to promote their long-term health, strengthen the local green infrastructure and have the greatest ecological value.
- 8.213 There are also a number of trees which have been assessed as being poor quality. These trees require removal as appropriate or pruning and/or surgery to enable them to be suitable in the context of the proposed development. The tree survey and assessment suggest that the approach

towards tree planting on the estate has not been considered strategically and with due regard to the impact of certain types of species in specific locations. It is also evident that the tree planting approach did not consider the pedology of the site, which is predominantly clay-based. This gives rise to issues of subsidence when the soil is dry in warmer periods of the year. It is therefore appropriate that some existing trees which are not of a high value, are removed where they pose a risk to buildings and their occupants. The arboricultural implications assessment therefore suggests replacement planting of similar or more suitable species which will help compensate for these losses.

- 8.214 The Assessment also sets out the measures which will be implemented to protect the RPA of the existing trees during the construction period. This takes the form of an Arboricultural Method Statement which is included within the submitted document.
- 8.215 Overall, the above demonstrates that the proposals will not have an unacceptable impact on the existing trees within and close to the development areas. In addition, the proposals include the planting of new trees will ensure that the principles of greening as set out in Policy D1 of Plan:MK.

Ecology and Biodiversity

- 8.216 An Ecological Impact Assessment (EclA) has been prepared by CSA Environmental comprising of a desk study and targeted species and habitat surveys.
- 8.217 Paragraph 170(d) of the NPPF sets out that planning decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity. This is supported by Policy NE3 of Plan:MK, which sets out a requirement for development proposals to maintain and protect biodiversity and result in a measurable net gain in biodiversity where possible, is set out within this policy. Any negative impacts can be offset through improvements, preferably on-site.
- 8.218 The ECIA has identified that there are no statutory designations covering any part of the site, and that amenity and recreational grassland dominates the site, with some smaller areas of semi-improved grassland around the edges of the estate along Stoke Road and Melfort Drive. The existing hedgerow in Warren Park has been identified as being of significant local value, and scattered areas of dense scrub across the estate are of a lesser ecological interest but do provide a habitat for a range of wildlife. The EclA also identified a number of locally important ecological features, and that development on the site provides no opportunity for these Great Crested Newt populations to be impacted.

- 8.219 As part of the ecological investigations and assessment, a biodiversity metric exercise has been undertaken using the Department for Food, Environmental and Rural Affairs (DEFRA) methodology (BM2.0). This has calculated the existing biodiversity and hedgerow value on the site as well as of the proposed development, taking into account the additional meadow planting and other planting across the estate to improve biodiversity and ecological value. Further detail on ecological improvements, which also form a part of the estate-wide environmental improvements, is contained within the DAS. Overall, the biodiversity metric exercise helps to demonstrate that net biodiversity gains are achievable.
- 8.220 Where all the relevant proposed areas were to be benefit from the creation of more sympathetic and ecologically valuable habitats, ecologists have advised that it is be possible to achieve a no-net loss of habitat diversity and a net-gain in hedgerows. This could be achieved considering the losses of semi-improved grassland at Melfort Drive and Stoke Road, and the loss of some areas of amenity grassland.
- 8.221 The EclA indicates that without any mitigation, the proposed development would have negative impacts significant at the local level. However, with the implementation of mitigation and precautionary measures as proposed, the development would not result in any significant residual negative impacts on the identified important ecological features within and close to the site. The report also suggests that the proposed development would comply with all relevant nature conservation legislation as well as local-level planning policies if the mitigation and enhancement measures set out were implemented. This includes Policies NE1, NE2 and NE3 of Plan:MK as well as the NPPF.

