



The Civic Society For Milton Keynes

PLAN:MK

**MILTON KEYNES
OPEN SPACE ASSESSMENT**

**A Response to
the Consultation by
Milton Keynes Council**

January 2018

INTRODUCTION

Milton Keynes Forum is the Civic Society for Milton Keynes, with membership open to local residents, organisations and businesses. It has contributed to constructive thinking about the development of the Milton Keynes area for almost three decades.

It is evident that the Open Space Assessment has not achieved what it set out to do. Nor has it been concluded in time to provide useable evidence on which to base policies and standards for the future provision of open spaces, or to inform the protection and use of existing open spaces, as it has not been subject to public consultation until its publication at the same time as 'Proposed Submission Plan:MK October 2017'. We set out below our considered comments, reasons and objections to specific aspects of policies, categories, standards and site designations proposed for open spaces, as well as support for some aspects.

This consultation response from Milton Keynes Forum is in addition to the submission we have already made relating to the consultation on the 'Proposed Submission Plan:MK October 2017'.

1. THE MILTON KEYNES OPEN SPACE ASSESSMENT

A plan and programme for the Open Space Assessment was set out in a MK Council document dated July 2016, entitled 'Open Space Assessment Note'. In this, at 3.3, Table 1: 'Approach and Scope to Open Space Assessment', it was indicated that Stage D would be about *"Defining policy implications"* and that this would use the findings of the previous three stages (A to C) to *"... inform policy recommendations regarding sites for protection/enhancement or removal in Plan:MK"*. It also proposed in Stage D that: *"The policy recommendations also respond to the application of the open space standards, and provide suggestions on areas of Milton Keynes where there is adequate open space, deficient open space, or a surplus of poor quality open space. This part of the assessment should help identifying important sites in need of quality improvements and set the context for the council to work with local communities on locally important sites"*.

This is not the outcome that has now been provided for public consultation. What has been published is too late; and:

- It has not provided the promised basis for defining policy implications;
- There has been no overarching statement of sites for either protection & enhancement or removal from Plan:MK;
- It has not provided any assessment of where open space is adequate, deficient, or surplus to requirements, or even any basis for such recommendations;
- It has not identified sites in need of quality improvements.

Not only do the final documents from the Open Space Assessment fall short of what was promised, but they have been made available too late, at a stage at which public responses could not influence the final consultation draft of Plan:MK, as both were made available through the Plan:MK website at the same time, around 1st November 2017, for a six week consultation period ending on 20th December 2017. Although consultees were informed in a letter by e-mail on 1st November 2017 that the 'Proposed Submission Plan:MK October 2017' had been published for public consultation, this made no reference to consultation on the

Open Space Assessment, but referred only to consultation on; *"The Proposed Submission Plan:MK October 2017, Proposed Submission Policies Map Schedule, Sustainability Appraisal, Habitats Regulations Assessment, Statement of Consultation together with a Statement of Representations Procedure ..."*

It was some weeks later that an MK Forum member noticed that the webpage containing links to the above documents also provided a link to a separate page for 'Technical Studies and Background Documents' and that under this was a heading 'Landscape', at the end of which was a further link to 'Open Space Assessment'. Clicking on that link led to PDFs for:

- 'Open Space and Recreation Facility Provision categories'
- A sequence of 45 'Draft 2017 Open Space Maps', one for each parish.

Beneath the 45 map PDFs was a heading 'Consultation October 2016', but at the foot of this was another link that had not been made available until late in 2017, probably October or November, entitled 'Open Space: evidence base towards draft qualitative criteria', an undated document which had not previously been made available to the public. In view of this, MK Council staff gave a dispensation that MK Forum could submit its response up to 5th January 2018.

What has been provided about open space for public consultation is therefore: in the 'Proposed Submission Plan:MK October 2017'

1. Revised open space policies
2. A revised list of open space categories at 'Appendix C. Open Space and Recreation Facility Provision'

... and, elsewhere,

3. 'Draft 2017 Open Space Maps'

... with the invitation in November 2017, *"Following the consultation with stakeholders in autumn 2016, a revised list of open space categories was produced. We are seeking comments on whether the categories and maps are logical and accurate"*:

There is also a further document, though consultation responses were not invited on this:

4. 'Open Space: evidence base towards draft qualitative criteria'.

What we do not have for open spaces is a single document summarising: background documents, previous policy, facts about open spaces, outcomes of the assessment of open spaces, and an explanation of why and how policy and standards are based on these. As a result, the crucial context for the proposed changes to open space designations has not been provided. It is not made evident that there have been previous reports on open space of direct relevance. For example, the Council published its 'Open Space Strategy' in 2007, intended to provide a framework for the provision and management of public open spaces for 20 years to 2027.

The original open space standards for areas developed by Milton Keynes Development Corporation are set out in 'The Milton Keynes Planning Manual' (1992). MK Council's open space policy and standards were set out in The Local Plan (2005) and many Local Plan policies were saved for continuing application when the Core Strategy (2013) was adopted. There have been other documents relating to open space such as: play area policies, and policies for provision of sports grounds and facilities. A whole range of documents are available about sites of significance for biodiversity. There is also the recent report of the Buckinghamshire & Milton Keynes Local Environment Partnership of its 'Green Infrastructure Plan', with relevant

recommendations to local authorities, such as Milton Keynes Council, about open space in relation to health, the economy, biodiversity and landscapes. We can find no references to any of these documents in the work that has been now been presented about open space in order to shape policies and standards for Plan:MK, though that report is referred to in the chapter on 'Environment, Biodiversity and Geodiversity'. This matters because what are now being proposed are changes to how particular sites are designated, but in the absence for any justification or evidence, or a sense that they are building on previous foundations.

For example, MK Council's 'Open Space Strategy 2007' has a section on 'The Open Space Legacy of Milton Keynes' (Section 2.04, page 8) which says:

"Milton Keynes is well known for its city landscape of parks, woods, lakes, waterways and wildlife sites which have been either retained and conserved or consciously provided and evolved for up to 35 years. It was and remains a feature of open space development in Milton Keynes that they frequently benefit from the utilisation of the 'natural assets' within new spaces whether they are local open spaces or larger District and Linear Parks. ... Collectively, the urban open spaces and the countryside provide a rich and accessible outdoor environment which is 'free' and contributes enormously to health and social well-being, economic activity and recreational opportunities for residents and visitors alike".

