

| | | |
|---|-------------------------------|---------------------------|
| Site address | Pre-app category | 5-9 residential dwellings |
| Wolverton Health Centre And Day Hospital Gloucester Road Wolverton Milton Keynes MK12 5DF | MKCC reference | 24/00654/PRES |
| | Case officer | Charlotte Ashby |
| | Meeting date | 01/05/2024 |
| Applicant name and address | Agent name and address | |
| NHS Property Services 10 South Colonnade Canary Wharf E14 4PU | N/A | |
| Development proposal | | |
| Development of 9no. dwellings with associated parking | | |
| Planning/land use constraints | | |
| <p>The application site is identified within the policy maps of Plan:MK as open amenity space, and contains a number of trees and vegetation. This site is also allocated as an existing community use in association with the Wolverton Health Centre located to the south east of the site. A redway runs along the north western boundary of the site, with a footpath connecting into the site. The site is located within a red zone for Great Crested Newts, within Flood Zone 1 and is at very low risk of surface water flooding. Residential properties are located to the east of the site and to the north east on the opposite side of the redway, with Greenleys Junior School located to the north on the opposite side of the redway. Great Monks Street is located to the west of the site, with some existing amenity open space and tree retained between the site and the highway.</p> | | |
| Relevant planning history | | |
| <p>11/00345/FUL Demolition of existing health centre building and the erection of a two storey building and single storey building for use as Health Centre including the extension of car parking area and landscaping. Permitted 06.06.2011</p> | | |
| <p>11/01867/DISCON Details submitted pursuant to discharge of conditions 2 (Commencement of Development), 3 (Details Fixed Plant), 7 (Detailed Landscaping), 9 (Evidence to Verify Carbon Dioxide Savings), 10 (Site Waste Management Plan), 11 (Report Detailing How 10% Materials By Value Sourced from Reused or Recycled Content), 12 (Secured By Design), 18 (Finished Floor Plans), 21 (Details of Wheel Cleansing), 24 (Details of Site Set Up), 26 (Details of Bin Stores) attached to planning permission 11/00345/FUL Details approved 21.10.2011</p> | | |
| <p>13/00252/NMA Non material amendment to planning permission 11/00345/FUL to revise the buildings approved height to a lower level Permitted 11.03.2013</p> | | |
| <p>13/00253/NMA Non material amendment to planning permission 11/00345/FUL to revise the gutter and downpipe arrangement shown on the approved drawings to a face fixed to elevation configuration. All</p> | | |

downpipes to be fitted with anti-climb covers
Permitted 11.03.2013

16/00171/NMA

Non Material amendment to application 11/00345/FUL to allow the rearrangement of car park and external ramp and stairs from car park
Permitted 16.05.2016

23/01321/PIP

Erection of up to 9no. dwellings
Withdrawn 24.07.2023

Relevant planning policy

Plan:MK (March 2019)

Policy DS1 - Settlement Hierarchy

Policy DS2 - Housing Strategy

Policy SD1 - Place-making principles for development

Policy HN4 - Amenity, accessibility and adaptability of homes

Policy CT2 - Movement and access

Policy CT3 - Walking and Cycling

Policy CT5 - Public Transport

Policy CT6 - Low Emission Vehicles

Policy CT9 - Digital Communications

Policy CT10 - Parking Provision

Policy FR1 - Managing flood risk

Policy FR2 - Sustainable Drainage Systems (SUDs) and Integrated Flood Risk Management

Policy NE2 - Protected species and priority species and habitats

Policy NE3 - Biodiversity and geological enhancement

Policy L2 – Protection of Open Space and Existing Facilities

Policy L3 - Change of use of amenity open space

Policy D1 - Designing a high quality place

Policy D2 - Creating a positive character

Policy D3 - Design of buildings

Policy D5 - Amenity and Street Scene

Policy CC3- Protection of Community Facilities

Policy SC1 - Sustainable construction

Supplementary Planning Documents/Guidance

Parking Standards SPD (2023)

Sustainable Construction SPD (2021)

Biodiversity SPD (2021)

New Residential Design Guide (2012)

Milton Keynes Council Surface Water Drainage; Local Guidance for Planning Applications SPG (2004)

National Planning Policy Framework (December 2023)

Section 2 Achieving Sustainable Development

Section 4 Decision-making

Section 6 Building a strong, competitive economy

Section 9 Promoting sustainable transport

Section 11 Making effective use of land

Section 12 Achieving well-designed and beautiful places

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

Emerging planning policy

Whilst a Neighbourhood Planning Area for Wolverton and Greenleys has been designed, there are presently no policies which can be afforded weight.