Energy and Sustainability

- 8.222 An Energy Statement and separate Sustainability Statement have been prepared by HTA Design which assesses proposals within both the Phase A detailed application and the Phase B outline application.
- 8.223 The UK aims to achieve an 80% reduction in greenhouse gas emissions by 2050 against the 1990 baseline, in order to meet legally binding climate change targets as set out in the 2008 Climate Change Act. Buildings account for over 40% of energy use in the UK, so there is an increasing need for development to meet robust energy performance and sustainability targets.
- 8.224 These targets have influenced a number of key objectives in national and local level planning policies. Plan:MK Policy SC3 indicates that the Council will encourage and support proposals for low carbon and renewable energy-led development, and Policy SC1 which sets out a number of criteria relating to sustainable construction which development proposals will be required to demonstrate. Plan:MK Policy D4 encourages the use of

innovative construction methods, stating that such proposals which raise the design standard in the borough will be supported. The Council's Sustainable Construction SPD (April 2007) sets out the structure and the criteria which sustainability statements should follow and meet.

- 8.225 The proposals have also been assessed against Part L of the Building Regulations (2013). Based on the requirements of Plan:MK, the residential and non-residential spaces must achieve at least a 39% reduction in regulated CO₂ emissions beyond Building Regulations Part L (2013).
- 8.226 In order to meet these targets, the new buildings have been designed to achieve a very high specification which prioritises a passive 'fabric first' approach to minimise energy demand. This has been achieved by orientating the proposed homes to maximise the number of rooms which received direct sunlight throughout the day and balance the percentage of glazing within the north-facing and south-facing windows to minimise the risk of overheating in periods of warmer weather. The design of the building facades has also sought to balance the proportion of solid wall to glazing, which consequently helps achieve a balance between daylight and winter solar heating without excessive solar gains in warmer periods.
- 8.227 In addition, new homes up to 3 storeys will be delivered through structurally insulated panels (SIPs) which speed up their construction and reduce the levels of embodied carbon. The construction of the proposed buildings will also embrace off site, modular methods where available which could result in significant carbon savings, quicker and safer construction and a higher build quality than some traditional methods.
- 8.228 After reducing the energy demand, the energy strategy then looks to reduce fuel consumption to improve the energy efficiency of the buildings. Proposed measures include the use of mechanical ventilation with heat recovery systems, air source heat pumps to provide heat and hot water, high efficacy lighting and minimising the need for comfort cooling through non-domestic spaces being designed to a shell and core building specification.
- 8.229 Once fuel consumption has been reduced, the energy strategy then sets out methods of generating on-site renewable energy. Roof mounted photovoltaic panels will be installed on the roof of the blocks of flats and on the majority of the houses, and air source heat pumps are proposed for each home which are a renewable, sustainable source of energy.
- 8.230 The Sustainability Statement is a standalone document; however, it complements the content and measures which are set out within the Energy Statement. It has considered how the proposed development embraces a number of sustainability principles from the outset, including using natural resources effectively, minimising pollution, creating healthy environments and enhancing biodiversity. Further information on the specific measures

implemented pursuant to these principles is contained within the Sustainability Statement prepared by HTA Design.

- 8.231 The combination of the measures set out within the Energy Statement and Sustainability Statement mean that the residential spaces have been designed to achieve a 57% reduction in CO₂ over Part L of the Building Regulations (2013) and non-residential spaces have been designed to achieve a 47% reduction. the proposed development across both the Phase A detailed application and Phase B outline application can achieve a 53% reduction in CO₂ emissions over the requirements of Part L of the Building Regulations (2013). This exceeds the target of 39% as set out in Plan:MK.
- 8.232 Overall, the new buildings and external spaces have been designed to be highly efficient and cost-effective to manage over the long-term. They have been designed to exceed carbon reduction targets through a wide range of measures and will incorporate a number of sustainable methods of construction including off-site modular technologies. The proposed development is therefore considered to be in line with the NPPF, Part L of the Building Regulations and Plan:MK Policies SC1, SC3 and D4, as well as the Council's Sustainable Construction SPD.

