



The Civic Society For Milton Keynes

PLAN:MK

PROPOSED SUBMISSION VERSION

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

December 2017

INTRODUCTION

This document details our comments upon the Proposed Submission Version of Plan:MK. It is our view that, as drafted, the plan is not sound for the following reasons:

1. Milton Keynes is at a critical stage of its development. This was vividly illustrated when, during the consultation period for the current stage of Plan:MK, the National Infrastructure Commission published its report "Partnering For Prosperity: A New Deal For The Cambridge - Milton Keynes - Oxford Arc" which, amongst other things, recommended the growth of Milton Keynes to 500,000 ie substantially above the level anticipated in Plan:MK. It is noteworthy, for example, that the report cites The Parks Trust as a case study for the long-term stewardship of "valued community assets" - in contrast, there is no encouragement within Plan:MK for the Parks Trust to be a recipient of areas of substantial open space generated by development.
2. We fully accept the time pressures upon Milton Keynes Council to deliver Plan:MK, however we do not think that it is aspirational enough to anticipate the requirements and opportunities provided by the Arc, albeit that they might not be known at present.
3. We are gravely concerned about the manner in which consultation has been carried out upon Open Space, which is a subject close to the heart of many residents of the city. Plan:MK clearly states that an Open Space Assessment will inform the Submission Version of Plan:MK. However, the public consultation upon the Assessment is running concurrently with that for the Plan (both have a closing date of 20 December 2017) and, therefore, it is physically impossible for the Assessment to take account of the consultation responses and then to inform the Plan, as the consultation on the Plan will have been completed before that. Furthermore, the Open Space Assessment process clearly envisaged (from reading the various documents) a) an initial Open Space Assessment; b) a report that would "*review the current and national policies*", "*set locally derived standards*" etc and c) incorporation of the findings into Plan:MK. However Stage a) has not been completed in accordance with the original objectives; Stage b) has not happened and, by default and as a consequence, neither has Stage c) been adequately addressed, as standards have been drafted in the absence of publishing evidence on which it was intended that they would be based. We have been informed that a further document (a "*Green Infrastructure Strategy*") is being prepared for consultation in early 2018 (which might be the "*report*" referred to above) but, while we may have the opportunity to comment upon it, we have lost the opportunity to comment upon potential changes to Plan:MK that might occur as a consequence. This is all very unsatisfactory and not an appropriate strategy for a city the size of Milton Keynes where open space is such a critical component of the city's structure.
4. It is difficult fully to appreciate the overall context of the Plan: there are no details of pertinent planning consents and other proposals within neighbouring authorities (particularly those around the southern edge of Milton Keynes).
5. Made neighbourhood plans should be the building blocks from which Plan:MK is built, especially in the case of the Business Neighbourhood Plan for our city centre. At present there is no analysis of where and why Plan:MK policies change the policies of any made neighbourhood plans.
6. There is no single map showing everything that is happening - existing and proposed land use designations, for example. As a consequence it is difficult, even for skilled professionals, to gain a proper and ready understanding of the plan as a whole - it must be doubly difficult for those with little detailed knowledge of such matters. Having queried this with Milton Keynes Council, we were informed that such a map would be produced once all of the comments have been made. With respect, this is too late: we see no reason why a draft map could not have been

made available at consultation stage on the basis that it would be amended as appropriate once comments have been made.

7. We are concerned about the lack of information within the Council's own website: there is no single page that holds all of the information and supporting papers for Plan:MK and it requires a detailed search by someone with a good knowledge of the history of the plan process to find them. It would be very difficult for the layman to find everything quickly.

SECTION 2 - VISION AND OBJECTIVES

1. Para 2.3: Amend final sentence of second paragraph of Vision to read *"It will actively reduce CO2 emissions to become one of the greenest cities in the UK...."*

SECTION 4 - DEVELOPMENT STRATEGY

1. We have a general concern that Plan:MK does not recognise the primacy of the CMK Alliance Business Neighbourhood Plan (CMKABNP) and, in particular, its intention to create mixed use areas across Central Milton Keynes. The Plan received wide public support at its referendum and no reason is given within Plan:MK as to why it is proposed to change it.
2. There is no consideration within Plan:MK of either affordability or the range and mix of dwellings required to satisfy potential residents.
3. Para 4.3: Whilst acknowledging the under-delivery of new housing, it is stated that *"simply providing enough land to meet the OAN may result in a plan that is not effective in meeting its needs over the plan period"*. However, Para 4.4 refers to such an over-provision without then demonstrating how this does not compromise the effectiveness of the plan.
4. Para 4.14: Delete *"residential area"* after *"Campbell Park"*.
5. Policy DS1: Delete *"(including Campbell Park)"* from description for Central Milton Keynes under *"1:Milton Keynes City"*.
6. Policy DS2 assumes new housing is to be provided by the regeneration of some of the existing estates as well as through opportunities around the centres of Wolverton and Bletchley. These areas currently provide some of the existing (genuinely) affordable housing in the Borough but Plan:MK does not consider the possible detrimental consequences of such regeneration on this vital resource. The proposals in DS2 are neither site specific nor related to existing Neighbourhood Plans. They are not listed in table 4.3 and their inclusion in this policy is unsound.
7. Policy DS2: Delete *"residential area"* from the second bullet point.
8. Policy DS2: Delete the ninth bullet points (*"The regeneration....local referendums"*).
9. Amend tenth bullet point to add *"on the basis that this will not reduce the number or percentage of affordable dwellings demolished in the regeneration process"*).
10. Table 4.3: Delete *"residential area"* from entry *"CMK and Campbell Park Residential Area"*
11. Para 4.51: There is no serious consideration of the challenges to High Street or Town Centre retail particularly from online competition, which is predicted to double in volume over the Plan period. There is no explicit recognition that shopping may increasingly become a by-product of visits to town centres and the priority is therefore to develop destinations and attractions. This is especially concerning as retail is a major employer in Milton Keynes, particularly in the City Centre.