You are advised to monitor progress of this plan at www.milton-keynes.gov.uk/planning.

Pre-application Advice

Principle of development

Residential use

Policy DS1 of Plan:MK sets out where development within the borough will be focused and requires that the provision of new homes and jobs take account of the settlement hierarchy. Further, policy DS2 sets out how new housing developments should focus new housing on, and adjacent to, the existing urban area of Milton Keynes as well as the three key settlements. In this instance the development site is located within the urban area of Milton Keynes and therefore complies with policies DS1 and DS2.

Loss of allocated community land

The existing site is associated with the Wolverton Health Centre, for which the land remains allocated as a community facility use. Policy CC3 of Plan:MK details that proposals involving the loss of existing community facilities or land allocated for that use should demonstrate that there is no longer a need for the facility or any type of community use on the site (as defined within paragraph 16.32). The pre application submission is accompanied by a letter from the Bedfordshire, Luton and Milton Keynes Integrate Care Board (ICB) which sets out the use of the land and confirms that the NHS property services seek to market the site for disposal, demonstrating that this use is not required for any expansion or use associated with the Health Centre or any healthcare need. During the pre application meeting the disposal of the site was discussed, for which the site has been listed on ePIMS since 2022 allowing other public sector bodies to purchase this prior to being put on the open market. The applicant outlined that no interest has been shown, and the site will be marketed on the open market for any potential use, therefore incorporating any community uses. Evidence of the marketing (ePIMS and open market) should be provided in the form of a marketing report to demonstrate that there is no longer a need for the site for any type of community use, for which the MKCC local validation list details that this should cover a period of no less than 6 months to ensure satisfactory marketing has taken place. This must include;

- (a) the period which the property has been marketed for;
- (b) the use(s) which the land has been marketed for, taking into account reasonable alternatives under the same use class and/or allowed for by permitted development rights;
- (c) the publications/websites in which and locations where marketing has taken place;
- (d) the price at which the land has been valued (taking into account any occupancy or use restrictions); and
- (e) a record of all enquiries made and offers received.

The supporting letter from the ICB is considered to satisfy part A.2 of this policy given that no healthcare facility is located within this portion of the land and it is clear that no health care facility would be required on this land in any case, with no evidence to the contrary.

Loss of allocated amenity space

The site is also allocated as amenity open space within the policy maps of Plan:MK. Policy L3 of Plan:MK sets out that planning permission will only be granted for the change of use of amenity open space if the proposal complies with one of several criteria under Part A of Policy L3. An assessment of each of the criteria of Policy L3 is required as set out below.

1. The land has been subject to an assessment which shows the open space to be surplus to requirements;

The pre application submission is accompanied by an open space statement which details the current site, the maintenance requirements and other relevant information. This statement also sets out the amount of space located within the proximity of the site, making an assessment against the different categories of open space/ facilities as detailed within appendix C of Plan:MK. This assessment therefore details the useable open space and play areas within proximity of the site, and given the overgrown and inaccessible amenity grassland of the site, in respect of useable open space this site is considered to be surplus to requirements.

2. The land does not fulfil a useful purpose in terms of its appearance, landscaping, recreational use or wildlife value;

The site contains a number of trees and landscaping, providing a vital contribution to the area in terms of appearance, landscaping and wildlife value. The information supporting the pre application submission details the potential presence of a number of protected species and therefore the land is considered to fulfil a useful purpose in this regard. In respect of recreational use, the site is overgrown and is not useable for any recreational purposes.

3. The land does not host an element of semi-natural habitat useful in creating a stepping stone to another habitat or any other feature of value to wildlife to a greater extent than would be the case if it was planted as a garden. In some cases, the continued protection of the land as open, natural garden land and type of enclosure may be regulated by conditions;

The land is a completely natural habitat and whilst a redway separates the site from further landscaping to the north, it is valuable in terms of its unique provision of habitat in an otherwise built up area and is considered to connect with the other areas of amenity space within the locality, allowing for the movement of species and wildlife. Consideration of the value of the site in this respect will be required both as part of the open space assessment and ecological considerations.

