



**FUTURE WOLVERTON OBJECTION**  
**BRICKHILL ESTATES (MK) LTD RESPONSE**

**The Agora Site**  
**Wolverton**  
**Buckinghamshire**

On Behalf of:  
Brickhill Estates (MK) Ltd.

July 2015

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## **Methodology**

This document has been prepared by CMI Architecture on behalf of Brickhill Estates (MK) Ltd in response to Future Wolvertons objection to the current Brickhill proposal for the Agora Site.

We appreciate your comments and, as we have demonstrated, much of your objection has been mitigated or addressed in the most recent documents submitted to Milton Keynes Council (MKC) or forms part of future planned discussions with MKC.

We would urge you to review our application again as many of your comments relate to earlier proposals and do not accurately reflect what we have applied for.

## **Response Introduction**

We appreciate your comments but we assert the majority of your response unqualified subjective opinion and we disagree with your interpretation of our scheme and your appraisal. We have demonstrated that much of your objection has been mitigated or addressed in the most recent documents submitted to Milton Keynes Council (MKC) or forms part of future planned discussions with MKC.

Your rigid interpretation of planning guidance and, in particular, the un-adopted neighbourhood plan would potentially remove 37% of the enabling housing development and 26% commercial development from the scheme and makes no concessions to viability.

We acknowledge that your 'wish list'<sup>1</sup> is extensive and we have delivered as much as we can within the physical and financial constraints of the development. Money may follow good ideas, but this is a multi million pound scheme and no development would be permitted without agreement from the local authority if such a scheme was not financially viable. We would also like to refer you to the comments contained within the UANP inspectors report regarding viability:

***89. The 10 requirements listed in the policy as items A to J may not all be wholly appropriate to every development and redevelopment proposal arising during the plan period. Additionally the Framework states that development “should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.” These issues can be dealt with by making the requirements apply to proposals as appropriate to scale and location and viability testing.***<sup>2</sup>

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<sup>1</sup> Marie Osborne Future Wolverton Acting Chief Executive, refers to 'our wish list' in interview with BBC 3 Counties Radio April 10 2015 ( <https://www.youtube.com/watch?v=f7cvcrWn1Ps>)

<sup>2</sup>Wolverton Town Centre Neighbourhood Development Plan Christopher Edward Collison Report of Independent Examination April 2015

*We would also draw your attention to the further professional advice you received from The Prince's Foundation:*

***There are no easy answers – but these might be considered:***

***•increase the overall quantity development on site***

***•reduce space for community uses and increase quantity of Residential space<sup>3</sup>***

It is disappointing that board has not engaged with us more fully as our professionally qualified design team would have welcomed the opportunity to go through the scheme and explain elements that may not have been understood by those not qualified in the production of architectural drawings, planning procedures or construction in general.

We perceive that in your enthusiasm to have the neighbourhood Plan adopted you have neglected to judge our proposal on its own merits. We understand that a lot of effort has gone in the production of Neighbourhood Plan but we cannot be held responsible for the conflict of timing and are also disappointed that you have not taken up opportunities to engage with us as developers which are stressed as a cornerstone of your Neighbourhood Plan. However, we have welcomed the input from the two board members that have contributed to our scheme. The offer to discuss any element of the scheme with our design team continues to remain open.

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<sup>3</sup>From published outcomes .Wolverton neighbourhood planning event Public open meeting , Biljana Savic, The Prince's Foundation 02 February 2012

## **Brickhills Response To Future Wolverton**

***A – Follow the historic grid pattern and reinstate Radcliffe Street as a direct highway link between The Square and Church Street.***

*Whilst the developer's proposals result in the reinstatement of Radcliffe Street, the nature of this new link is not that envisaged in the Neighbourhood Plan or Development Brief.*

*Future Wolverton believes that further attempts need to be made to make this link more pedestrian and cycle friendly. We are concerned that the quality of the street scene is being compromised by the dominance of on- street parking, and whilst we acknowledge that on-street parking is important, we believe it could have been delivered in a way which would improve rather than detract from the public realm.*

*The road is narrow – 12 meters wide - despite the fact that the Brief calls for a link of between 12m – 22m. This narrowing of the link appears to have happened to accommodate on-street parking, but to the detriment of the pavement width.*

*Future Wolverton believes that the footway on new Radcliffe Street should be, at the very minimum, the width of the footway on The Square which is 3 meters. We would argue that it is possible to accommodate parking and extend the width of the pavement, and that it is essential to do so if the new link is to provide the site for community events and markets. We believe that the highway needs to be a minimum of 17 m to accommodate a 3 m footway and parking bays of 2.5 m.*

*We are concerned that the narrowness of the road, combined with the fact that all the housing development along new Radcliffe Street is all 3 storey, could make this crucial new road feel “tunnel like” and will result in an unattractive, oppressive environment.*

## **A. Brickhill Response**

This is unqualified subjective opinion and we disagree with your interpretation of our scheme and your appraisal.

Both the Adopted Development Brief (ASPD) and Un Adopted Neighbourhood Plan (UANP) documents are open to different interpretations, both professional and unqualified.

We have provided adequate space for two HGV's passing, however, the final format of the street and how it will be operate will be at the discretion of Milton Keynes Highways. A cycle path would potentially be of limited benefit as it does not connect with any dedicated cycling infrastructure.

The parking spaces on Radcliffe Street have been clearly marked in our proposal to prevent the ad hoc arrangements visible on neighbouring residential streets. The ASPD proposes perpendicular parking on both sides of Radcliffe Street which would create significantly more on-street parking than our proposal and further 'increase the dominance of the car'.

Your statement regarding the street width is factually incorrect at 13.2 - 14.2 m<sup>4</sup> the proposed new stretch of Radcliffe Street exceeds the minimum width requirement in both the ASPD and UANP. The pavement width also exceeds the MKC guidance and the parking spaces sizes are MKC compliant.

The interpretation of how the street 'feels' is subjective. We have worked with a professional<sup>5</sup> team of advisers including planners, urban designers, architects and conservation officers in developing our scheme. Two board members have also engaged directly with us and their influence on the scheme is visible and we thank them for their input.

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<sup>4</sup> Our Technical design team have advised that a further gains are to be expected at the technical design stage.

<sup>5</sup> RTPI, RICS, CIAT and RIBA accredited

***B – Provide an active retail frontage on the reinstated Radcliffe Street and Church Street, with a mix of new ground floor units of modern size and standard, suitable for current retail, service and office requirements.***

*There are no retail/office units on Radcliffe Street as envisaged by the Plan and Brief. This is hugely disappointing as a key aim of the Neighbourhood Plan was to “join-up” the town centre by having active frontages on Radcliffe Street. The expectation was that this would draw people up into The Square and improve footfall.*

*The Plan and Brief envisaged new Radcliffe Street as a site for community events and street markets. The brief says that the opportunity should be created “for some activities to spill out onto pavements (e.g. cafes, restaurants) particularly along the new extended Radcliffe Street.”*

*We believe that by failing to include retail, office and other mixed uses on Radcliffe Street, the planning application will fail to deliver a vibrant busy feel with lots of pedestrian “comings and goings”.*

## **B. Brickhill Response**

Your statement regarding Radcliffe Street is factually incorrect. The proposed retail frontage from Church Street carries on 30-40% up the new Radcliffe Street to allow for the larger floor plate retail units at the new junction. Should market conditions dictate, ground floor residential units with independent access could make suitable office units subject to planning consent.