12. Para 4.57: a) Delete *"and including....west of Marlborough Street"* from the first sentence; b) Delete final two sentences *"If retail development.....PSA of CMK"* and replace with *" , as detailed in the policies within the CMK Alliance Business Neighbourhood Plan"*..
13. Figure 1: Amend plan to remove Block E4 (Xscape) from the Primary Shopping Area to reflect the CMKABP.
14. Policy DS3: Delete Policy G and add new Policy *"Encourage the development of basic, flexible low cost space need for artists"* (see comments in S16 Culture and Community below).
15. Policy DS3 makes no reference to the significance of the retail sector to the local economy. We think that this is a major oversight.
16. Policy DS6 refers to *"areas defined as Linear Parks on the Policies Map"*. There is no such map available as part of the suite of documents for Plan:MK. There is, however, a collection of 90+ plans of individual development sites but no single map showing Linear Parks, as referred to in DS6.

SECTION 5 - STRATEGIC SITE ALLOCATIONS

1. Policy SD2: The definition of the Primary Shopping Area should be amended by deleting *"including the area around....Marlborough Street"* from the second paragraph.
2. Para5.14: Add: *"The bus interchange is to remain in close proximity to Milton Keynes Central Railway Station"*
3. Policy SD11: Add additional bullet point to Section 3 *"Suitable public transport services to the sites throughout their periods of development from the first residential occupations"*.
4. Policy SD13: Add *"Development proposals will include the removal of the level crossings in Bow Brickhill and Woburn Sands and their replacement with bridges."*
5. Policy SD16: We have no objection to the development of this site at the appropriate time but consider that it is illogical to consider it until the precise alignment of the Oxford-MK-Cambridge Expressway is known. We note that the policy is inconsistent with that of the "mirror site" to the east of Brickhill Street (SD13) which states *"planning permission.....will not be permitted until 2019/20, once the detailed alignment of the Cambridge-Milton Keynes-Oxford Expressway is known"* - there is no similar wording in SD16.

Even then, we would argue that the site's development should be more focussed upon the railway line rather than the Expressway. It has convenient access to Bow Brickhill railway station (which would imply residential use) but should also be explored for rail-based freight. Use for "standard" warehousing should be the least favoured option and, in any event, if more B2/B8 land is required during the plan period, Milton Keynes East (ie the land east of M1 J14) is better placed as it has more convenient motorway access.

In any event, we remain to be convinced that there is a need for more large scale warehousing within the Plan period and we feel that it is a poor return for the city in terms of job density given the amount of land required for such use when considered at a city scale and the other pressures upon Milton Keynes.

Fundamentally however, we do not necessarily believe that there is proven demand for warehousing space within MK that requires the allocation of this site for such a use:

- a. Policy ER1 is incorrect in that it includes Caldecotte South as "vacant land" - this is curious given that it has yet to receive planning consent and should be deleted. The amount of vacant Employment Land is therefore 134.5ha.

- b. Table 4.4 (p24) indicates a forecast demand for Employment Land for 2016-2031 of 132ha (of which Industrial/Warehousing comprises 116ha).
- c. On the face of it there is therefore sufficient employment land within Milton Keynes with the appropriate planning consents for the Plan period.
- d. However, the June 2017 update of the "Milton Keynes Economic Growth and Employment Land Study" indicates a wide range in perceived demand according to whether one uses the EEFM figure of 87ha or the Experian one of 132ha. Significantly, neither predicts a shortage of land but it is pertinent to point out that each figure has an allowance for churn and windfall (35%/62% and 22%/39% respectively).
- e. The argument is therefore, not about the quantity of land available but the quality and, in particular, sites for large warehouses, along the lines of Magna Park.
- f. We accept that Magna Park has been successful but the reality is that half of the space let to date (c270,000 sq m) has been to one occupier (John Lewis/Waitrose). What is the reality of this happening again?
- g. Critically the amount of jobs created over the Plan period from warehousing varies from c956 (EEFM - "distribution and logistics") to 4,500 (Experian - "land transport, storage and post").
- h. The logistics industry is changing and the amount of automation increasing and there is therefore a logic that looks more towards the EEFM figures rather than those from Experian.
- i. There are also competing sites outside Milton Keynes eg by M1 (Junction 13) and M1 (Junction 15) Northampton (para4.47).

When one takes all of the above together the reality is that the need for this site for warehousing is unproven and, even if the site is developed, the amount of jobs generated could be low. It seems a poor return for the city for such a big piece of land in such a strategic location.

While we feel that the site may be too small, we accept, that it might be feasible to develop it for rail based freight distribution and we would support this given the overall paucity of such sites in the local area and the environmental benefits that would result from such a use.

