

The CMK Alliance Plan 2026

A Business Neighbourhood Development Plan for Central Milton Keynes

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1. Introduction

- 1.1 The CMK Alliance Plan 2026 (the 'Plan') is a pioneering business neighbourhood development plan prepared by an alliance of Central Milton Keynes Town Council and local business leaders, working in partnership with Milton Keynes Council. The Localism Act has set a number of regulations which must be followed in preparing neighbourhood plans, and this document summarises the 'Public Consultation' process undertaken by the Alliance in accordance with Section 14 of Part 5 of the Neighbourhood Planning Regulations 2012.
- 1.2 This document is an Annex to the main Consultation Statement and provides more details about the public consultation (Regulation 14), including publicity materials, copies of representations received, how issues and concerns raised have been considered and, where relevant, addressed in the revised version (the Examination Draft) of the Plan.
- 1.3 Copies of consultation materials are included in Appendix 2 and all consultation responses in Appendix 3 (Consultation Feedback Matrix).

2. About the Consultation

- 2.1 The *Consultation Draft* of the Plan was submitted to formal public consultation for eight weeks (from 12th October to 7th December 2012). The statutory minimum is six weeks, but two additional weeks were included to allow time for leafleting residents during the first week.
- 2.2 A letter announcing the public consultation, including an 8-page synopsis of the Plan (the *Prospectus*), was distributed to:
 - » 850 CMK businesses (posted 12th October 2012);
 - » 2,000 CMK households (hand-delivered 12th - 18th October 2012);
 - » MKC ward councillors and MK parish/town councils (via email); and
 - » Statutory consultees (mainly via email with some via post), as shown in Appendix 1.
- 2.3 The *Consultation Draft* of the Plan and *Prospectus* were also available for viewing and downloading as pdf files from the Alliance website (www.cmkalliance.co.uk). The MK Council website¹ posted information about the consultation and provided links to

- the documents on the Alliance website. Milton Keynes City Centre Management (MKCCM) also posted information on their website². A hard-copy of the Plan was placed in the MK Central Library.
- 2.4 On 10th October 2012, a business launch event was held in the recently opened Network Rail National Headquarters building in CMK with 60 attendees from the business community and the local press. A press release was issued to the local newspapers.
- 2.5 Public exhibitions were held with members of the Steering Group in attendance to answer questions, as follows:
 - » 17th October, 11am-7pm Acorn House Reception (5-10 attendees);
 - » 24th October, 11am-7pm Acorn House Reception (5-10 attendees);
 - » 31st October, 11am-7pm Acorn House Reception (5-10 attendees);
 - » 2nd November, 12pm 2pm, MK Central Station, CMK (station concourse);
 - » 14th November, 11.30am-1.30pm, Sainsburys, CMK (entry hall).

http://www.mkccm.co.uk/haveYourSay/cmkalliance/default.asp

¹ http://www.milton-keynes.gov.uk/planning-policy/displayarticle.asp?ID=86168

3. Overview of Consultation Responses

- » 7th November, 8am-9.30am City Breakfast Club, Doubletree Hotel (75 attendees); and
- » 8th November, 12:30pm-7pm Acorn House Reception (5-10 attendees).
- Information about the exhibitions was included in all consultation materials.
- 2.7 Emails were also sent to the 115 registered users of the Alliance website and the MKCCM email distribution list (approximately 400 contacts, mainly businesses in CMK) to announce the public consultation and to serve as reminders nearer the closing date.
- 2.8 Copies of the *Prospectus* were displayed in the Town Council's three notice boards (in front of the library, Theatre District, and Campbell Park). Consultation posters and postcards were also placed on MKCCM notice boards in Station Square, thecentre:mk shopping centre and Xscape.
- 2.9 Presentations were also made to two stakeholder groups:
 - » CMK Development Stakeholder Group (28 Nov) ~17 attendees; and
 - » MK Forum (1 Nov) ~10 attendees.

- 3.1 A total of 76 formal consultation responses were received. Two representations were received after the deadline, but the Steering Group decided to consider these.
- 3.2 The breakdown of the 76 responses received is as follows:
 - » 44 (56%) from MK residents. It was not possible to distinguish responses from CMK residents from other residents in the wider Borough;
 - » 15 (20%) from CMK businesses;
 - » 10 (13%) from the Voluntary Sector or other organisations; and
 - » 7 (9%) from Statutory Consultees.
- 3.3 The main issues raised are shown in Table 1. These are discussed in more detail in the next section.

- 3.4 Other issues raised included:
 - » Concerns about land use 'allocations;'
 - » Wording of various policies being too prescriptive or confusing;
 - » Too many principal pedestrian routes;
 - » Requests to include or re-instate the Boulevard through Midsummer Place;
 - » Views that the wording of Policy G1 (protecting the infrastructure) was not strong enough; and
 - » Issues with cycling routes & policies.
- 3.5 Appendix 3 includes a list of the respondents (Table 2) and the detailed analysis of the responses (Table 3). The content of all responses received is shown in Table 4 (Consultation Feedback Matrix).

	TOPICS RAISED BY RESPONDENTS	FOR	AGAINST	TOTAL NO. OF RESPONSES TO TOPIC
1	generally supporting the overall Plan	40	4	44/76
2	protecting the classic CMK infrastructure	30	3	33/76
3	proposals for smaller independent retailers, the outdoor market and/or market hall	13	4	17/76
4	proposals for more community and cultural facilities, including a wider range for younger and older people and the voluntary sector	16	0	16/76
5	increase the number of parking spaces	10	5	15/76
6	proposed shuttle and transport interchange	10	2	12/76
7	7 advocating MK wide referendums		0	12/76
8	mixed use across CMK and/or the mixture of uses indicated in the proposals plan	7	5	12/76
9	supporting a university in CMK	10	1	11/76
10	creation of a civic or public square and/or public event space	10	0	10/76
11	design guidance for developments (weather protection for pedestrian, building heights)	4-6	4-5	9/76
12	seeking additional language regarding sustainability, with proposals such as extending chp	6	0	6/76
13	proposed housing densities too high	5	1	6/76
14	regeneration of exising sites, especially ageing office stock, not adequately covered by the Plan	5	0	5/76
15	supporting the retention of the qualities of Campbell Park and its surroundings or expressing concerns about development within the Park	5	0	5/76

