

CMK Alliance Business Neighbourhood Plan, Submission Version, May 2013
Regulation 16 publicity stage - summary of responses

Respondent	Organisation	On behalf of	Comments
Judi Moore			An exciting wish list of new facilities for CMK – how will it be delivered? Why is the Council seeking a new university when we already have the Open University – let the OU develop further. Confusing title – little to do with businesses in CMK.
Charles Routh	Natural England		No comment
Samuel Dix	Buckinghamshire County Council		No comment
Sue Bull	Anglian Water		No comment although if the Neighbourhood Plan proceeds further would like the opportunity to comment at a later stage on any issues relating to Anglian Water.
Patrick Donovan	Newport Pagnell Town Council		Had made previous comments at an earlier consultation meeting, little has changed in the Plan since then. No further comments to make.
John Oldfield	Bedford Group of Drainage Bodies		No reference to flood risk management in the Plan, despite the aspirations for large scale redevelopment and provision of a significant number of new homes and jobs. The drainage infrastructure of CMK is aging and was designed to old standards. Flood risk management should be accommodated as a primary design constraint and delivered to current day standards.
Jane Hamilton	Bedford to Milton Keynes Waterway Trust		The section in the Plan relating to the Bedford to Milton Keynes Waterway should be strengthened to more clearly support the Waterway. Add text to section 8.29 “Any development in the vicinity of the canal should also take into account the proposed Bedford to Milton Keynes Waterway which will link into the Grand Union Canal from the

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			<p>east via Newlands”</p> <p>Policy CMKAP G4 final sentence should be amended to read: “the design of developments will be required to enhance the appearance of the waterway, provide active elevations facing the Waterway and provide for a link to the proposed Bedford to Milton Keynes Waterway”.</p>
Simon Dackombe	Thames Valley Police		<p>Supportive of the work of the CMK Alliance and to the vision of continued growth and development of CMK as a modern, vibrant and successful component of CMK.</p> <p>Any development/redevelopment should have regard to the operational requirements of TVP. Careful consideration needs to be given to any development that would impact on TVP’s ability to respond. Particular care needed in the area around the Central MK police station.</p> <p>TVP need to deal with the impacts of new development which increases demand on TVP’s resources. No funding in place to mitigate the effects of such increasing demands. Request that the Neighbourhood Plan recognises the impact of development on policing and identifies that any additional infrastructure should be funded through developer contributions.</p> <p>TVP have previously identified a need for a new 24/7 neighbourhood office in CMK. This should be located in one of the main retail hubs and provide a strong visible presence. This facility is included in the Council’s LIP and TVP request that the Neighbourhood Plan should explicitly acknowledge this and identify its provision as a key requirement of future growth.</p>
Martin Small	English Heritage		<p>Commented on previous draft, seeking change to Policy CMKAP G1. Do not agree with the Alliance’s response to those comments. Those earlier comments therefore remain but do not contend that the Plan fails to meet the Basic Conditions because of the failure to</p>

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			address those issues raised.
Raymond Cole	Sport England		Site A1.3 allocated as a major leisure centre – this site also identified in a S106 agreement for a full size community football artificial grass pitch. Sport England supports the allocation of this site for formal sporting facilities.
Karen Hill	Old Woughton Parish Council		<p>The Plan fulfils its objective of providing a comprehensive basis for managing CMK development to 2026.</p> <p>Adherence to the CMKAP design principles is very important; it ensures that the concepts established by the founding fathers will continue to be applied whilst allowing for viable future growth and adaptation to changing times.</p> <p>Realise that the CMPAP should be in conformity with the Core Strategy, but given the CMKAP's status as a fully researched document, produced in an exemplary fashion, the Core Strategy should indicate that the CMKAP is the prime source of planning guidance for CMK.</p> <p>Endorsement of the plan should be extended to the borough of Milton Keynes because all residents and businesses look to CMK as the focus of the city. This could present some practical difficulties and there would need to be an intense public awareness campaign.</p> <p>Applaud the idea of creating a more vibrant centre by encouraging mixed use.</p> <p>It would be a mistake to preserve 'carbuncles' that people no longer appreciate, whose usefulness has passed. The Point could fall into this category. Policy CMKAP G2 could refer to the need to select designers who recognise the classic nature of CMK architecture and the fact that CMK is not a traditional city centre.</p>