- 6. 5.33: Delete "*will be developed.....within a residential area*" and replace with "*will be developed for mixed uses in accordance with the Central Milton Keynes Alliance Business Neighbourhood Plan*".
- 7. Policies Map Document: a) The CMK Inset Maps 1 and 2 should be amended by removing Block E4 from the Primary Shopping Area; b) the frontage designations should match those of the CMK Alliance Business Neighbourhood Plan, which refers to "*Active*" frontages rather than "*Primary*" and "*Secondary*"; c) to avoid confusion, the site boundaries for **all** sites that include "*Classic Infrastructure*" as defined in the CMK Alliance Business Neighbourhood Plan should be amend to delete the "*classic infrastructure*", the development of which is covered separately by Policy G11 of the same Plan. The identity of such sites is readily apparent from the CMKABNP and do not need to be itemised here.

SECTION 6 - ECONOMY AND RETAIL

- 1. 6.16: It is illogical to include Caldecotte South as being "vacant" given that it has no extant planning consent. The amount of vacant land is therefore 134.5ha. We note, in passing, that

the base date for the table is April 2017, which was during the consultation for the Draft Plan (which did not identify the site for such development – this seems curious).

2. Para 6.43: We do not think that the categorisation of Kingston and Westcroft as Town Centres is appropriate as they do not have the range of goods, services and shops that one would associate with such locations (they do not have Post Offices, for example). We would suggest that they be categorised as “District Centres”. We also propose that there is a category of “Retail Parks” to cover Winterhill, Rooksley and MK1.
3. Para 6.44: Delete “it has been expanded to take in the area around the Xscape building”.

SECTION 7 - HOMES AND NEIGHBOURHOODS

1. In spite of its title Chapter 7 makes no attempt to propose policies that help form decent homes in thriving neighbourhoods, nor does it mention neighbourhood plans. This is a significant omission. As with the NPPF, there is no definition of what a neighbourhood might be, although areas where a neighbourhood plan has been or is being drawn up implicitly define themselves as neighbourhoods. In MK the areas are often whole parishes, which is usually more than one neighbourhood.
2. The current Wikipedia definition is:
Neighbourhood is generally defined spatially as a specific geographic area and functionally as a set of social networks. Neighbourhoods, then, are the spatial units in which face-to-face social interactions occur—the personal settings and situations where residents seek to realise common values, socialise youth, and maintain effective social control.
3. Neighbourhoods, one assumes, contain a number of places to which NPPF refers (para 69):
4. Planning policies and decisions, in turn, should aim to achieve places which promote:
 - a. **opportunities** for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;
 - b. **safe and accessible environments** where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - c. **safe and accessible developments**, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
5. Plan MK refers repeatedly to placemaking (see Policy SD1 for example) but does not use it as a building block towards creating neighbourhoods.
6. Likewise there is little reference to the role density might play in creating neighbourhoods although high density is assumed to be desirable: no densities are quoted except the wide ranges in Campbell Park (150-500 dwellings per hectare). and Central Bletchley (150-250 dwellings per hectare).
7. Policy HN1 Section C4b) refers to proposals where there is inadequate provision of open space and suggests it would be acceptable if there were adequate provision within a reasonable distance. This policy would allow developers to underprovide open space and cannot be justified. An indication of the reasonable distances to different kinds of open space should be given. We therefore propose the following amendment to read “*Demonstrate that there is a sufficient quantity of public open space within 50 m of all dwellings on the site*”.
8. Policy HN2 Section Ai): We query whether the percentages are correct. As written it implies that the percentages in Subsections i and ii are proportions of the 31% figure (ie 25% of 31%) and that, critically, the amount of affordable rental housing is 5% of 25%. We do not believe that this

is correct and believe that the figure should be 20% ie if there are 25 units for Affordable Rent then 5 will be for Social Rent. We therefore propose that the figure of 5% in subsection i be changed to 20%.

9. Policy HN2 is vague about the integration of social housing into the wider scheme. It should be 'pepper potted' across a development and should not be identifiable as separate blocks. We therefore propose the following amendment to HN2 Section A to read *"The design, siting and phasing of affordable housing.....and inclusive communities. The affordable houses should be spread throughout the site (ie pepperpotted") and not concentrated in one area. Piecemeal proposals...."*.
10. Policy HN2 Section B permits a financial contribution instead of providing social housing. We believe that this discourages land owners from thinking creatively, discourages social integration and encourages the creation of ghettos. We therefore believe that the policy should be amended by the deletion of the final sentence *"in exceptional circumstances.....may be accepted"*.
11. Self-build and custom build housing is now an accepted part of Government thinking and is specifically referred to in the NPPF (para 50) which requires local authorities to plan for a mix of housing, based upon current and future trends for a range of housing including *"people wishing to build their own homes"*. Milton Keynes had a strong record of self-build both through individual plots and sites for self-build groups and probably in excess of 2,500 homes were built in this manner by Milton Keynes Development Corporation and its successors (it is believed that, at its peak in the 1980s, 10% of the country's self-build houses were being built within the city). We believe that this is a strong indicator of demand and that the proposed policy HN5 is an aspiration rather than a specific strategy for ensuring that such land will be made available. We therefore believe that the policy should be deleted and replaced as follows (the wording largely replicates that of Policy WE7 (Custom Build Dwellings)) in the adopted Teignbridge Local Plan 2013-2023:
"To support prospective custom builders on sites of more than 20 dwellings developers will supply at least 5% of dwelling plots for sale to custom builders, which will be controlled by the following means:
 - a. *The Council may seek developments of more than 10 custom build dwellings in a single site location to be developed in accordance with an agreed design code;*
 - b. *Planning permissions should include conditions requiring custom build developments to be completed within three years of a custom builder purchasing a plot; and*
 - c. *Where plots have been made available and marketed appropriately for at least twelve months and have not been sold, the plot(s) may either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer"*.
12. Policy HN10, which would allow small scale affordable schemes to be built outside the village envelope demonstrates the need to adopt neighbourhood plans across the Borough with a commitment in Plan:MK not to grant permission for proposals that breach these plans. This in turn requires a long term, 30 to 50 year strategy for the development of Milton Keynes with clear and strictly limited allocations of housing to all villages in the Borough. We therefore propose that the Policy be amended by the insertion of the wording *"Unless it would conflict with an existing Neighbourhood Plan"* at the start of the first bullet points I and ii (ie, *Unless it would conflict with an existing Neighbourhood Plan, outside the development boundaries....."*).
13. *Central Milton Keynes: A Special Neighbourhood*
The NPPF supports policies that increase the vitality of town centres, being an essential component of the local economy. An inclusive, vibrant city centre underpins the policies of the