Table 1: Summary of Main Responses

4. Revisions Made to the Consultation Draft

- 4.1 How the main issues and concerns have been considered is summarised below. In considering the 76 formal representations, it is important to place the numbers in context: there are 3,000 CMK residents (250,000 MK residents) and nearly 1,000 CMK businesses.
- 4.2 **Support for the Plan**: Of the 44 respondents who provided general comments on the overall Plan, 40 were supportive and 4 were not. Those supporting the plan included residents, as well as local businesses and organisations. Those not supportive of the Plan included major landowners in the retail and leisure sector.
- 4.3 **Small shops and market**: Of the 17 respondents who commented on the Plan's proposals to encourage the provision of smaller shops, enhance the outdoor market and promote a covered market hall, 13 were supportive and 4 were not. No substantive changes have been made to these elements of Policy SS2.
- 4.4 **Community and cultural facilities**: Of the 16 respondents who commented on the Plan's proposals for community and cultural facilities, all were in favour. No substantive

- changes have been made to these aspects of the Plan.
- Parking standards: Of the 15 respondents who commented on the Plan's proposal to increase parking provision in future (by changing the parking standard from Zone 1 to Zone 2), 10 were in favour and 5 were not. Those not in favour included MKC Highways officers and the MK Bus Users Group. After reviewing all of the representations and following further consultation with MKC, the Alliance have re-visited the parking standards and have narrowed the scope to two key issues - parking for office developments in CMK and visitor parking for residential developments in the Campbell Park grid square. The revised Plan (Policy T4) now alters the parking standards for only these two land uses and retains the existing parking standards for other land uses.
- 4.6 **Shuttle and transport hub:** Of the 12 respondents who commented on the Plan's proposal for an intra-CMK shuttle and a second transport interchange/hub in the central retail area, 10 were in favour and 2 were not. No substantive changes have been made to these elements of Policy T2.

- 4.7 **Referendums**: 12 respondents expressed the view that the referendums for the CMK business neighbourhood plan should be MK-wide, since the city centre is a key area for the whole Borough. This is a matter for consideration by the Examiner, in accordance with the *Localism Act* and *Neighbourhood Planning Regulations*.
- 4.8 **Mixed-use development:** Of the 12 respondents who commented on the Plan's mixed-use policies, 7 were supportive and 5 were not. After careful consideration of the responses, the Alliance's view remains that mixed-use development contributes significantly to the vibrancy of city centres in general and CMK in particular. No substantive changes have been made to Policy G6, although the text has been clarified following input from MKC Development Plans officers.
- 4.9 A university in CMK: 10 respondents expressed support for establishing a major university in CMK (or expanding the existing University Campus MK). Several supported more specifically the policy of reserving key sites for this and other major opportunities. One respondent was not in favour. Apart from clarifying the wording in Policy SS1, no

- substantive changes have been made to this aspect of the Plan.
- 4.10 **Civic square**: Of the 10 respondents who commented on the Plan's proposals to support a new civic square in CMK (possibly by pedestrianising part of Midsummer Boulevard East), all were in favour. However, in processing other representations, for example expressing the desire to re-instate Midsummer Boulevard through Midsummer Place, it became clear that the brief for a major new civic square in CMK needs to be more carefully researched. The Plan has therefore been revised to incorporate a new Policy SS3 which identifies Midsummer Boulevard East between Midsummer Place and Campbell Park as an Inset Action Plan Area within the Plan, where a detailed design and consultation process is to be undertaken by the CMK Alliance; and that the resulting scheme be processed either as a Modification to this Plan in due course, or be incorporated in a roll forward of this Plan.
- 4.11 **Design guidance**: 9 representations were received which commented on various aspects of the design guidance for new developments, mainly relating to building heights and providing weather-protection for pedestrians, with roughly half of those responding supportive of some aspects and half not in favour of other aspects. Apart from clarifying some of the wording of these aspects within the relevant Policies, no substantive changes have been made to this aspect of the Plan.
- 4.12 Sustainable design and construction: 6 comments were received seeking additional support or language regarding sustainable design and construction in the Plan, with suggestions such as extending the Combined Heat and Power (CHP) network in CMK. The Alliance view has been that the emerging Core Strategy and 2005 Local Plan both contain policies covering efficient use of natural resources and guidance to reduce environmental damage, and there was no need to repeat these in the CMK Alliance *Plan.* However, in response to this consultation feedback, additional text has been added to emphasise sustainable design and construction, and biodiversity in

- landscaping, and to refer better to existing policy.
- 4.13 **Housing densities:** 5 respondents expressed a view that the proposed housing densities are too high. Whilst the Alliance are sympathetic to this view, in order to meet the Core Strategy's allocation of 5,000 dwellings in CMK, the densities need to be high. The indicative land uses, including residential development, as expressed in the Proposals Plan, are flexible and subject to alternative proposals and densities with the agreement of MK Council, who will monitor the overall delivery of dwellings and commercial floorspace in CMK. That said, the distribution of residential dwellings has been revised in the Proposals Plan to achieve a better balance.
- 4.14 Regeneration: 5 respondents expressed the view that guidance for regenerating ageing office stock is not adequately covered by the Plan. As stated in the introduction to the Proposals Plan, in the present national economic crisis it has not been practicable to carry out a conventional 'hard and soft' analysis in full, through which an assessment is made on a plot by plot basis of the likelihood of change in the plan

period ahead. The Plan assumes redevelopment proposals will at least aim broadly to replicate as a minimum the existing quantity and mix of land uses, enriched in quantity and mix in response to the overall approach for CMK set out in the Plan.

- 4.15 **Campbell Park**: 5 respondents expressed concern about potential development within Campbell Park. Wording in Policy G4 has been revised to strengthen the intended aim of the policy.
- 4.16 **Minor revisions and corrections** have been made extensively throughout the Plan to address other points raised in the representations, as agreed by the Steering Group and detailed in the Feedback Matrix (Table 4 in Appendix 3).