The report goes on to say, at Section 2.05, that:

"The open space of Milton Keynes is predominantly 'green space' and the common perception is that the City has sufficient, so why do we need a 'strategy'? The apparent abundance of green and pleasant open space, seemingly free from threats and problems can hide underlying issues and lead to complacency among both the community it serves and the agencies responsible for maintaining and managing those open spaces. Complacency can in turn lead to under-valuing the asset rather than recognising the importance of open space and the substantial contribution made by open space to the quality of people's lives"

2. NATIONAL PLANNING POLICY FRAMEWORK REQUIREMENTS

The National Planning Policy Framework (NPPF) sets out a number of requirements relating to open spaces.

At Section 73 the NPPF says: *"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should be used to determine what open space, sports and recreational space is required.*

At Section 114 the NPPF says: *"Local Planning Authorities should:*

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;"*

At Section 117 the NPPF says: *“To minimise impacts on biodiversity and geodiversity, planning policies should:*

- *plan for biodiversity at a landscape-scale across local authority boundaries:*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan:*
- *aim to prevent harm to geological conservation interests;”.*

It is the view of Milton Keynes Forum that MK Council’s Open Space Assessment documents have failed to provide a robust assessment that takes account of all these requirements for open space, biodiversity and geodiversity.

3. OPEN SPACE, LANDSCAPE CHARACTER, AND BIODIVERSITY

Open spaces provide multiple and overlapping benefits. The same site may provide some or most of the functions of flood alleviation, parkland, play areas, sports facilities, habitat for wildlife, and structural landscape of visual importance. In providing these it will also contribute to the physical and mental health and wellbeing of users of these spaces. The overall visual landscape also contributes to place-making, local distinctiveness, and to the image and reputation of Milton Keynes as a place to live and for business and the economy to thrive.

There is no apparent recognition in the documents presented for consultation that these overlapping purposes of open spaces are adequately appreciated. These three distinct aspects of the uses of open space - functional, visual and biodiversity - need to complement each other, even though each space may major on only one or two of these. For example, this may mean that a particular site is designated as a local park but also provides useful habitat for wildlife and makes an attractive contribution to the overall landscape structure of the area.

Landscapes

The value of many open spaces may be largely visual ones and in a Milton Keynes context most of these contribute to a connected network of landscapes. This relates to the distinctive objectives in developing Milton Keynes as a New Town, which is well described in ‘The Milton Keynes Planning Manual’ (Milton Keynes Development Corporation 1992, Chapter 3: ‘Landscape, Parks and Open Space’: page 63) which says:

“One of the chief characteristics of Milton Keynes is the high quality of its landscape. The Corporation has always placed great emphasis on this aspect of development, in the Master Plan goal of ‘an attractive city’.

The Parks and open spaces cater for the outdoor activities of residents and visitors ... but they also establish a green image for the city and a setting for its buildings. This setting is re-inforced further by city road landscaping, local open space and, at a smaller scale, by the hard and soft landscaping of streets and redways and the landscape component in built development.

Together, these elements create a structural framework for development and provide the 'predominant continuity of green space' envisaged in the Master Plan."

As a result, the open spaces and landscapes of Milton Keynes are the outcome of more extensive landscape design than ever went into a parkland designed by William Kent or 'Capability' Brown and deserves to be respected for that, even when changes are proposed.

Nowhere in the 'Open Space Assessment' for Plan:MK is there evidence that the visual landscapes of Milton Keynes have been adequately appraised. MK Council commissioned a Landscape Character study of only the rural areas of Milton Keynes, but has commissioned no such studies of the urban landscapes, despite the character and extensiveness of these and that there is as much need to protect these visual landscapes within the 'city'.

In the 'Pevsner' for Buckinghamshire (1994) Elizabeth Williamson refers to Kevin Lynch's book 'Theory of Good City Form', which described what he called 'urban countryside'. Elizabeth Williamson says that this is "a label that fits MK better than any yet invented". We could also describe this as 'the countryside within the city', as throughout Milton Keynes there are quietly beautiful landscapes that retain much of their rural character. Hundreds or acres of land within the 'city' on floodplain pastures are managed productively, being grazed by sheep and cattle while also providing public use of these areas. There is no sense within the 'Open Space Assessment' that this is recognised or appreciated.

Biodiversity

Almost any open space has benefits for some wildlife, and all open spaces can be managed to maximise their value for wildlife, as far as is compatible with their functional purposes or visual contribution as landscape. Sites to be designated specifically as wildlife areas should be chosen on the basis of ecological evidence of their importance for biodiversity, though many sites that do not have this evidence will still attract some kinds of wildlife.

In the hierarchy of international, national and locally designated sites of importance for biodiversity, Milton Keynes Borough has:

- None of the international site designations (Ramsar, SPA or SACs)
- Two SSSIs (Sites of Special Scientific Interest), both of which are within the 'city'
- Eight Buckinghamshire & Milton Keynes Local Wildlife Sites within the 'city', one at the edge of Newport Pagnell and a further 12 in the rural area
- 24 Milton Keynes Biological Notification Sites within the 'city', one (Oakhill Wood) straddling the 'city' boundary and 42 in the rural area
- Four Local Geological Sites within the 'city', and two in the rural area.

A review is in progress across much of Buckinghamshire of existing and potential Local Wildlife Sites, to confirm or de-designate existing sites as appropriate, or to add to them, potentially with some to be upgraded from Milton Keynes Biological Notification Sites to Local Wildlife

Sites. These designations are agreed by a panel of ecology specialists led by the Buckinghamshire & Milton Keynes Environmental Records Centre (BMERC), but they have yet to report on their review of sites within Milton Keynes Borough. Until then, the existing designations apply as summarised above.

Milton Keynes has also designated a series of MK Wildlife Corridors which were set out in The Local Plan. These were identified through the 1996 study 'The Wildlife Corridors of Milton Keynes' and include:

- Seven Wetland Corridors (rivers, brooks and canal) but also identified two further corridors along smaller brooks that required further survey
- Three Woodland Corridors (including the North Bucks Way and the old Oakhill Lane Corridor
- Four Railway Corridors
- The Grid-road Parkway Corridors
- The V4 Watling Street Corridor
- The A5 Corridor
- The M1 Corridor

These have not been adequately reflected in the 'Proposed Submission Plan:MK October 2017' or in the mapping of open space.