Central Milton Keynes Alliance Business Neighbourhood Plan (CMKABP) which was nationally the first to be made that covers a city centre.

One of the purposes of CMKABP was to bring stability to the planning regime for CMK and to give clear guidance to developers and land-owners as to what was expected of them. This is undermined by Plan:MK.

For example, CMKABP Policy G6 states: *"Mixed-use is encouraged for all development proposals to create interest and vitality throughout the day and a sense of security at night"*.

But Plan:MK refers to the residential area of Campbell Park and the Central Business District which CMKABP carefully avoids doing, having a much more permissive approach to land use, so long as there is a mixture of uses in all developments.

CMKABP includes an indicative block by block land use proposal and a monitoring system that shows what has been achieved to date and what was needed in subsequent developments to achieve the number of dwellings for example required in CMK. Plan:MK does not include such intensive monitoring.

It is a requirement of NPPF that the Primary Shopping Area be defined. CMKAP defines the Primary Shopping Area between Silbury and Avebury Boulevards and defines, in addition, an Edge of Centre Shopping Area north and south of these boulevards and along Midsummer Boulevard to Station Square. This is an equivalent area of edge of centre retailing as the 300m zone around the Primary Shopping Area but excludes H5 Portway. All this was subject to close scrutiny by the Inspector at the public hearing for CMKABP and was accepted by him, due to the unique built form of CMK, though it was a special interpretation of guidance.

Plan:MK does not follow the CMKABP for the PSA nor does include any boundaries to the edge of centre: there is no evidence as to why this change has been made.

Policy HN1 Part C/2a refers to a density for CMK excluding Campbell Park of 150-500 dwellings per hectare. For a mixed use CMK, as established in CMKABP, this is a meaningless method of assessing proposals. CMKAP proposed a monitoring system that assessed the total number of dwellings and other uses across CMK including Campbell Park: if overall targets set out on a site by site basis were not being met, remaining sites to be marketed would have a development brief that corrected any imbalance. No reference is made in Plan:MK to this essential monitoring tool for CMK.

These are examples of the way in which essential policies of CMKAP have been arbitrarily omitted, undermined or changed without evidence to support the replacement policies, whilst CMKABP policies were the subject of substantial consultation, debate and were supported by voters in a city-wide referendum. They were also reviewed by an inspector and were considered appropriate for CMK.

Plan:MK should include all the policies of CMKABP and, if changing circumstances require some modification, these should be highlighted and justified.

SECTION 8 - TRANSPORT AND CONNECTIVITY

1. It might be helpful either to change the title of this section or the policy references so that they coincide (viz *"Transport and Connectivity"* and *"CT"*).
2. Policy CT1: Add to bullet point ii: *"This could include priority measures on roads and at junctions for buses through the use of bus lanes and bus activated traffic signals"*.

3. Policy CT1: Add Section C: *"Development will not be permitted upon the "Bletchley Chord" ie the land required in Bletchley to permit the eastward rail connection from Central Milton Keynes to Bedford"*. This is referred to in the NIC Report (p37)
4. Policy CT3: Add to bullet point A after the first sentence: *"The design of housing layouts should be fully permeable so that there are convenient, well supervised links from the ends of culs-de-sac to adjoining areas to ensure that walking times are minimised"*.
5. Policy CT3: Bullet point A: Add *"corridors"* at end (to read *"along grid road corridors"*).
6. Policy CT3: Bullet Point E: Add *"to the current Redway design standards"*.
7. Para 8.36: The wording *"mass transit routes"* is confusing and, in the context of the remainder of this paragraph could be interpreted as meaning eg a monorail. We propose that *"public transport routes"* be used instead.
8. Policy CT5: Bullet point i: Insert *"which may be outside the development itself"* after *"measures"*.
9. Policy CT5: Bullet point iii: Insert *"walking distance"* after *"400m"*.
10. Policy CT7: There is reference to a *"Freight Strategy"*, which we have been unable to find amongst the suite of documents connected with Plan:MK or via doing a *"Freight Strategy"* google search of the MK Council website. We are therefore unable to comment in detail other than that we believe that Caldecotte South should be considered for rail related feight.