Appendix 1: Statutory Consultees

Consultee Company / Organisation	Contact	Role / Position	Contact Info
Aylesbury Vale District Council	Mr Martin Dalby	Plans Team Leader	mdalby@aylesburyvaledc.gov.uk
Bedford Borough Council	Mr Paul Rowland	Assistant Director	martin.tidy@bedford.gov.uk
		Planning and Housing	
Bedford Group of Drainage Boards	Mr John J Oldfield	Engineer of the board	john.oldfield@idbs.org.uk
Borough Council of Wellingborough	Ms Sue Bateman	Senior Planning Officer	sbateman@wellingborough.gov.uk
British Gas Properties	Mr Richard Alden		richard.alden@uk.ngrid.com
British Gas Southern	Mr J Harley		via post
Buckinghamshire County Council	Mr Marcus Rogers	Acting Head of Service	marogers@buckscc.gov.uk
Buckinghamshire Health Authority	Mr John Spargo		via post
Central Bedfordshire County Council			planning@centralbedfordshire.gov.uk
English Heritage	Mr Richard Peats		richard.peats@english-heritage.org.uk
Environment Agency	Mr Adam Ireland		adam.ireland@environment-agency.gov.uk
Highways Agency	Mr Darren Rhoden	Senior Network	darren.rhoden@highways.gsi.gov.uk1
		Manager	
Homes and Communities Agency	Mr Charles Amies	Head of Area -	charles.amies@hca.gsi.gov.uk
		Midlands South East	
Milton Keynes Community NHS Trust	Mr Graham Ball		via post
Milton Keynes Council	Mrs Diane Webber	Senior Planning Officer	diane.webber@milton-keynes.gov.uk
Milton Keynes General NHS Trust	Mr Mark Millar	Chief Executive	via post
Milton Keynes Local Strategic Partnership	Mrs Tina Butterwick		tina.butterwick@milton-keynes.gov.uk
Milton Keynes Partnerships	Mrs Sheila Keene	Head of Strategic Policy	sheila.keene@hca.gsx.gov.uk;
		and Planning	
MK Primary Care Trust	Ms Beryl Anderson		via post
Natural England			consultations@naturalengland.org.uk
Natural England	Consultations		consultations@naturalengland.org.uk
Network Rail	Ms Lorraine McGarrigle	Team Organiser	lorraine.mcgarrigle@networkrail.co.uk
Network Rail	Mr Richard Eccles	Director, Network	richard.eccles@networkrail.co.uk;
		strategy and Planning	
Northamptonshire County Council	Mr Mark Chant	Head of Planning Policy	planning@northamptonshire.gov.uk
O2	Mr Peter Foster	Central Acquistion &	Peter.foster@O2.com1
		Planning Manager	
South Bucks District Council	Mr Ian Motuel	Planning Policy	lan.motuel@southbucks.gov.uk
		Manager	
T Mobile	Mr Martin Carroll	Acquistion Manager	Martin.carroll@t-mobile.co.uk3
Wellingborough Council	Ms Sue Bateman		SBateman@wellingborough.gov.uk

Consultee Company / Organisation	Contact	Role / Position	Contact Info
MK Parishes			
ABBEY HILL PARISH COUNCIL	Mr Julian Vischer	Clerk	abbeyhpc@gmail.com
BLETCHLEY & FENNY STRATFORD TOWN COUNCIL	Mrs Lisa Courtney	Clerk	lisa.courtney@bfstc.co.uk
BRADWELL PARISH COUNCIL	Mr Harold Atkins	Clerk	clerk@bradwell-pc.gov.uk
BROUGHTON & MILTON KEYNES PARISH COUNCIL	Helen Ward	Clerk	clerk@broughtonandmkv-pc.gov.uk
CAMPBELL PARK PARISH COUNCIL	Dominic Warner	Clerk	dominic.warner@campbell-park.gov.uk
CENTRAL MILTON KEYNES TOWN COUNCIL	Paul Cranfield	Clerk	cmktowncouncil@msn.com
GREAT LINFORD PARISH COUNCIL	Mrs Eirwen Tagg	Clerk	parish.manager@great-linford.gov.uk
KENTS HILL AND MONKSTON PARISH COUNCIL	Mrs Amanda Wilmot	Clerk	clerk@kentshill-monkston-pc.org.uk
LOUGHTON PARISH COUNCIL	Brian Barton	Clerk	parish.clerk@loughtonmk-pc.gov.uk
NEW BRADWELL PARISH COUNCIL	Adele Boughton	Clerk	clerk@newbradwell-pc.gov.uk
NEWPORT PAGNELL TOWN COUNCIL	Shar Roselman	Clerk	TownClerk@newport-pagnell.org.uk
OLD WOUGHTON PARISH COUNCIL	Karen Hill	Clerk	clerk@oldwoughton.org.uk
SHENLEY BROOK END & TATTENHOE PARISH COUNCIL	Carole McMillan	Clerk	clerk@shenleybrookend-pc.gov.uk
SHENLEY CHURCH END PARISH COUNCIL	Jane Munn	Clerk	clerk@shenleychurchend-pc.co.uk
SIMPSON AND ASHLAND PARISH COUNCIL	Mrs Rachel Clark	Clerk	simpsonparish@tesco.net
STANTONBURY PARISH COUNCIL	Mrs Helen Mortimer	Clerk	parishmanager@stantonburyparishcouncil.org.uk
STONY STRATFORD TOWN COUNCIL	Mr Charles Brindley	Clerk	Office@stonystratford.gov.uk
WALTON COMMUNITY COUNCIL	Karen Hill	Clerk	clerk@waltoncommunitycouncil.gov.uk
WEST BLETCHLEY COUNCIL	Helen Hupton	Clerk	Clerk@westbletchleycouncil.gov.uk
WOLVERTON & GREENLEYS TOWN COUNCIL	Jennifer Saunders	Clerk	office@wolvertonandgreenleystowncouncil.gov.uk
WOUGHTON COMMUNITY COUNCIL	Tracy Peters	Clerk	tracy.peters@woughtoncommunitycouncil.gov.uk
ASTWOOD & HARDMEAD PARISH COUNCIL	Mrs Patricia Reynolds- Nunn	Clerk	Patnunn@btinternet.com
BOW BRICKHILL PARISH COUNCIL	Debbie Mayer	Clerk	parish.clerk@bowbrickhill.org.uk
CASTLETHORPE PARISH COUNCIL	Stephen Bradbury	Clerk	clerk.castlethorpe@gmail.com
CLIFTON REYNES & NEWTON BLOSSOMVILLE PARISH COUNCIL	Mrs Heather Rodgers	Clerk	clifton.newtonparishcouncil@hotmail.co.uk
EMBERTON PARISH COUNCIL	Mrs Karen Goss	Clerk	Kanngoss@aol.com
HANSLOPE PARISH COUNCIL	Mr Albert McDonald	Clerk	hanslopeparishcouncil@hotmail.com
HAVERSHAM CUM LITTLE LINFORD PARISH COUNCIL	Mr Mike Morris	Clerk	Parishclerk@havershamvillage.co.uk
LAVENDON PARISH COUNCIL	Hannah Patton	Clerk	lpc.clerk@btconnect.com
LITTLE BRICKHILL PARISH COUNCIL	Alan Kemp	Clerk	alan.kemp6@btinternet.com
MOULSOE PARISH COUNCIL	Mr Peter Bloomfield	Clerk	Pbloomfield2@compuserve.com
NORTH CRAWLEY PARISH COUNCIL	Patricia Reynolds-Nunn	Clerk	patclerkncpc@btinternet.com
OLNEY TOWN COUNCIL	Liam Costello	Clerk	townclerk@olneytowncouncil.gov.uk
RAVENSTONE PARISH COUNCIL	Anna MacDougall	Clerk	ravenstoneclerk@gmail.com
SHERINGTON PARISH COUNCIL	Wendy Austyn	Clerk	wendy543@hotmail.com
STOKE GOLDINGTON PARISH COUNCIL	Sue Grant	Clerk	stokegoldingtonpc@hotmail.co.uk
WAVENDON PARISH COUNCIL	Alan Kemp	Clerk	alanj.kemp@btinternet.com
WESTON UNDERWOOD PARISH COUNCIL	Mrs Gillian Nicol	Clerk	gillian.nicol@unicombox.com
WOBURN SANDS TOWN COUNCIL	Mrs Lynne Stapleton	Clerk	I.stapleton@wstc.org.uk