In this respect, Milton Keynes was well ahead of the advice to the Government by the Lawton Report ('Making Space for Nature' 2010) which was reflected in the Government's biodiversity policy in 2011, 'Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services'. In turn, this is reflected in planning policy in the NPPF, such as the requirement to *"identify wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation"*.

Open space functions

What the Open Space Assessment focuses on more fully is the functional aspects of open space: places with specific practical functions such as sport, play and allotments, which are reflected in many of the types of open space shown in the maps of open space.

4. THE REVISED OPEN SPACE AND RECREATION FACILITY PROVISION CATEGORIES

MK Council's 'Open Space Strategy 2007' says (Section 2.02, page 7) says:

"Milton Keynes Development Corporation provided open space and to a large extent determined the type, location and content through a hierarchical 'formula' based on prescribed needs from the local neighbourhood level to the city wide level. That early visionary approach to open space provision through development has been largely retained, subsequently became a Milton Keynes Local Plan standard, which has been reaffirmed on adoption of the Local Plan in December 2005."

That report goes on to say:

"The Milton Keynes range of open spaces and the areas they serve within the existing hierarchy are:

- *Incidental open space : [typically in residential areas and of immediate community or neighbourhood interest]*
- *Play Areas : Neighbourhood and Local*
- *Local Parks : [serving part of or a whole grid square]*
- *District Parks : [serving a number of grid squares]*
- *Linear Parks : [typically centred on the river valleys and flood plains, serving adjacent grid squares and sometimes beyond]*
- *Country Parks : [a much wider catchment and outside the scope of the original MKDC open space hierarchy]*
- *There are exceptions to the 'standard' such as The Willen Lakes area where a considerably wider range of managed indoor and outdoor recreational attractions give the areas a City wide appeal. Campbell Park is also an exception in that it is intended to serve both local needs and be the main 'City Park'."*

So the original concept was of six categories with occasional one-off exceptions. MK Council's 'Open Space Strategy 2007' (Section 2.03, page 8) says:

"The categorisation of open spaces into one of the above types should give a reasonable indication of the size, facilities and features expected within the space. This assertion is correct in general terms but the variety which may be found within a single open space category is such that an over reliance on a 'standard' could be misleading. Although useful as background information, it is more appropriate to consider each space as individual, particularly in the context of the community it is intended to serve. It is very important to consider the evolving needs of the whole community and how open spaces might contribute towards those needs in the future."

The February 2017 'Draft Plan:MK for Public Consultation' listed each type of open space and standards in terms of: minimum size, catchment area or standard, characteristics, and principles. These were set out in Appendix L3: 'Open Space and Recreational Facility Provision' which categorised open space with the following 15 types, as:

- Linear Parks
- Destination, Country Parks and District Parks
- Local Parks
- Pocket Parks
- Civic Spaces
- Amenity Open Space
- Green Access Link
- Areas of Wildlife Interest - Natural and semi natural
- Allotments & Community Growing Areas
- Transport Corridors
- Paddocks
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)
- Playing Fields & Outdoor Sports Facilities
- Sports Facilities.

These have been substantially revised in the November 2017 'Proposed Submission Plan:MK October 2017' at Appendix C: 'Open Space and Recreational Facility Provision'. This has 14

types, as it omits separate mention of 'Sports Facilities. However some types are described differently and the term 'Destination and Country Parks has been removed:

Section 1

- District Parks (not Destination, Country Parks and District Parks)
- Local Parks
- Pocket Parks
- Amenity Open Space
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)
- Playing Fields & Outdoor Sports Facilities (does not include school playing fields because these are not publicly accessible)
- Allotments & Community Growing Areas

Section 2

- Linear Parks
- Green Access Links
- Areas of Wildlife Interest - Natural and semi natural

Section 3

- Transport Corridors
- Paddocks
- Civic Spaces.

The set of parish maps presented separately in the November 2017 consultation use a slightly different range of categories from the previous two typologies, and add seven new ones ('Village Green', 'Orchard', 'Churchyard', 'Cemetery', 'Common Land' and 'Proposed Linear Park') but does not reinstate 'Country Parks', so there are 20 in all; and it describes some of them in other ways, as shown below:

- Linear Park
- District Park
- Local Park
- Pocket Park
- Village Green (not in Plan:MK Appendix C)
- Transport Corridor
- Amenity Open Space (over 1000m² a clarification which has been added to the Plan:MK Appendix C title)
- Playing Fields & Sports Facilities (not Playing Fields & Outdoor Sports Facilities)
- Site of Wildlife Interest (not Areas of Wildlife Interest - Natural and semi natural)
- Green Access Link
- Civic Square (not Civic Spaces)
- Allotments (not Allotments & Community Growing Areas)
- Orchard (not in Plan:MK Appendix C)
- Paddock
- Churchyard (not in Plan:MK Appendix C)
- Cemetery (not in Plan:MK Appendix C)
- Common Land (not in Plan:MK Appendix C)
- Proposed Linear Park (not in Plan:MK Appendix C)
- Local Play Areas (LPAs)
- Neighbourhood Play Areas (NPAs)

The consultation on the 'MK Open Space Assessment' to which we are responding is explained in the following way: *"Following the consultation with stakeholders in autumn 2016, a revised list of open space categories was produced. We are seeking comments on whether the categories and maps are logical and accurate"*: In response, it is our view that the proposed revised categories are neither accurate nor as logical as they need to be. They are based on far too many categories. They include some types that are not publicly accessible so do not need to be included. They confuse issues of legal status with open space function - we do not see the necessity of including a category of 'Common Land' as Bury Field is used as either a large local parkland or a large amenity open space. We see little value in including churchyards as these have a specific and permanent purpose which is not as public parkland.

It would make more sense if the types of open space were focused entirely on public open spaces. Paddocks are in private use and usually have no public access. Golf Courses are run as commercial activities, available only to members or fee payers, in much the same way as private sports facilities such as the David Lloyd Centre at Newlands. Allotments usually provide access only to allotment holders. We doubt that it assists open space policy to include any of these in the Open Space policies or plans.

