

## **Future Wolverton response to the Agora Planning Application – 15/00913/FUL**

Future Wolverton is a Community Benefit Society which seeks to achieve the sustainable, creative improvement of Wolverton over the next 5 years. Established in 2013, we have 118 members, made up of local residents and businesses. Many of these members joined the organisation after we successfully led the development of the Wolverton Town Centre Neighbourhood Development Plan on behalf of the Town Council.

Future Wolverton welcomes developer interest in the Agora site. It is the long held wish of the local community to see the Agora – a building which is completely out of character with the Victorian town that surrounds it - redeveloped, and the original grid street pattern of Wolverton reinstated.

This community aspiration has been encapsulated in various planning policy documents that have been developed over time, including the Local Plan, Wolverton Regeneration Strategy, Milton Keynes Core Strategy and the Agora Development Brief.

Most recently the Wolverton community began the process of developing a Neighbourhood Plan focussed on the Town Centre. It was hoped that the neighbourhood plan would succeed (where other planning documents had seemingly failed) to bring forward redevelopment of the Agora.

By developing the Plan we were led to believe that the community would be “leading” the redevelopment process rather than being in opposition to a developer’s scheme which failed to meet local expectations.

Future Wolverton is confident that Policy W1 within the Neighbourhood Plan is a true reflection – in both aspirations and detail - of the sort of redevelopment the local community would like to see on the Agora site.

Our confidence in our own process was reinforced by the Independent Examiner who described the community consultation which led to the development of the plan as "having been extremely comprehensive and carefully undertaken and recorded, demonstrating the very best practice in achieving meaningful and beneficial engagement with the full range of stakeholders."<sup>1</sup>

**Future Wolverton objects to the current planning application for the Agora site on the basis that it does not meet the policies of the Wolverton Town Centre Neighbourhood Development Plan or the planning and design principles contained within the Agora Development Brief.**

To illustrate our objections we will make detailed reference to Policy W1 of the Neighbourhood Plan, before looking at the relevant sections of policies W2 to W7.

Our objections also highlight specific requirements of the Agora Development Brief, which are referenced throughout. We also refer to several documents submitted as part of the planning application.

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<sup>1</sup> A Report to Milton Keynes Council of the Independent Examination of the Wolverton Town Centre Neighbourhood Development Plan. 15 April 2015 page 11 paragraph 38

Policy W1 – The Agora Site	Future Wolverton assessment of the compliance with the policy
<p><b>A – Follow the historic grid pattern and reinstate Radcliffe Street as a direct highway link between The Square and Church Street.</b></p>	<p>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.</p> <p>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.</p> <p>The road is narrow – 12 metres 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.</p> <p>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 metres. 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.</p> <p>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.</p>
<p><b>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</b></p>	<p>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</p>

<p><b>retail, service and office requirements.</b></p>	<p>draw people up into The Square and improve footfall.</p> <p>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.”<sup>2</sup></p> <p>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”.</p>
<p><b>C - Include development fronting Church Street, with priority around the junction with Radcliffe Street.</b></p>	<p>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.”<sup>3</sup> 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.</p> <p>Future Wolverton believe that the overall quality of the scheme has been affected by limiting the extent of the development along Church Street.</p> <p>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.</p>
<p><b>D - Make a clear distinction between public and private spaces, particularly at the rear of buildings.</b></p>	<p>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.</p>

<sup>2</sup> Agora Development Brief September 2013 page 24 paragraph 4.2.21

<sup>3</sup> Agora Development Brief, September 2013, page 23 paragraph 4.2.12

	<p>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.</p>
<p><b>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.</b></p>	<p>The proposed development does not provide any new public open space to support street markets and community events.</p> <p>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.</p> <p>There has been no attempt by the developer to achieve this in the planning application.</p>
<p><b>F- Retain views of St George’s Church, in particular the spire, through breaks in development along Church Street.</b></p>	<p>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.</p> <p>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.</p> <p>It also does nothing to enhance this importance entrance to Wolverton Town Centre.</p> <p>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.</p>

