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2 June 2015

Dear Directors and Board Members

Future Wolverton Town Meeting 19th May

Thank you very much for the opportunity to present at your event on the 19th May at St Georges Church in Wolverton.

We were delighted with the feedback especially given that most people didn't get the chance to review the scheme beforehand but disappointed we were not able to respond directly to the questions raised at the event.

The majority of the questions raised had already been asked after our public consultation on the 10th April where we had approximately 210 people attend and our responses had already been published on the MKC and CMI Architecture websites.

As you are aware we have been working on this scheme for 2 1/2 years now and are offering up a viable and deliverable scheme that can be made reality by 2017

We have submitted a scheme which is planning policy compliant, and has been thoroughly tested by professionals, costed by quantity surveyors and compared against current market data in determining the actual viability, a pre requisite for both our lenders and MKC. In developing our scheme we had the opportunity to review previous suggestions including an 80 unit scheme which was served up but was not fully tested as financially viable and deliverable and of course then went away.

Mention was also made regarding the use of a Compulsory Purchase Order (CPO) to deliver an alternative scheme. However, having spoken with Milton Keynes Council since the meeting we understand there are no current plans or funds available to implement the CPO process. CPO is a powerful planning tool which can be effective but would require a further scheme to be put through public consultation. The process could take almost 3 years to reach a conclusion after which, if favourable, the purchasing Authority would need to find a developer through an OJEU tender process. Funding would then have to be secured before the scheme could begin. The Brickhill proposal is at this point today.

In response to the questions raised at the meeting I have detailed our answers below:

Design of residential

- 1. Too much residential property – concern over the impact of a large number of new dwellings in the centre of town-**

A. The development creates 100 residential units which accords with the Adopted Agora Development Brief Supplementary Planning Document (ASPD) and the Un Adopted Wolverton Town Centre Neighbourhood Development Plan 2015 – 2025 (UANP). These documents allow for between 80 and 120 on the scheme.

2. Concern over lack of outside space for new residential properties.

A. This development is in a conservation area and the potential overlooking precluded the inclusion of balconies. Where feasible we have given units set back terraces. Neither the ASPD nor the UANP has set outside space per unit as a requirement.

3. Not Lifetime Homes or wheelchair friendly

A. 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.

4.0 Where will residents hang their washing?

A. A Code 4 Indoor Retractable Line compliant with the Code for Sustainable Homes will be provided to all units. These are fixed above baths. Neither the ASPD or the UANP have set an additional requirement for this.

4.1 Rubbish disposal for residents and businesses.

Each residential and commercial unit has access to a bin store. Each bin store will contain at least 2 X 1100 Litre Eurobins, one for recycling and one

for regular waste. Waste management and collection will be included within the management contract for the estate. Although not required by regulation additional provision has been added in light of feedback from the public consultation on 10 April. Neither the ASPD or the UANP have set an additional requirement for this.

5.0 Not sure about the design trying to look “old” when it’s new!

A. The development is within a conservation area and has evolved through discussions with the MKC planners, conservation officers and local residents. Detailing and scale has been influenced from the surrounding area using current and historical research materials. Both the ASPD and the UANP have set preference for this style of development.

5.1 Tallest building should be 3 storeys

A. Four storey development has been limited to the new corners of Radcliffe 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 these parts of the development.

Residential mix

6.0 Concern that there is no old people’s housing

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

We were informed that 30-60 sheltered units would be required to make a 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.

Also from qualified feedback, a 10 unit residential care facility would have the same operating costs as a 30 person unit as there are no economies to be made, making the facility unaffordable or unviable in the Wolverton area. It is for these reasons there are no dedicated units 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.

7.0 Like flats not houses

A. The question is not understood

8.0 Density of dwellings too much

A. The development creates 100 residential units which accords with the ASPD and the UANP. These documents allow for between 80 and 120 on the site.

9.0 Don't put all the social housing together

A. The Housing Associations in negotiations for the site have expressed a preference that all their units are within the same block. This makes on-going management simpler and keeps their running costs down. Housing association properties have to conform to an additional specification making "pepper potting" neither practical nor viable. 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. However, the affordable housing is not isolated, it sits at the heart of the scheme amongst the market housing.