We commissioned Retail Consultants to assist in the development and marketing of the retail offering. Viability studies have concluded that the new Radcliffe Street would be a secondary retail location and units would not let easily. There is currently no significant demand. There is currently an excess of retail and office space available in and around the Wolverton area. Empty retail units would have a negative impact on the 'sense of place' we are trying to create and potentially reduce footfall.

In working the scheme into detailed plans using topographical data, the architects believe the slope of the street would limit the frontage of any retail outlets and require a hand-rail which would impact on the provision of car parking. This would also limit the community events that could be held on the street and exclude some sections of the community. Our proposed scheme is fully inclusive.

There is no dedicated open or community space in the development. The new Radcliffe Street forms part of the new link to The Square and has been designed to be more distinctive than the surrounding streets and creates a public link between two previously disconnected parts of the town. The creation of the 'behind the scenes' delivery yard and the rear parking courts will reduce congestion and improve the overall environment for community events.

We do not believe that by not including retail, office and other mixed uses on Radcliffe Street, the proposal fails to deliver an environment with the potential for a 'vibrant busy' feel with lots of pedestrian 'comings and goings'.

***C - Include development fronting Church Street, with priority around the junction with Radcliffe Street.***

*The Agora Development Brief requires the focus of the development along Church Street to be at the Radcliffe Street end of the site “because this is seen as the heart of the town centre.” By putting all the retail units on Church Street the developer is drawing activity away from the heart of the town centre as defined by the Brief and the Plan.*

*Future Wolverton believe that the overall quality of the scheme has been affected by limiting the extent of the development along Church Street. This is because the scale and massing of the proposed retail development on Church Street is out of keeping with the surrounding town centre – in other words the developer has found it necessary to make the development on Church Street 3 and 4 storey, rather than mirroring the other side of Church Street which is 2 storey. If they had extended the development along the street, they may have been able to incorporate some 2 storey development at the same time as achieving a greater mix of uses.*

## **C. Brickhill Response**

Your observation fails to take into account the current and potential retail offering within The Square which will act as a natural draw. The new Radcliffe Street forms part of the new link to The Square and has been designed to be more distinctive than the surrounding streets and creates a public link between two previously disconnected parts of the town.

Parking is one of the key issues in Wolverton and to remove car parking to develop more retail and two storey buildings along Church Street would reduce parking below the MKC compliant level. Four storey development has been limited to the new corners of Radcliffe Street and Church Street and the accommodation proposed forms a substantial part of the viability of the scheme.

Both the ASPD and the UANP have determined four storeys as acceptable in specific parts of the development. Other proposals mooted have failed to take into account the actual parking requirement needed for a development of this scale.<sup>6</sup> Both planning documents and the professional advice provided to Future Wolverton allow for flexibility on the grounds of viability and we have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing our scheme which we feel is a fine grain response to the challenges of the site.

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<sup>6</sup> One scheme circulated on social media only allows for 77 car parking spaces, 38 of which are private on this basis this scheme would not succeed at planning. Our scheme proposes 207 spaces.

***D - Make a clear distinction between public and private spaces, particularly at the rear of buildings.***

*Whilst private parking is provided at the rear of the flats, it is not clear how servicing will occur to retail units A-C, so there may be a conflict between private and public space if servicing of these retail units is envisaged at the rear. There does not appear to be a sliding barrier providing access to existing residents of Buckingham Street to the rear of their homes and access to some of the private parking for the flats. Given that this private parking shares the same access road as HGV deliveries to the shops on Church Street and car access to the public car park, there is a risk that the private parking will be used by shoppers.*

## **D. Brickhill Response**

Information has already been provided on this subject. There will be no conflict. Units A-C will be serviced by a timed loading area in the new Radcliffe Street. Deliveries to Units A-C will be conditioned as part of any consent.

There is no sliding barrier to the access road behind Buckingham Street. This will remain public highway.<sup>7</sup> Clear signage and active parking management will be provided to reduce the chance of accidental incursions.

Our proposal does not preclude some future arrangement where freeholders along Buckingham Street and the freeholder of the new blocks could negotiate an adoption, making this road private subject to the usual permissions and agreements.

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<sup>7</sup> Other proposals in circulation limit or in one case remove rights of access from Buckingham Street residents.

***E- Incorporate public open space around the junction of Church Street and the new link to The Square to improve the urban environment and support street markets and community events.***

*The proposed development does not provide any new public open space to support street markets and community events. As previously said, Future Wolverton are concerned that a huge opportunity has been lost to make new Radcliffe Street a vibrant public space at the heart of the town centre. We believe that with clever use of street materials, public art features and planting could mean that Radcliffe Street could be this space whilst remaining a public highway. There has been no attempt by the developer to achieve this in the planning application*

## E. Brickhill Response

A market does not fall within the scope of this Agora redevelopment scheme. However, the Prince's Foundation proposal suggests using the current Agora Car Park and The Square, has also been proposed as a market venue. Both these ideas are feasible and complement our proposal. The Planning Obligations Officer at MKC will determine how section 106 monies will be allocated and some of this money could be used to develop these ideas further. However, once again, it is important to note that the slope on the new Radcliffe Street might limit community activities and exclude some sections of the community.

There is no dedicated open or community space on the development. However, the new Radcliffe Street forms part of the new link to The Square and has been designed to be more distinctive than the surrounding streets and creates a public link between two previously disconnected parts of the town. The creation of the 'behind the scenes' delivery yard and the rear parking courts will reduce congestion and improve the overall environment for community events.

You are also factually incorrect. Our architects have already engaged with the planning and conservation officers with regard to the careful selection of materials and choice of street furniture that will be selected (or designed) to compliment the conservation area setting. Details of an international public artist have also been passed to MKC for consideration.

We totally reject the comment 'There has been no attempt by the developer to achieve this in the planning application'. Our architects have worked with both the ASPD and UANP and have integrated as much of the Future Wolverton's 'Wish list' as possible. We have also tested the impact of items on the 'Wish list' against the scheme viability.<sup>8</sup>

Viability within the UANP and ASPD uses the same 'in house' MKC evidence base.

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<sup>8</sup>We estimate the wish for the retention of trees on The Square removes 10% of enabling development; 500sqm community space at the foot of Church Street removes a further 14 % of enabling development and a widening of Radcliffe Street a further 8%.

However, the UANP ask for considerably more elements than the ASPD but does not explain where funding for the additional elements will come from.



***F- Retain views of St George's Church, in particular the spire, through breaks in development along Church Street***

*There is no "framing of views" of the listed buildings through breaks in the development on Church Street as suggested in the Plan and Brief.*

*Whilst we acknowledge the importance of Town Centre parking, we believe that retaining the car park in its' current form at the end of Church Street does nothing to enhance the views of the Church at the Creed Street and Church Street junction.*

*It also does nothing to enhance this importance entrance to Wolverton Town Centre. We would have liked to see a more imaginative approach to the retention of views of the key buildings within the town, rather than an approach that is simply based upon not putting anything "in front" of the key buildings. This is another missed opportunity to create a more interesting town centre and enhance Wolverton's sense of place.*

## **F. Brickhill Response**

This is factually incorrect; our architects have framed views within the development and taken great care to protect the views of the historical assets within the conservation area. Priority has been given to the historical assets and the outlook of house holders.

There is a statutory requirement to provide a level of parking that cannot be ignored. However, we have taken a steer from the Princes Foundation report. The car park will be re landscaped, more trees will be planted and a feature gable and space for public art will be introduced.

We have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing our scheme, and we are confident we are proposing an imaginative scheme which will create an interesting town centre and enhance Wolverton's 'sense of place'.

