

Plan:MK Draft Consultations  
Planning Department  
Milton Keynes Council  
Civic Offices  
1 Saxon Gate East  
Central Milton Keynes

**Date: 9 June 2017**

Dear Planning Enquiries

**PLAN:MK WORKING GROUP - RESPONSE TO DRAFT PLAN:MK CONSUTATION**

Thank you for opportunity to respond to the Draft Plan:MK Consultation.

Walton Community Council (WCC) considered a proposed response at its Full Council meeting on Wednesday 7 June 2017 following lengthy, detailed consideration by its established Plan:MK Working Group.

The Council welcomes the comment that Plan:MK will provide the strategic context for Neighbourhood Plans. Neighbourhood plans lie at the heart of Plan:MK and it is important that Plan:MK emphasises the value of Neighbourhood Plans and not be considered as an add on to the plan.

It was clear that some policies could not be fully addressed at this stage and the draft would benefit from a further light consultation prior to formal submission to the Secretary of State. This could delay submission by months but it would allow time to consider important key issues such as the location and impact of the East-West Expressway and at this stage it was important to have considered all aspects of the plan carefully and in good time.

The Plan:MK Working Group considered the Draft Plan:MK document in detail and made comment about the policies and responded to each of the questions set out in the document. Underpinning all comments made, Walton Community Council wishes to emphasise the need to develop the infrastructure before any homes are occupied.

**Vision and Objectives**

The vision set out in the document is not clear or concise enough to engage the public and should be more focussed. WCC considers the provision of a new university and the challenge of regeneration should be more appropriately identified as a delivery method rather than a vision.

## **Strategic Objectives**

WCC considered that the objectives of the Plan:MK should include milestones and measures of progress and success. It would be helpful for residents to have the ability to track progress against these milestones and to know who was responsible for its delivery.

## **Policy MK1 – Presumption in Favour of Sustainable Development**

WCC was concerned about the inclusion at paragraph 3 and believes that Milton Keynes Council should always ensure that all appropriate development control policies are included as part of Plan:MK and that all those policies are fit for purpose.

## **Section 4– Development Strategy for Homes, Employment, Retail and Leisure**

The whole of section 4 needs to show clearly the interaction between homes, employment, retail and leisure. Paragraph 4.13 states that Central Milton Keynes and Campbell Park will see the delivery of some £3,500. WCC believes that the provision of a new university will bring its own housing challenges and so a high proportion of these dwellings should be suitable for single occupancy or purpose built for shared student accommodation.

## **Policy DS1 – Settlement Hierarchy**

WCC believes that the whole of the south-east growth area requires a masterplan linking all the elements of homes, employment, retail and leisure together with the proposed expressway, rail links and grid roads.

## **Policy DS2 – Housing Strategy**

The policy should clearly indicate that the plan period for the building of 1,000 dwellings to the south east of the existing urban area is from 2026 to 2031.

It was encouraging to see that Plan:MK was recognising neighbourhood plans. It was important that the development of any small to medium sized non-strategic site for housing should reflect the character, density and open space requirements of the surrounding area.

## **Policy DS3 – Employment Development Strategy**

WCC believes that there is a disproportionate amount of employment space for warehousing. Milton Keynes should be more aspirational in its approach to ensure economic growth in areas other than warehousing. A larger proportion of warehousing will attract a population largely made up of unskilled workers whilst the employment needs of the knowledge economy are likely to commute to the area. There needs to be a redressing of the balance. Links with Cranfield University could provide further research and development employment opportunities which could attract further business from its supply chains. This would ensure there was a wider range of employment opportunities throughout the Borough.

There is a lack of information within this policy about how Milton Keynes will attract and aid the development of high tech companies that are likely to use highly skilled employees coming from the university.

WCC believes that reliance on retail and warehousing is not the future now that more people are inclined to shop on-line. There is no strategy to encourage and attracting manufacturing which, again is important to ensure that there are a varied range of employment skills in Milton Keynes.

Policy DS3 encourages the use of alternative means of transports and WCC believes an equal emphasis should be place on the use of efficient cars.