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			<p>Transport in CMK is currently a problem. Welcome the approach of the plan to these challenging issues. Enthusiastic about the shuttle bus concept.</p> <p>A second transport hub for CMK seems sensible if it spreads the 'load' across CMK and provides access to the retail core.</p> <p>Strongly support 7.8 – the importance of future proofing the movement corridors and 7.19/23 – the need to plan for delivery of a rapid transit network.</p> <p>The plan could be improved by inclusion of a list of business friendly criteria which will encourage economic growth.</p>
Rose Freeman	The Theatres Trust		<p>This section states that coach parking at the theatre could be removed. This is not clear – it does not explain why coach parking would be removed. – obviously the Theatre needs to have coach parking.</p> <p>More performing arts spaces are proposed, hope that these will not be in competition with MK Theatre, but will be more of a community based enterprise. We would like to be kept advised of new performance spaces in CMK.</p> <p>Correct the reference to the Use Classes Order in relation to theatres.</p>
Rio D'Souza	Highways Agency		<p>Proposals for a bus shuttle and creation of a new interchange by 2018 are broadly consistent with the CMK Development Framework and the Highways Agency is encouraged by the priority given to these proposals.</p> <p>In order to achieve significant modal shift the MK Star radial services referred to in the</p>

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			<p>CMK Development Framework are important.</p> <p>The Plan questions the LTP3 proposed enlargement of bus stops in CMK- these proposed improvements could be key to increasing the attractiveness of public transport in the long term, particularly in providing attractive interchange facilities between the MK Star routes and the proposed shuttle.</p> <p>On car parking, the plan proposes increasing parking standards. The implications of this approach on the surrounding road network need to be considered. The plan proposes multi-storey car parks – provision of additional parking spaces could lead to an increase in the number of car trips on the highway network. A Transport assessment will be needed for each parking facility in order to assess the impact within CMK and across the wider network.</p> <p>The Agency in principle supports Park and Ride but it may be that such schemes will not reduce the number of car trips on the highway network. Clarification is needed regarding the number of spaces to be provided at the Park and Ride sites. A TA may be required for each facility.</p> <p>The Plan is consistent with the Development Framework in terms of proposals to encourage walking and cycling.</p> <p>Table 4 of the Plan appears to indicate that the total quantum of development now planned is greater than that in the Core Strategy. It is unclear whether the potential impacts of this additional quantum on the road network have been assessed and whether transport proposals have been enhanced to account for this.</p>

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			<p>There is potential that additional trips generated by the proposed development could have an adverse effect on the Strategic Road Network. The HA seeks reassurance that the SRN will be no worse off with development.</p> <p>A TA will be required for developments of a sufficient scale so that the impact on the SRN can be considered.</p>
Kevin Watson	Indigo Planning	X-Leisure Ltd	<p>The Plan does not adequately take account of or plan for mixed retail and leisure destinations in the town centre such as Xscape.</p> <p>Xscape performs an important function in CMK as a key leisure and retail destination contributing significantly to the economy. Xscape are keen to be involved in the development of planning policy and have commented at the draft stage. Many of those original comments remain pertinent.</p> <p>Apart from the PSA, there are no quarters or districts. We disagree with this approach. Allowing any land use to be located anywhere in the city centre will dilute the primary uses of certain areas of the city and be detrimental to the character and function of these areas.</p> <p>Proceeding with the Plan as it stands will lead to uncertainty and confusion as to the appropriateness of development in certain areas.</p> <p>This para identifies the Station End for a variety of uses particularly leisure. In fact, Xscape and the surrounding area is the most appropriate area for such uses.</p> <p>The Plan identifies the PSA and then the rest of the city centre as Edge of Centre. This does not accord with para 23 of the NPPF. Also the uses permitted in the PSA are too varied for</p>