SECTION 9 - EDUCATION AND HEALTH

Policy EH8: One of the key structuring elements of the residential areas of Milton Keynes is the local centres, which will typically comprise a First School, meeting place and a range of shops, including hot food takeaways. If one accepts that takeaways are an integral part of the economy then, if they cannot in future be provided in local centres because of proximity to schools, where can they go? The only realistic alternative is either elsewhere within the residential areas at a suitable distance from the school (realistically, therefore, in a an area surrounded by houses or an employment area, both or which are undesirable). The upshot therefore is that it is unlikely that the new residential areas will have hot food takeaways, which will not only inconvenience the residents but also increase the chance that they would merely drive to find one rather than walk, which would seem to be counter-intuitive. This, in turn, will lead to a lessening of the vitality of the local centres and run the risk that they might also become less viable (see 6.57-8 and Policy ER15).

Whilst, at one level, the policy can be seen to be addressing one problem (childhood obesity), by doing so it is causing others and runs the risk that local centres in the newer areas will be less viable and attractive than those elsewhere. The issue to be addressed is not the distance from the school *per se* but the times in which children can buy the food. It therefore makes sense to permit takeaways to be provided but ensure that they are not open either during the lunch hour or when children are going home afterwards. We therefore propose the following amendment to EH8: Delete the policy and replace it with *"The Council may impose conditions restricting the opening hours for hot food takeaways within 400m from a school entrance to ensure that the units are not open during school hours or a reasonable time thereafter"*.

SECTION 11 - MANAGING AND REDUCING FLOOD RISK

1. Para 11.6: The penultimate word should be *"flood"* not *"food"*.

2. Para 11.8: It is our view that sustainable drainage is currently provided in a piecemeal manner, development by development, rather than strategically over a whole area. This tends to lead to provision of so-called ponds which are often deep and unattractive 'bomb craters' of little practical use, because developers want to minimise land take for SuDS. The better alternative is provision of fewer, larger water bodies which can be made of practical use such as for boating, or made to provide valuable habitats. We therefore propose that *"and will be required to demonstrate how it fits in with the wider scale SuDS and flood management design for the surrounding area. It will also meet the requirements..."* after *"incorporate SuDS"* in the second paragraph.
3. Policy FR3: Add *"or dry or wet balancing lakes"* after *"all other ordinary watercourses"*.

SECTION 12 - ENVIRONMENT, BIODIVERSITY AND GEODIVERSITY

1. The NPPF states (117), inter alia, that *"To minimise impacts on biodiversity and geodiversity, planning policies should:*
 - a. *Plan for biodiversity at a landscape-scale across local authority boundaries;*
 - b. *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."* (117)
2. While there is a map of Biodiversity Opportunity Areas in Plan:MK which does part of this task, it does not include the wildlife corridors identified in the previous local plan and it is important that it should.
3. Section 12 of Plan:MK
 - a. Contains no map of how wildlife corridors and ecological networks will connect, be created, and be enhanced, in the newly expanded city, nor can a map be found in any of the supplementary materials.
 - b. Does not actively identify areas for ecological restoration and habitat creation.
 - c. Does not present plans for landscape-scale ecology across local authority boundaries (e.g. the North Bucks Way and areas of Whaddon Chase on the border with Aylesbury Vale District Council).

SECTION 13 - HERITAGE

1. The NPPF is clear that Local Authorities should set out a positive strategy for the conservation and enjoyment of the historic environment (126) and that, when considering the designation of new conservation areas that *"they should ensure that an area justifies such status because of its special or historic interest"* (127).
2. New Towns as a whole represent a unique architectural heritage in that they illustrate concentrated periods of development undertaken by short-lived government agencies (the development corporations) across a wide range of building types - houses, offices, shops, factories and community buildings. It is a poorly understood and little researched period of our architectural history.
3. Milton Keynes is unique (we believe) in that it is the only New Town that has specifically researched its modern heritage to the extent that it has its own Local List (known as the Local

Heritage Register). This has been a commendable project, which Milton Keynes Forum has supported wholeheartedly. However, we do not consider that the proposed Strategy in Plan:MK sufficiently builds upon the lead taken in the initial commissioning of the Register. We therefore feel that the Strategy should be expanded to recognise the importance of Milton Keynes within the British and International New Town movement which, in turn, reflects back to the Council's wish for the modern built heritage of the city to contribute to projects 5 and 6 of "Milton Keynes: Making a Great City Greater" (see 15.2 below).