10.0 Needs to be a greater mix of housing

A . There is a good mix of tenures 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

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

The housing associations preference was for 2 bed units. 2 and 3 bedroom houses would affect the viability of scheme because of the garden and parking requirements. 11 houses (the max possible being Housing Quality Indicators (HQI) compliant) on Buckingham Street would reduce the deliverable units on the development to 70 units which would not meet the requirement within the ASPD or the UANP.

The gardens of 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 a requirement within the ASPD or the UANP.

11.0 Concern that the 2 bed flat mix will attract a transient population which does not contribute to the community.

A. This is anecdotal with no supporting evidence. Transient population is more associated with HMO in larger properties. This issue has been highlighted by some HMOs operating in the older housing stock in Wolverton. HMOs are not proposed for the development and would require a licence.

None of the proposed units are for short let. This would require planning consent.

Any residents would be obliged to contribute to the local community financially through council tax and would also contribute by using local businesses.

There is no specific implement to force new residents to contribute socially or voluntarily to a community. However, it is assumed that potential resident to Wolverton will want to be there because of the local amenities and therefore contribute.

12.0 Residents want a mix of 1 and 2 beds for young and old people

A. This is anecdotal with no supporting evidence. However, provision has been made for young and old people in the mix and sizes of units offered for sale. Given economies of scale smaller 2 bedroom units would compare favourably in price with 1 bedroom units. Many mortgage lenders are now offering 'rent a room' mortgages to first time buyers taking into account the economic realities of getting on to the property ladder. Given the choice 2 Bedroom units would be the preference.

13.0 Would like to see some houses in the development as well as flats

2 and 3 bedroom houses would affect the viability of scheme because of the garden and parking requirements. 11 houses (the max possible being HQI compliant) on Buckingham Street would reduce the deliverable units on the development to 70 units which would not meet the requirement within the ASPD or the UANP.

The gardens of 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 a requirement within the ASPD.

Retail development

14.0 Concern over access for deliveries for shops

A. Delivery routes have been tested by our Transport Consultant and are compliant with Freight Transport Association (FTA) guidance. It is anticipated that delivery movements will be agreed, conditioned and managed. This should prevent some of the issues experienced in other parts of Wolverton where existing commercial units retain consent for 24/7 deliveries.

15.0 There should be no more takeaways in the new retail

A. The application is for A1 retail consent, which does allow for sandwich bars. However, one retailer may require A3 consent for a café/restaurant (yet to confirmed). A5 take away consent is not being sought as this would potentially damage the retail offering currently being negotiated. A restriction could in theory be conditioned by MKC.

16.0 Retail rents need to be realistic for small businesses

A. Rents will be competitive to ensure all units are filled. We are creating a new High Street as requested in the ASPD or the UANP.

In the interest of maintaining a viable High Street offering, we are currently negotiating directly with an expert retail consultant and potential new and existing 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 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 would need to be sought. On a first reading it would appear that up to 20% discounts 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 in deterring some brands from the High Street line up.

17.0 We want quality new retailers

A. We are creating a new High Street and we are negotiating with High Street brands as well as existing retailers. There will be 'anchor' tenants who will attract similar brands. A retail consultant has been appointed to conduct negotiations.

18.0 We want more frequent, quality markets

A. A market does not fall within the scope of this Agora Redevelopment scheme. However, the Princes Trust proposal suggest using the current Agora Car Park and using The Square, Wolverton's original market place, has also been proposed. Both these ideas are feasible and complement the proposal on the table. The planning obligations officer at MKC will determine how the section 106 monies will be allocated and some of this money could be used to develop these ideas further. However, it is important to note that the slope on the New Radcliffe Street might limit activities.

Sustainability

19.0 Lack of sustainability in the design of the property –

A. Environmental sustainability is the heart of this development but being in a conservation area means it is not necessarily visible. Units will be built to comply with or exceed the current building regulation requirements while still using traditional materials and disguising 'kit' to respect the conservation area. In this respect the proposal is compliant ASPD.

This is a highly urban site within a conservation area so the materials required have an impact on the ability to deliver zero carbon homes viably. However, the high-embodied carbon within the brick specified is mitigated by the large solar array proposed on the roof of the Church Street block.

At the time of writing this response no information was available about the district heating system proposed in Wolverton in the UANP. The proposed units are serviced via a number of shared service cores which would lend themselves to future upgrading should a district heating service go online. This would bring the development closer to achieving the notional target within the UANP.