***G- Be between two and four storeys in height with the taller buildings on the corners of the site and along the reinstated Radcliffe Street link between Church Street and The Square.***

*The Agora Development Brief says that “The building heights of new buildings should be guided by the height of existing surrounding buildings which means predominately 2-3 storeys with a potential for 4 storey buildings to mark the key corners of the reconnected Radcliffe Street and The Square.”*

*.Despite this being a requirement of the Brief, over a quarter of the development is 4 storey, and the rest is 3 storey. There is no 2 storey element at all, even in blocks E and F on Buckingham Street where the Brief says that “care needs to be taken with the scale and detailed design of any new housing that may occur on Buckingham Street.”<sup>5</sup>*

*Future Wolverton considers that the height of the development is a key departure from the requirements of the Plan and Brief, and results in a scale and massing which is completely out of character with the rest of the town centre.*

## **G. Brickhill Response**

We do not believe this development is out of character.

The architects have gone to great lengths to borrow references from the surrounding context as requested in both the ASPD and UANP. In respect of height, the development deviates partially from the brief but this is on the grounds of viability, which is allowed for in the planning guidance. We have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing our scheme. The proposal has been tested by 3D modelling to ensure it is not overbearing.

***H – Where practicable service yards do not conflict with private amenity space or private parking provision for residents or undermine the quality of the environment at the front.***

*For retail units D-H it is envisaged that delivery lorries will be using the entrance to what will remain of the Agora car park (on the corner of Church Street and St George's Way).*

*This could potentially lead to conflict with cars entering the (public) car park, and new residents accessing their private parking and existing residents their garages.*

*There is no clarity as to how units A-C will be serviced, other than by delivery lorries parking at the side of unit A on new Radcliffe Street.*

*We consider this arrangement to constitute an undermining of the new street scene.*

## **H. Brickhill Response**

Deliveries to shop units have been considered and tested by our traffic consultant which is why a delivery yard is included within the scheme. However, unlike other parts of the town, where deliveries can happen 24/7, the new units will have managed and conditioned deliveries. The service yard and access have been designed to FTA standards with tracking work undertaken by a qualified traffic consultant.

Clear signage and active parking management will be provided to reduce the chance of accidental incursions. Our proposal does not preclude some future arrangement where freeholders along Buckingham Street and the freeholder of the new blocks could negotiate an adoption, making this road private subject to the usual permissions and agreements.

There is clarity in how units A-C will be serviced. This is by a timed loading area in the new Radcliffe Street and information has been provided. Deliveries to Units A-C will be conditioned, this model works in other parts of the UK and we can see no reason why Wolverton would be an exception.

We have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing our proposed arrangements which constitute a vast improvement on the current street scene and will create a vibrant new retail and residential offering.

***I – Except in new residential development where parking should be designated to each unit, all parking should be accessible to town centre users, and include an element of on- street parking. Existing adopted highway should be retained and enhanced where practicable.***

*The developer has yet to clarify under what terms the remaining Agora car park car park will be “public” in the sense of being freely accessible to all town centre users, for instance by the ownership being transferred to the Town Council.*

*We are also concerned that there is no provision for parking for staff who will work in the new retail units.*

*There is no doubt that residential parking in Wolverton is at saturation point, and yet little consideration appears to have been given to parking for visitors to the residents of the flats. The Design and Access Statement simply says “it is the intention to make use of the public spaces for visitor parking”.*

*This will only be possible if the new retail units have occupiers who do not intend to open in the evenings and at weekends. If the new retailers are open at these times, then the car park may well be used for shopping traffic which will conflict with visitor traffic.*

## **I. Brickhill Response**

This is factually incorrect. The car park will remain in the ownership of the developer and those spaces allocated as public spaces on the site layout will remain freely available to all town centre users. Exactly who will administer the operation of the car park is yet to be determined and is subject to ongoing negotiations with MKC.

Staff who drive to work will continue to park in the public car park. Incentives could potentially be offered to employees to promote the use of public transport as in similar schemes elsewhere in the UK. This is a well connected site with good public transport links.

We have provided 106 public car parking spaces which will be available to all town centre visitors regardless of which home their friends live in, shop they shop in or where their friends are getting married.

Clear signage and active parking management will be provided to reduce the chance of accidental incursions.

***J – Integrate the existing Electric Bus Charging Infrastructure.***

**The bus charging infrastructure remains within the highway on Church Street, but this does not amount to an “appropriate integration” since no mitigation is suggested (in terms of highway layout and design) which allows for the significant waiting times the bus requires.**

*Overall the provision for buses within the development is very poor, with no account taken of the fact that Wolverton is a bus terminus, and that there can be several buses waiting at the beginning or end of their route at any one time.*

*We would have liked to have seen bus layovers incorporated into the development which would allow buses to wait off the main highway. This in turn would have improved traffic flow and safety on Church Street.*

## **J. Brickhill Response.**

There was no requirement or need to move the charging infrastructure which will continue to service electric buses. A further lane was not directly requested but the principle was tested by our architects who reported it would have removed 8% of enabling development reducing the viability of the scheme.

We have agreed the principle of two bus stops with MKC and we have provided two custom bus stops<sup>9</sup>. From information supplied the current bus pull-in may actually contribute to congestion in the town. A concern raised during consultation is that buses are stationary for prolonged periods until departure times creating congestion.

The bus stop proposal is borrowed from busy London bus routes and has been discussed and developed in conjunction with MKC. However, bus management and the need for buses to wait, which exacerbates the current bus congestion, does not fall within our scope or influence. We understand Wolverton Town Council is looking to engage directly with the bus companies.

Custom bus stops will be designed to complement the historic setting and sited to prevent interference with the retail offering.

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<sup>9</sup>Custom bus stops will be designed to complement the historic setting to prevent interference with the retail offering.

***K – Improve cycling and walking links within the town centre, retaining existing pedestrian links such as that between St George’s Church and Church Street.***

*The proposed development fails to address the need to improve cycle and pedestrian routes through the town centre.*

*The developer cites the opening up of Radcliffe Street as an example of improving pedestrian movements, but this is an inevitable consequence of reinstating the grid road pattern, not a deliberate attempt by the developer to improve pedestrian movement.*

*Indeed, the route for HGV’s into the service yard at the rear of units D-H cuts across a key public right of way which runs alongside St George’s Church and crosses the car park. This means that people will be crossing where HGV’s will be driving in.*

*The sustainability of the development is further compromised by the downgrading of the bus facilities – with the central bus hub outside the Agora replaced with two separate bus stops. The pavement is not widened at this point to accommodate large numbers of people waiting for a bus. This is despite the requirement in the SPD that says that “pavements need to reflect the requirements of bus stops and associated shelters”.<sup>7</sup>*

## **K. Brickhill Response**

The introduction of a new street with wider pavements, trees and street furniture connecting two currently disjointed streets will obviously improve pedestrian links. Cyclist will also benefit and will not have to dismount to go up steps or continue their journey through a public car park as they do currently. In introducing the new link we have done what was required of us in both the adopted and un adopted planning documents and never claimed or exaggerated otherwise as asserted.

The route for HGV's has been tested by our traffic consultants and designed to exceed FTA requirements. However it is inevitable that in an urban development of this scale that vehicle access and pedestrian routes come into contact at various points and to pretend otherwise would be folly. These areas require sensible and safe management and we are proposing timed deliveries for the new retail unit rather than the 'free for all' that currently exists in other parts of Wolverton.

The bus stop arrangements are a compromise to achieve the 'High Street' that has been requested of us. We are providing more bus stops and more overhead bus stop coverage than the current arrangements which will also be set in a sheltered high street. The existing bus stop forms part of the 1980's Agora Landscaping which obliterated the town centre and in reinstating a town centre there has to be elements compromise.