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			<p>an area which should be focussed on retail uses. The Plan's approach does not accord with the Core Strategy.</p> <p>Support the promotion of residential uses across the city centre.</p> <p>Support increase in leisure and clustering at Xscape but do not support clustering in the retail core, along pedestrian routes, Boulevards or Gates or at the Station End.</p> <p>The Public Consultation report states that once adopted, the CMKAP will replace the CMK Development Framework. This is not the case – the DF will retain its SPD status.</p> <p>The identification of an Edge of Centre zone is not in accordance with the NPPF. Xscape supports mixed use in the Edge of Centre zone but this should not just be for larger units.</p> <p>Porte cocheres are proposed to be retained. These are not safe crossing points. Additional traffic calming and pedestrian crossings should be installed to improve pedestrian connectivity and safety.</p> <p>Note the attention to detail in the design principles but the plan should not be overly prescriptive. Still concerned that Xscape may be affected by the listing and retention of buildings in the city.</p> <p>Welcome change to the policy CMKAP G7 in respect of glazed frontages.</p> <p>Reword CMKAP G9 to make it clearer – some advertising is needed in obvious locations to attract visitors</p>

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			<p>Xscape remain of the view that their site should be identified as suitable for B1 office and C1 hotels. Parts of the site are also suitable for residential.</p> <p>The approach to the Indicative Land uses is too restrictive. There should be no upper limit.</p> <p>Do not support transfer of public realm to the Parks Trust. Ideally the PT should transfer their land to a single land holding for CMK rather than perpetuating fragmented ownerships.</p> <p>The Plan does not mention sustainability, in the context of waste management, energy use, efficient development etc.</p>
Philip Ashbourn	Cyclists Touring Club		<p>The Plan is weak on cycle parking. Cycle parking standards need to be more strongly enforced in all developments. Short term parking is Sheffield racks is needed. Long term parking under cover is also needed together with changing and showering facilities.</p>
Jon Muncaster			<p>Pleased that the main thrust of the plan is to ensure new development is closer to the established character of CMK.</p> <p>Supports:</p> <ul style="list-style-type: none"> • Retention of the Gates and Boulevards as basis of CMK connectivity • Provision for specialist/independent retail <p>Would like to see:</p> <ul style="list-style-type: none"> • More recognition of heritage value of Common Lane • Include an additional crossing/ underpass between Campbell Park H4 block and Springfield.

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Milton Keynes Council	Milton Keynes Council		<p>Comments on referendum area – CMK has a regional role; what happens in CMK is of relevance and interest to people and businesses across the borough; precedent unlikely due to the scale and complexity of XMK – unlikely to be seen in many other similar plans. Referendum area should extend across the Borough.</p> <p>General concern with the level of prescription in the Plan – not in keeping with the NPPF need for flexibility to adapt to changing circumstances.</p> <p>Concern about the reservation of large sites for indeterminate period of time in Policy CMKAP SS1.</p> <p>CMKAP SS2 – the approach to the edge of centre definition is not in compliance with the NPPF and could have the effect of diluting the retail focus of the Primary Shopping Area.</p> <p>CMKAP SS2 – New Market Hall – question the deliverability of this part of the policy.</p> <p>Need to update the Plan to reflect the adopted version of the Core Strategy.</p> <p>CMKAP T2 – second public transport hub – the Council considers that there is a more flexible solution than creating a new hub.</p> <p>Intra-CMK Shuttle – notes that funding for the shuttle would have to be prioritised against other schemes in LTP3.</p> <p>CMKAP T4 – increases car parking standards for office developments in CMK – concern that this is not in conformity with the Development Plan due to the impacts this could have on the wider strategic transport network.</p>