Although the 'Proposed Submission Plan:MK for public consultation, October 2017' refers to biodiversity sites in Chapter 12, Environment, Biodiversity and Geodiversity, these are not adequately reflected in the Open Space Assessment or 'Appendix C, Open Space and Recreation Facility Provision'. That Appendix also uses categories that do not equate to the biodiversity ones in Chapter 12. For example, it introduces a new category, 'Sites of Wildlife Interest' which is applied to a wide range of sites with other biodiversity designations, such as Howe Park Wood 'SSSI', and Tongwell Lake 'Local Wildlife Site', but is also applied to numerous small sites within housing areas that have never before been considered for formal designation for their wildlife; and for which, as far as we know, there is no objective record of their wildlife interest, although like any landscape area they are likely to have some of the more common species of bird, insect and mammal.

Another issue is the one of open spaces that serve many purposes. For example, although Tongwell Lake has biodiversity value for wildfowl and wetland birds, it is also effectively a Local park for the people of Blakelands, and it is used by a water-skiing club. A better designation would be either a District Park or a Local Park that also has a biodiversity designation and value. Also, it would be simpler to accept that some long-established landscape features do not fit readily into these kinds of categorisation and should not be forced into them. For example, it is now proposed to call Howe Park Wood a 'Site of Wildlife Interest' when it is far more than that. It is a 60 acre ancient woodland of national SSSI status, but has a network of paths that make it popular parkland for dog walking and walkers more generally. It even has a play area and an education and visitor centre, but unlike District Parks it does not have any playing fields or sports facilities.

Unfortunately, the Open Space Assessment makes no reference to most of the previously identified MK Wildlife Corridors, but introduces a new typology of 'Green Access Link' which is applied to a few of the previously identified Wildlife Corridors but designates additional ones such as the avenue of London Plane trees and the grassy mounds which form an avenue either side of the main roads through Bradwell Common. Although road corridors such as this are described as a 'Green Access Link', others are described as 'Transport Corridor'. On the other

hand, 'Green Access Link' is applied to some long-established routes used as Redways and horse-riding paths which already have a biodiversity designation as a 'Wildlife Corridor', such as Common Lane through Bradwell, Heelands and Bradwell Common.

In our view, the most recent sets of open space categories have added confusion rather than clarity, which is compounded because the categories used for the most recent set of maps differ from those in the 'Proposed Submission Plan:MK October 2017' Appendix C: 'Open Space and Recreational Facility Provision'.

We suggest that the long list of 20 open space categories now proposed is unnecessarily complicated and confuses rather than clarifies when compared with previous open space categories. It also adds confusion to biodiversity site categories and fails to take account of the fact that some sites have multiple purposes.

We do not agree with the view that the category of 'Linear Park' should be confined only to river valleys. It should be applied where parkland is in extended linear form, or where new parkland can be created in this form. In particular, we think this should apply to the western flank of Milton Keynes along the alignment of the North Bucks Way from Bottledump Roundabout northwards through the Western Expansion Area, eventually extended to the River Great Ouse, a route that is of considerable importance for biodiversity and is valued as a walking route. We agree that the Ouzel Valley Linear Park should be extended northwards to the Great Ouse. We consider that other opportunities should be sought as Milton Keynes expands to ensure that residents from all parts of the 'city' are within range of a linear park, whether in the valleys or rivers and brooks or on higher ground.

5. THE PROPOSED STANDARDS FOR OPEN SPACE AND RECREATION FACILITY PROVISION

The standards set out in the October 2017 version: 'Appendix C, Open Space and Recreation Facility Provision' have introduced some confusions:

- 1) District Parks are to have catchments of 1,200 metres, but their Characteristics are to be that they "*Actively attract visitors from a wide catchment, typically further than 10 kilometres ...*" It can't be both. This is a very different definition from the established MK definition of District Parks which has been applied to larger parks serving a local population of around 15,000, so has been applied to sites such as: Tattenhoe District Park, Emerson Valley DP, Great Linford DP, Manor Fields Bletchley etc. and is appropriate for the new park at Fairfield. The muddle began in the February 2017 consultation on Plan:MK which introduced a new category of 'Destination, Country Parks and District Parks' which has now been discarded by calling these just 'District Parks'. The original concept for District Parks in MK applied to larger parks serving a district, much as retail provision has been made on a district as well as local basis. We think this is a more appropriate use of the term.
- 2) We do not agree with the designation of Campbell Park as a District Park as it was designed to be a park for all of the 'city' and contains an events area, an open air auditorium and a cricket pitch constructed to county cricket standards. In the Milton Keynes context it is a one-off.

- 3) Surely, a 'Pocket Park' is just a small local park that would be better described as a 'Local Park'?
- 4) The term 'Amenity Open Space' is a useful one but we see no reason why this should apply only to grasslands. It would be an appropriate description of many of the open spaces that have now been placed in the category of 'Areas of Wildlife Interest'.
- 5) We suggest that the category of 'Green Access Link' is an unnecessary complication. Some of these are 'Wildlife Corridors' but all are visual landscape features and some should be simply categorised as 'Amenity Open Space'.
- 6) We support the view that landscaped Transport Corridors "*Define the urban form of Milton Keynes*" and "*Also provide key habitats.*". We suggest that these are of probably of greater importance for biodiversity than has been recognised, and can be valuable linear habitats in line with the Lawton report and Government biodiversity policy on connected and linear habitats.
- 7) We prefer the title 'Civic Spaces' to the more limited one on the open space maps of 'Civic Squares'.

What is not clear is what objective information the proposed revisions to standards are based on.

6. THE DRAFT 2017 OPEN SPACE MAPS

We welcome the mapping of open spaces provided in the sequence of 45 'Draft 2017 Open Space Maps', but have reservations about the differences to categorisation that these have introduced, as set out above.

We have a number of concerns about these maps:

- 1) There are many small areas of landscape within housing that have not been shown with any designation, but no evidence has been provided for their exclusion.
- 2) Two categories show swathes of transport corridors as if they were accessible and useable open spaces, including the tarmac and inaccessible grass verges. This applies to the presentation of almost all 'Transport Corridors' and some 'Green Access Links'. Presentation of tarmac and roadway as open space gives a substantially misleading presentation of public open space. We recognise the value of the landscape that flanks the grid-roads visually and for biodiversity, but only some of this is accessible open space. Where it is, particularly alongside the earlier grid-roads, it provides on the housing area side valuable accessible open spaces that look like local parkland and are well-used by local residents. We suggest that these areas should be recognised as a form of Local Park, a kind of parkway linear park.