***L – Include a mix of new housing which complements the existing provision and meets the particular needs of older people (extra care housing) and younger people (supported housing).***

*The proposed development comprises flats only, of which 98 are two bedroomed, with 1 x one bedroomed flat and 1 x three bedroomed flat.*

*This does not constitute “a range of town centre housing” as required by the NP and Agora Development Brief.*

*The Plan and Brief require the needs of two particular sections of the community to be addressed through the redevelopment; housing for older people – many of whom are forced to leave the Town when they need to downsize – and younger people who are looking for their first home and may require some support to make the move into independent living. These locally identified needs are not addressed by the developer.*

*The other major flaw in the proposed housing development is the way in which all the different tenures of housing – affordable, shared ownership, rented and privately owned – are separated from one another and located in a particular part of the development.*

*This does not make for a successful community, and is unlike the rest of the town where people live next door to one another with no knowledge as to whether they are renting, own or are a council tenant.*

## L. Brickhill Response

There is a good mix of tenures and sizes within the development as per the ASPD and the UANP:

- 10% Shared Ownership
- 22% Social Rented
- 68% Market Sale
- 100% Lifetime Home compliant
- 47% Wheelchair Accessible / suitable for later living

There is a good mix of sizes within the development 67sqm - 91sqm as per the ASPD or the UANP.

2 and 3 bedroom houses would affect the viability of scheme because of the garden and parking requirements. For example, if we were to provide 11 houses<sup>10</sup> on Buckingham Street this would reduce the total number of deliverable units on the development to 70 units which would not meet the requirement within the ASPD or the UANP.

The gardens of any new houses on Buckingham Street would be heavily overlooked by the apartments on the new Radcliffe Street and would therefore conflict with MKC New Residential Development Design Guide Supplementary Planning Guidance (SPD) adopted April 2012 this document is a requirement of both the ASPD or the UANP.

All units will comply with relevant sections of Lifetime Homes when completed. Level threshold access will be provided to all units with the exception of one unit on Radcliffe Street (E4) where the topography prevents this. With minor adaptation, units on the ground floor (except E4) and those serviced by lifts are wheelchair accessible. Neither the ASPD nor the UANP has set additional requirements in this area. These units are multi generational.

We have approached thirty later-life housing suppliers to discuss the potential of sheltered housing or a residential care home for the site.

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<sup>10</sup> This would be the maximum number of 2 and 3 bedroomed houses we could physically deliver using the current Housing Quality Indicators (HQI) guidance.

We were informed that 30-60 units would be required to make a sheltered scheme viable, but those approached did not believe there was a demand in the Wolverton area as a new 50 apartment scheme is already proposed for Stony Stratford. It is important to note that the suppliers stated that 2 bedroom units were the preferred unit size.

From qualified feedback, a 10 person unit residential care facility would have the same operating costs as a 30 person unit as there are no economies of scale to be made. This would make any facility unaffordable or unviable in the Wolverton area. It is for these reasons there is no dedicated facility on site.

Lifetime Home units ensure that all units are accessible and those residents wishing to down size have a selection of different unit sizes to choose from. Both the ASPD and the UANP require housing provision for the elderly, but both require a financially viable and deliverable scheme. We believe that the selection of Lifetime Home units provided is a qualified compromise.

The Housing Associations in negotiations for the site have expressed a preference that all their units are within the same blocks. This simplifies on-going management, keeps their running costs down and tenant services charges low.

Housing Association properties have to conform to a higher specification making "pepper potting" neither practical nor viable in smaller blocks. Neither the ASPD nor the UANP have set an additional requirement for this. The MK Affordable Housing SPD allows for this on the grounds of viability.

The affordable housing is not isolated; it sits at the heart of the scheme amongst the market housing.



***M - Include a range of small to medium sized retail units (50 – 100 sq. m) and office units and workshops suitable for town centre businesses that may require relocation and new occupiers***

*The scheme incorporates housing and retail uses only.*

*The range of uses envisaged by the Plan and the Agora Development Brief – including small office units, workshop space and community space – are completely missing from the proposed scheme.*

*For a Town Centre to have a sense of place, be interesting and be somewhere you might want to wander round, it needs a mix of uses. The potential to “chance upon” something different and/or surprising is what makes for a vibrant town centre.*

*Even the public toilet is located in the car park rather than incorporated into the heart of the town centre!*

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## **M. Brickhill Response**

To be a 'vibrant' and viable town centre Wolverton needs to have its commercial space filled and we make no excuse for the fact that our scheme, unlike others, has been market tested using guidance from experts and the latest market information to ensure this can happen. It is disappointing that the commercial realities do not reflect aspirations of the planning documents. However, in providing flexible spaces it will be able to easily adapt to the ebb and flow of the economic situation.

In the interest of maintaining a viable High Street offering, we are currently negotiating directly with potential new retail clients and existing Agora tenants. There remain many reasonably priced retail opportunities throughout Wolverton, which, if utilised correctly will create a balanced and viable town retail sector.

It is important to note that the UANP quotes up to £25.00 per sq. ft. as an achievable rent but this conflicts with current market data provided by our agents who have been appointed to market the new units.

The criteria set out in the UANP for managing the retail space for small traders would appear to be complex and clearer definition of how this model would work or be managed needs to be sought. On a first reading it would appear that up to 20% discount off market rents should be granted in perpetuity to tenants approved by an unidentified third party at the cost of the developer/ landlord. It is understood that similar models may work in Central London, but these have the benefit of much higher rents, greater footfall, no requirement to provide parking and excellent transport links. Based on our evidence this could prove restrictive and deter some brands from a High Street line up.

Subsidised office space in the centre of the town was tested as unviable. There is currently an oversupply of office space in the Wolverton area with four undersubscribed business hubs all with better parking facilities. A2 office facilities could be provided within the proposed development in some ground

floor residential units subject to planning consent but there is currently no demand.

There are several Community Buildings within the vicinity of the site and more are planned and therefore there is no dedicated open or community space on the development. However, the new Radcliffe Street forms part of the new link to The Square and has been designed to be more distinctive than the surrounding streets and creates a public link between two previously disconnected parts of the town.

The creation of the 'behind the scenes' delivery yard and the rear parking courts will reduce congestion and improve the overall environment for community events. The creation of a public square at the junction of Church Street and the new Radcliffe Street is not a requirement of the ASPD and would detract from the conservation areas traditional grid pattern.

The interpretation of 'sense of place' is subjective and deeply personal. However we have collaborated with a professional team of advisers including planners, urban designers, architects and conservation officers whose definition of 'sense of place' is as equally valid as the author's but also backed up with years of professional experience and formal educational qualifications. Without the right experience or evidence one might only "chance upon" crime or empty shops. We therefore continue to assert that we have proposed a development that will, once complete, create a vibrant town centre.

The public toilet has been placed in response to direct feedback from the public consultation on the 10th April.



***N – Retain the existing London Plane trees and other trees where practicable replacing any trees lost as a result of the development***

*The developers own tree survey states that the redevelopment “will require removal of the majority of the trees within the site area.”*

*This is despite the Brief and Plan stating that the existing London Plane trees should be retained where at all possible.*

*It is unacceptable that only 18 of the 40 lost trees are being the replaced.*

*The proposed scheme for replacement trees seems to have no logical reasons behind it other than the fact that a “gap” exists in the development where a tree could be located.*

## **N. Brickhill Response**

It is an unfortunate fact that Trees have to be removed from the site to allow for development but where possible we have sought to retain trees by the augmentation of hard landscaping. Both the ASPD and UANP allow for this.