4. The loss of amenity open space would not set a precedent for other similar proposals which cumulatively would have an adverse effect on the locality or the environment;

The development would not be considered to set a precedent for similar proposals for the loss of allocated amenity open space given the other requirements of surrounding amenity open space as a landscape buffer between highways and development. The site is an area of land to the rear of the existing built form rather than a design feature within an existing estate, it is considered that the loss of this amenity space would not likely set a precedent for future change of use of allocated amenity space of this nature to contravene the aims and objectives of the allocations.

5. The continued maintenance of the land for public amenity purposes would be impractical or unduly onerous; or

The information available to the council states that the land is not privately maintained, and was in good condition when a site visit was carried out for the previous permission in principle application in June 2023, largely consisting of established tree and shrub coverage. As such, it is not considered that the continued maintenance would be impractical or unduly onerous.

6. Open space lost should be replaced by land of equivalent size or greater following an assessment justifying this need.

No proposals have been put forward to replace this land, and it is not considered that there is the potential to replace this area of land within the immediate area.

In summary, the loss of this generously sized area of grassland and trees contributes to the soft landscaping of the area, breaking up the expanse of built form between the redway and the Health Centre site. It is noted that it is unlikely that this land is used for recreational purposes, however it is likely that the site would be a host to local ecology, creating a continuous band of green space and allowing movement for wildlife. The area is well maintained and this reinforces its importance and prominence within the area. However, the open space assessment does outline the amount of open space remaining within the vicinity of the site at all levels as outlined within appendix C and the loss of this space is not likely to set a precedent for the loss of amenity open space.

On the basis of the above, and further evidence being provided the proposed development is likely considered to comply with Policy L3 of Plan:MK.

Highway safety, capacity, access and parking provision

Policies CT1, CT2 and CT5 of Plan:MK seek to ensure that development proposals possess links to public transport and are acceptable in regard to traffic generation and accessibility to all users of the highway. Policy CT6 requires development proposals to provide electrical vehicle charging points to support the use of low emissions vehicles. Policy CT10 seeks to ensure that development proposals are in accordance with the Council's Parking Standards (SPD) unless mitigating circumstances indicate otherwise.

The development seeks the use of the existing access from Gloucester Road with no alterations required to the access for this to be acceptable for residential use for the small number of dwellings, complying with policy CT2 of Plan:MK. An existing pedestrian access also serves the site to the north, connecting the development to the redway which leads to Greenleys local centre and to Wolverton. The Highways officer has requested that the proposed pathway link to the redway is increased in width to 3m to ensure that this is satisfactory for both pedestrians and cyclists, although it is noted that this minor section would connect directly to the 3m wide redway. As such, whilst a widened pathway would be desirable, it is unlikely that the development would be unacceptable if this is not amended within any forthcoming submission, and would comply with Policy CT3 of Plan:MK in its current state for active travel arrangements.

In respect of the site layout and parking provision, the 9 dwellings proposed would require a total of 18 allocated spaces and a further 4.5 unallocated spaces given the location within zone 4 of the Milton Keynes Parking Standards. The proposed layout also details tandem parking arrangements for 5 of the plots, and therefore in accordance with the Parking Standards a further 2.5 unallocated spaces are required, equating to a total of 7 unallocated spaces. The site layout details 18 allocated spaces, however only 3 unallocated visitor spaces are shown which are also located adjacent to the remaining NHS car parking. This arrangement may result in some confusion over the use of the spaces and ideally the spaces should be provided within closer proximity of the properties to create a more physical separation between the uses. Given the location of the development, the full 7 unallocated spaces should be provided as there is no opportunity for on street provision as would ordinarily be the case for housing schemes.

The development also results in the loss of 7 spaces from the existing car parking provision for the health centre. However, the pre application submission is accompanied by a transport statement which details an accumulation exercise demonstrating that there will likely be 56% spare capacity. On that basis, the loss of spaces is acceptable and retains space for any future expansion of the existing health centre building. Whilst this assessment also details that there would be potential space for visitor parking associated with the proposed dwellings, it is maintained that the relationship between the dwellings and the health centre should remain separate and therefore the applicant is encouraged to review the potential for the unallocated spaces within proximity and close to the dwellings proposed.