Consultee Company / Organisation	Contact	Role / Position	Contact Info
Bodies representing the interests of different groups in the area			
Age UK Milton Keynes	Ms Jane Palmer	Chief Exec	info@ageukmiltonkeynes.org.uk
Church of Christ the Cornerstone, CMK	Revd Tim Norwood	Head	tim@mkdeanery.org
Community Foundation	Ms Julia Upton	Chief Exec	julia.upton@mkcommunityfoundation.co.uk
CommunityAction:MK	Ms Ruth Stone	Chief Exec	support@CommunityActionMK.org
MK Forum	Ms Carol Barac	Chair	carolbarac136@btinternet.com
Fred Lloyd Roche Foundation	Mr Henk van Aswegen	Chair	henk@mkcdc.org.uk
Urban Eden	Mr Theo Chalmers	Chair	t.chalmers@vervepr.co.uk
Xplain	Ms Linda Inoki	Leader	xplain.mk@gmail
Neighbouring parishes outside MK			
Aspley Guise Parish Council	Mrs M Fitzgerald	Clerk	clerk@aspleyheath.org.uk
Beachampton Parish Council	Rosie Corlett	Clerk	rcorlett@ctdi.co.uk
Bozeat Parish Council	Mrs L D Payne	Clerk	clerk@bozeatparishcouncil.gov.uk
Carlton & Chellington Parish Council		Clerk	david@jenkins2107.freeserve.co.uk
Cranfield Parish Council	Mrs Rosemary J Davey-Hunt	Clerk	cranfieldpc@btconnect.com
Deanshanger Parish Council	Mrs Sue Wilcox	Clerk	clerk@deanshangerpc.net
Grafton Regis Parish Meeting	Mr Derek Bird	Parish Correspondent	derekstanleybird@hotmail.com
Great Brickhill Parish Council	Ms Karen Barker	Clerk	karenlbarker@btinternet.com
Hackleton Parish Council	Mrs T L Charteress	Clerk	hackletonpc@btinternet.com
Harrold Parish Council	Mrs Nina Bransgrove-Knight		clerk@harrold.org.uk
Heath & Reach Parish Council	Mrs Sara Crann	Clerk	clerk@heathandreachpc.co.uk
Hulcote and Salford Parish Council	Mr Alf Murphy	Chairman	billfield88@btinternet.com
Lathbury Parish Council	Mr James Fishwick	Chair	chair@lathburyvillage.org.uk
Newton Longville Parish Council	Mrs Janet A Pickup	Clerk	newtonlongvillepc@hotmail.co.uk
Old Stratford Parish Council	Mr D M Everett	Clerk	de@mk196aw.fsnet.co.uk
Potsgrove Parish Meeting	Mr David Greenwood	Chairman	via post
Stoke Hammond Parish Council	Ms Sue Mordue	Clerk	stokehammondparishcouncil@gmail.com
Warrington Parish Meeting	Cllr Graham Harrison	Chairman	via post
Yardley Gobion Parish Council	Miss Lesley Ratcliffe	Clerk	tim.bartlett@southnorthants.gov.uk
Yardley Hastings Parish Council	Mr Geoffrey Gill	Clerk	yhparishclerk@gmail.com

Appendix 2: Public Consultation Materials



CMK Alliance **Business Event** Wednesday 10th October 5:30pm - 7:30pm

The Quadrant: MK (Network Rail National Centre) Elder Gate Milton Keynes MK9 1EN

The CMK Alliance Plan 2026, a business neighbourhood plan for Central Milton Keynes, and the new CMK Development Framework are now out for public consultation.

The CMK Alliance Plan and CMK Development Framework together shape the future of CMK to 2026, setting out the aspirations, principles and policies for the city centre, including: strategic objectives for major opportunities; jobs; retail; cultural, sports and community facilities; transport and parking; and the framework for future development.

The event will be your opportunity to learn more about the plans and to discuss and share your views with the CMK Alliance Steering Group and MK Council.

PROGRAMME

5:15pm: Arrival

5:30pm: Welcome

Phil Smith, Chair Business Leaders

5.35pm: Introduction to the CMK Alliance

Paul Hunt, Chair CMK Business Forum

5:40pm: Opening Remarks

Gareth Bradford, Communities and Local Government (DCLG)

5.45pm: CMK Alliance Plan 2026

Rebecca Kurth, Chair CMK Alliance Robert de Grey, Editor & Master Planner, CMK Alliance

6:15pm: New CMK Development Framework

Nick Fenwick, Assistant Director, Planning, MK Council Neil Sainsbury, Head of Urban Design, MK Council

6:30pm: Questions and comments

7:00pm: Food and Refreshments

Members of the CMK Alliance Steering Group and MK Council will be available for further discussion.

7:30pm: Close

For more information contact the CMK Alliance Team on 01908 398135 or email info@mkccm.org





----PRESS RELEASE----

NEW ROADMAP TO PROSPERITY FOR CMK

15 Oct 2012

In another first for Milton Keynes, the country's first Business Neighbourhood Plan is now out to public consultation. The CMK Alliance Plan 2026 sets out a detailed, joined-up plan for managing the development of CMK and Campbell Park grid squares for the next 15 years. The pioneering plan is the result of an alliance between the CMK Town Council and local business leaders, working in partnership with Milton Keynes Council.

After six months of public workshops, online comments, and marathon meetings the plan incorporates the desire of residents and businesses for a more exciting, enriched and sustainable place to live, work and play.