19.1 What about green roofs?

A. Water attenuation is done underground as roof space has been allocated to a solar array.

19.2 Sustainability not mentioned in the planning application

A. A Section within the Design and Access covers some aspects of sustainability. A separate Energy Statement and a Sustainability Statement have also been submitted to MKC.

Transport/movement

20.0 Should be a 20 mph speed limit for Radcliffe Street

A. We agree and representations should be made to Milton Keynes Highways Department.

21.0 Pavement width and street width too narrow

A. The pavement widths meet or exceed current MKC, A Highway Guide for Milton Keynes, consultation draft and exceed the traditional Wolverton pavement widths.

22.0 Needs to be street parking

A. Street Parking has been limited on the New Radcliffe Street to improve the quality of life of residents and differentiate it from other exclusively residential streets in the area. The scheme is compliant with and exceeds the current requirements set out in the MKC, Addendum to Parking Standards for Milton Keynes 2009.

23.0 The new Radcliffe Street should be more pedestrian friendly

A. The new Radcliffe Street has been provided with pavements wider than those in other parts of Wolverton and will be planted with trees to improve the pedestrian experience. Street furniture is usually conditioned as a part of any permission and our architects are already discussing options with MKC and bespoke fabricators. However, provision has been made for at least one bench to allow pedestrians to pause en route, in direct response to a request made in the feedback from the 10th April. Please note that there is an incline of almost 1:20 on the New Radcliffe Street which has been managed with flat areas to prevent the need for hand-rails and allow for level threshold access for homes.

24.0 The split bus stop is a concern

A. 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.

25.0 Concern about retaining two-way traffic on Church Street

A. This was proposed to MKC as one solution. However, the street has capacity to be altered to accommodate one way. Representations regarding the 2way/1way issue should be made to Milton Keynes Highways Department who will ultimately make the decision with which we will have to comply.

26.0 Scheme favours car drivers over pedestrian

A. The rear parking and delivery courts are designed to separate pedestrians and vehicles. The pedestrian routes through the development are wider and will be well lit.

The new Radcliffe Street has been provided with pavements wider than other parts of the Wolverton and will be planted with trees to improve the pedestrian experience.

27.0 Access to garages at the back of Buckingham Street north side compromised by the scheme

A. This is not true. The access road will be upgraded and widened to 6m and this improvement will curtail the unofficial parking in the area. However, it is acknowledged that other schemes, by other bodies, have removed this right of way but this is not the case with Brickhill's proposal.

28.0 Support two-way on new Radcliffe Street but concerns over rat running – will need to be pedestrian friendly and traffic calmed.

A. We have provided a two way street capable of allowing two HGVs to pass. Traffic calming will be determined by MKC and representations regarding the traffic calming issue should be made to Milton Keynes Highways Department who will ultimately make the decision with which we will have to comply.

29.0 Church Street must stay two-way

A. This was proposed to MKC as one solution. However, the street has capacity to be altered to accommodate one way. Representations regarding the 2way/1way issue should be made to Milton Keynes Highways Department who will ultimately make the decision with which we will have to comply.

30.0 Concern over no pull-ins for buses on Church Street

A. From information supplied the current bus pull-in may actually contribute to congestion in the town. It is reported that bus drivers hold back until departure times. The bus stop proposal is borrowed from busy London bus routes and has been discussed and developed 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.

Parking

31.0 What about Fridays when all the parking in the Town is full because of the Mosque?

A. Parking is a Wolverton wide problem. However, the Agora Development should not be seen as a vehicle that can solve **all** the town's parking problems, neither does it claim too. The Agora redevelopment proposal contributes by providing more spaces than the MKC requirement and improves circulation through the town. More visible management of the Agora Car Park under new management should also facilitate positive a change. However, a local parking permit scheme, grants to convert back gardens to parking spaces and a re-configuration of Local Authority car parks have all been suggested by Wolverton residents as potential opportunities to alleviate parking. These ideas warrant further investigation but do not fall within the scope of our remit or influence, however these ideas have been put to the Council. It is important to note that alternative schemes proposed by other bodies offer as few as 77 space for the entire site.

32.0 People working in the town should have parking permits

A. Parking permits have been suggested by local residents as a way of managing car parking. This is out of the scope of the Agora development and representations regarding the introduction of parking permits in Wolverton should be made to Milton Keynes Highways Department who will ultimately make the decision.

