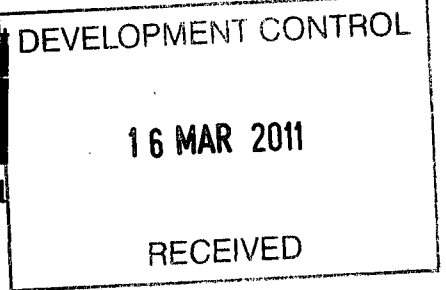




Stony Stratford Town Council



Mr Alan Mills
Major Plans Team Leader
Milton Keynes Council
Civic Offices
1 Saxon Gate East
CENTRAL MILTON KEYNES
MK9 3EJ

14 March 11

Dear Alan

Planning Application No: 11/00143/FUL

You will be aware that a special meeting of Stony Stratford Town Council took place on Tuesday 8 March 2011 to consider the above planning application. The meeting was attended by approx 80 members of the local community. Representatives of the applicant's agent, Barton Willmore, gave a brief overview covering changes that had been made to the scheme since the public exhibition in May 2010. Members of the local community made many objective comments and raised areas of concern.

Having heard everything and following a recommendation from its planning committee, the Town Council agreed that it should OBJECT to the proposals. In coming to this conclusion, the Town Council accepts that the current food retail offering is inadequate but feels that there are alternative solutions to those proposed in this application.

Overdevelopment

The proposal requires an increase in size for the food store from the present 650sq m to the proposed 1565 sq m of net retail floor space. The Town Council considers that this is a massive overdevelopment of the site and is contrary to Local Plan policy TC1 Character and Function of the Shopping Hierarchy which states that "*The long-established Town Centres will function primarily as local shopping destinations for the daily or specialist needs of their largely static residential populations and in recognition of the constraints placed upon their development and expansion by acknowledged conservation aims and allied considerations.*" The stated aims of the applicant are to provide a store of such size that users will be encouraged to do their weekly shopping which is completely against the aims of the policy.

Furthermore, Local Plan policy TC3 Stony Stratford Town Council states that "*Stony Stratford is defined as a Town Centre meeting the daily shopping needs of the local population. Small scale additions of new individual shop units will be permitted within the Town Centre. Development proposals should preserve or enhance the character or appearance of the Conservation Area.*" Clearly this application isn't small scale and the demolition of approx 2/3rds of the built form of Cofferridge Close and replacement with a structure that is out of character with the remaining buildings from the original scheme neither preserves nor enhances the character or appearance of the Conservation Area.

Traffic/Parking/Pedestrians

The application proposes to replace the current public parking in Cofferridge Close, totalling approx 120 spaces which provides both 2 hour maximum and all day parking, with a total of 163 spaces that will be time limited, currently suggested to be 3 hours. This will remove a total of 62 all day parking spaces from

the centre of town with the potential to further inconvenience residents living in the immediate vicinity who already have on street parking difficulties.

The current layout of Cofferridge Close provides pleasant pedestrian routes to the various corners of the development as spokes from a central hub. The proposals will remove this central hub and will require pedestrians to undertake more tortuous and ill defined routes which in some cases will be positively dangerous. Of particular concerns are the routes to the Health Centre where pedestrians will have to cross the service area and the inherent dangers that will entail with delivery vehicles undertaking complicated manoeuvres in a service yard (see drawing no 2140/ATR/017 in the traffic assessment) which appears to be too small for the vehicles that will use it. Additionally, the route into Horsefair Green is via a pavement through the public part of the car park which peters out when the private parking area is reached.

The size of the service area is a concern as the manoeuvring needed will increase both noise and pollution to the detriment of residents and pedestrians alike.

For a market town of its size (less than 6,000 population), it is considered that traffic movements in the town are already close to or at saturation levels. Tables 4.4 and 4.5 of the traffic assessment show that the number of trips into Cofferridge Close will more than double (from 1058 to 2263 daily trips) should the development go ahead. This is hardly a 'slight' increase in traffic as the applicants contend.

Furthermore, table 6.1 compares traffic flows currently with projected 2016 flows and demonstrates that the daily volumes of traffic in both Horsefair Green and Wolverton Rd being in excess of 8000 vehicles and in particular, Horsefair Green would suffer an increase of over 30% from the current baseline. This is unsustainable in a town that is already close to or at saturation point.

Such increased volumes are bound to have an effect on pedestrian safety and this will be the case particularly in Horsefair Green and Silver St.

In conclusion, the above demonstrates that the application contravenes Local Plan policy T10 Traffic which states that "*Planning permission will be refused for development if it would be likely to generate motor traffic: (i) exceeding the environmental or highway capacity of the local road network or (ii) causing significant disturbance, noise, pollution or risk of accidents*" and Local Plan policy D1 Impact of Development Proposals on Locality which states that "*Planning permission will be refused for development that would be harmful for any of the following reasons: (i) Additional traffic generation which would overload the existing road network or cause undue disturbance, noise or fumes (vi) Inadequate access to, and vehicle movement within, the site.*"

Landscaping

The application includes proposals to remove 51 mature trees including the majority of the remaining part of the orchard that occupied the site before Cofferridge Close was built. The green space in the Close which is so valued by the community is significantly reduced and the remnants of the original landscaping of the 1970's Cofferridge Close development are removed.