<p><b>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.</b></p>	<p>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.”<sup>4</sup></p> <p>Despite this being a requirement of the Brief, over a quarter of the development is 4 storey, and the rest is 3 storey.</p> <p>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></p> <p>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.</p>
<p><b>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.</b></p>	<p>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).</p> <p>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.</p> <p>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.</p> <p>We consider this arrangement to constitute an undermining of the new street scene.</p>
<p><b>I – Except in new residential development where parking should be designated to each unit, all parking should be</b></p>	<p>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</p>

<sup>4</sup> Agora Development Brief September 2013, page 24 Building Heights, paragraph 4.2.20

<sup>5</sup> Agora Development Brief, September 2013, page 23, Scale and Orientation of new development, paragraph 4.2.10

<p><b>accessible to town centre users, and include an element of on-street parking. Existing adopted highway should be retained and enhanced where practicable.</b></p>	<p>by the ownership being transferred to the Town Council.</p> <p>We are also concerned that there is no provision for parking for staff who will work in the new retail units.</p> <p>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”.<sup>6</sup></p> <p>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.</p>
<p><b>J – Integrate the existing Electric Bus Charging Infrastructure.</b></p>	<p>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.</p> <p>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.</p> <p>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.</p>
<p><b>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.</b></p>	<p>The proposed development fails to address the need to improve cycle and pedestrian routes through the town centre.</p> <p>The developer cites the opening up of Radcliffe Street as an example of improving pedestrian</p>

<sup>6</sup> Planning, Design and Access Statement, CMIA, Section 6 Parking and Access, paragraph 6.0.2

	<p>movements, but this is an inevitable consequence of reinstating the grid road pattern, not a deliberate attempt by the developer to improve pedestrian movement.</p> <p>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.</p> <p>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></p>
<p><b>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).</b></p>	<p>The proposed development comprises flats only, of which 98 are two bedroomed, with 1 x one bedroomed flat and 1 x three bedroomed flat.</p> <p>This does not constitute “a range of town centre housing” as required by the NP and Agora Development Brief.</p> <p>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.</p> <p>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</p>

<sup>7</sup> Agora Development Brief, September 2013, page 23, Scale and Orientation of new development, paragraph 4.2.9

	<p>separated from one another and located in a particular part of the development.</p> <p>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.</p>
<p><b>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</b></p>	<p>The scheme incorporates housing and retail uses only.</p> <p>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.</p> <p>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.</p> <p>Even the public toilet is located in the car park rather than incorporated into the heart of the town centre!</p>
<p><b>N – Retain the existing London Plane trees and other trees where practicable replacing any trees lost as a result of the development</b></p>	<p>The developers own tree survey states that the redevelopment “will require removal of the majority of the trees within the site area.”<sup>8</sup></p> <p>This is despite the Brief and Plan stating that the existing London Plane trees should be retained where at all possible.</p> <p>It is unacceptable that only 18 of the 40 lost trees are being the replaced.</p> <p>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.</p>

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<sup>8</sup> C.A.T. LANDSCAPE CONSULTANCY Tree Report, Arboricultural Impact Assessment & Method Statement Redevelopment of Agora Centre Wolverton, Milton Keynes, January 2015

<p><b>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.</b></p>	<p>The Plan has a specific reference to the creation of new “green infrastructure” as part of the redevelopment.</p> <p>Despite this, the development is ruthlessly urban in look and feel, with virtually no soft landscaping and minimal trees.</p> <p>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></p> <p>This negates the importance of green, open space to physical and mental health and is in conflict with Natural England's Accessible Natural Greenspace Standards which provides a set of benchmarks for ensuring adequate access to natural and semi-natural greenspace near to where people live.</p> <p>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.</p> <p>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.</p>
<p><b>P – Street materials and street furniture should comply with the Public Realm Design Manual</b></p>	<p>The Design and Access Statement makes limited reference to the Public Realm Design Manual, and only in the context of “street furniture”.<sup>10</sup> There is no reference made to the best practice principles for the public realm as contained in the Design Manual in particular:</p> <ul style="list-style-type: none"> <li>- 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’</li> <li>- Appropriate and varied scale – which adds interest and defines character, from</li> </ul>

<sup>9</sup> Design and Access Statement, section 7 Sustainability , paragraph 7.5.1

<sup>10</sup> Design and Access Statement, section 4, landscape and biodiversity, paragraph 4.13