It is noted that the accompanying pre planning statement details the provision of secure covered storage providing 2 spaces per dwelling which would be acceptable, however cycle parking provision

should be detailed on the proposed site plan for any forthcoming application.

In accordance with Policy CT6 and the Milton Keynes Parking Standards, residential properties should provide 1 EV charging point per dwelling which should be detailed within any forthcoming application. The securing of 1 space per dwelling is captured under part S1 of the Building Regulations.

The pre application submission details the provision of a bin store, however no further information has been provided in respect of collection. It is likely that the arrangement will be for refuse vehicles to enter the site, and therefore swept path drawings should accompany any forthcoming submission alongside an assessment of the impact on the existing parking provision for the health centre when collection takes place.

Please have regard to the LHA's guidance for developers at www.milton-keynes.gov.uk/highways/new-roads-and-adoptions/new-roads-milton-keynes.

Character of the area, design and layout

Policies SD1, D1, D2 and D3 of Plan:MK require, amongst other initiatives, that development integrates well with the surrounding built environment through sympathetic design, massing and scale. The guidance set out in the New Residential Design Guide (NRDG) SPD should also be noted. In particular, page 94 states the guidance for separation distances between dwellings of 13.7m side to back and 22m back-to-back.

The proposed site layout creates the appearance of a self-contained area of housing to the rear of the Health Centre, with retained landscaping separating the uses. As outlined above, the site is well connected to the redway network to the north with a legible layout presented, connecting the pathways to the Health Centre as existing and to the dwellings proposed.

Given the location, no design precedent exists for the layout and appearance of the dwellings, with no physical relationship between the properties off of Marron Lane (exceeding the distances as outlined within the NRDG) or the health centre. There are no significant concerns in respect of the proposed layout. Overall, given the fairly contained site and landscape buffer shown on the proposed plans (subject to detail as outlined within the landscaping section below on the types and categories of trees currently within the site to enable an assessment of their loss), the development is likely to accord with the design policies of Plan:MK.

However, careful consideration of the value of the site an undeveloped area of amenity open space within the City and its value to the character of the area will need to be considered in detail at the application stage.

Residential amenity

Policy D5 of Plan:MK seeks to ensure that development proposals do not cause an unacceptable loss of light, loss of privacy or create a visual intrusion between residences. Policy HN4 requires that residential units meet the NDSS, as well as other criteria regarding accessibility and flexibility of homes.

The pre application submission is not accompanied by floor plans, however the statement outlines that each dwelling will be compliant with the Nationally Described Space Standards (NDSS) and therefore Policy HN4 of Plan:MK. Any forthcoming application should ensure that the floor plans are compliant with the minimum standards and should outline that the dwellings proposed would provide sufficient sunlight/ daylight, particularly for the plots adjacent to the existing tree line.

The dwellings are located a sufficient distance from the closest neighbouring properties to the east and would not be considered to result in a loss of light, privacy or overshadowing on that basis.

The NRDG also provides guidance on minimum external private amenity space for new dwellings, requiring a minimum of 10 metres depth for family dwellings, although they can be shorter for wide

frontage units. In this instance the rear amenity space exceeds 10m for all plots. It is therefore considered that the amenity space as provided would serve the reasonable needs of the users and is acceptable.

Policy D5 of Plan:MK outlines that development should provide appropriate refuse storage and collection areas. The proposed site plan does not detail any refuse storage for each of the dwellings or a communal store, however the submitted pre planning statement details that a refuse store will be provided within a suitable distance for residents to ensure compliance with the recommended drag distances. This distance or location is currently unknown, and therefore any forthcoming application should detail the proposed store on the site plan and detail the exact arrangements for the collection of the bins given the distance of the site from Wolverton Road.

Landscaping

Policy D1 of Plan:MK states that development proposals will be permitted if landscaping and boundary treatments integrate with and/or enhance those of the surrounding area. Development should provide hard and soft landscaping that enhances the public realm and is appropriate to its context.

The site layout seeks to retain the established trees surrounding the site, alongside further planting within the site which is viewed favourably.