- 3) Areas shown as Linear Park have been extended to sites that have not previously been considered to be part of the Linear Parks. For example, extensive amenity open spaces with play areas through Woolstone and the large locally-managed Great Linford Park should probably be shown as either Local Park, District Park, or amenity open space.
- 4) We are surprised that the length of the River Great Ouse north of Newport Pagnell has not been shown as 'Future Linear Park' including the existing notable wildlife site of lakes and their surrounds at Gayhurst Quarry and Kickles Pit.
- 5) It is inconsistent that designations such as Playing Fields, Play Areas and Allotments are not indicated in their colour on the areas of Linear Parks but are shown by colour for other areas.
- 6) We think that there should be a distinction to show areas of open space such as Golf Courses, Paddocks, School Playing Fields etc that are an important part of the visual landscape but for which there is not general public access as of right. This could be done, for example, with a toned overlay.
- 7) We find it surprising that some existing public open spaces have been shown as potential development sites in the 'Proposed Submission Plan:MK Policies Map: Schedule of new and deleted designations, October 2017' without any explanation of that in the Open Space Assessment.
- 8) The Calverton map shows a large area of Linear Park which is not currently linear park, so should probably be shown as 'Proposed Linear Park'.
- 9) The mapping is unhelpful in not showing lakes as separate features as they are extensive and are not open space in the conventional sense of places where people can walk.
- 10) The Wavendon map has not indicated the areas of open space to be provided as part of planning consents for developments such as Eagle Farm. These need to be added.

7. THE QUANTITY, QUALITY AND ACCESSIBILITY OF OPEN SPACE PROVISION IN THE BOROUGH

We understand that the Open Space Assessment set out to assess the 'quantity, quality, and accessibility' of open space throughout the borough. We have seen no evidence that presents the size of each site or the overall quantity of each type, though we recognise that categories need to be revised before final presentation of that information.

We have not seen useful data on the quality of open spaces, and we do not see any sign of objective criteria used to test the accessibility for each type of open space.

Although the report, 'Plan:MK Open Space Assessment' makes some interesting subjective judgements about the qualities of particular open spaces used as examples, the language suggests a lack of objective evidence. For example:

- *"Very accessible"*

- *“Publicly accessible”*
- *“Attractive and tranquil”*
- *“Provides sufficient parking”*.

It is not made clear what criteria have been used to assess accessibility. Is this a matter of a particular population number within a defined distance or walking time, or does it imply use of other forms of transport? How is 'sufficient parking' determined? What objective methodology has been used to assess attractiveness or are these simply professional opinion, or the views of local users of the site? However, the photos provide useful information to inform such a discussion.

8. CONCLUSION

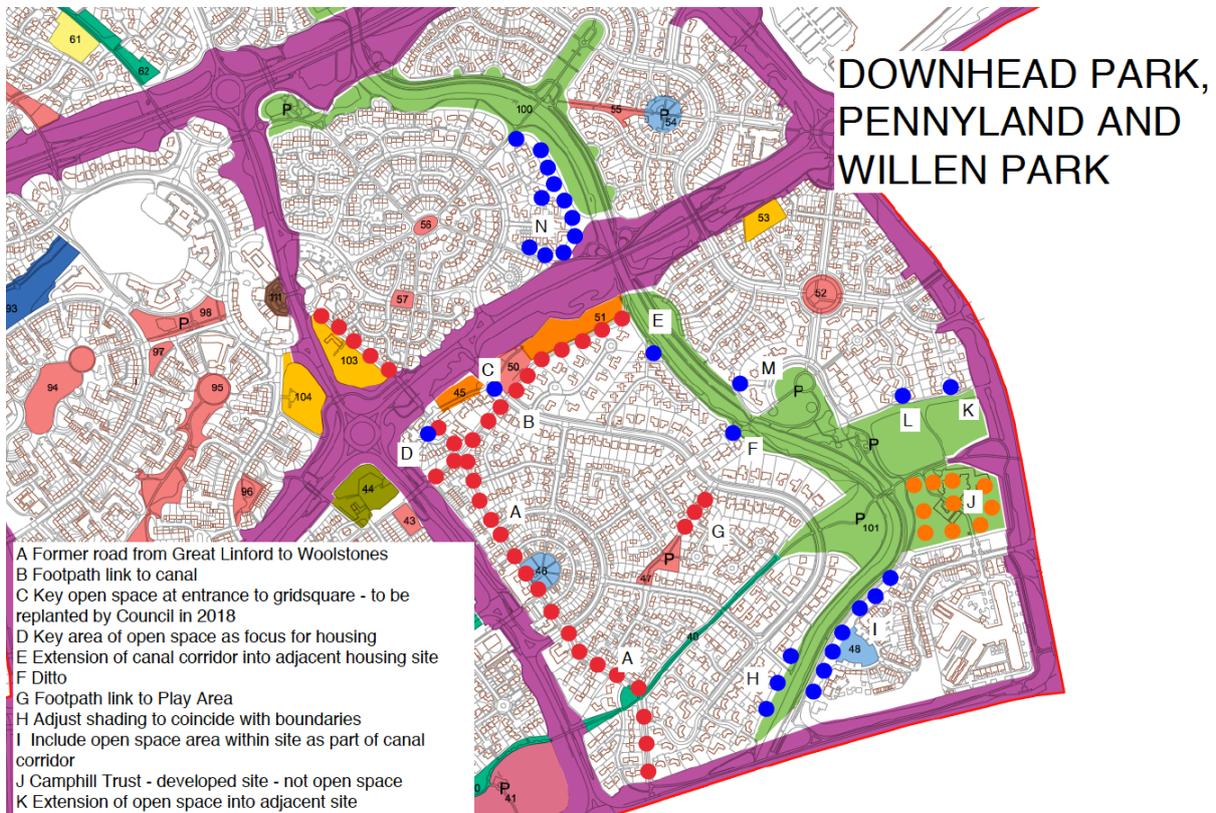
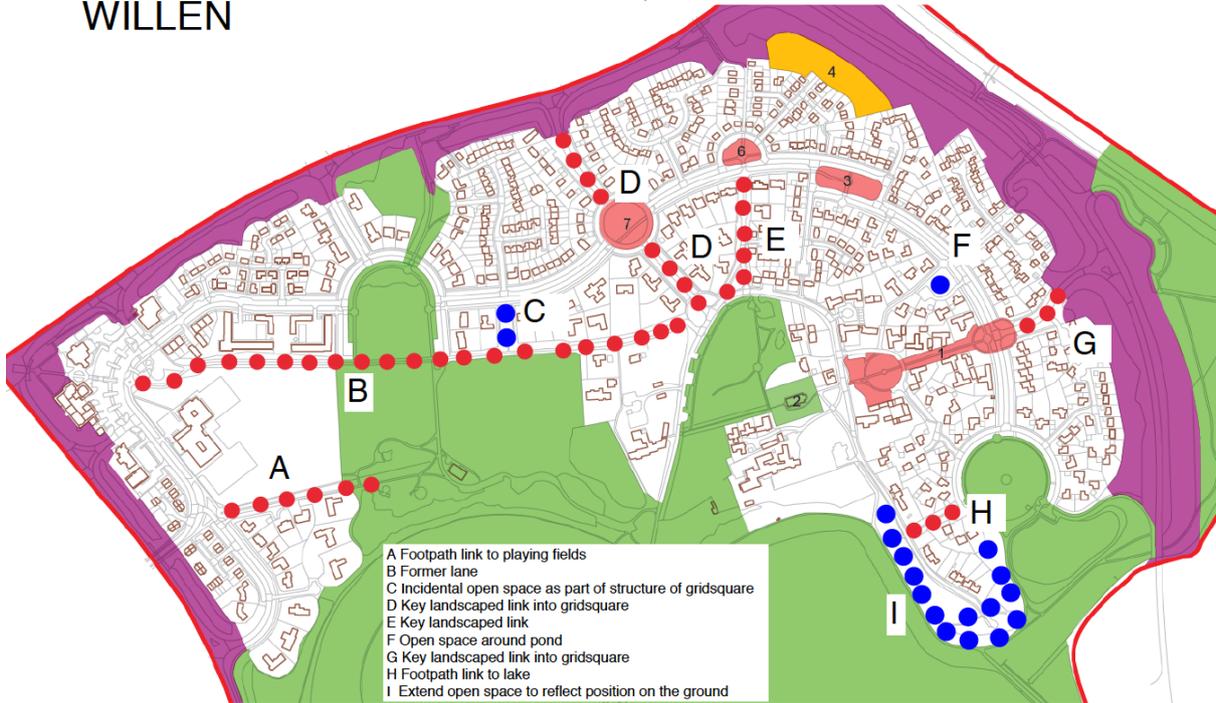
MK Forum welcomes the opportunity to comment on open space policies, standards and proposals. We would have been able to contribute to the formulation of these more effectively if the consultation had been carried out at the right stage. We are disappointed that this important work appears not to have been adequately resourced to have enabled it to be carried out more effectively.