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			<p>CMKAP G6 – the plan moves away from the zoning of the city centre by quarters. Concern that this could dilute the certainty by making it less clear what is and what is not permissible in certain locations and can help to avoid juxtaposition of different uses.</p>
MK Arts and Heritage Alliance	MK Arts and Heritage Alliance		<p>Supportive of the vision statement but regret that it does not include an ambition for international recognition.</p> <p>Regret absence of reference to the Mk cultural dimension.</p> <p>Welcome the need to expand the number and breadth of cultural facilities and would particularly welcome the creation of an ‘exceptional public space’.</p> <p>Bullet 2 would benefit from being more explicit.</p> <p>The final sentence could be more specific.</p> <p>Public art is used in a narrow sense ie artworks, when it should be used to refer both to commissioning artworks and supporting more transient community experiences.</p> <p>Design of buildings – add another bullet to the aims” to distinguish MK from other cities” to encourage creativity and give MK a competitive edge</p> <p>Planning obligations – strongly support the aim of the policy and the policy itself</p> <p>Supportive of a new civic space in the MBE area</p>
Linda Inoki	Xplain		<p>The public consultation process has been thorough; generally supportive of the plan.</p>

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			<p>Xplain created out of frustration with the damage caused by short term property development.</p> <p>Plan reflects the view that CMK was originally very well-planned and continues to offer unrivalled accessibility, convenience and safety.</p> <p>The Plan's provisions for more community spaces, independent retailers are welcome. Commendable policies are: G1 (retention of the infrastructure); G3 (retention of landscaping and open spaces); G4 (protecting Campbell Park); G5 (protecting the Green Frame); G6 (mixed use development rather than zoning); SS1 (reserved sites for major new employment and learning); SS2 (improving the outdoor market, a new market hall and preventing dead shop frontages); T1 (designing for the hierarchy of gates, boulevards and streets).</p> <p>Questions the following policies – G9 - Height 8 storeys – why encourage such heights along the Gates and Boulevards, especially the ones in the Campbell Park grid square. Contradicts Policy G4 of protecting the park and its setting.</p> <p>5000 new dwellings seems too high.</p> <p>The plan should make some provision for restoring transport and pedestrian access along the whole of Midsummer Boulevard.</p>
Danny Harris			<p>The Plan's aims of protecting the original infrastructure/ public realm/ transport routes are fundamental (especially along Midsummer Boulevard).</p>

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			<p>An innovative and sustainable method of transport would suit Milton Keynes' future growth as a whole – the shuttle proposal is a step in the right direction.</p>
<p>Milton Keynes Council's Libraries, Arts Public Art and Heritage</p>	<p>Milton Keynes Council's Libraries, Arts Public Art and Heritage</p>		<p>Welcome the clarity of vision in the Plan and the stated need to ensure a vibrant city centre. Pleased that cultural activity is recognised as playing a part in this.</p> <p>Suggest the inclusion of CMK as an International City by including reference to MK's aspirations, including the International Sporting City; International Festival; Rugby World Cup 2015 and aspiration for the EU Capital of Culture in 2023.</p> <p>The MK Parks Trust public art plan should be referred to in the context of Campbell Park.</p> <p>Regret wording – drawing together “minorities and the less fortunate” – CMK should focus on celebrating the diversity of the borough more.</p> <p>In order to help to increase pedestrian footfall along key pedestrian routes, the Plan could use a cultural themed approach to attract audiences to desired routes eg using public art and linking to existing and planned cultural facilities.</p> <p>Magnet Three does not take into account current and future developments (Mk Gallery expansion; Mk rose; new Events area and Belvedere, Campbell Park Sculpture Park).</p> <p>Figure 6 (Proposed Culture, community and Leisure) does not relate to the strategic plans produced by this team.</p> <p>Suggests the Plan outlines major event opportunities within CMK and their importance for profile raising, community pride and the visitor economy. In terms of the Plan's aspirations</p>