Flood Risk Assessment and Sustainable Drainage Systems

- 8.233 A Flood Risk Assessment and Outline Drainage Strategy has been prepared by WSP. The report indicates that the site is within Flood Zone 1 (as illustrated in Figure 4 and paragraph 4.23) which is classified as having a very low risk of tidal and fluvial flooding. It has also indicated that the site has a negligible risk of groundwater flooding, and a low risk of sewer flooding. However, there are some areas which have a 'high' to 'medium' risk of surface water flooding (as illustrated in Figure 5), therefore a Flood Risk Assessment and Outline Drainage Strategy have been prepared.
- 8.234 The Flood Risk Assessment has demonstrated that the proposed development is protected from flooding during a 1 in 100 year plus 40% climate change allowance worst case rainfall event. This will be achieved with sustainable drainage systems (SuDS) in the form of retention basins/ponds and concrete attenuation storage tanks, with associated flow control devices.
- 8.235 These SuDS measures are part of an estate-wide integrated solution which will reduce surface water runoff and correspond with greenfield runoff rates. This has the impact of reducing the surface water runoff rate into nearby existing watercourses and minimising the flood risk on-site and off-site including to Water Eaton Brook.

- 8.236 Drainage specialists at WSP who have identified that Water Eaton Brook is in a good condition but may benefit from restoration work. A number of improvement works have been identified and will be implemented as part of the proposed development, in agreement with the LLFA, to ensure that the Brook is restored sustainably allowing any flood risk to be further minimised.
- 8.237 The Outline Drainage Strategy which forms a part of this report contains further detail on the SuDS measures which will minimise the flood risk to the site. It also contains details on further measures such as rainwater harvesting and how the location of the designed SuDS has considered the location of existing trees which are to be retained through the development, as well as where new trees and landscaping are proposed. It is intended to retain as many healthy specimens as possible.
- 8.238 The design and approach to SuDS has been extensively discussed with the LLFA and Anglian Water, as well as the Council's Highways Officers to minimise any instances of conflict and to ensure that the proposed drainage strategy is acceptable. This includes the proposals for Anglian Water to adopt the below ground attenuation systems, and the retention pond to be adopted by the LLFA. Details of these discussions can be found in Appendix F of the Flood Risk Assessment and Outline Drainage Strategy report prepared by WSP.
- 8.239 Overall, the assessment undertaken demonstrates that there will not be an unacceptable risk of flooding which would preclude development of the site as proposed. The Flood Risk Assessment and Outline Drainage Strategy prepared sets out a number of design and SuDS recommendations to mitigate the impacts of surface water flooding on the proposed development.

Contamination

- 8.240 A Geo-Environmental Preliminary Risk Assessment has been undertaken by WSP.
- 8.241 It indicates that there are a number of existing potential contaminative sources within and surrounding the estate, which could affect all five development sites. The risk posed to sensitive receptors as a result is considered to be low-moderate, however, until further detailed analysis & assessment is carried out, the extent of any potential impacts remains unknown. The Assessment recommends that an intrusive ground investigation is undertaken accordingly to mitigate such risks.

Noise

8.242 An Acoustic Assessment has been prepared by WSP to assess the noise generated by the proposed energy centre.

8.243 The assessment has established the prevailing noise conditions at this part of the development site and derived external noise limits at the nearest sensitive receptors. It has also modelled a number of variations of the capacity of the building, in order to establish what level the centre can operate at within external noise limits. The assessment has indicated that the cumulative noise generated by the energy centre would not exceed levels of background noise levels at the site. Designs including an acoustic screen have also been tested to further minimise any acoustic impact. The assessment recommends that further analysis be undertaken after the design stage.

Section 106 Obligations and Community Infrastructure Levy (CIL)

8.244 Any short-term negative impacts generated by the proposals will be minimal and can be mitigated through a S106 agreement or Unilateral Undertaking. The draft Heads of Terms set out below address the anticipated site-specific obligations we consider may be required between the applicant and the Council. These have been prepared in accordance with the Council's Planning Obligations for Education Facilities SPG, Planning Obligations SPG for Leisure, Recreation and Sports Facilities and Social Infrastructure Planning Obligations SPD. and with due regard to pre-application discussions. It is noted that the application is accompanied by a financial viability assessment and this may have an impact upon Section 106 matters; this will be discussed in detail with the Council as part of post submission negotiations.