	<p>backways 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</p> <ul style="list-style-type: none"> <li>- Creating memorable places and spaces – with a streetscape punctuated with memorable places and spaces each offering a distinct aspect and atmosphere</li> <li>- Animation and visual interest – with active frontages, art, lighting and events focussed on key pedestrian routes</li> </ul> <p>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.”<sup>11</sup></p>
<p><b>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.</b></p>	<p>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”.</p> <p>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.</p>

<sup>11</sup> Wolverton Public Realm Design Manual, Milton Keynes Council 2012

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<p><b>R – Ensure redevelopment is accessible to all</b></p>	<p>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.</p>
<p><b>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.</b></p>	<p>The Neighbourhood Plan has a strong aspiration for the Agora redevelopment to be a zero carbon.</p> <p>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.</p> <p>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.</p>
<p><b>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</b></p>	<p>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.</p> <p>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.</p>

Whilst the focus of our objection to the planning application is the lack of compliance with Policy W1, the developer has also failed to take into account the detail within a number of other policies within the plan.

These are listed below, on a policy by policy basis.

<p><b>Policy W2</b></p>	<p><b>Future Wolverton assessment of the compliance with the policy</b></p>
<p><b>A. Improve the movement of pedestrians and cyclists around the town centre, promote sustainable travel to the railway station, and improve bus interchange facilities.</b></p>	<p>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.</p>

	<p>We do not believe that the propose development has given sufficient weight to the importance of promoting sustainable travel.</p> <p>Two projects are mentioned in the Plan as a mechanism to achieve Policy W2 A. They are:</p> <p>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.</p> <p>Project 4: Extension of redways (Milton Keynes network of segregated routes for cyclists and pedestrians) into the town centre.</p> <p>Neither of these projects are referred to or addressed by the planning application.</p>
<p><b>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 Greenspace Standard</b></p>	<p>The developer has failed to address the need for either private or public green infrastructure within the proposed development.</p> <p>Future Wolverton believes that the creation of green roofs (or walls) would work well in a constrained urban environment.</p>

<p><b>Policy W3 – The Railway Works site</b></p>	<p><b>Future Wolverton assessment of the compliance with the policy</b></p>
<p><b>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</b></p>	<p>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.</p> <p>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</p>

	<p>Modwen which is located at the end of Radcliffe Street.</p> <p>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.</p> <p>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.</p> <p>The success of both applications will either strengthen – or destroy – Wolverton’s strong sense of place</p>
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<b>Policy W4 – Town Centre Diversity – Ground Floor uses</b>	<b>Future Wolverton assessment of the compliance with the policy</b>
<p><b>Proposals which protect, enhance and promote a diverse range of uses will be supported.</b></p> <p><b>Primary and Secondary Frontages</b>  <b>The over dominance of any particular use will be avoided by:</b></p> <p><b>A. Retaining all shops and shop floorspace (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></p> <p><b>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.</b></p>	<p>Future Wolverton believes that the scheme proposed by the planning application fails to create a diverse town centre.</p> <p>This failure is a result of a number of key issues with the proposed scheme:</p> <ul style="list-style-type: none"> <li>• The lack of ground floor retail frontage on new Radcliffe Street which was envisaged to be a primary frontage.</li> <li>• The continuous frontage of residential development on new Radcliffe Street.</li> <li>• The lack of leisure, commercial, office, tourism, cultural and community provision in the development.</li> </ul>

<b>Policy W5 – Supporting Street Markets.</b>	<b>Future Wolverton assessment of the compliance with the policy</b>
<p><b>A site for a street market in The Square will be supported by:</b></p> <p><b>B. Improving physical links between public transport interchange and The Square, supported by appropriate pedestrian signage.</b></p> <p><b>F. Providing public toilets for visitors and traders.</b></p> <p><b>G. Providing off street long stay (more than four hours) parking to support market trade.</b></p> <p><b>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.</b></p>	<p>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.</p> <p>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.</p> <p>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.</p>

<b>Policy W6 – Supporting and promoting small, local trade</b>	<b>Future Wolverton assessment of the compliance with the policy</b>
<p><b>Provision through major development</b></p> <p><b>In the case of provision through a major development, the following requirements shall apply:</b></p> <p><b>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.</b></p> <p><b>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.</b></p>	<p>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 regionals/nationals that require big floor-plate units.</p> <p>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.</p> <p>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.</p>