#### **Policy DS4 – Retail and Leisure Development Strategy**

There is space set aside in Central Milton Keynes for retail and leisure facilities that will attract many visitors to Milton Keynes. Sign posting and way markings are generally poor in Milton Keynes and this needs to be addressed. Information about tourist attractions, leisure facilities, bus services etc is key and should be available to visitors exiting Milton Keynes train stations.

At point 5, it should be an emphasis on 'master planning' and the provision of new shops, services and facilities should be planned well ahead of time in areas of new development.

### **Section 5 – Spatial Delivery of Growth: Strategic Site Allocation**

#### **Policy SD1 – Place-Making Principles for Development**

At paragraphs 3 and 19, the word 'should' to be replaced with 'must'.

Within the policy, the term 'facilities' needs to be more specific and using such loose language may result in key aspects of the policy being lost. For ease of understanding, terms such as 'facilities' could be expanded in a glossary. Further to paragraph 8, what was meant by the 'the shortest distance'?

WCC agrees that rapid public transport solutions proposed as part of new urban extensions must connect to Central Milton Keynes but also to other main district centres such as Kingston and Westcroft.

WCC believes the use of 'Park and Ride' will attract visitors to Milton Keynes but also considers it important to consider every day provision for 'Park and Ride' facilities where appropriate.

### **Policy SD3 – Central Milton Keynes – Role and Function**

WCC believes that the re-development of Station Square would not be in the interest of Central Milton Keynes and would only add to existing traffic congestion. The area should prioritise maintaining bus/taxi/train links.

As mentioned previously, WCC believes that there should not have a local economy over-reliant on retail and flexibility of use should be considered for any large-scale area available for development.

### **Policy SD4 – Central Milton Keynes – Connectivity**

WCC does not understand the first bullet point in Policy SD4.

WCC agrees that an enhanced and high-quality network of pedestrian/cycle routes will improve accessibility but that this should not be at the expense of maintaining existing routes. However, WCC accepts that transport is changing and that people 'get around' in many ways, such as Segways. The redways will need to adapt to change.

WCC would prefer to see the provision of express bus routes using solely grid roads to ensure quick connectivity between areas. Buses that travel through the estates could be used to transport residents to express bus stops.

### **Policy SD6 and SD7 – Eastern Expansion Area and Western Expansion Area**

Reference should be made to maintaining a grid road system.

### **Policy SD8 – Strategic Land Allocation**

Bullet point 3 – replace 'should be' with 'must be'.

### **Policy SD11 – General Principles for New Strategic Urban Extensions**

Infrastructure needs to be built earlier and wishes to emphasise the need for 'I' before 'E'. It believes that proposals for strategic urban extensions should be specific e.g. development must be within (*distance*) of doctor's surgery.

In addition to the Council, relevant community organisations and/or stakeholders, including Town and Parish Councils, should be involved in development briefs, similar to the proposed level of involvement of relevant stakeholders in development frameworks.

### **Policy SD12 – Delivery of Strategic Urban Extensions**

The Policy is missing paragraph 4.

WCC would suggest that the last sentence in paragraph 2 is deleted as developers must comply with existing design codes.

### **Policy SD13 – South East Milton Keynes Strategic Urban Extension**

WCC very much welcomes the last sentence in paragraph 5.25 that states that the principal vehicular access to the site should be sought via an extended H10 grid road that is delivered ahead of occupation of new housing within the site.

### **Policy SD15 – Land at Eaton Leys, Little Brickhill**

WCC believes that the whole area should be master planned in consultation with Aylesbury Vale and expressed some concern that the development would have an adverse impact on the A5 roundabout.

### **Policy SD16 – Strategic Employment Allocation, Land South of Milton Keynes, South Caldecotte**

The development must be sensitive to its neighbours and neighbourhood uses. It is imperative that the grid road would need to be dual carriaged or at least be of a design capacity so that it could be dual carriaged in the future.

### **Section 6 – Economy and Retail**

With reference to Table 6.1, WCC believes that Towergate should be allocated as employment land.