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			<p>for new facilities, MKC supports the expansion of the Mk Gallery and would include the Concert Hall and Performing Arts venue if provided with evidence of need. MKC does not though support a City Museum in CMK as a feasibility study shows that the best location is at the MK Museum site in Wolverton.</p> <p>Public art – the Plan considers public art as a curatable feature alone – it is wider than sculpture. It would be better if the Plan embraced a wider understanding of public art and included reference to work of Thomas Heatherwick and Michael Pinsky and the Public Art Strategy.</p>
Sid Hadjiouannou	Turleys	CMK Britel Nominees 1 & 2	<p>Broadly supportive of the Plan although some of the previous representations made on the draft remain outstanding.</p> <p>When assessing the Plan against the Basic Conditions, consider that the Plan has not taken account of all local circumstances, particularly in respect of commercial issues facing the business community. There is a need to provide sufficient flexibility in plan-making in order to be able to adapt to changing economic circumstances. Consider that the Plan could be too prescriptive, particularly in terms of land use designation. Particular concern with Policy G6 – Mixed Use, as a prescriptive interpretation of mixed use could challenge the viability of developments.</p> <p>Policy CMKAP G11 would benefit from further clarification and interpretation as the requirement for alternative proposals for a site to come forward and be considered could delay much needed investment. Policy CMKAP T1 requires vehicle movement and parking to be considered against ‘<i>indicative</i>’ land use proposals - this requires parking to be assessed on the basis of speculative demands and proposals which might not come forward. This does not provide flexibility.</p>

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			<p>The Plan needs to be updated to reflect that the Core Strategy is now adopted and correct the relevant policy reference (Policy CS7). Policy CMKAP G6 (mixed use) is not wholly consistent with core Strategy CS7 which encourages a mix of uses in CMK and not necessarily mixed use development. In respect of site E2.4 (the car park to the east of thecentre:mk building) the Plan shows mixed use to include dwellings and hotels but excludes car parking, the existing and established use of the land. This is an important omission and should be corrected. Consider that a multi-storey car park on this site would better reflect the core Strategy vision and our clients' continued aspiration for the site, given past permissions of an MSCP in this site.</p>
Stacey Rawlings	Bidwells	Barratt Northampton	<p>Object to the draft Plan, especially in relation to Policy CMKAP SS1 and blocklet B4.4/ part of B4.3. The Plan should reflect existing commitments and extant planning permissions and be in general conformity with the 2013 Core Strategy.</p> <p>The draft is not accompanied by any background evidence and/or Options Assessment. None of the undeveloped sites were assessed in detail for their combined ability to deliver the required 5,000 homes.</p> <p>Policy CMKAP SS1 – the Plan proposes two strategic reserve sites, one of which is Block B4 – on the basis that they are in public ownership and sufficient other sites have been identified to deliver the required growth in CMK to 2036. This is incorrect – the Plan must recognise the different circumstances for the eastern part of Blocklet B4.3 and B4.4. The plan does not reflect the reliance on the delivery of the 2,000 homes on B4.4 to meeting the 5,000 homes target in the Core Strategy.</p> <p>Section 1 – Challenge 2 – this part of the Plan suggests that development forward of the existing building line along Gates and Boulevards is inappropriate. However, planning</p>

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			<p>permission has previously been given for this to occur. Do not accept that development forward of the building line on remaining grid squares is necessarily harmful or that such a restrictive approach should be applied when the remaining undeveloped areas of CMK need to be developed efficiently. The impact of this approach would be to force higher development densities.</p> <p>Do not consider that an appropriate strategy is in place in the Plan to ensure the delivery of the 5,000 homes required by the Core Strategy. Concerns about the evidence base on which the CMKAP is based, and particularly, further information is needed on the spatial distribution of development across the various Blocks and Blocklets.</p> <p>There has been no direct consultation with Barratt Homes who are the developer of Block B4.4 despite the authors of the Plan being fully aware of Barratt's involvement.</p> <p>An SEA would have been desirable so that options around site specific developments can be more fully assessed.</p>
Mike LeRoy			<p>Referenda – CMK is not a town or even the centre of a town, it is the centre of a city of over 210,000 people and of a much wider sub-region. CMk provides fundamental services for surrounding residents and retail, leisure and other services for the whole city. It would therefore be wrong for decisions about the future of CMK to be based on two referenda confined to those who live in CMK and those businesses based there.</p> <p>Status of the Plan – surely decision makers will be required to do more than “take the plan into account”, but to comply and confirm to it.</p> <p>Mixed use and liveable housing – there are incompatibilities between proposed policies for</p>