It is acknowledged that the existing site contains a significant amount of trees and landscaping, however in the absence of an arboricultural impact assessment with the pre application submission detailing the type and category of the trees within the site, a full assessment of the impact of the loss of the existing landscaping and trees cannot be made. The location of the development within the site should be influenced by an arboricultural impact assessment and tree surveys to ensure that the trees surrounding the site can be retained and that development would not encroach upon the root protection areas of the trees. Similarly, drainage details will need to be designed to avoid conflict with landscaping and should instead be located under hard landscaped areas if attenuation is proposed. Any forthcoming application should be accompanied by the arboricultural information as outlined above (and further to the rear of this report) alongside hard and soft landscaping details.

Ecology

Policy NE2 of Plan:MK requires applicants to demonstrate that their proposals will not have a negative effect on statutorily protected species or wider biodiversity. Paragraph 175 of the NPPF requires the protection of biodiversity, or the mitigation and/or compensation for any negative effects.

In order to demonstrate the potential effects of the proposals, the applicant should engage a suitably qualified ecologist to carry out relevant surveys and prepare any mitigation strategies that may be required. These should be included in an Ecological Impact Assessment. If these details were submitted as a Preliminary Ecological Appraisal this would likely result in an objection from Ecology on the basis of this report only being satisfactory in instances where the development would have no significant ecological effects, no mitigation is required and no further surveys are necessary, which is not applicable in this case.

Policy NE6 focusses on environmental implications, including external lighting schemes. A Lighting Assessment may be required in this case to satisfy all the criteria set in part I of this policy with a focus on minimising light pollution, particularly given the confirmed habitats on site including roosting potential in trees and foraging for bats. It would be beneficial if engagement takes place with a consultant ecologist and lighting engineer at an early stage in order for a sensitive lighting scheme to be developed in line with the Institute of Lighting Professionals Guidance Note 8 – “Bats and Artificial Lighting at Night” (2023).

Policy NE3 seeks that development delivers a net increase in biodiversity where possible. It states that proposals providing in excess of 11 dwellings will be required to submit a Biodiversity Impact Assessment Metric (BIAM) to demonstrate any loss or gain of biodiversity. As a last resort, any loss

of biodiversity may be compensated by a contribution towards providing improvements to biodiversity elsewhere in the Borough, although the Policy states that this can only occur if harm cannot be mitigated or avoided.

The development would not be required to submit a biodiversity impact assessment metric in accordance with Policy NE3, however as of the 2nd April, biodiversity net gain of 10% is mandatory for small sites. In this regard, a future application would need to be informed by a calculation undertaken in the Statutory metric with the trading rules satisfied. There is a legal requirement to comply with the rules of the metric as set out within the Statutory User Guide as this forms part of the legal package secured by the Regulations. Any metric submitted with a trading error to discharge the statutory condition will not be considered valid. Given the habitats proposed as lost under future development, assurances will be sought at the application stage as to whether sufficient units could be secured to achieve a 10% net gain and meet the trading rules as required under the legislation.

Further information on the statutory requirements for developers at each stage of the planning process can be found at Meet biodiversity net gain requirements: steps for developers - GOV.UK (www.gov.uk) and biodiversity net gain planning practice guidance - GOV.UK (www.gov.uk).

A future planning application must be supported by the minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and any further information relating to “significant on-site” or off-site gains that would be necessary to secure relevant s106 planning obligation / agreement or relevant planning conditions should permission be granted (see biodiversity net gain planning practice guidance - GOV.UK (www.gov.uk)). Given the nature and scale of the development a draft Biodiversity Gains Plan and draft Habitat Maintenance and Management Plan (HMMP) would be required to inform any forthcoming application.

A future planning application must also provide additional, faunal enhancements in line with local net gain policy requirements. These should comply with the expected provision set out in paragraph 5.12 to 5.19 of the Biodiversity Supplementary Planning Document (June 2021). Given the nature of the proposed development, it is likely measures such as integrated bat and bird boxes would be necessary to provide permanent provision.

The site is located within a red impact area for Great Crested Newts, with 3 ponds located within 500m of the site boundary, 1 of which is within 50m with no dispersal barriers allowing direct passage of Great crested newts onto the development site. As such, any forthcoming application could either establish the presence or likely absence of GCN by way of a survey (and potential population assessments) undertaken by a suitably qualified ecologist (and in accordance with the Great Crested Newt Conservation Handbook (Froglife, 2001) and the Great Crested Newt Environmental eDNA Technical Advice Note (Natural England 2014)), which may require an EPS site based migration license if GCN are identified, or the District License scheme could be applied for. This is a voluntary scheme, but can provide more certainty and reduce risk to project timescales and the need for further surveys or mitigation. More information is available at www.naturespaceuk.com. If you decide to enter into the scheme, you should do so prior to the planning application submission and provide the necessary report or certificate issued by NatureSpace as part of your submission.