WCC is supportive of policies ER3 through to ER11, however, it should be made clear that ER4 is concerning the operation of home-based businesses and not 'working from home'.

### **Policy ER12 – Protection of Shops, Post Offices, Banks and Public Houses and Community Facilities**

WCC supports this policy in principal but would not wish to see education land used for other purposes. If in the future an educational need is realised then there will not no land left to extend a school or provide any extra resource. WCC would prefer that there remained some resilience in the provision of educational land use.

WCC is supportive of policy ER13. It was also supportive of policy ER14 but wished to see the words 'should' and 'majority' changed to 'must' and 'all', respectively.

### **Policy ER16 – Car Related Retail Uses**

WCC supports this in part but believes this does not reflect reality. The policy should relate to 'large' showroom dealers rather than smaller car-related uses.

WCC is supportive of policies ER17 and ER18.

With reference to paragraph 6.62 (Street Markets), WCC believes that policy is weak in respect of the retention of existing markets and that prior to considering the creation of new markets, consideration should be given to the relocation of the existing street market.

## **Section 7 – Sustainable Construction and renewable Energy**

### **Policy SC1 – Sustainable Construction**

WCC would wish to see this policy applied to all construction and not just developments exceeding 10 dwellings.

WCC are supportive of policies SC2 through to SC4.

## **Section 8 – Managing and Reducing Flood Risk – No comments**

## **Section 9 – Biodiversity and Geodiversity – No comments**

## **Section 10 – Milton Keynes Heritage - No comments**

## **Section 11 – Open Space, Leisure and Recreation**

### **Policy L4 – Horse Related Development**

The policy should refer to Appendix C.

### **Policy L7 – Milton Keynes Bowl**

The policy should refer to 'routes' instead of 'sites'.

## **Section 12 - Design**

Throughout section 12, there are references to 'good quality' and 'high quality' and it would be helpful if the difference could be explained. In section D3, reference is made to new development creating character, yet there is no explanation on how this can be achieved.

## **Question 2 – Internal Space of Dwellings**

**Do you consider that there should be a policy requiring the Nationally Described Space Standards for new dwellings to be applied to all new dwellings in the Borough? Please explain why or why not.**

**Ans:** WCC would be supportive of a minimum standard for floorspace for dwellings and that the nationally described space standard should be a minimum. Larger floorspace should be encouraged as this would support the policy of attracting a diverse range of employment skills into the area.

### **Question 3 – Amenity and Living Conditions**

**Do you consider that Plan:MK should include a policy or policies that address matters of amenity and living conditions in more detail? Please explain why or why not.**

**Ans:** Yes. WCC would like to see a policy that is supportive of general well-being and any policy that encourages social cohesion. WCC believes that standard guidelines should be developed on floorspace and sunlight/daylight amenity.

### **Section 13 – Homes and Neighbourhoods**

#### **Policy HN1 – Housing Mix and Density**

WCC believes that larger sites should provide smaller housing and affordable housing and that infills should provide for larger homes as high density infills will create added pressures on social well-being and surrounding infrastructure.

### **Question 4 – Housing Mix and Older People**

**Considering the projected demographic shift in the population of MK, do you think Policy HN1 should adopt a more prescribed approach to facilitate the provision of general market and affordable housing that helps to meet the need and desire of different age groups and household types to find suitable accommodation within MK?**

**Ans:** WCC believes that there should be adequate provision for older people to live independently in their own homes.

### **Question 5 – Alternative Approaches to Density**

**Do you consider that a more prescribed approach to densities should be adopted in Plan:MK for certain areas of growth and change in the Borough?**

**Ans:** There are no density figures in the document and WCC think it would be appropriate to state maximum densities. There should be a distinction of densities dependent on area and whether a development was located within CMK or out of centre.

Densities of 15 to 25 dph are extremely low. For example, Church Farm is 30 dph on average. 15 at the top end is for large houses and balanced by higher densities in the southern part. Wavendon Gate and Old Farm Park are also at that level.