With over 60 hectares (150 acres) of land still available for new, or further development, and with Milton Keynes widely slated as the engine of regional growth, this is an important step in the city's evolution.

At a packed launch event hosted by Network Rail in their glittering new building, Gareth Bradford, from the Department of Communities and Local Government, congratulated the CMK Alliance for its commitment to Localism and for creating an exciting 'roadmap' for Britain's fastest-growing city.

The plan is firmly focussed on boosting jobs and prosperity, as well as creating a more interesting, varied and attractive centre for local residents and visitors.

Highlights of the plan include:

- · a prime site set aside for an expanded University campus
- a sleek new CMK Shuttle service, to help people move around the centre without cars
- . a new Market Hall for independent retailers, in addition to the outdoor market
- more places and spaces for social, cultural and sporting activities to enrich community life
- retention of the city's unique design and infrastructure, including grid roads and green spaces

"We've tried hard to get the balance right between the need for growth and change, and the need to keep CMK special, and true to itself," says Paul Hunt, co-chair of the Alliance and MD of John Lewis in the city centre. "It's been refreshing to have a frank dialogue between business and residents over many months. We all agree that CMK has a unique appeal, as a spacious, highly convenient local and regional centre. We want to build on its strengths, while helping to generate the next wave of growth."

Rebecca Kurth, chair of CMK Town Council, comments, "One of the great advantages of the new plan is that it gives clear guidance to would-be developers about what works for CMK. This should reduce controversy and delays and encourage growth. We now have the roadmap and a clear direction, but this is no time to sit back and relax. Many town centres across Britain are in decline so we have to keep moving forward, and this is where we need the public to stay involved and continue the journey."

In another first, the plan will go out to public referendum, one for residents and another for the business community. All being well, the CMK Alliance Plan will then be adopted by MK Council, as the Local Planning Authority, who will then use its policies to manage future development.

Meanwhile, the public and business community can view and comment on the plans at a series of drop-in sessions at Acorn House, or online via www.cmkalliance.co.uk

Contacts for press interviews:

Paul Hunt via personal assistant: 01908 325346

Rebecca Kurth mobile: 07948 366942

October 2012

Dear Resident



Good news for the future of our community - CMK and Campbell Park

Last April, we wrote to you about the CMK business neighbourhood plan - an exciting new opportunity for local people to help create the city centre we want. After six months of public workshops, online feedback, and marathon meetings the resulting CMK Alliance Plan 2026 is now out to public consultation.

The enclosed Prospectus is for you, and contains the main points of the plan. The full document sets out a detailed, joined-up roadmap for managing the development of CMK and Campbell Park grid squares for the next 15 years. It is firmly focussed on boosting jobs and prosperity, as well as creating the more interesting, varied and attractive centre that people have asked for. Highlights include proposals for:

- more places and spaces for social, cultural and sporting activities to enrich community life
- retention of the city's unique design and infrastructure, including grid roads and green spaces
- a sleek new CMK Shuttle service, to help people move around the centre without cars
- · more parking for new residential developments in Campbell Park
- · a new Market Hall for independent retailers, in addition to the outdoor market
- · a prime site set aside for an expanded University campus

The full plan is available to view and download at www.cmkalliance.co.uk

Public consultation runs from now until Friday, 7th December

This is a further chance to have your say. Please get involved and help ensure the city centre meets the needs and hopes of our community.

You can comment on the plan until 7th December in four easy ways:

Via the website: www.cmkalliance.co.uk

 In writing to: CMK Town Council

45 Stokenchurch Place, Bradwell Common, Milton Keynes MK13 8AU

consultation@cmktc.org · By email to:

• In person at friendly drop-in sessions at Acorn House, 351 Midsummer Blvd, CMK

Wednesday 31st October 11am - 7pm Thursday 8th November 12:30pm - 7pm

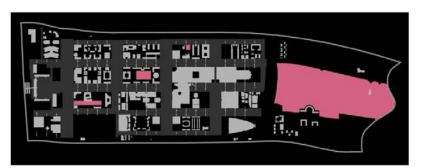
Exhibition panels and full information will be available at these open sessions. Please call in to find out more and tell us what you think.

If you have any queries or would like to talk to us about the CMK Alliance Plan 2026, please call us on 01908 398135 or email us at cmktowncouncil@msn.com.

Yours sincerely

Rebecca Kurth, Chair Ken Baker Andy Thomas Andre Brady Elizabeth Rowell-Tinsley Linda Inoki Ramo Erdogan Charles Ashbury

> website: centralmk-tc.gov.uk 45 Stokenchurch Place, Bradwell Common, Milton Keynes MK13 8AU cmktowncouncil@msn.com



The CMK Alliance Plan 2026

A Business Neighbourhood Development Plan for Central Milton Keynes

Consultation Prospectus

Executive Summary

The CAN Alliance Plan 2005 (CMCAP) is a represent houseon. negribourhood development plan prepared by an aliance of Central Milton Keynes Town Council and local business leaders, working in partnership with Miton Keynes, Council. The Aliance's plan for CMK (Central Milton Keynes) duilds on the success of the last forty years and plans its continuing growth over the next fifteen.

The Plan is made up of a number of different sections, which togethe form a comprehensive basis for managing development in the city centre up to 2025. The first section captures the appraison, and strategic objectives of the Plan. Detailed policies and proposals are included in the second section - policies which will made all velopments across the ody centre, as well as ode specific policies for areas identified as major opportunities. The final section sets out land user proposals for future development, and addresses implementation and monitoring

There are over 60 hextares (160 acres) of land yet to be fully

- · expand and diversify the retail offer of CMK;
- . build many more offices to create new jobs.
- · reserve key sites for major opportunities, such as the proposed expansion of the University
- complete almost 5,000 new deeltross
- . emich its social sporting and cultural life with new facilities.

The Planceletinges CMCs distinct design and heritage - its renowned grid of roads, wide pedestnan underpasses and pote cocheres acovered walloways), its generous and convenient car paning its remarkable landscaping and sturning Carrobell Park, all of which contribute to the commercial attractiveness and quality of life in our city.

The Plan also promotes CMK's emerging role as the centre of a prosperous and growing out region, through greater and more diverse development. That contributes to the economic, social and environmental well-being of Miton Revines.