Cofferridge Close, either loved or hated by the community, makes a significant contribution to the Conservation Area and these proposals are contrary to Local Plan policy HE6 Conservation Areas which states that "*Development proposals within or affecting the setting of a Conservation Area should preserve or enhance the character and appearance of the area.*" This application neither preserves nor enhances the Stony Stratford Conservation Area.

Loss of Facilities

The proposed demolition of the only food retail store in the town is of great concern to many of the elderly and less able members of the community, as it would leave the town without a food retailer for the duration of the development. Should the application be permitted, it would have to be conditional upon the

provision of a temporary facility in the town to allow the community to at least shop as they are currently able to.

The loss of the dentist which is so valued is of great concern. This facility should have a planning use code of D1 and would be classed as a Community Facility. The proposal to remove the Facility is contrary to Local Plan policy C2 Protection of Community Facilities which states that "*Planning permission will be refused for proposals that involve the loss of an existing community facility or the loss of a site allocated for such purpose, unless: (i) there is no longer a need for the facility for any type of community use, or (ii) An acceptable alternative facility can be provided elsewhere.*" The application neither demonstrates that the facility is no longer needed nor proposes an alternative for its relocation.

Design

The application fails to provide any details of a lighting scheme for the site, seating in the public areas and signage to and around the site. The design of the pedestrian areas around the customer entrance to the store are particularly cramped and requires a redesign to ensure that it can cope with the volume of pedestrian traffic that a development of this size would need to be sustainable.

The existing buildings provide a continuity of form from the restaurant and shop unit fronting to High St right through the site to the dwellings on Silver St. This application seeks to replace the red brick structures in the centre of the site with a predominantly glazed structure, isolating the remaining elements of the 1970's development. Any future proposals should look at the site as a whole retaining the continuity as it currently exists.

The size of the store proposed in the application has reduced in size from that which was exhibited in May 2010 (1800 sq m to 1565 sq m). This reduction of 13% is not mirrored in the number of car parking spaces proposed now against the number proposed at the May 2010 exhibition. In fact, the number has not changed remaining at 163 spaces which, one assumes, is now an over provision as the May 2010 figures, we are told, were based on the MKC Parking Standard requirement for the then size of store.

General Points

The Town Council does not understand how this proposal accords with the MKC Retail Capacity and Leisure Study dated February 2010 which states that additional convenience shopping floor space should be provided in Wolverton and the Western Expansion Area.

The application proposes the removal of elements of A1, A3, B1 and D1 uses and their replacement with a single A1 food store. This is in conflict with national guidance provided by PPS4 as it reduces the range of services that are available in the town.

The Town Council is aware of issues that free holders who bound the site and/or have property on the site have with the proposals. Access rights that these residents have across what is now public highway must be retained and the Town Council asks that MKC should not pass back any public highway on the site to the site owners.

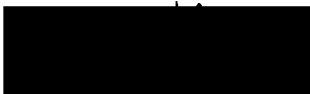
There appears to have been a general lack of consultation on these proposals which have been prepared, we understand, over several years. The first formal knowledge of the proposals that the Town Council had was immediately prior to the public exhibition in May 2010 although there was a hint that 'something was in the wind' when it was approached by a local company about the possible establishment of a second entrance from Silver St into Cofferridge Close in the summer of 2009.

The Town Council would suggest that this application, when refused, should precipitate a development and conservation brief for Cofferridge Close to be prepared by MKC to allow relevant stakeholders to contribute to a document that should guide any future applications for redevelopment of the site.

And finally, the Town Council is somewhat surprised that the application contains no justification as to why the existing buildings have to be demolished in favour of a new building. The Town Council feels that reordering of the building is possible to enable it to meet the requirements of providing a larger quality food store whilst retaining the mixed use development that the town currently benefits from. This approach would accord with Emerging Core Strategy policy CS-20 which states that *'New developments should protect and enhance the character, diversity and cultural significance of the Borough's historic assets, including important elements of the 20th Century New Town architecture. Development proposals must consider the character, appearance and setting of buildings, structures, areas, parks and gardens and landscapes that are of historic, architectural, cultural or archaeological interest.'*

In conclusion, whilst it might seem attractive to the town to welcome, on economic grounds, a supermarket of the size proposed, the traffic proposals raise serious concerns about the potential for gridlock which could actually lead to the local economy being worse off. For the above reasons, the Town Council would not wish to see a modified version of these proposals resubmitted; rather, a scheme that reuses the existing buildings and is based on a development brief that has been prepared by MKC.

Yours sincerely



Charles Brindley
Clerk to Stony Stratford Town Council