4. We particularly feel that the three housing exhibition villages within MK (Homeworld, EnergyWorld and FutureWorld) should be properly appraised with a view to designating them as Conservation Areas. Such villages are rare and we only know of two others that are extant: The Cheap Cottages Exhibition (1905) and the Urban Cottages Exhibition (1907), both of which are in the Letchworth Conservation Area.
5. Furthermore we consider that the strategy does not properly allow for the general recording of the demolition of what may be termed "First Generation" New Town Buildings (housing estates are excluded from this) (whether or not they are on the Register) and nor does it impose a suitable quality threshold on replacement of buildings on the Register that are demolished. As a consequence, the overall quality of the building stock could be diminished as buildings that are on the Register are demolished.
6. We therefore propose new paragraphs 2, 3 and 4 to the Strategy as follows:
Paragraph 2: "Taking account of entries in the Local Heritage Register, the Council will create new Conservation Areas as appropriate, looking in particular at the housing exhibition villages of Homeworld (Bradwell Common), EnergyWorld (Shenley Lodge) and FutureWorld (Kents Hill) Whilst it is appreciated that the latter will fall outside the scope of the register (because it was not constructed under the aegis of Milton Keynes Development Corporation, its unique nature should justify its inclusion in this exercise.
Paragraph 3 "In the event that either a) a building on the Local Heritage Register or b) a "First Generation" New Town building is demolished, then the following wording is to be incorporated in the planning approval: "Prior to the commencement of the development hereby approved, a scheme for the recording of the existing building hereby approved to be demolished shall have previously been submitted to and approved in writing by the Local Planning Authority. The recording shall be carried out in accordance with the approved details and two copies of the building recording report shall be deposited with Milton Keynes Sites and Monuments Record with an additional copy of the report to be forwarded to the National Monuments Record prior to the occupation of the development hereby permitted.
Paragraph 4 "In the event that consent is given for the demolition of a building or other feature included on the Local Heritage Register, the replacement building or feature should be of sufficient design quality to merit inclusion on the Local Heritage register in its own right at the appropriate time." (NB Similar wording has already been used by the Council in granting consent for the demolition of various buildings in MK eg Our Lady of Lourdes Catholic Church, Coffee Hall (14/02425/FUL).
7. The existing paragraphs 2 - 4 would be renumbered accordingly 5 - 7.

SECTION 14 - PUBLIC OPEN SPACE, LEISURE AND RECREATION

1. The NPPF requires that *"the planning system should contribute to and enhance the natural environment....."* (109) and that local planning authorities should plan *"positively for the creation,*

protection, enhancement and management of networks of biodiversity and green infrastructure" (114). We consider that Plan:MK fails to address these points.

2. Policy L4: The purpose of the third and fourth paragraphs ("*The provision....or organisations*" and "*Proposals for.....or organisations*") is to ensure that appropriate parks and open spaces will be provided as part of housing developments. It also appears to be aimed at ensuring that their long-term care will be fully provided for without recourse to funding from the local authority.

In the distinctive context of Milton Keynes, these paragraphs do not make adequate provision. These wordings work against an existing structure for care of open space in Milton Keynes that is highly regarded and is a more appropriate means, which has been recognised widely, most recently in a National Infrastructure Commission report about the Cambridge-MK-Oxford Arc. In most parts of the UK the options for management and maintenance of open space and parks are largely for either: the local authority, funding through housing being made available leasehold, or through a landscape management company to which home owners will contribute an annual fee for maintenance of the shared landscape.

One of the often-noted unique feature of Milton Keynes is that the majority of its landscapes, parklands, open space and green infrastructure is in the long term care of a charity, The Parks Trust which holds a 999-year lease to this land. The Trust was established in 1992 and fully funded with endowments of property and investments to enable it to manage, maintain, plan and develop over 5,000 acres of Milton Keynes land for the long term, primarily for public access and enjoyment. As more housing has been developed over the ensuing 25 years, further land has been transferred to The Parks Trust, together with capital endowments which have been calculated to be sufficient to enable the long-term care of the newly transferred parklands, play areas, green infrastructure and other open space. It therefore carries out many of the functions in relation to public open space that has been carried out elsewhere by a local authority, or in London by a body such as The Royal Parks.

In a changed financial climate for local authorities, it has become necessary for many of them to establish different funding models for care of open space. In the case of Milton Keynes a funding and management model already exists in the form of the charitable trust whose charitable purposes relate specifically to the management and care of open space throughout the Milton Keynes. It is far more than a landscape management company. It is not a landscape contractor. In these circumstances, what is needed from a housing developer is simpler. They need to plan open space in consultation with The Parks Trust and negotiate with them an appropriate endowment to be transferred with the land, so The Trust can become fully responsible for all that will be required to manage and maintain that land.

The way in which these paragraphs of Policy L4 are worded makes no mention at all of The Parks Trust model, so would be likely to lead developers of new housing to put misplaced effort into drafting a strategy for other kinds of open space management and funding. The consequence of this would be a sharp division between areas of the 'city' benefitting from unified management of the parklands by The Parks Trust and newer areas where management would be piecemeal, unintegrated, and an ongoing financial burden through either landscape management fees or leasehold charges.

The current plan treats a body such as The Parks Trust as simply a local contractor, and makes it likely that future open space and landscapes would be maintained by many different landscape management companies whose focus would be on local uses rather than the citywide, integrated use of parklands in MK currently. Such maintenance businesses would have little incentive to improve these areas.

The Parks Trust has a well-qualified and experienced staff providing the full range of skills needed to manage public access land, from landscape maintenance through arboriculture,

biodiversity management, infrastructure management, communication with users, and much else.

We suggest below alternative wording to make clear that the standard way to achieve long-term management of public open space is through The Parks Trust, except where Milton Keynes Council wishes to retain management of specific types or areas of land, or where very localised small amenity areas or street trees within housing might be managed in a different way.

3. Policy L4: The grammar of the final sentence of the third paragraph has become mangled and needs to be redrafted.
4. Policy L4 is deficient because it does not respond to NPPF 114 regarding management. Therefore, an organisation must be appointed for the **management** (as well as maintenance) of the created open space which is capable of delivering **enhancement** of networks of biodiversity and green infrastructure. Furthermore, the management plan must also demonstrate the capacity to establish "*coherent ecological networks that are more resilient to current and future pressures*" (NPPF 109).
5. Consequently we propose that the third paragraph of Policy L4 be redrafted to "*The provision, future management and maintenance of open space, parks and any artificial grass pitches or surfaces should be an integral part of new development, which should be considered at the beginning of the design process. Proposals will include a management, maintenance and ongoing funding strategy for new or extended open space and green infrastructure, outlining details of the owner, the responsible management body, and a long term financially suitable management plan. Both the management plan and the designated management organisation must demonstrate the capacity to enhance biodiversity and green infrastructure networks in the city, and set out a plan for how new green infrastructure created will be managed as part of a coherent and resilient ecological network across the wider region*".