To achieve arouth within the existing and local, and development poss, the Plan supports buttorn at froher densities than thos assumed when CMK was originally planned. With buildings up to perently eight grows both growth can be accommodated without

The CMGP provides releases developers and landwares considerable flexibility in how they develop their plots, but asks them to take greater responsibility in heiging to build a successful city certire improved pedestrian mates, bringing more annulion through greater niced use and active fromages, creating a diverse street life and safe. right life. This will onve growth in both the dayline and night-time

As well as offering more space to large stores in the Primary Shopping Area, the Plan emourages the provision of small and independent pecialist shops, and a new Market Hall to complement and enhance the outdoor market. The Aliance's aspiration is to transform into the heart of the city, an exching public space - a destination in its own right - with animaled public art and programmed events, a place where Millor Keynes mode, coldbrates and demonstrates

Land is reserved on two prime sites for major coportunities. institutions and headquarters of a scale and reputation to ruse the profile of Mittin Keynes nationally and internationally. The Plan supports the aspirations of the University Centre Milton Keynes (JCMK) as the first step in establishing a university for Miton Keynes

It is important that the centre remain a desirable place to live. particularly for younger individuals and couples working in the centre and for older 'empty-resters'. New housing will be designed to encourage the creation of strong communities, sharing responsibility for their sumunatings. To support residents as well as those working in CMK, the Plan identifies lates for the provision of new sports. community and medical facilities

Finally, the Allianne renormers the ortical role that ease of general and convenient parking has played in the success of Millon Keynes from its beginning. There is a long term need to make public transport, cycling

and walking the preferred mode of choice for more people corning to and errowing CMK, and the Plant promotes these modes of transport. At the same time, good provision for cars remains a competitive adortage for CMK, helping its economic development which is of regonal importance and in the national interest.

At the head of a city well placed to drive the habonal econor recovery, what happens in CMK is of national significance. The CMK Allianse Plan 2006 prepares CMK to fulfil or role through a balanced accounts counciling growth and development which retaining to competitive advantage as a distinctive place with a high quality of life.







Existing Use Plan В C D Е G Campbell Park Ward The Existing Use Plan (above) records the situation on the ground in CMK at the time of The Proposals Plan (opposite) shows the proposed land use mix encouraged by this plan for preparing this Plan. There is a coarseness of the grain of the uses that dominate the land use each undeveloped or under-developed Blocklet where development may reasonably be expected pattern. Generally speaking, it is only in the most recent developments (such as the Hub and in the life of this Plan, based on current information. A few sites with existing development have Vizion) that show a smattering of mixed uses - indicated here by roughly proportionate stripes of also been included where public consultations have been carried out with a view to reland use colour on developed Blocklets The Existing Use and Proposals Plans use an urban planning technique to schematically illustrate Please note: the drawings are illustrative only. Please see full draft Consultation Plan for more the predominant land uses and indicative mixed-uses of sites. Ground floor uses are shown by detailed information (www.cmkalliance.co.uk). stripes in the upper-left corner. Upper floor uses are shown proportionally in the main box. THE DESIGNATION AND PERSONS NAMED IN and an investigation

A city that will last through all horizons of history

in the long sweep of the history of human divilisation, cities developed by accident or design in places of strategic importance, locations were mostly strategic places of connection and market places on trade routed or were chosen to but the politics of appreciation discontrol a local population) or defence (to prefer a local population).

Our own oby of Witton Keynes, possibles, an unusual place in firstory. One consequence of the Second World War (1929 -1945) was the reation of an opportunity for radical changes to come about - after the War is new welfure cyclem provided old age pensions, unemployment pay, and help for those in need, and the right to develop land was

This last point is really important with regard to the story of Milton Keynes. The Town and Country Flanning Act 1947 gave every town half the responsibility to make plans for their area, induding making reen Belts around the major obes to stop them sprawing into the countrycole

Burlinghamshee County Council was particularly aware of these pressures. Under the guidance of the County Planning Officer Fred. Pooley, in 1964 Euckinghamshire County Council deoded that the best defence against the pressures for development in the south of the County was to create a new fown in the north, in the vicinity of the enting towns of Electrical Story Strafford and Wicherton.

Buckinghambline County Council, and bok up the idea. Much to the dismay of the County, however, the Government appointed a New Town Development Conversion to create the new city, and that organisation decided to commission a fresh Müster Pfan.

The brief, when 22,000 acres of rural Blackinghamshire were selected in 1965, was to transform them into a self-sustaining city fit for 250,000

To a lot of young falented planners, architects and engineers, it was mostible. People look pay cuts to roin the multi-discrimary learn

Lord Campbell of Estan, 1973

and the second section

Our Vision for Central Milton Keynes

tacking the most interesting shallenge in Europe." Add to that a generous pot of public funds, dislike of red-tape, charasmatic leaders and the benigh dictatorship of the new Milton Keynes Development Corporation, and Milton Keynes was set to be unique.

In the city centre - Central Milton Keyned - the plan created an exceptionally safe, spacious, flentille and relained way to keep goods. people and services flowing, as the centre grew. Engineers and architects worked crossly together to create a robust inhastructure Unusually, the intractructure was more important from the buildings which they expected would come and go over time. The inhastructure was to be the eternal skeleton, muscles, affected and nervous system of the public realm in CMK that asserts its status as a true objective

CMK has largely fulfilled its promite of becoming a thriving city centre 25,000 people work in CMK and it attracts over 30m viotors a year e right-time economy has grown markedly over recent years with further development likely. The latest company to relocate da headquarters here is Network Rail, bringing in 3,000 further jobs and

in pregioning a gran for CMM furthe next 15 years or more, it is certain thal CMK will achieve the datus in practice and reality of being a removal centre, with all that means in terms of its scale of commercial rive and cultural functions and altractions. It is also cottain in preparing a plan for CMK, that to be successful in the long-term, CMM must remain true to itself.

The CMKAP is a clear statement of intent in terms of how local people and but nected want to see our ofy centre to develop in the coming years, providing guidance and certainty to investors, residents and

At a time when many town centres in the UK are declining and high streets fading. CMK council attend to rest on its past success. We must approved and learn from our part mistakes. Our future prosperity is not guaranteed - we must actively work together to

Our Vision

By 2026, CMK will be the dynamic centre of one of the fasted-growing regions in the South-East. It will support thousands of new jobs and wide-spread

- the most accessible ofly centre in the UK, pioneering sustainable yet convenient transport choices for workers, visitors and residents;
- . The home of an expanding university, delivering innovative approaches to higher education and nurturing new business ventures in technological and creative hubs across the centre,
- · a ubrart and safe place, with an inovacingly regional and national role, that welcomes, surprises and delights workers, visitors and residents alike, with a rich mix of shipping leisure, sports, cultural and social facilities offering an exching street life and diverse night life;
- · an admired prestigious only centre, celebrating its distinctive dtyscape and high quality infrastructure.
- . the home of people and organisations working to reduce their curbon footprint
- an inclutive place, encouraging participation and interaction, connecting people, stimulating ideas, and inspring falure generations;
- . the centre of crvic life for Milton Keynes.