33.0 Not enough parking – but never will be!

A. Parking is a Wolverton wide problem. However, the Agora Development should not be seen as a vehicle that can solve all the towns parking problems, neither does it claim too. The Agora redevelopment proposal contributes by providing more spaces than the MKC requirement and improves circulation through the town. More visible management of the Agora Car Park under new management should also facilitate positive a change. However, a local parking permit scheme, grants to convert back gardens to parking spaces and re configuration of Local Authority car parks have all been suggested by Wolverton residents as potential opportunities to alleviate parking. These ideas warrant further investigation but do not fall within the scope of our remit or influence, however these ideas have been put to the Council. It is important to note that alternative schemes proposed by other bodies offer as few as 77 spaces for the entire site.

Representations regarding the introduction of parking permits in Wolverton should be made to Milton Keynes Highways Department who will ultimately make the decision.

34.0 Access to the new residents parking will require driving down Buckingham Street

A. Buckingham Street is a public highway and our architects have been guided by local plans which allow for access. However, the gated private entrance to Block F is at least 14 m away from the nearest house on Buckingham Street and should not impact current resident “manoeuvres”.

35.0 Need to introduce a residents parking scheme across Wolverton

A. A local parking permit scheme, grants to convert back gardens to parking spaces and re-configuration of Local Authority car parks have all been suggested by Wolverton residents as potential opportunities to alleviate parking problems. These ideas warrant further investigation but do not fall within the scope of our remit or influence. Representations regarding the introduction of parking permits in Wolverton should be made to Milton Keynes Highways Department who will ultimately make the decision.

36.0 If residents have more than one car where do they park?

A. Without a parking permit scheme, current arrangements would apply. However, this site has great access to public transport which should act as a draw for some new residents. The Agora Car park is open 24hr a day and with management could shoulder some of the evening parking load.

Overall

37.0 Concern that it is perceived that any solution to the Agora problem is good enough

A. We have proposed a scheme that complies with (or mitigates) both the ASPD and the UANP. More importantly this scheme is fully funded and viable against 'real' market figures. Other schemes proposed may look like attractive alternatives but their viabilities have not been tested using "real" market figures, national and local planning guidance or local and national regulation and may directly conflict with UANP.

Brickhill commissioned its architects to examine the ideas and viability of other proposals that are in the public domain as part of the design process. The schemes provided a valuable resource of ideas but we are advised that significant elements of these proposal fail to comply with the UANP, the ASPD and the MK Core Strategy as well as national planning guidance and building regulations.

38.0 There needs to be rigour in the decision making process

A. We have fully complied with UK planning regulations and in addition we have undertaken an extensive pre-application process. Representations about “rigour” within the planning process should be addressed to the Rt Hon Greg Clark MP, Secretary of State at the Department for Communities and Local Government, who is responsible for planning legislation and policy.

39.0 Any new development needs to be better

A. No perimeters have been specified with which to respond to this question. Expectations have been raised by a series of different proposals and schemes produced over the past decade with varying 'key' features. Other schemes proposed may look like attractive alternatives but their viabilities have not been tested using “real” market figures, national and local planning guidance or national building regulations and would directly conflict with UANP.

These other documents have influenced the design but we have to be guided by the current adopted guidance, which is the ASPD. Using this document we have proposed a scheme that complies with (or mitigates) both the ASPD and the UANP. More importantly this scheme is fully funded and viable against ‘real’ market figures.

40.0 Needs to be a balance of tall buildings – concern over the height of buildings towering over the Queen Vic

A. Four storey development has been limited to the new corners of Radcliffe and Church Street and the accommodation proposed forms a substantial part of the viability of the scheme. The development at its highest point does not exceed the historical precedent set by the former Institute destroyed by fire in the 1970s. Both the ASPD and the UANP have allowed for this scale.

41.0 No context to the drawings to show how the new development will fit with the current buildings

A. This is incorrect. Context drawings have been supplied as part of the planning application and public consultations. We commissioned a 3D computer model of the site and images are available on the architects website. www.cmiarchitecture.co.uk.

42.0 Concern that it looks like a “mini MK” not Wolverton

A. This is subjective and was not part of the architect’s intention. The scheme has been developed with the valuable input of the MK Conservation officers , Planners and local residents.