SECTION 15 - DESIGN

1. The NPPF (56 to 68) puts good design at the heart of its policies for making places better for people. It says that the good design of buildings is to be in addition to the good planning of streetscapes and places, although it makes no attempt to define what good design might be. It encourages innovation and community involvement, and requires design to relate to its context with exceptions for innovation, particularly in sustainability. It supports design guides, if not too prescriptive in detail, and discourages local authorities from imposing architectural styles. It requires local authorities to have design review panels and to use the option of referring major projects to national design review.
2. "Milton Keynes: Making A Great City Greater" (the report for the Council by the Milton Keynes Futures 2050 Commission) has, as its opening words "*Better by design, Milton Keynes is loved by the 400,000 people who live here....*" and "*Milton Keynes: Different By Design*" was the strapline for the city's bid to be European Capital of Culture in 2023.
3. It is through its built environment that Milton Keynes makes its greatest impact upon both the residents and visitors and, therefore, the achievement of high quality designs for buildings and neighbourhoods should be a strong, integral component of Plan:MK.
4. Without robust mechanisms for implementing the Design Policies, the regeneration and expansion of MK will not achieve the standards aspired to in Plan:MK. It only offers a fine prospectus without the power to implement it, which brings the whole process into disrepute and will result in unsustainable sprawls around the elegantly structured New City.
5. Policies within Plan:MK, whilst being well meaning in their intent, can vary between being a statement of the obvious eg Policy FR1 ("*All new development must incorporate a surface water*

drainage system with acceptable flood control") or being so vague that they would offer little support to officers in rejecting an application on design grounds eg Policy D3(5). (*"Development proposals that meet the following objectives and principles will be permitted: The building's form, massing, rhythm and façade elements are carefully designed to create character and visual interest"*).

6. It is not clear how such a policies could be applied in a consistent manner that would give demonstrable strength to the Council in being able to reject poor quality designs. A shrewd applicant will generally be able to find a way to argue that the application is policy compliant and the Council will always have their eye upon what might happen if the application is refused and proceeds to appeal.
7. This is an unsatisfactory situation in a city that is striving to achieve high design standards. We therefore believe that it is imperative that Milton Keynes has a local design panel as envisaged in the NPPF (62). Such panels are a feature of many progressive authorities and, pertinently for Milton Keynes, already exist in both Oxford and Cambridge, the cities at either ends of the Oxford-MK-Cambridge Arc. We therefore propose the following new policy: *"The Council will, in consultation with the Design Centre CABE, establish a Local Design Review Panel"*. Such a panel would help to reinforce the Council's hand when considering whether or not applications meet the requirement under Policy D3(7), which states that approval will be granted if *"buildings are designed to an exemplary standard and employ high quality materials"*
8. Policy D1(7) is deficient in that it does not refer specifically to the city's redway network. We therefore propose that *"using a network of redways of similar distribution as the existing city"* should be inserted after *"walking and cycling....."*. In addition, design guidance for the redways needs reviewing and updating as necessary
9. Policy D3(9) refers to the consideration of tall buildings without attempting to define what is meant by *"tall building"*. We consider that there is no justification for *"tall buildings"* outside CMK, where their design is covered in the CMK Alliance Plan.

SECTION 16 CULTURE AND COMMUNITY

1. Paragraph 70 of the NPPF recognises that planning policies and decisions should "plan positively for the provision of.....cultural building" which, we assume, also includes works of art.
2. Milton Keynes has a national reputation for its collection of public art, two pieces of which are listed Grade II: Octo (Wendy Taylor) outside Norfolk and Ashton Houses in Central Milton Keynes and 2MS Series No 1 (Bernard Schottlander) outside Challenge House, Bletchley.
3. We are concerned that spending of the arts and culture should be fully protected at a time when it is under increasing pressure compared with, for example, spending upon social services and health. We fear that this could mean that citizens of the later phases of Milton Keynes will not enjoy the benefits of those involved in the earlier phases which could, in turn, lead to the creation of a divided city. We therefore think that Policy CC1 (Percent for Art) should mean just that.
4. We propose that the final paragraph of Policy CC1 should be amended to:
"At least 1% of the capital cost of a new development should be allocated towards cultural wellbeing, including public art, to enhance the cultural offer and appearance of the development, its surrounding and Milton Keynes as a whole".

SECTION 17 - SUSTAINABLE CONSTRUCTION AND RENEWABLE ENERGY

1. Policy SC1: Insert as new second sentence: *"Passivhaus standards are seen as being desirable for residential accommodation"*.
2. Delete the second of the second set of bullet points. Wind turbines are covered by standard development control procedures and, while we accept that such applications are controversial, there is no reason why they should be treated as an exception from the standard procedures.
3. Policy SC1, B4a refers to *"connection to a renewable or low carbon community energy scheme"* but there should be specific explanation of this under the *"Local Policy Context, Energy & Carbon"* such as: *"For example, the Central Milton Keynes (CMK) district heat and power scheme has the capability for extension throughout CMK, enabling new and existing developments to be supplied with piped heat and locally-generated electricity by private wire. This avoids the inevitable and substantial electricity transmission losses over the distances of the National Grid between power sources and users, and heat losses at point of energy generation"*.