Proposals Plan В C D G Н Class A1/A2. Shops/Financial & Class D1. Non-residential Class C1. Hotels professional services Class C2. Residential Class A3. Food and drink Class D2. Assembly and leisure institutions incl colleges incl cinema, bingo, concert hall, Class B1. Offices, R&D and light industry. Class C3. Dwellinghouses Multi-storey car parks

Planning for Prosperity

Increasing Mixed-Use Developments

A key frome that underpins the Plan is to broaden the mix of uses across CMC. A successful obviolette medicto have a diverse street Its and safe night life - a meture of different uses such as offices, strong restaurants, theatres, and flats all built in close processly creating comings and goings! Form early morning to late evening, on weekdays and at weekends

The Plan seeks to achieve the following objectives:

- . In renferce and extend CMCs 'magnet' areas of greatest
- . to encourage the spread of pedestrian footfall along principal
- pedednan routed between the magnet areas. . To achieve a good mix of activities during both day and evening hous, and on weekdays and at weekinds, and frough the presons. This will stimulate both the daytime and night-time.
- . To create an enhanced social, cultural and civic space for public assembly which iserves as the heart of the city.
- . In increase vanity and competition in the Primary Shorping Area, including the provision of small retail units.
- . To disperse uses to reduce peak load hidspots on the CMK gnd.

A fleshie approach will be taken to the proposed and uses. With the offered flexibility to investors and divelopers, however, comes the responsibility to help Miton Keynes build its only centre.

Diversifying the Primary Shopping Area

6

The city centre is often perceived as just a large shopping centre, offering multiple chain store brands and franchised restaurants, with spaces. Residents and visitors seem to do to the centre for specific and he over "the place to most friends and collegative to ment/ emissiand expenence the heart of oily life. The consumer dimension tends to dominate the cavic and social devenoins of life in CMC. There is a

eed to create a stronger sense of place, a vital and existing heart to

The Alkance's strategy is to found own this area to become a driver of a. much wider spread of economic, social and cultural activity, through a

- to diversify the retail offer with independent small choos:
- . to create a covered Marvet Half as a centre of excellence for specialist traders which will emande and complement the th-Normandan
- . to current the broadth and number of community and cultural
- to promote the development of more holes, and a wider range of commorcial legure.

There is an opportunity to create an exceptional public space around and including Midsummer Boulevard north of the Point and west of Market Square, and for if to become a destination mits own notif, with a overse and varied offer for people of all ages and all purses. This vil build on the success of the MK Theatre and tempt more visitors. further along Midsummer to the Mr. Gallery, and the oblights of Canobel Parkbeyond

Encouraging the 24 hour Economy

The Plan promotes an increase in commercial leasure provision, including clubs, burs, restaurants, butels, span, gyms, sports provision, onemas, and other lessure outlets. While additional facilities will duster in the retail core and Xsoape, the Plan's moved use approach encourages lesure uses being located along principal nedestrian naties, particularly Michannier Brazierand

Exceptional Developments

One of the key challenges for the Plan is to protect CMVs distinctive. identity and quality of place, whilst providing appropriate flexibility to future development apportunities. From time to lone, the original design principles have been broken, sometimes to good effect, sometimes in ways that seem to bring no benefit to CMN



in central, over 60 hydranes (150 acres) of developable land in CMI fibeen years. But it is not in the interests of CMK to turn away major electional investments because some of the policies of the Plan might not be met. If flexibility is to be permitted, it has to be carefully considered, to enable an exceptional development to take place and

Exceptional developments should timo offers that the city centre ctiectives of the Plan and be descried to high standards of architecture and sudianability, in a way that complements CMV's

Promoting a High Quality of Life

The Plan seeks to create a living city centre, not only in response t denied but also by ricrease anniation and encourage a seme of security through natural surveillance from doors, windows and belonies. Thus the plan promotes housing development across CMK, whilst remaining sensitive to potential environmental processes such as noise and nuisance. Although there is a proprised concentration of housing sites around Carrobell Park, housing diswhere in CMK is encuraged. Essential facilities and services are required to that CMK. is seen to be a good place to live long term, not translettly

Working in CMK

The Plan's proposals exceed MK Council's draft Cize Shategy aspraising for office employment growth, because the Aliano considers it essential to have a choice of investment sites available to the market at any one time and also has an ambitious vision for CMK as becoming a major regional centre for investment in office development in the plan period. Businesses are increasingly seeking. ofy certire locations over out of fown Justiness parks to satisfy the demands of staff for access to befor public transport and more facilities and more socialising out of office hours.



Associated with the expansion in office accommodation will be an accesses in the number of hotels in CMK linked to conference facility one of which might be a more substantial international conference or

A wide rance of cultural, sporting and community facilities errich the constrainty of the carms by making it a more interesting and cogsible place to live and work in thus making it a none attractive place in

Learning in CMK

City centres are places where not only trade but also the exchange of knowledge and learning takes place

Miton Keynes is the largest flow in the country that is without a university for students readert in the locality students of the Open University are taught at a distance). The University Centre Mitton Keynec (UCNW) is the first step-in establishing a university for Mitton Keynes. The Plan seeks to support this endeavour in several ways.



Improving Transport & Parking

Face of movement and access by all modes - including walking cycling and public transport - was one of the founding principles in the design of Million Keynes. Articipating the need to plan for the comfort and convenience of private cars in modern life led the designers of CMK to design the gnd road system and to incorporate generous quartities of free, highly visible surface car parking spaces. These pecial features have been critical to the success of CNA, over the past 40 years and even with the imposition of parking charges, the rane of our access and parking remains a major competitive advantage over ordinary town and city centres.

One of the key challenges for the Aliance Plan is to address the significant increase in the number of journeys to CMK, and to avoid ever increasing demands for space for car parking and the concession hat follows, the meed to make public transport, cycleng and walking. the superior choice for as many people as possible. The shallenge is

Public Transport

The Alliance Plan public baragort strategy ballos on the Council's Local Transport Plan. Firstly, the CMGRF supports the presion of a public transport interchange in the heart of the city centre, in addition to the one recently completed at Station Square. Secondly, the Plan promotes the delivery of an intra-CMA shuttle service - a seek reliable Sittury and Avetury Boulevards and the existing porte-coopere infrastructure as stopping or halling points

A key part of the Plant's depan strategy is to improve the pedestrian expenence within CMs and the trikages to the surrounding estate Many of the Plan's general policies - active frontages and principal pedestrian routes - which are aimed at increasing the vibrancy of the oty's streets, will also encourage walking as a mode of fransport

There is a strong need to complete an least-west Redway to cornect National Cycle Route 51 from where it leaves Campbell Park at Marborough Gate to where it exits Station Square over the Sotbridge to Loudron. The Alliance Plan supports the MK. Council's Local



Transport Plan proposal to use the central median of Midsummer Blvd. with improved grading to underpasses to provide a cyclable route throughout.