Flood risk/drainage

Policy FR1 of Plan:MK states that all new development must incorporate a surface water drainage system with acceptable flood control and demonstrate that water supply, foul sewerage and sewage treatment capacity is available or can be made available. It also requires a sequential approach to all sources of flood risk. Policy FR2 requires new development to incorporate sustainable drainage systems (SuDS) as a means of managing surface water drainage.

The site is located within flood zone 1 and is at very low risk of surface water flooding, with small pockets of low and medium flood risk to the north along the redway and the western side of the site. No information accompanies the pre application submission in respect of drainage information.

Any forthcoming application should be accompanied by a Drainage Strategy/ statement/ scheme which should follow the drainage hierarchy and set out how the water will be drained from the site to ensure that the development would not increase the impact on adjacent areas or within the wider site.

Any infiltration must be undertaken in accordance with BRE 365. Please note the minimum infiltration rate the LLFA accepts is 1.0×10^{-6} m/s. To protect groundwater from pollution, any infiltration structure must be shown to be constructed with the base set at a minimum of 1.2 m above the anticipated groundwater level. Information on groundwater levels should be ascertained through on-site testing.

Surface Water Runoff Rates

Runoff from the site must mimic natural drainage as closely as possible. As the site is greenfield, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 100% Annual Exceedance Probability (AEP) 1 in 1 annual probability and 1% AEP (including an appropriate allowance for climate change) critical rainfall event should never exceed the peak greenfield runoff rate for the same event.

Surface Water Runoff Volumes

As the site is greenfield, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 annual probability, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event. Methods to deliver volume control include infiltration and rainwater harvesting as these can significantly reduce the volume of water discharged offsite. Where the controlling of runoff to greenfield volumes is not practicable, the runoff volume should be reduced as much as possible with any additional volume stored on site and released at a low rate that will not increase downstream flood risk (normally 2 l/s/ha).

Attenuation

An assessment of the volume of attenuation storage that will be required on site should be produced. This should be based on the 1% AEP plus climate change storm event and allowable discharge rate for the site. The method and volumes of attenuation should be identified and located on a plan of the proposed development. SuDS such as permeable paving, swales, green roofs, attenuation basins and wetlands should be preferred on all development sites ahead of conventional piped drainage measures.

Permeable paving should be used in areas where car parks and pavements are proposed, allowing rainwater to infiltrate through the surface and into the underlying areas. Water can be temporarily stored before infiltrating the ground, reused, or discharged to a watercourse or other drainage system. Water quality can be improved by using surfaces with an aggregate sub-base.

Flat roofs or extensions on a site present an opportunity for green roofs to be integrated into the building, minimising the quantity of surface water runoff that enters the current drainage infrastructure, which can help to alleviate flooding and improve capacity. Interception should be considered as part of a Drainage Strategy. Policy SC1 of Plan:MK includes policies that seek the incorporation of green roofs and/or walls into the structure of buildings where technically feasible to improve water management in the built environment, provide space for biodiversity and aid resilience and adaptation to climate change. Additionally, water reuse and recycling and rainwater harvesting should also be incorporated wherever feasible to reduce demand on mains water supply, subject to viability.

The site's surface water drainage strategy must give priority to the use of SuDS as this is now a material planning consideration. SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS can offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and volume of surface water run-off

from a site, promoting groundwater recharge, and improving water quality. SuDS can also be integral in the design and delivery of green infrastructure across a site.

The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles.

Exceedance Flows

The surface water scheme must ensure the level of flood risk from the drainage system is acceptable for the site. For extreme events, the layout of the site should be designed so that any exceedance flows (those flows in excess of what the system has been designed to cater for) are safely managed in conveyance and storage zones.

Water Quality

The presence of impermeable areas across a development can increase the risk of pollution entering a watercourse or groundwater and the variability in the level of pollutants arising from urban runoff is great. To protect the quality of receiving water bodies, surface water runoff arising from the site should be of an acceptable quality. This can be achieved through pollution prevention measures, interception, treatment and maintenance.