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			<p>housing, mixed use, commercial development, the night time economy, transport and sustainable development. There are relatively few ways of reducing the ingress of external noise to a residential property. Other solutions include keeping housing physically remote from night time economy and noisier commercial activities. Alternatively planning policies could establish a noise standard to be met by residential developments.</p> <p>Station Square should be added to the list of areas to be protected as public open spaces.</p> <p>Section 7.29 refers to “cycle-way signing” – as almost all provision for cycles is on redways which are shared with pedestrians surely this should refer to signing for cyclists and pedestrians and not “cycle-ways”?</p>
John Adams	Deloitte.	Intu Plc	<p>Broadly support Opportunity Two to transform the PSA into the heart of Milton Keynes. Midsummer Place is a significant asset to CMK but some spaces within and adjacent to the centre are not as inviting as they could be and could be redeveloped to encourage further animation and interaction. Intu consider that overall the proposed interventions for retail land uses in the Plan are too rigid for a plan of this nature and question whether these are in line with an up to date evidence base and in general conformity with the Core Strategy.</p> <p>The proposal for small shops refers to research based on a booming economy and the Portas Review. The proposal for small shops is not fully defined but a high proportion of units in the PSA already comprise small shops of around 100-500sqm, in comparison with modern retailer requirements of 1,000-2,500sqm. Policy SS2 could result in units for which there is no demand, which are difficult to let and remain empty. The Plan would be contrary to para 17 of the NPPF which requires Plans to “take account of market signals”.</p> <p>Evidence behind the proposal to increase town centre and retail uses outside of the PSA</p>

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			<p>and create a new definition of Edge of Centre is unclear. Dispersal of retail around CMK would dilute demand and undermine investor and retailer confidence in the PSA as well as confusing and detracting from the shopping experience by distorting the well-defined retail circuit.</p> <p>The Plan seeks to dictate supply at a time when investors need as much flexibility as possible. The wording of Policy CMKAP SS2 cannot be supported as it is unduly prescriptive.</p> <p>Welcomes the commitment to ensure the legacy of CMK but looking at policies CMKAP G1, G3, G7 and SS£ plus figures 8 and 9 there seems to be a conflict between policies relating to highways/transportation and those of public spaces and place-making. This is most pertinent along Midsummer Boulevard East. The inclusion of the public transport spine appears to pre-determine the need based solely on a legal position and not on up to date evidence on deliverability or demand. The NPPF is clear that planning policy must be positively prepared, effective, justified and consistent with national policy.</p> <p>Intu agrees with the sentiments of para 7.8 which recognises that flexibility in transport solutions is needed to future-proof transport in CMK however, this is in conflict with the proposed rigid proposals of the Plan in other areas.</p> <p>Intu does not believe that the need for Policy CMKAP SS3 and the need for an AAP is justified. It is not clear what an AAP would achieve over and above the existing Core Strategy policies and the proposed Neighbourhood Plan policies.</p> <p>The combination of Policy G1 and associated Exceptional Developments policy G11 are not necessary and are overly prescriptive.</p>