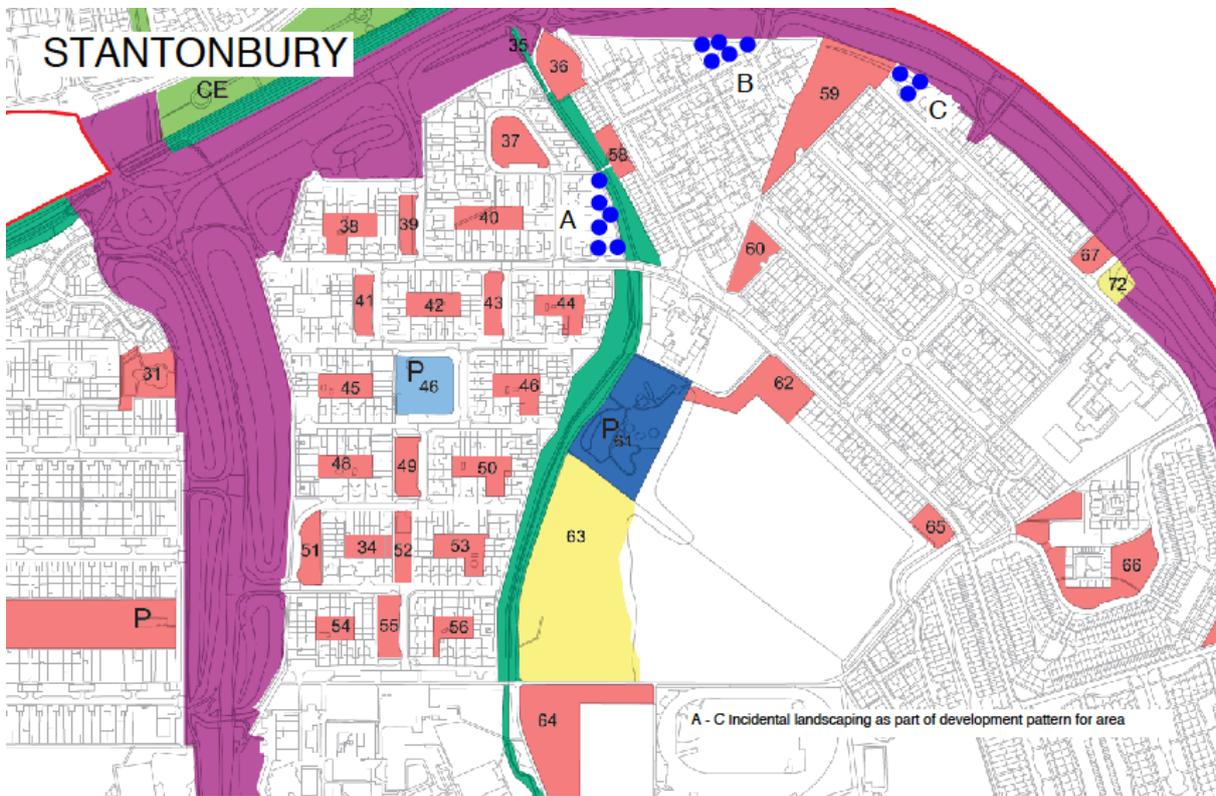
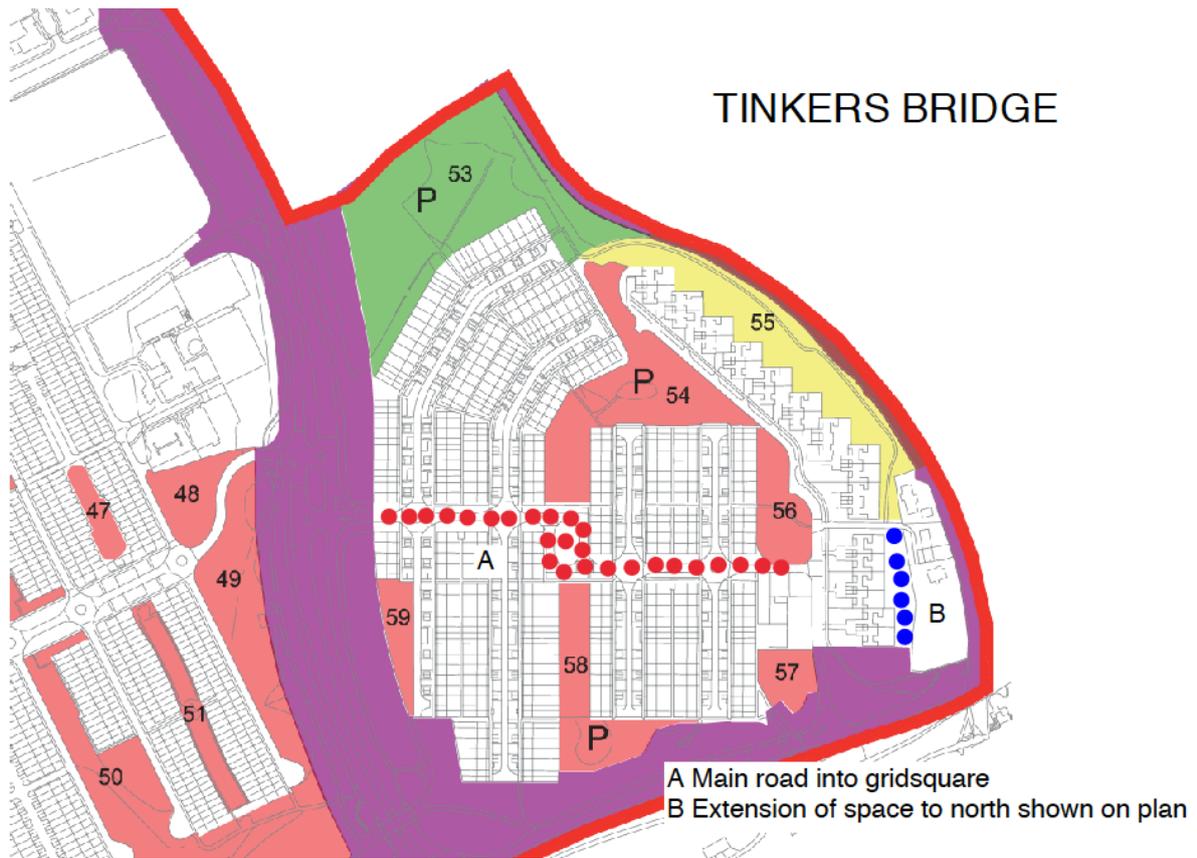
Open space and the visual landscape are at the heart of the character and experience of Milton Keynes and require vigilance to ensure that as the 'city' grows it continues to value these and to develop new areas that are of the same high standards.