43.0 Concern about impact on surrounding property in terms of noise

A. A noise study would normally be conditioned as part of any major application and the recommendations contained within would form part of the construction specification. No queries or requirements regarding the noise from the development have been raised in ASPD or the UANP which both support development. However, should the Agora be refurbished as a venue it is envisaged that the noise would be greater.

44.0 No proper provision for an outdoor market

A. The Princes Trust proposal suggest using the current Agora Car Park and using The Square, Wolverton's original market place, has been proposed. Both these ideas are feasible and complement the proposal on the table. The planning obligations officer at MKC will determine how the section 106 monies will be allocated and some of this money could be used to develop these ideas further. However, it is important to note that the slope on the New Radcliffe Street might limit activities

45.0 The Square isolated with no retail on the new Radcliffe Street leading people to it.

A. The retail frontage from Church Street carries on 30-40% up the New Radcliffe Street. Viability studies have concluded that the New Radcliffe Street would be a secondary retail location and units would not let easily. The topography of the street would limit the frontage of any retail outlet and may require the length of the street to be provided with a hand-rail which would impact on the provision of car parking. Deliveries to retail units would congest the newly formed street. However, should market conditions dictate ground floor residential units with independent access could make suitable office units. There is currently no demand.

46.0 No child friendly spaces/play areas

A. No play area has been requested on the site, which is already a compromise between accommodation, parking and circulation. The current Agora and the previous structures it replaced did not make provision for a children's play area. However, the refurbished Square, New Bradwell Park and Wolverton Recreational Grounds provide excellent existing playground/play area provision, with the nearest play area being behind St George's Way flats. The planning obligations officer at MKC will determine how the section 106 monies will be allocated and some of this money could be used for off-site play area provision.

47.0 Why is the levels difference not being used to create parking underneath?

A. Undercroft parking has been used in some parts of the development for residents only. Two-tier parking/ multi storey parking would have a negative impact on the visual appearance of the development and was dismissed for this reason. The site has a finite amount of space and the provision of a delivery yard and maintaining road access to the rear of Buckingham Street limited the opportunity for decked parking. Underground car parking both public and private is unviable at £75k -100k per space and because of the access and exit requirements.

48.0 Protection of heritage essential

Historical assets within the area will be unaffected by the development and the historic setting will be improved with the removal of the Agora.

49.0 Lack of public open space and community space

A. 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 to previously disconnected parts of the town. The creation of the 'behind the scenes' delivery yards 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 could potentially be grounds for refusal on the basis of non compliance.

50.0 Could the development fund the re-modelling of The Square?

A. In theory yes but no contribution has been sought directly for this. The planning obligations officer at MKC will determine how the section 106 monies will be allocated and some of this money could be used for re-modelling of The Square.

51.0 Like idea of the Business Hub in the Neighbourhood Plan

A. 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.

52.0 Like the idea of a mini in-door market

A. An in-door market hall is recommended as an option within the earlier Wolverton Regeneration Strategy Supplementary Planning Guidance (2004), but this document has been superseded in 2013 by the ASPD which does not require one. Although there is no requirements for an indoor market, this was a suggestion mooted by the Agora tenants and the idea is currently being tested for viability and would be subject to achieving a critical mass of stall holders. The flexibility of the design allows for units to be merged or separated to accommodate different retail options.

53.0 Mostly a good scheme but let's try to make it better. Right balance of viability and meeting the plans. Good to finally see something happening.

The development would not be able to proceed if viability could not be demonstrated to both the local authority and the lenders underwriting the scheme. An 'in-house' viability test was sufficient to create a framework in the local planning documents but for planning a more professional and evidence-based viability study is required. We now know how many square feet of residential accommodation is projected and how many lifts are required and how much solar energy will be created etc.

How the development blends in with its surroundings and the detailing and materials required to conform with both local plans and the conservation area makes this an expensive build from the outset. There have some been some sacrifices to the "wish list" and compromises but the final result will be a new town centre and an opportunity for the residents of Wolverton. The viability has been scrutinised by MK council and this proposed development is ready to go and would avoid the uncertainty of a further two and half years seeking and then enforcing CPO.

END OF QUESTIONS

We have asked our architects to post this response on their website and forward a copy to residents on their consultation database. Should you require any further information or clarification please do not hesitate to contact myself or our architects.

Your Faithfully

Neil Hollingworth and James Pargeter