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			<p>The intention of Policy G7 is welcome in principle but has to be practical in its application – the desired configuration of units by a proposed occupier may not enable active frontages on more than one elevation.</p> <p>The viability evidence behind Policy CMKAP T2 is unclear – in line with NPPF para 177 the provision of planned infrastructure should have a reasonable prospect of being deliverable in a timely fashion.</p> <p>Table 1 appears to show the Plan’s policies “leapfrogging” the core Strategy policies and do not indicate where they are in alignment. The table needs to be updated for clarity.</p> <p>The boundary of the PSA in Figure 11 is different to that in the Core Strategy. The edge of centre boundary is not in line with the NPPF definition.</p>
Elizabeth Hobbs	National Market Traders Federation (MK Branch)		<p>The Plan allows for a natural expansion of the market square area into the HCA car park and would provide a future indoor space for traders wanting a more permanent location. The Market Square has recently been listed as CMK’s first Asset of Community Value – this shows the importance of the market.</p> <p>Infrastructure in CMK is vitally important – traffic can move through the shopping centre building in both directions via Secklow Gate Bridge; pedestrians can move safely between the market and the shopping centre.</p> <p>The mixed type of development that the plan proposes is forward looking and provides the flexibility that CMK requires in the future.</p>
Will Cousins	MK Gallery		Broadly welcome the Plan as an enabling framework for development and growth.

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			<p>Particularly welcome the proposal for more detailed research, planning and investment around Midsummer Boulevard East. A partnership between local authority, private landowners and investors will be key to success here. MK Gallery is willing to be proactive in this respect. Welcome the emphasis on improved transport to improve the flow of visitors, workers and residents between Station Square and Campbell Park.</p> <p>Concern - given the Gallery's planned expansion is of national and international significance it is surprising that the redevelopment is not more readily identifiable as a priority for delivery. The Gallery and Theatre should be shown on Figures 5, 6, 7 and 16.</p>
Alan Francis			<p>Welcome some of the changes from the draft plan but most of original comments have not been addressed and are maintained here. Responses to many of original comments are disappointing and inconsistent.</p> <p>Welcome the decision to retain Zone 1 parking for Blocks D and E. Zone 2 is acceptable for Campbell Park but Zone 1 should be retained for Blocks A, B and C.</p> <p>Whilst the Plan accepts that the amount of parking is within its remit, it denies that how those cars get to those parking spaces is within its remit. The number of parking spaces affects the number of cars coming into CMK and thus has an MK wide impact. CMK cannot be treated separately from the rest of MK.</p> <p>The Plan should be compatible with MKC's LTP3.</p>
Julia Foster	David Lock Associates	MK Development Partnership	<p>The Plan promotes a comprehensive approach to development which must be applauded.</p> <p>The Plan could do more to align with the NPPF requirements for plans to "plan positively" to support local development. The emphasis of the Plan is skewed towards protecting the</p>

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			<p>existing through a series of ‘development management’ style policies which impose a number of requirements and restrictions. Some of these policies could be more positively framed to support investors in responding to commercial opportunity; to ensure the vitality of the town centre and ensure that development is viable and deliverable.</p> <p>The nature of the Plan and how it is prepared means that it does not have the means or resources to undertake the necessary detailed research and evidence to assert with confidence that development can be constrained or restricted in a number of ways without risking the prospects of development. MKDP considers that the combined requirements of the Plan may render some worthwhile development unviable at this stage and for the foreseeable future. Therefore the Plan fails to have sufficient regard to NPPF para 178 and the need to ensure viability and deliverability.</p> <p>In some cases, policies are not worded clearly enough to be readily interpreted and applied.</p> <p>The role of MKDP as facilitator of development and major landowner should be highlighted in the Plan.</p> <p><u>Executive Summary</u> – this reads more as a mission statement rather than a summary of the Plan’s content.</p> <p><u>Relationship to other plans</u> – for clarity, this section should be reworked to list all policies relevant to CMK.</p> <p><u>Vision</u> – generally supported but should refer directly to the need for economic growth and investment.</p> <p><u>Policy S1</u> – does not reflect the wording in the now adopted Core Strategy</p> <p><u>Access, Transport and Parking Strategy</u> - the Plan rightly identifies transport and parking as</p>