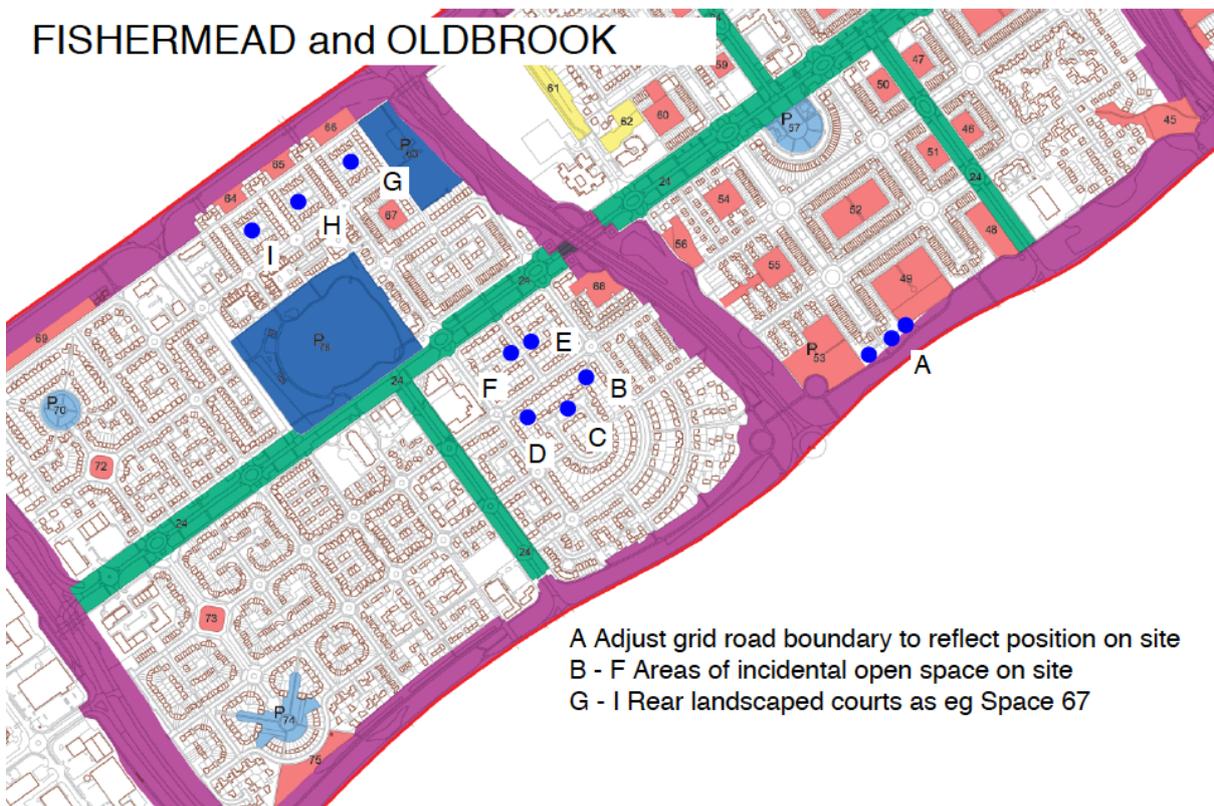
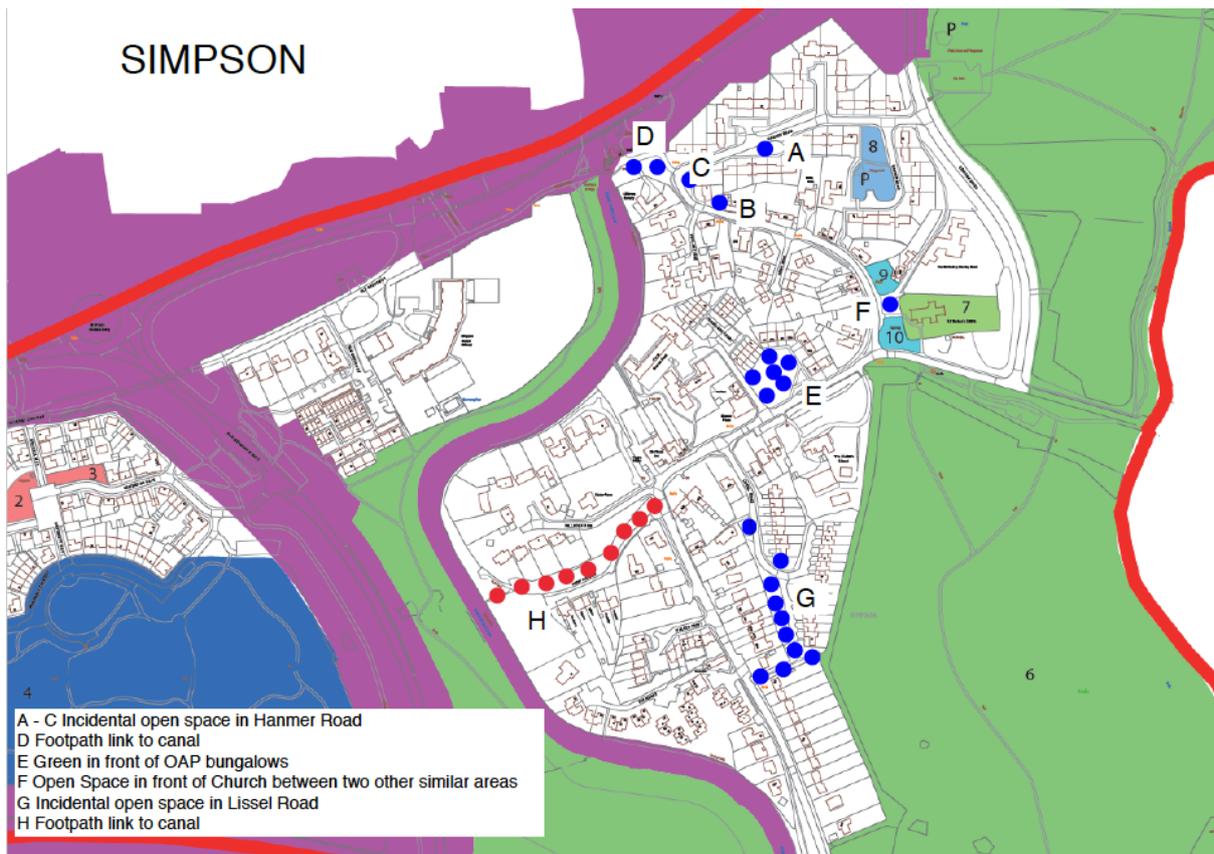
APPENDIX