APPENDIX A - OPEN SPACE AND RECREATION PROVISION

1. Table 18.2: CMK Food Centre and D3.4: These are sites in the Primary Shopping Area and the latter has been allocated in the CMK Alliance Business Neighbourhood Plan for an indoor market hall with community and cultural uses and D3.4 is an important site by virtue of its location. We would not object to residential use as an adjunct to other uses to create mixed-use developments.
2. Allocated Sites and Housing-led Sites: Remove CMK site D3.4

APPENDIX C - OPEN SPACE AND RECREATION PROVISION

1. Table 20.1 Section 1: District Parks: Currently, Milton Keynes has some larger parks described on the City Atlas as District Parks, but which do not meet the size or characteristics of District Parks set out in Appendix C Section 1: for example, Tattenhoe Park and Emerson Valley Park, which are both larger than typical local parks. Perhaps the only current parks that meet the proposed criteria for District Parks are Willen Lake, Furzton Lake, Caldecotte Lake and Campbell Park. The first three of these are distinctive in that each of them surround a flood-management lake. Campbell Park was designed to be a park for all of the 'city', not just as a District Park. However a planned park for the Fairfield area of the Western Expansion Area is shown as a District Park on maps produced in association with the Council's Open Space Assessment, but is unlikely to have the characteristic set out of being *"a major visitor attraction"*, nor will it be linked, more than tenuously to a *"multi-functional open space."* We suggest the proposed standard for 'District Park' requires more refinement.
2. Table 20.1 Section 2: Linear Parks: No justification is provided for the statement that Linear Parks are *"Only required where an urban extension incorporates a significant watercourse"*. For example there are several existing linear parklands that bear no relationship to watercourses. The Railway Walk, with associated woodlands and parkland such as Stonepit Field is not related to a watercourse. A watercourse is usually considered to be a river or stream through which water flows, not a canal that has no ongoing flow. In Milton Keynes, the linear parklands either

side of the Grand Union Canal are effectively a linear park. Another linear parkland feature is the former drover's roadway up the western flank of MK, much of which is the route of the North Bucks Way long-distance path: this is flanked by accessible areas of open space such as the eastern flank of Oakhill Wood and Hazeley Wood. It has many of the other characteristics of linear parkland, including importance as a wildlife corridor. Many types of habitat are needed as wildlife corridors as some species are not river valley specialists and require uplands, woodland and features other than river valleys. It is not evident why the definition of Linear Parkland should be confined to river valleys.

3. Table 20.1 Section 2: Green Access Links: No evidence is provided for the statement that green corridors should be provided "*along certain transport routes*" then qualifies this as "*roads other than grid roads*" when the linear planting alongside many of the grid roads is of importance in providing linear habitats for wildlife, which echoes the requirements set out in the Lawton Report for linear connected habitats reflected in the Government's "Biodiversity 2020" Report and its phrase "*More, bigger and less fragmented areas for wildlife*".
4. Table 20.1 Section 2: Areas of Wildlife Interest - Natural and semi-natural: Under the 'Principles' column it is stated that Areas of Wildlife Interest should be "*well integrated into the development*" and "*development should front onto wildlife sites*". This may not be intended to require a close juxtaposition but it appears to and could well lead to wildlife sites deteriorating under excess pressure from being too close to development. For example, the most significant areas of woodland for diverse biodiversity are its outer edges where trees are flanked by a progression through scrub and tall grass to more open areas. Where development crowds a woodland edge, significant biodiversity will be lost.
5. Table 20.1 Section 3: Paddocks: It is not evident why paddocks are to be "*mostly located in rural areas*" and are "*Not expected within developments within the city boundary*". Milton Keynes was designed with an extensive network of horse-riding paths and bridlepaths and has numerous paddocks and at least one riding stable within it. Two major long-distance bridlepaths pass through the 'city': Midshires Way from the River Thames to Stockport and Swan's Way from Goring to Salcey Forest. Children enjoy visiting paddocks to see horses. It is not evident why paddocks should be the preserve of only rural areas.

APPENDIX G LOCAL CENTRES

There are a number of factual errors in the Table:

Bradwell Common	Aldi is on the edge of the gridsquare and is a destination retailer rather than a Local Centre. The Local Centre, is in the middle of the gridsquare at the entrance to Summerfield School and combines a general store, hot food takeaway and meeting place. There are also single retail units in Wimbledon Place and Wandsworth Place.
Conniburrow	There are various units spread throughout the eastern half of the gridsquare - they are not all on Conniburrow Boulevard.
Downs Barn	There is a general store on Downs Barn Boulevard and a number of workshops as part of the Cross and Stable Church development.
Fishermead	There are no units on Pentewan Gate. The Co-Op is on Fishermead Boulevard and there are various units spread throughout the north-eastern quadrant of the gridsquare.

Hodge Lea	There is a convenience store in Brookside.
Shenley Lodge	There is a general store at the eastern end of Faraday Drive.
Springfield	There is a general store on Springfield Boulevard.
Stacey Bushes	The local convenience store is on Briar Hill. The reference here seems to relate to the retail development on Erica Road, which does not function as a local centre as it is akin to a small retail park.