The ASPD request that we retain the trees on Creed Street and we have fully complied. The UANP goes further and sets out policy W1 N. which seeks the retention of the plane trees and the replacement of any trees lost on the AGORA site which would remove at least further 10% of enabling development and undermine the schemes viability.

Your statement is factually incorrect, as a direct result of the public consultation on 10 April we engaged the services of an arboriculturist to work with our landscape experts to identify where and what trees could be planted. We are now proposing 28 trees to mitigate against the 40 lost.

***O – Include the introduction of water efficiency measures and new green infrastructure in the form of sustainable urban drainage systems which reduce flood risk and add ecological value and interest to the development.***

*The Plan has a specific reference to the creation of new “green infrastructure” as part of the redevelopment.*

*Despite this, the development is ruthlessly urban in look and feel, with virtually no soft landscaping and minimal trees.*

*The suggestion from the developer seems to be that because the development is within the town centre there is “easy access to local parks and other surrounding green spaces”<sup>9</sup>*

*This negates the importance of green, open space to physical and mental health and is in conflict with Natural England's Accessible Natural Green space Standards which provides a set of benchmarks for ensuring adequate access to natural and semi-natural green space near to where people live.*

*Natural England's most recent wording of the standard is that no person should live more than 300m from their nearest area of accessible natural green space of at least 2ha in size.*

*The only mention of water efficiency measures in the scheme is the collection and recycling of rainwater. No detail is given of how this will be achieved, but we assume this is through the installation of water butts or similar.*

## **O. Brickhill Response**

We have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing the proposed arrangement which constitutes a vast improvement on the current street scene and will create a vibrant new retail and residential offering

There is no conflict with Natural England's Accessible Natural Green Space Standards. Although this is a highly urban site there are three green designated public spaces within 300m of the site.

Information has been provided on water attenuation. Internal water saving measures and above ground rainwater storage (butts) sufficient for watering landscaped areas would normally be detailed at Building Regulations stage. We have also submitted a proposal two large underground water attenuation tanks to prevent localised flooding.

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***P – Street materials and street furniture should comply with the Public Realm Design Manual.***

*The Design and Access Statement makes limited reference to the Public Realm Design Manual, and only in the context of “street furniture”. 10 There is no reference made to the best practice principles for the public realm as contained in the Design Manual in particular:*

- *A unifying design approach that pays particular attention to the conservation area context – consistency and co- ordination, with room for richness and imagination in ‘special areas’*
  
- *Appropriate and varied scale – which adds interest and defines character, from back ways to shopping streets. Wolverton will benefit from a network of public spaces and routes that vary in scale and activity, from the smallest courtyard to larger civic and ceremonial spaces*
  
- *Creating memorable places and spaces*
  - *with a streetscape punctuated with memorable places and spaces each offering a distinct aspect and atmosphere*
  
- *Animation and visual interest – with active frontages, art, lighting and events focussed on key pedestrian routes*

*Future Wolverton do not believe that developer has really understood or taken account of a key aspiration in the Public Realm Design Manual that “Wolverton must aspire to become a place with the highest quality architecture, landscape architecture and public realm design that will enhance and complement its historic character and context.”*

## **P. Brickhill Response**

We have worked with a professional team of advisers including planners, urban designers, architects and conservation officers in developing the scheme and we would like to re-assure Future Wolverton that our design team have fully understood and have taken account of a key aspiration in the Public Realm Design Manual that "Wolverton must aspire to become a place with the highest quality architecture, landscape architecture and public realm design that will enhance and complement its historic character and context."

Early on in the planning process it was agreed that street furniture and the finer architectural detailing are to be agreed in collaboration with the MKC planning and conservation officers as a pre commencement condition. Each block is designed on a scale to have its own personality and will be detailed from contextual sources within Wolverton.

**Q – Be of good design more in keeping with the Victorian architecture of the setting which preserves and enhances the character of the Conservation Area.**

*The brief says that “any concept and design should be a specific response to the context of the site”. The proposed scheme – a 3 and 4 storey flat based scheme cannot be said to be in keeping with the Victorian context of Wolverton which is a terraced house based place. There is no fine grain definition between terraces, no rhythm of front doors, no front gardens giving pattern and interest, so the development does little to “preserve and enhance the Conservation Area”.*

*The scale and orientation of the development is not sympathetic with the surrounding townscape, with Blocks B, C and D much greater in massing and scale than the nearby residential terraces. The “elevation design” of the blocks is not reflective of the terraced streets, where each unit is separated from another by subtle changes in detail and design. Instead the development gives long elevations with only a nod to detailing.*

## **Q. Brickhill Response**

We believe that our scheme will 'preserve and enhance the Conservation Area'.

Our architects have responded to the ASPD and UANP and designed a viable scheme which allows for three and four storey buildings. They have shown their design evolution to a panel of qualified professionals and consultants before exhibiting the scheme to the public. Following our public exhibition on the 10th of April, further changes were made including those changes that resulted after direct engagement from two members of Future Wolverton as mentioned earlier.

For reasons previously explained and professionally qualified, houses are not viable on this site. We are advised that, aside from design issues such as overlooking and parking, their potential resale would not cover their own construction and land costs, far less deliver any of the social requirements and benefits of the ASPD and UANP .

We would refer you to the professional guidance given to you by the Princes Foundation of this being a 'Highly Marginal ' scheme .

Our architects presented evidence of a sample of the proposed detailing at your public event on the 19th May paying more than just a 'nod' to detailing. Short of full construction drawings, it is difficult to see what else could be required at this stage.

***R. Ensure redevelopment is accessible to all***

*Modern building standards require that the redevelopment is accessible to all.*

*However, there is no indication of additional thought being given to how the public realm and other features of the development might help meet the needs of all groups in society.*

## **R. Brickhill Response**

Our architects are fully aware of their and our obligations under the relevant guidance. The design is fully accessible and inclusive.

We have provided a level of information suitable for a planning application which will be further detailed at the Building Regulation stage.

When there has been an issue with accessibility, such as the steep pitch and access issues on the new Radcliffe Street, we have relied on the expert advice of our architects and land surveyors to come up with compliant solution and have informed the appropriate bodies.

***S – Subject to viability testing, new development will be zero carbon and resilient to the impact of climate change and served by a district heating network where convenient connection is available.***

*The Neighbourhood Plan has a strong aspiration for the Agora redevelopment to be a zero carbon.*

*Whilst the developer is proposing renewable energy in the form of solar panels, there are no other indications of how the development is an example of good practice in sustainability terms.*

*This is despite the strong track that the Wolverton community has in addressing energy use, and the existence of local projects such as Wolverton Community Energy.*

## **S. Brickhill Response**

A zero carbon development on this scale constructed in traditional masonry materials would be impossible given the high levels of embodied energy already present in the fabric. However, our architects were keen to see a development that exceeded both the Local D4 energy policy and current building regulations in the delivery and operation.

We have engaged a qualified energy consultant to assist in designing the development and we have submitted his proposals to MKC for scrutiny. Being an urban site and in a conservation area there is limited opportunity for onsite renewables but we believe the 200+ PV array with capacity for future expansion is excellent use of roof space.

We are very supportive of Future Wolverton's track record on energy saving measures and the car share scheme will contribute to the travel plans we will have to prepare for our proposals at some point in the near future. Rest assured the fabric of our buildings and their thermal efficiency should far exceed the houses Future Wolverton has helped insulate thus contributing to the goals of Wolverton Community Energy.