We have included on the following pages comments upon the existing plans for some gridsquares with which some of our members are familiar, and which show spaces that they feel to be important but which have been excluded. It is not intended to be an exhaustive survey of the city but it illustrates some of the concerns that have ben referred to above.

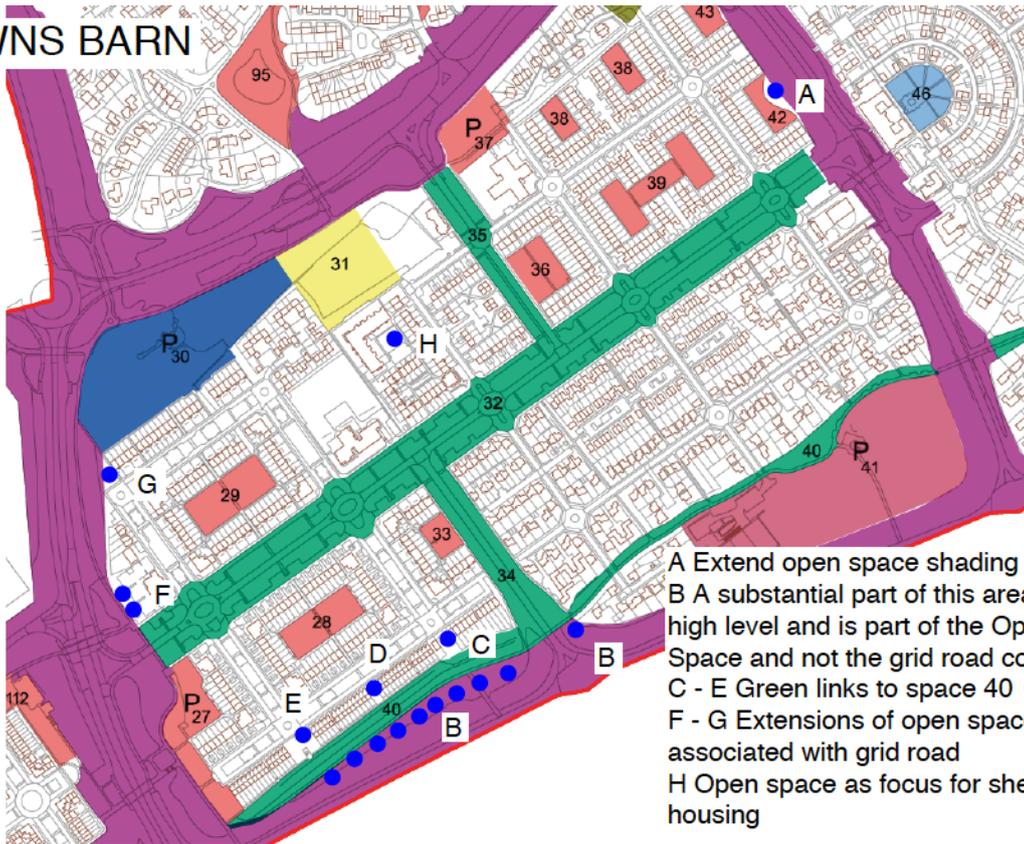
WILLEN







DOWNNS BARN



BRADVILLE