Pollution Control: Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. A construction surface water management plan should identify how surface water run-off will be managed. In addition to run-off from exposed ground, pollutants from transport routes, washing areas and/or fuel storage areas have the potential to enter a surface water drainage system. It is essential that the risk of pollution is considered and mitigated appropriately. Appropriate interceptors should be included and not rely on retrospective measures.

Climate Change Allowances

All surface water drainage strategies are expected to incorporate the latest climate change allowances for rainfall intensity. The peak rainfall allowances map provided on gov.uk should be used to determine the appropriate climate change impacts on peak rainfall intensity per management catchment. Applicants should use the development guidance to work out the lifetime of the development. They should consider a residential development to have a minimum lifetime of a 100 years.

The correct climate change allowances should be used for both the 1% and 3.3% annual exceedance probability events. Where the central allowances are used, we may ask for justification of the design life of the development to ensure that the correct climate change allowances are applied.

Urban Creep

Allowances Urban creep should be considered in any application to account for increases in impermeable surfaces throughout the lifetime of development (e.g. the addition of conservatories or building extensions). This should be limited to residential development only and use the allowances shown in Table 2 taken from the Local Authority SuDS Officer Organisation (LASOO) Practice Guidance. In order to adhere to current best practises, Milton Keynes City Council prefers that developers include 10% urban creep in drainage calculations.

Table 2: Urban Creep Allowances

| Residential development density (dwellings per hectare) | Change allowance (% of impermeable area) |
|---|--|
| ≤25 | 10 |
| 30 | 8 |
| 35 | 6 |
| 45 | 4 |
| ≥50 | 2 |
| Flats and apartments | 0 |

Maintenance and Management

In line with the Planning Practice Guidance (PPG), the design of a SuDS system needs to take into account the construction, operation and maintenance requirements of both the surface and subsurface components. An appropriate maintenance plan should be submitted with any planning application which covers the maintenance for the lifetime of the system. Such a plan will often be required as a condition of planning permission for a site. There are several options for adoption and maintenance of SuDS and include:

- The Parks Trust (the Council's preferred adopting body for SuDS that fall within public open space or other green spaces) will normally adopt land containing SuDS with commuted sum payment to cover the cost of future maintenance. The Parks Trust may have specific design requirements, and these should be accounted for early in the design process.
- Anglian Water will consider adoption of a scheme designed to their standards. There is a Pre Planning Service where developers can request a connection to their network for surface water disposal Pre-planning (anglianwater.co.uk). In addition, they have recently made available a free service where developers can discuss their SuDS elements they wish Anglian Water to adopt pdsa-form.pdf (anglianwater.co.uk).

Permission and Licences

It is the responsibility of the applicant to identify all the necessary permissions and licences required to carry out works.

Please have regard to the LLFA's Surface Water Drainage Guidance for developers at www.milton-keynes.gov.uk/flood-and-water-management/flood-risk-guidance-developers.

Sustainability and digital connectivity

Policy SC1 of Plan:MK requires all new development to demonstrate how sustainable construction principles will be implemented within the proposed development, to include the minimising of waste, the sourcing of materials, energy and climate reduction and water consumption. Any forthcoming application should therefore be accompanied by a sustainability statement detailing how the development will accord with these principles.

Policy CT9 of Plan:MK seeks to ensure that all new developments are served by digital communication services that provide at least superfast broadband speeds. Any forthcoming application should be accompanied by a digital connectivity statement which details the superfast broadband available within the area. Notwithstanding this information, this requirement is captured through Part R (RA1) of the Building Regulations.

Other matters

The Council's Statement of Community Involvement states "for larger-scale or potentially controversial development proposals, the Council encourages developers to engage with relevant stakeholders, including the local community, Ward Members, and Town and Parish Councils at the earliest opportunity". In particular, Town and Parish Councils and Ward Councillors can play an important and helpful role in highlighting specific local issues that could then be addressed prior to the submission of an application. Contact details are available at:

- www.milton-keynes.gov.uk/your-council-and-elections (Ward Councillors)
- www.milton-keynes.gov.uk/your-council-and-elections/councillors-and-committees/contact-your-parish-town-or-community-council (Town and Parish Councils)