***T- Ensure that the necessary on and off site infrastructure, for example school, places and community facilities are provided to mitigate the impact of development***

*Over the last five years Wolverton has absorbed over 1000 new homes, and the local community are rightly concerned that there has been no corresponding increase in infrastructure such as school places and health facilities.*

*The lack of community space in the development proposals is one example of how the developer is failing to acknowledge the need to provide infrastructure as part of the development.*

## **T. Brickhill Response**

We are providing a new high street and link road as well as other items requested in the UNAP and are under no formal or legal obligation to provide further community space for Wolverton where there is currently adequate provision and more planned. As already pointed out the insistence on 500sqm space would remove 14% of the total enabling development and render our and any other scheme irredeemably unviable in current market conditions.

The developer has no say in the infrastructure items you list as you are more than aware. Section 106 monies are payable by developers to cover the essential infrastructure items and you also know that figure is derived from the future value of the scheme and overheads. We have always met our section 106 agreements and this development would be no different.

Your statement is also factually incorrect, a new health centre has been constructed within the last two years, there has been expansion to school provision with more planned and a new leisure facility has been created as a result of 106 provision.

W2

***A. Improve the movement of pedestrians and cyclists around the town centre, promote sustainable travel to the railway station, and improve bus interchange facilities.***

*A key aspiration of the plan is to improve the sustainability of Wolverton Town Centre, by addressing problems with the movement of people, cyclists and buses around the town centre.*

*We do not believe that the propose development has given sufficient weight to the importance of promoting sustainable travel.*

*Two projects are mentioned in the Plan as a mechanism to achieve Policy W2 A. They are:*

*Project 1: A comprehensive street improvement scheme for Church Street, Radcliffe Street and Creed Street which involves making some streets one-way, introducing dedicated bus lay overs and reducing the dominant effect of cars by increasing the width of pavements.*

*Project 4: Extension of redways (Milton Keynes network of segregated routes for cyclists and pedestrians) into the town centre.*

*Neither of these projects are referred to or addressed by the planning application.*

## **W2 A . Brickhill Response**

The UANP is yet to be adopted and although it has influenced our scheme we have to put more weight on the guidance contained within the ASPD.

The development has two bus stops, cycle storage and is within walking distance of a mainline station. MKC policy prevents us from removing car parking space so it is difficult to see what else we could do in respect of sustainable transport. A detailed travel plan would normally be submitted as a condition post planning.

### **Project 1A & 4**

This is a highly urban and constrained site and dedicated bus layovers and additional cycle lanes would reduce the enabling development on the site and make the scheme unviable. However, we believe the introduction of rear parking courts, a delivery yard and active parking management will reduce the dominant effect of cars. We have deliberately allocated bays on the new Radcliffe Street to prevent the chaotic ad - hoc parking elsewhere and have increased pavement width wherever there has been an opportunity, such as at the bottom of Radcliffe Street.

***C. Enable the creation of new green infrastructure such as private gardens, open spaces and green roofs within the town centre, complying with Natural England's Accessible Natural Green space Standard***

*The developer has failed to address the need for either private or public green infrastructure within the proposed development.*

*Future Wolverton believes that the creation of green roofs (or walls) would work well in a constrained urban environment.*

## **W2 C . Brickhill Response**

We are confident that our scheme is fully compliant with Natural England's Accessible Natural Green Space Standard. If the location was not suitable for development under this guidance it would prevent **any** development by **any** developer, and render the Agora Site Plan Section of the UNAP obsolete before it was even adopted. The Agora would be there to stay in its current capacity indefinitely.

Future Wolverton are entitled to their opinion regarding green roofs. However, we have worked with experienced construction professionals and a qualified team of advisers including planners, urban designers, architects and conservation officers in developing the scheme and we have concluded future provision for additional PV and Solar thermal renewables should take priority.

Green walls were considered out of keeping within the conservation area and additional ecological measures have been proposed on other parts of the development.

### ***Policy W3 – The Railway Works site***

***B. Ensuring that the new pedestrian and vehicular routes within those parts of the site that are publicly accessible make as direct links as possible with Stratford Road and the town centre, consistent with principle E below, and complement the grid layout of the residential part of Wolverton.***

*Future Wolverton are concerned that this planning application is being considered before the St Modwen outline planning application for the Railway Works site has been submitted.*

*The inter-relationship between the St Modwen site and the Agora site are crucial to the success of Wolverton and the Town Centre, especially in terms of the future of the land owned by St Modwen which is located at the end of Radcliffe Street. If Radcliffe Street is to be the heart of the town centre, then it is essential that what happens on the Agora site makes sense with what happens on the St Modwen site.*

*Two such significant applications should be being considered together by the local planning authority, in order to ensure that nothing is agreed in one development area that would impinge upon another development area.*

*The success of both applications will either strengthen – or destroy – Wolverton's strong sense of place.*

### **W3B . Brickhill Response**

Unless previously specified we have every right to expect that our application be considered on its own merits and therefore is subject to its own to time scale. To delay the determination of an application, to wait for another third party to submit an application or to wait for planning document to be adopted without agreement would set a challengeable precedent where any developer would be forced to seek legal guidance.

The interpretation of 'sense of place' again is subjective and deeply personal. However we have collaborated with a professional team of advisers including planners, urban designers, architects and conservation officers in developing the scheme whose definition of 'sense of place' is as equally valid as the author's but also backed up with years of professional experience and formal educational qualifications.

However, we note your concern and we have had meetings with St Modwen's and our consultants are communication over some key bilateral issues.

## **Policy W4 – Town Centre Diversity – Ground Floor uses**

*Proposals which protect, enhance and promote a diverse range of uses will be supported.*

*Primary and Secondary Frontages The over dominance of any particular use will be avoided by:*

*A. Retaining all shops and shop floor space (A1 use) at ground floor level within the primary and secondary frontages, in accordance with the town centre use mix requirements for the specified frontages set out within Table W4 - 1.*

*B. Ensuring that within any defined primary frontage, non-retail uses do not create a continuous frontage of more than two units. Subject to this limit, where there is an identified need, support will be given to proposals for non-retail use which would enhance and diversify the mix of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in the town centre.*

*Future Wolverton believes that the scheme proposed by the planning application fails to create a diverse town centre.*

*This failure is a result of a number of key issues with the proposed scheme:*

- The lack of ground floor retail frontage on new Radcliffe Street which was envisaged to be a primary frontage.*
- The continuous frontage of residential development on new Radcliffe Street.*
- The lack of leisure, commercial, office, tourism, cultural and community provision in the development.*

#### **W4 . Brickhill Response**

Your statement is factually incorrect the proposed retail frontage from Church Street carries on 30-40% up the new Radcliffe Street to allow for the larger floor plates of the retail units at the new junction. Should market conditions dictate ground floor residential units with independent access could make suitable office units.

We have applied for A1 retail consent for all retail spaces and until there is a permission there is technically no space to let. Just as with other high streets in the UK, there is opportunity for a mixture retail and non retail uses. Also as with similar developments in the UK it is assumed that as the scheme nears completion, additional use permissions will be applied for.

Tenants have specific needs and what you, or we would perceive as an ideal site for a cafe for example, may be inappropriate to a potential tenant. We have earmarked and designed some units for specific anchor tenants and we are actively negotiating with a mixture of retail and non retail tenants.

Conditions set would normally allow a certain amount of flexibility in shop uses and allow the high street to 'refresh' periodically. A sustainable retail offering has to be allowed to develop and grow over a long period of time.