<b>Policy W7 - Shopfront Design, Advertising and Security</b>	<b>Future Wolverton assessment of the compliance with the policy</b>
<p>The design of a shopfront will take into account the wider relationship with the surrounding built environment. Proposals for shopfront design (including refurbishing existing shopfronts) will:</p> <ol style="list-style-type: none"> <li>1. Be appropriate in proportion, materials and details to maintain and reflect the style and characteristics of the Conservation Area and neighbouring properties.</li> <li>2. Enhance the buildings character and compliment adjacent shop fronts where these are of good quality design.</li> <li>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 shopfront</li> </ol>	<p>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.</p> <p>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></p> <p>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.</p> <p>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.</p> <p>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.</p>

Finally, because of the large number of residential units included in the application, we have given some additional consideration to Council’s New Residential Design Guide (2012).

We believe the application fails to comply with the key design principles in the guide as set out below.

<b>Residential Design Guide Principles</b>	<b>Future Wolverton assessment of the compliance with the policy</b>
<p><b>Appreciating the context</b> <i>Context Appraisal</i> Developers should consider the context at a number of different levels, from the site itself, through its immediate</p>	<p>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</p>

<sup>12</sup> Design and Access Statement, section 5.9 Architectural styles, paragraph 5.9.4

<p>surroundings, to the wider local area. At the site level, developers should identify the key existing features, including ... buildings, routes and land uses.</p> <p>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</p>	<p>huge benefit that the distinctive heritage assets and buildings within the town centre offers to the overall context.</p> <p>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.</p> <p>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.</p>
<p><b>Building the place</b> <i>Context</i> Existing positive site features should be used to structure the entire development (established as part of the context appraisal);</p> <p><i>Movement network</i> 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;</p> <p><i>Density/housing types</i> A range of densities should be included that ..... will encourage a range of house types to be provided that suit a range of needs;</p> <p><i>Public space</i> Open space in all its forms has a major influence on the wellbeing of the whole community and that value should</p>	<p>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.</p> <p>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.</p> <p>The planning application does not offer a range of densities or housing types – it only delivers 2 bedroomed flats.</p> <p>The lack of community open space in the development detracts from the overall quality.</p>

<p>be fully recognised as integral to the quality of the development as a whole.</p> <p><i>Biodiversity</i> 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</p> <p><i>Landscaping within streets</i> Greenery within streetscapes is considered one of the most important aspects contributing to the neighbourhoods that residents like to live in.</p>	<p>There are no bio-diversity features incorporated into the development, despite the opportunity for green roofs and walls, and a SUDS system.</p> <p>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.</p>
<p><b>Detailing the place</b></p> <p><i>Flexible homes</i> 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.</p> <p>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.</p> <p><i>Creating Designs that are Accessible for All</i> Detailed designs should allow a place to be accessible for all: and in particular, for the elderly, people with a disability and</p>	<p>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.</p> <p>The development offers no opportunity for residential units (which are all flats) on Church Street to be converted into commercial units.</p> <p>We do not believe that the flats will be suitable for families with small children due to the lack of any outdoor space.</p> <p>The aspiration to have homes which are</p>

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<p>families with small children</p> <p><i>Flatted developments</i> 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.</p> <p>Where possible, ground floor apartments should have their own small private rear garden.</p> <p>All apartments should provide space to dry clothes either within the apartment or within a communal facility.</p>	<p>suitable for older people and include an element of care is not reflected in the proposed development.</p> <p>The proposed flats have no access to private outside space, no balconies and no roof gardens.</p> <p>Ground floor apartments do not have their own private gardens.</p> <p>There appears to be no provision for a space to dry clothes apart from within the flat above the bath.</p>
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**In conclusion, Future Wolverton objects to the planning application for the Agora site because it:**

- **Fails to comply with the policies contained within the Wolverton Town Centre Neighbourhood Development Plan**
- **Fails to comply with the Agora Development Brief, adopted by Milton Keynes Council in 2013.**
- **Fails to comply with the Design principles within the Milton Keynes Residential Design**