An application submission for this proposal should meet the following requirements:

| Forms, schedules and plans (list as per Section 1 of Annex B of PAVR) | Required? |
|---|-------------------------------------|
| Application form (including ownership certificates) | Yes |
| Appropriate fee | Yes |
| Block plan | Yes |
| Conditions pro-forma (for applications seeking approval of details required by conditions) | |
| Conditions tracker (for applications seeking approval of details required by conditions) | |
| Conveyancing plan | Yes |
| Drawing schedule | |
| Elevation drawing | Yes |
| Floor plan | Yes |
| Housing accommodation schedule | |
| Illustrative masterplan | |
| Landscaping plan | Yes |
| Layout plan | Yes |
| Other plans or drawings to explain the development (e.g. for details required by condition) | |
| Parking plan | Yes |
| Phasing plan | |
| Roof plan | Yes |
| Sectional drawing | |
| Site location plan | Yes |
| Site photos | Yes |
| Street scene drawing | |
| Swept path drawing | Yes for refuse vehicles if required |
| Topographical survey | |
| Window and door drawings and details | |
| Statements, assessments and reports (list as per Section 2 of Annex B of PAVR) | Required? |
| Air quality assessment | |
| Arboricultural impact assessment | Yes |

| | |
|---|-------------------------|
| Arboricultural (or tree) survey | Yes |
| Archaeological desk-based assessment (including field evaluation where appropriate) | |
| Biodiversity Impact Assessment Metric (BIAM) | Yes- small sites metric |
| Community facilities analysis | Yes |
| Daylight and sunlight assessment | |
| Design and access statement | |
| Digital connectivity statement | Yes |
| Digital communications statement | |
| Economic statement | |
| Energy and climate statement | |
| Environmental statement | |
| Equalities impact statement | |
| Fire statement | |
| Flood risk assessment (FRA) | |
| Foul drainage statement | |
| Framework travel plan | |
| Geophysical survey | |
| Health impact assessment | |
| Heritage impact assessment | |
| Housing statement | |
| Land contamination assessment (phase 1 site investigation) | |
| Landscape and visual impact assessment | |
| Lighting assessment | Yes |
| Marketing report | Yes |
| Microclimate assessment | |
| Minerals extraction feasibility study | |
| Noise impact assessment | |
| Odour assessment | |
| Parking assessment | Yes |
| Planning obligations statement (heads of terms for a section 106 agreement) | |
| Planning statement | Yes |
| Play and open space statement | Yes |
| Ecological Impact Assessment | Yes |
| Retail impact assessment | |
| Retail sequential assessment | |
| Rural enterprise statement | |
| Site waste management plan | |
| Soil quality assessment | |
| Sports and open space analysis | Yes |
| Statement of community involvement (SCI) | |
| Statutory declaration | |
| Structural survey | |

| | |
|-----------------------------------|---|
| Surface water management strategy | Yes |
| Sustainability statement | Yes |
| Transport assessment | |
| Transport statement | Yes in order to detail the lack of spaces associated with the health centre |
| Utilities assessment | |
| Viability appraisal | |
| Other | |

For more guidance on what is required within these requirements, see the Planning Application Validation Requirements (PAVR) at www.milton-keynes.gov.uk/planning. Locally requested items are based on the latest adopted PAVR (March 2023).

Following receipt of the related application, we will endeavour to publish this pre-application advice against the formal application record or, when systems allow, under the original pre-application reference, in accordance with the Pre-application Engagement and Planning Performance Agreements Planning Service Charter (March 2023), available at www.milton-keynes.gov.uk/planning

Regard should also be had to outline conditions where this advice relates to a proposed submission of reserved matters. All applications for reserved matters must fulfil any information requirements set by outline conditions and remain within any specified parameters of the outline permission (both the description and that stated in conditions).

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice the formal determination of any planning application we receive from you on this proposal. If you have any queries in relation to the above matters do not hesitate to contact the case officer.

Case Officer:

| | | |
|--|------------------|---------------------|
| Charlotte Ashby Senior Planning Officer | Date: 03.05.2024 | Signature: C. Ashby |
|--|------------------|---------------------|

Checked by:

| | | |
|--|---------------------|--------------------------|
| Richard Stewart Team Leader (West) - Development Management | Date: 14.05.2023 | Signature: R. Stewart |
|--|---------------------|--------------------------|