Artificial fixes and to insist on uses which do not meet the tested needs of the local demographic will lead to failure and voids. It is for this reason we have developed out scheme in consultation with retail experts to ensure enduring viability.

***Policy W5 – Supporting Street Markets.***

***A site for a street market in The Square will be supported by:***

***B. Improving physical links between public transport interchange and The Square, supported by appropriate pedestrian signage.***

***F. Providing public toilets for visitors and traders.***

***G. Providing off street long stay (more than four hours) parking to support market trade.***

***H. Providing short-term parking for market traders which will allow them to unload and re-load at the beginning and end of the market session.***

*Policy W5 of the Neighbourhood Plan is undermined by the downgrading of the public transport interchange proposed by the planning application, and the fact that new Radcliffe Street is not the pedestrian and cycle friendly street it was envisaged to be.*

*The provision of public toilets at the far end of Church Street within the car park will do little to support market activity in The Square.*

*There is no mention in the application of the need for short term parking (which could be located on Buckingham Street alongside The Square) to allow for market loading and unloading.*

## **W5. Brickhill Response**

Your statement is factually incorrect we have not sought to 'Undermine' the UANP but have achieved a compromise integrating the transport links into the town high street to enhance the 'sense of place' that we hope to achieve.

A road between the Church Street is obviously going to improve transport links and cyclists as well as all other road users will benefit.

From our recent public consultation a preference was expressed for a public toilet in or near to the car park hence its proposed location within our scheme.

As you are more than aware parking outside the development is not within our remit and is MKC issue and could form one of the pre commencement or pre occupation conditions. What you are asking for parking wise is perfectly feasible and we would obviously support and accommodate such provision.

## ***Policy W6 – Supporting and promoting small, local trade***

### ***Provision through major development***

***In the case of provision through a major development, the following requirements shall apply:***

***For schemes involving over 1,000 square metres of development the provision of small shops will be required subject to viability, with the number of units relative to the size and scale of the development.***

***Once provided in a new development, a condition (or legal agreement if appropriate) should be put in place so that planning permission would be required for any proposal to combine smaller units into larger units.***

*The retail units on Church Street proposed by the planning application are large, and whilst the developer has indicated that they could be sub-divided to provide smaller units, Future Wolverton believes it is more likely that the units will be marketed to regional and national retailers that require big floor-plate units.*

*This means that the developer is failing to comply with Policy W6 A of the Neighbourhood Plan, an issue already raised by traders within the Agora who are concerned that no small units are being provided to relocate their businesses.*

*More generally, the function that the units within the Agora currently perform – of giving people an affordable start-up space – will be lost if no provision is made for small units within the scheme.*

## **W6. Brickhill Response**

Our architect has confirmed the retail units can be split to accommodate an evolving retail offering.

In making your objection your interpretation of policy is selective and does not take into account points 10.2 and 10.3 of the UANP. The units are being marketed to local and national tenants and the smallest unit proposed is 47sqm and the largest unit will be under 475 sqm.

We are creating a new high street with a strong 'sense of place' which needs to be viable and reflect the aspirations and demographic within the community. The current retail offering within the Agora has been demonstrated as unsustainable and is unfortunately unviable in its current format.

In upgrading the Wolverton retail offering and by providing quality retail accommodation within the town centre, opportunities will naturally be created in other parts of the town suitable for start ups and current small businesses. However, we are in negotiations with some current Agora tenants regarding space within the proposed development to form “an indoor market” within one of the units.

## ***Policy W7 - Shop front Design, Advertising and Security***

***The design of a shop front will take into account the wider relationship with the surrounding built environment. Proposals for shop front design (including refurbishing existing shop fronts) will:***

- 1. Be appropriate in proportion, materials and details to maintain and reflect the style and characteristics of the Conservation Area and neighbouring properties.***
- 2. Enhance the buildings character and compliment adjacent shop fronts where these are of good quality design.***
- 5. Recess the entrance door back from the edge of the pavement, and have an appropriate style of door serving upper floors if this is part of the original shop front***

*The lack of detail provided by the application makes it difficult to assess whether or not the new shop fronts proposed for Church Street will be an appropriate design. The Design and Access Statement says that “the facades use symmetry and repetition” and there is also reference to “sash windows, glazing bars for windows and cornice detail.”<sup>12</sup>*

*Whilst it is correct to point out the patterns and symmetry that are a feature of the town centre, it is equally important to acknowledge the subtle differences that exist between the Victorian shops units.*

*Future Wolverton is concerned that new shops proposed by the development will look too similar, and as such will detract from the eclectic mix of other shops in the town.*

*In existing parts of the town centre, front doors serving flats above shops are recessed and located alongside doors to shops, but this does not appear to be the pattern of the proposed development.*

## **W7. Brickhill Response**

We have worked with professional team of advisers including planners, urban designers , architects and conservation officers in developing the scheme.

Subtle differences between shop fronts have already been proposed and will be developed further with the planning and conservations officers as a pre commencement conditions.

To create a 'disneyesque' insta-eclectic frontage would be highly contrived and artificial and could potentially conflict with the priorities of the conservation area. Over time and given a strong architectural foundation it is envisaged that a restrained eclectic look will evolve as units change ownership and the development begins to grow organically and developing a stronger 'sense of place' .

Our architects have presented evidence on a sample of proposed detailing at your public event on the 19th May. Short of full construction drawings, it is difficult to see what else could be required at this stage.

Shared fire safe stair cores make the development economically viable and have to be compliant with modern Building Regulations and our architects looked for local context to address this issue. Entrances have been designed to reflect their location within the hierarchy of Church Street and precedents for breaking the rhythm and the domestic detailing exist at the pub, Maisies, and the betting shop to name a few, none which are set back.

## ***Residential Design Guide Principles Appreciating the context***

### ***Context Appraisal***

***Developers should consider the context at a number of different levels, from the site itself, through its immediate surroundings, to the wider local area.***

***At the site level, developers should identify the key existing features, including ... buildings, routes and land uses.***

***The positive features of the surrounding local area that help create an identity or character for the development should be used as design cues to be interpreted in the new development***

*The planning application does not demonstrate an appreciation or understanding of the very strong sense of community and identity that exists in Wolverton, and does not recognise the huge benefit that the distinctive heritage assets and buildings within the town centre offers to the overall context.*

*The town has a diverse and mixed community, which is cohesive and functions well.*

*By proposing only one type of housing, all of the same size and style, the application fails to appreciate this context.*

*The application also fails to respond to the surrounding context of the conservation area, with the scale and massing of the development blocks completely out of character with the surrounding 2 storey, terraced streets.*

## **Residential Design Guide Principles**

### **Appreciating the context: Brickhill Response**

We believe our scheme does demonstrate an appreciation and understanding of the very strong sense of community and identity that exists in Wolverton and this is reflected in our proposal.

The enhancement of the conservation area and setting of the historic assets within it have been one of the core drivers of the scheme. Our architects spent many months researching the history of Wolverton, its people and its architecture. The conservation officer at MKC provided invaluable advice which is clearly reflected in our scheme.

We have worked with professional team of advisers including planners, urban designers, architects and conservation officers in developing the scheme.

We believe we have demonstrated with the evidence provided that we are delivering a development that will support a town centre to meet the needs of a diverse and mixed community, which is cohesive and will function well.

There is a good mix of tenures and sizes within the development 67sqm - 91sqm as per the ASPD or the UANP. We are proposing 100 new homes of varied sizes and all tenures so we fail to see how that cannot meet the need of an expanding diverse and mixed community.