#### **Policy HN6 – Accessible and Adaptable Homes**

WCC was fully supportive of this policy.

### **Question 7 – Temporary Accommodation**

**Do you consider that Plan:MK should adopt a policy to guide and support the provision of temporary accommodation to meet the needs arising from rough sleepers, homeless people and those who have an urgent requirement for alternative accommodation? If so, what criteria should this policy use to help consider such proposals?**

**Ans:** WCC finds this question confusing as it does not indicate whether this would be temporary accommodation for the homeless or accommodation for those who are temporarily homeless. WCC would rather see policies that tackle both scenarios and provides for a permanent solution.

WCC was supportive of policies HN7 and HN8.

### **Question 8 – HiMO Exemptions**

**Do you consider that policy HN7 should allow for exemptions to HiMO proposals where it involves a change of use of entire blocks of (e.g. Flats/apartments) or a complete row of houses within a street? Alternatively, do you think this could be achieved via a change to the adopted HiMO SPD?**

**Ans:** WCC would not be supportive of such measures. WCC believes that changing exemption to allow for whole blocks of flats or rows of houses will have a detrimental impact to an area.

## **Section 14 – Culture and Community**

### **Question CC1 – Reserve Sites**

**MKC intends to review its approach to the provision of Reserve Sites in new developments. The review will consider standards of provision; mechanisms for the release of Reserve Sites; and mechanisms for allowing sites to be used for alternative uses after a certain point in time. The review will be undertaken in conjunction with the review of the Local Investment Plan and the preparation of the Planning Obligation SPD. We are seeking views on the above approach, especially standards of provision and mechanisms for the release of sites and their alternative use.**

**Ans:** Reference should be made to neighbourhood plans.

### **Policy CC6 – Provision of New Schools – Planning Considerations**

WCC is supportive of the proposals for new school and that in addition, the proposals should include good access to public transport. WCC believes it is essential that outdoor facilities are provided for sport and recreation.

### **Statement 1 – Hot Food Takeaways**

WCC is supportive of restricting the proliferation of hot food takeaways and fast food establishments around primary and secondary schools and wish that this policy applied to mobile sites as well as fixed sites.

### **Section 15 – Connectivity**

#### **Policy CT1 – Sustainable Transport Network**

WCC believes that Milton Keynes requires a transport system that fits in with Milton Keynes and not the other way around. Grid road express bus routes that link communities will help people to get around, especially if those links are connected to rail and CMK. Better connections are needed for Bletchley and Woburn.

#### **Policy CT2 – Movement and Access**

WCC fully supports the multi-centric nature of Milton Keynes.

#### **Policy CT3 - Walking and Cycling**

As with policy CT2 there is no mention of grade separated crossings which must be fully utilised when undertaking any extension of the road network.

In point (d), the word ‘should’ should be replaced with ‘must’.

#### **Policy CT7 – Grid Road Network**

WCC believes it is imperative to the character of Milton Keynes that the grid road system is maintained and extended where appropriate. WCC suggests changing the second paragraph in this policy to: “It must be a requirement to extend the grid road system design into any major new development”.

### **Section 16 – Infrastructure Delivery**

WCC believes it is of most importance that adequate infrastructure is in place prior to any occupancy of new development.

### **Appendix D – Proposals for the Provision of Childcare Facilities**

WCC recognises the need for good local childcare but consideration needs to be given for a nursery’s sole use of a community facility to the exclusion of all other users.

Residential dwellings used for childcare purposes do not need planning permission but there should be some consideration given to the impact a childcare service in a residential dwelling can have on parking provision in the immediate area.

I would be very grateful if you would consider the comments made by Walton Community Council when producing the final version of Plan:MK.

Yours Sincerely,



Lesley Sung  
**Parish Manager**  
**Walton Community Council**

**Cc**

Members of the WCC Plan:MK Working Group

Chairman of the Council

Vice-Chairman of the Council

Ward Councillors David Hopkins, Victoria Hopkins, Alice Jenkins, Vanessa McPake, Jenni Ferrans and Andrew Buckley