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			<p>the most controversial issue to be tackled. The Plan could have been more ambitious in its exploration of the potential to improve the pedestrian experience of CMK. The Plan identifies Park and Ride sites – P&R generally operates where there are existing issues of town centre congestion but these circumstances are not present in CMK nor are they likely to be for the foreseeable future. There is, therefore, no incentive for a visitor to use park and ride.</p> <p><u>University</u>: support the principle of a university in Milton Keynes, however it is not apparent how advanced plans for a university might be. MKDP would welcome consideration of the full range of options for the delivery of this ambition. It is important that the Plan distinguishes between aspiration and more specific and deliverable proposals.</p> <p><u>Intensity of Activity and Uses</u>: the Plan proposes to create a more exciting and attractive environment by introducing mixed use and active frontages. Some additional supporting text would be useful to note that clusters of uses can create distinct destinations – spreading the jam too thin can be counter-productive; viability may impact on delivering certain secondary uses in certain locations.</p> <p><u>Preserving the classic CMK</u>: MKDP seek flexibility on Policy CMKAP G1 to allow variation in the approach to perimeter surface parking within blocks. Welcomes recognition of exception circumstances but the way that changes would be justified seems draconian – in this regard the Plan does not meet Basic Condition 1 as it may stifle innovation in design contrary to NPPF para 58.</p> <p><u>Spatial & Design Strategy</u>: Supports identification of the Station End as a magnet of activity but a more intensive and positive approach to development is sought. By contrast, MKDP view Campbell Park as a longer term opportunity for city centre expansion and not an immediate priority.</p> <p><u>General Policies</u>: amendment sought to Policy G1 to give flexibility in determining how to accommodate parking provision in development blocks. Para b) of Policy G3 with its protection of Common Lane is a potential and presently unjustified barrier to investment</p>

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			<p>which is not in conformity with the Development Plan or the NPPF. Policy G7 – MKDP supports the ambition to support active frontages but considers that the related requirement to provide continuous weather protection on all blocklet frontages is unrealistic and could restrict economic development.</p> <p><u>Policy SS1</u>: MKDP welcomes the recognition of the importance of these strategic sites. Major development should be defined in relation to the key objectives of the Plan to realise ambitions for a regional city centre.</p> <p><u>Policy SS2</u>: welcomes the prospect of an improved market offer close to the PSA but can see no justification for identifying Block D3 for the market before detailed work has been undertaken.</p> <p><u>Policy SS3</u>: would be helpful for the Alliance to articulate their vision for Midsummer boulevard East and acknowledge that a formal review of the Plan is not the only way to bring forward proposals but that these could emerge through SPD, a development brief or as an inset to Plan:MK.</p> <p><u>Policy SS4</u>: Critical that there is broad understanding that the land use proposals map is indicative and the policy is flexible.</p> <p><u>Policy T1</u>: continued protection of the established network of Gates, boulevards and Streets is welcomed in general terms. But the practical application of criterion c) is a cause for concern as it appears to require developers to assess impacts not only of their development but also possible future developments – this is in direct conflict with the NPPF.</p> <p><u>Policy T2</u>: the proposed intra:MK transit network has some merit but the cost should not be under estimated and there are alternatives. MKDP question the need for a second public transport hub as Midsummer boulevard already performs this role well.</p> <p><u>Policy T4</u>: the plan’s aim of promoting a shift to sustainable travel whilst taking into account the parking needs of business is inherently contradictory and remains unresolved.</p>

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			MKDP support the enhanced standards for B1 uses. Concerns with criteria c, e, and f in terms of burdens they would impose on commercial development.
Anonymous – local resident			<p>Concerned about the Plan – it will stifle investment in CMK and deter new development. It flies in the face of the NPPF and is contrary to the Core Strategy. It introduces uncertainty; no evidence is provided for most of the proposals and no explanation about the viability and delivery of schemes.</p> <p>Clearer support for strengthening the whole of the central shopping area is needed to give future planning applications a positive policy framework.</p> <p>Insufficient consultation has taken place with local residents, many of whom do not speak English as their chosen language.</p>