For reasons previously explained, and professionally qualified, houses are not viable on this site. We are advised that aside from design issues such as overlooking and parking their potential resale would barely cover their own construction and land costs far less delivering any of the social requirements and benefits of the ASPD, UANP .

We would refer you to the public guidance given to you by the Princes Foundation of this being a 'Marginal Scheme'.

## **Building the place**

### ***Context***

Existing positive site features should be used to structure the entire development (established as part of the context appraisal);

### ***Movement network***

The movement network must be designed and laid out such that pedestrians are considered first, followed by cyclists, public transport users, Service delivery vehicles and finally cars;

### ***Density/housing types***

A range of densities should be included that ..... will encourage a range of house types to be provided that suit a range of needs;

### ***Public space***

Open space in all its forms has a major influence on the wellbeing of the whole community and that value should be fully recognised as integral to the quality of the development as a whole.

### ***Biodiversity***

Biodiversity features which might be incorporated in the design and layout of new developments could include:

- (1) Sustainable Urban Drainage Systems (SUDS);
- (2) Green roofs and green wall

***Landscaping within streets*** Greenery within streetscapes is considered one of the most important aspects contributing to the neighbourhoods that residents like to live in.

The scheme proposed in the planning application has clearly not been structured around the positive features of Wolverton town centre, such as the listed buildings and heritage assets and The Square. Instead the development appears to be

designed around the constraints of the site, and has an “island” feel.

Apart from the reconnection of the grid road system, the application fails to prioritise the needs of pedestrians and cyclists and public transport users over the cars.

The planning application does not offer a range of densities or housing types – it only delivers 2 bedroomed flats.

The lack of community open space in the development detracts from the overall quality.

There are no bio-diversity features incorporated into the development, despite the opportunity for green roofs and walls, and a SUDS system.

Despite the urban constraints of the site, it is hugely disappointing that only 18 trees are being proposed by the developer although 40 are being taken out. The redevelopment of the site was an opportunity to provide a blueprint for “greening” the rest of Wolverton’s streets.

## **Building the place: Brickhill Response**

We have worked with professional team of advisers including planners, urban designers, architects and conservation officers in developing the scheme and believe the proposal knits well into the existing urban context.

The enhancement of the conservation area and setting of the historic assets within it have been one of the core drivers of the scheme with our architects spending many months researching the history of Wolverton, its people and its architecture. The conservation officer at MKC provided invaluable advice which is clearly reflected in our scheme.

The introduction of a new street with wider pavements, trees and street furniture connecting two currently disjointed streets will obviously improve pedestrian links. Cyclist will also benefit, although there is no dedicated cycle lane, cyclists will not have to dismount to go up steps or continue their journey through a public car park as they currently do.

The blocks do have different densities and there is a good mix of tenures and sizes within the development 67sqm - 91sqm as per the ASPD or the UANP. For reasons previously explained, and professionally qualified, houses are not viable on this site. We are advised that aside from design issues such as overlooking and parking their potential resale would barely cover their own construction and land costs far less delivering any of the social requirements, infrastructure and benefits of the ASPD and UANP .

We would also refer you to the professional guidance given to you by the Princes Foundation of this being a 'Marginal Scheme'.

There is no dedicated open or community space on the development. There is no specific requirement within the ASPD. A 500sqm community space requested in the UANP "wish list" at the foot of Church Street removes 22% of enabling development and would make our and most other legitimate schemes unviable.

The new Radcliffe Street forms part of the new link to The Square and has been designed to be more distinctive than the surrounding streets and creates a public link between two previously disconnected parts of the town. The creation of the 'behind the scenes' delivery yard and the rear parking courts will reduce congestion and improve the overall environment for community events.

Information has been provided on water attenuation. Internal water saving measures and above ground rainwater storage (buts) sufficient for watering landscaped areas would normally be detailed at Building Regulations stage. We have also submitted a proposal two large underground water attenuation tanks to prevent localised flooding.

As a direct result of the public consultation on 10 April we engaged the services of an arboriculturist to work with our landscape experts to identify where and what could be planted. We are now proposing 28 trees to mitigate against the 40 lost. The new Radcliffe Street when complete would make a fine 'Blueprint' for greening the rest of Wolverton's residential streets.

Green walls were considered out of keeping within the conservation area and additional ecological measures have been proposed on other parts of the development.

### ***Detailing the place Flexible homes***

***A key requirement of “sustainable communities” is “an urban fabric and individual buildings which can meet different needs over time”. Places need to be adaptable at different levels from the neighbourhood down to the individual home.***

***Within appropriate locations, such as high streets, public squares and corners of busy streets, consideration should be given to designing buildings which are capable of conversion to commercial use.***

### ***Creating Designs that are Accessible for All***

***Detailed designs should allow a place to be accessible for all: and in particular, for the elderly, people with a disability and families with small children***

### ***Flatted developments***

***Within flatted developments, each apartment must have access to private open space. This can be provided in the form of private gardens for ground floor flats, balconies, roof gardens or terraces, or private shared gardens.***

***Where possible, ground floor apartments should have their own small private rear garden.***

***All apartments should provide space to dry clothes either within the apartment or within a communal facility.***

*The proposed development offers only 2 bedroomed flats which are inflexible and will be unable to adapt to changing needs over time. The Victorian houses that surround the development site are extremely flexible, offering opportunities to re-model to accommodate changing needs over time. Some houses in Wolverton have been converted into flats, and there are many examples of where shops have been converted into houses.*

*The development offers no opportunity for residential units (which are all flats) on Church Street to be converted into commercial units.*

*We do not believe that the flats will be suitable for families with small children due to the lack of any outdoor space.*

*The aspiration to have homes which are suitable for older people and include an element of care is not reflected in the proposed development.*

*The proposed flats have no access to private outside space, no balconies and no roof gardens.*

*Ground floor apartments do not have their own private gardens.*

*There appears to be no provision for a space to dry clothes apart from within the flat above the bath.*

## **Detailing the place: Brickhill Response**

From the most recent census data almost 80% of the housing stock in Wolverton is in the form of two and three bedroomed houses with a great number of houses under occupied. By offering 100 new energy efficient family homes in various sizes and tenures we are providing flexibility within Wolverton's housing market. This will allow movement within the housing stock without removing existing family homes through subdivision or conversion to HMO or commercial uses and wisely many local authorities have issued article 4 directions to prevent the very changes you are proposing.

Most of the Ground Floor units within the development are suitable for conversion to A1 or A2 use subject to the usual planning consents. However, we have demonstrated there is no demand for such premises and empty shops and offices would negatively affect the 'sense of place' we are aiming to achieve.

The proposed social housing on the scheme is HQI compliant with terraces provided to more than 16% of the units. The development also benefits from having 3 designated open spaces within 300m.

Despite extensive research we could not find a later-life housing provider willing to consider such a small supported residential scheme as the one proposed on your 'wish list'. This was disappointing but we are sure that you can appreciate designing and constructing a facility where there is no potential operator would be folly and affect the ongoing viability of the development.

The development is within a conservation area which restricts the opportunities for balconies but they have not been ruled out to the rear of properties and may form part of a reserved matters application subject to discussions with the local planning and conservation officers.

The provision for drying clothes is compliant with the Code for Sustainable homes and the same method is used in most modern flats as an alternative to tumble drying. There was no additional requirement in this area in the UANP.

## **Summary**

We would urge you to properly review our application given the questions you have raised, and an open invitation remains to discuss any points you have.

This is a viable scheme, that meets or exceeds the majority of the criteria set out in the various documents both adopted or proposed, and is deliverable for the benefit of the People of Wolverton.