8.245 The following obligations are considered likely:

- Affordable housing and associated monitoring costs;
- Carbon Offsetting contribution;
- Education, comprising:
 - Early years;
 - Primary pupils;
 - Secondary pupils; and,
 - Post-16 pupils.
- Leisure, Recreation and Sport, comprising:

- Playing fields;
- Allotments;
- Swimming pools; and,
- Sports halls.
- Social Infrastructure, comprising:
 - Libraries;
 - Adult Education;
 - Museums;
 - Health Facilities;
 - Public Art;
 - Inward Investment;
 - Voluntary Sector; and,
 - Social Care.
- Wheelchair accessible housing;
- Travel Plan;
- Transport - including provision of electric vehicle charging points;
- Travel Plan;
- S278 agreement/highways works.

8.246 Milton Keynes Council does not have an adopted Community Infrastructure Levy (CIL) schedule or system in place.

9.0 Summary and Conclusions

- 9.1 This planning application seeks to achieve two key objectives: the deliver much needed housing for existing and new residents; and to address the issue of a poor-quality environment on the Estate. This proposal presents an opportunity to improve the Estate's Open spaces for the benefit of the existing and future residents, and to replace existing underutilised commercial spaces with more suitable, tailored floorspace on the estate. A suite of estate-wide environmental improvements seeks to create a public environment which supports the needs of the community and raises the aspiration of its residents.
- 9.2 The Council are seeking to increase the number of homes, particularly affordable new homes, on a number of sites within the Estate. The sites have been allocated for new residential development within the Lakes Estate Neighbourhood Plan and are situated in locations which have good access to public transport. Residents will also benefit from a number of new and improved walking and cycling routes to a range of destinations.
- 9.3 The detailed planning application proposes a gross total of 308 new homes, and the outline planning application proposes a gross total of 281 new homes (or net total of 82 new homes), which will provide a number of benefits:
- A **good proportion of affordable housing** will be provided, with 51% social rented homes, and 49% for private ownership. The introduction of private tenures will diversify the housing mix to address the existing tenure imbalance.
 - The proposed new homes provide a **high quality of accommodation**, with all new homes having private amenity space, and being predominantly dual aspect. The proposed residential homes will comply with policy standards in terms of internal space standards, daylight and sunlight.
 - **Substantial improvements are proposed to the landscaping and public realm**, through the programme of estate-wide environmental improvements including enabling east-west access across Serpentine Court and the reconfiguration and improvement of Warren Park, which contribute towards a net gain in biodiversity value across the Estate. Children's play provision has been taken into consideration alongside this, and accessibility to doorstep play will be greatly improved to all homes on the estate.
 - Delivering an **energy and carbon efficient development** which satisfies best practice standards, minimises fuel bills, and reduces reliance on natural resources.

- The re-provision of **commercial floorspace** will provide a number of economic benefits, including provision of high-quality workspaces for local resident and a revitalised retail officer.

- 9.4 Development on the estate is constrained due a number of factors, including the existing housing blocks, and to ensure existing high value trees are protected. The issues of security and anti-social behaviour have been addressed through the increase of passive surveillance and the new buildings being designed to provide active frontages to key public areas.
- 9.5 The development will be appropriately phased to ensure that new homes are provided prior to the demolition of existing homes at Serpentine Court.
- 9.6 As well as the physical changes to the built environment, the proposed open space and recreation strategy also presents a significant opportunity to improve the health and wellbeing of the local population.
- 9.7 To enable construction work to commence without delay all details are included for the Phase A detailed planning application for the scheme save for those that will be secured by planning condition. The outline consent seeks consent for details of layout, scale and means of access whilst reserving matters relating to appearance and landscaping.
- 9.8 It is concluded that the proposed development will deliver a range of planning and regeneration benefits that satisfy local and national planning policy. We therefore request that Milton Keynes Council grant planning permission for these proposals which will deliver a vastly improved external environment and additional new homes, including a good proportion of affordable homes.