Further improvements will be sought for cycle provision in the vicinity of Station Square, via a cycling 'hub' with dedicated changing facilities and cycle storage (lockers), possibly co-located with a cafe and visitor's information.

Parking

CMK has the highest numbers of car parking spaces in proportion to development of any city centre in the country. Milton Keynes also has one of the highest levels of car ownership and the lowest number of public transport journeys.

As CMK grows, it simply will not be possible to keep building surface level parking spaces, because we're running out of land and even our famous grid roads will eventually become grid-locked with congestion However, the CMKAP does require more parking to be delivered, as a better balance is needed between current constraints and what is needed to ensure we do not hinder economic growth and prosperity in

Business Neighbourhood Plan

What is a business neighbourhood plan?

The Localism Act 2011 created new ways for local people to achieve their own ambitions for their community or 'neighbourhood.' One way is a new approach to local planning policy, called a Neighbourhood Development Plan.' Neighbourhood planning is about building neighbourhoods and planning positively for development - not stopping growth.

Business Neighbourhood Development Plans are neighbourhood plans for areas that are primarily commercial to ensure that the business community is fully represented and engaged in the planmaking process

Why do we need a new plan for CHK?

The main planning documents for CMK were prepared over ten years ago, and since that time, much has changed. In particular, the 2001 CMK Development Framework proposed far-reaching changes to the original plan for CMK, including some that are no longer considered achievable or even desirable. That is why MK Council has recently prepared a revised CMK Development Framework: (issued for public consultation at the time of writing).

The Alliance has worked closely with MK Council, which is one of its partners, to ensure both the CMKAP and revised CMK Development Framework present consistent approaches. The Framework sets out the vision for CMC and includes neneral design and development principles. The CMKAP builds on those principles with more detailed roposals and policies.

Once a neighbourhood plan has been prepared, it must undergo formal public consultation - one conducted by the parish or town council and one, at a later stage in the process, by the local authority, Responses received during the consultations will be reviewed and checked against the plan, which may result in changes to the plan.

The regulations then require an independent examiner to check that the plan meets the right basic standards. If the plan contradicts or does not meet the standards as set-out in the over-arching policy documents, the examiner will recommend changes

The neighbourhood planning regulations require the local authority to organise a referendum on any plan that passes independent examination. This ensures that members of the community will have the final say on whether a neighbourhood plan comes into force.

For business neighbourhood development plans, it is expected that two referendums will be held - one by the residents and one by the business community.

If the majority of the residents and local businesses voting in their respective referendums support the plan, then the local planning authority must bring it into force.

Once a neighbourhood plan is in force, it carries real legal weight Decision-makers will be obliged, by law, to take what it says into account when they consider proposals for development in the

The CMK Alliance Plan 2026

Draft for Public Consultation: October 2012

This document has been prepared by the CMK Alliance, a committee of CMK Town Council

Available for downloading from www.cmkalkance.co.uk.

For further information please contact:

Paul Cranfield Clerk CMK Town Council 45 Stokenchurch Place Bradwell Common Miton Keynes

cmktowncouncil@msn.com

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What is a business neighbourhood plan?

In August 2011, Central Milton Keynes was chosen as a frontrunner to pilot the Governments' new neighbourhood planning process as part of the Localism Act 2011.

Neighbourhood development plans aim to make the planning system more democratic by letting the people who know about and care about an area undertake the planning for it.

Business neighbourhood development plans are for areas that are primarily commercial to ensure that the business community is fully represented and engaged in the plan-making process.

The CMK Alliance Plan 2026 is the first business neighbourhood plan in the country to reach the public consultation stage

Neighbourhood planning is about building neighbourhoods and planning positively for development - not stopping growth.



Neighbourhood Development Plans must support the growth objectives of the higher level planning documents, the Local Plan or Core Strategy, and conform with National Planning Policy.

a plan by local people planning together for our local area

CMK Alliance Plan 2026

Key Objectives

- · Interesting and safe streets to encourage more pedestrians along principal routes
- Mixing city living, working and shopping to achieve a wider mix of activities during both day and evening hours, on weekdays and at weekends, and through the seasons
- Creating a civic space to create an enhanced social, cultural and civic space for public assembly which serves as the heart of the city
- · Greater variety of shopping to increase variety and competition in CMK's central shopping area, including the provision of small retail units and a Market Hall
- Avoiding congestion to disperse land uses to reduce peak load hotspots on CMK's grid roads, boulevards and gates

Proposed Land Uses

Over 60 hectares (150 acres) of land proposed for development over the next 15 years:

- 250,000 m² for offices (equivalent to 5 Network Rail buildings)
- 110,000 m² for retail (equivalent to another centre:mk building)
- . 5,000 new dwellings (in addition to the 2,000 existing dwellings).

This means about every three years building:

- · 50,000 m2 of offices
- · 20,000 m2 of retail space
- · 1.000 dwellings
- · 2 to 3 cultural, sporting or community facilities.

a plan for prosperity

building on CMK's unique advantages

Why do we need a new plan for CMK?

At a time when many town centres in the UK are declining and high streets fading, Central Milton Keynes cannot afford to rest on its past success. We must acknowledge and learn from our past mistakes. Our future prosperity is not guaranteed - we must actively work together to achieve it.

The CMK Alliance Plan aims to retain the businesses that are here. encourage new investment, and ensure CMK remains a desirable place to live, work, and visit. The Plan celebrates what makes CMK distinct and successful:

- · Tree-lined boulevards and gates
- · Underpasses and porte cocheres (covered walkways)
- . Rows of ground-level car-parking surrounding shops and offices

The Plan also promotes CMK's emerging role as the centre of a prosperous and growing sub-region, through greater and more diverse development that contributes to the economic, social and environmental well-being of Milton Keynes.



The CMK Alliance Plan is a Business



Why are the two CMK plans out for consultation?

The last plan for CMK, the 2002 CMK Development Framework, proposed far-reaching changes to the original plan for CMK, including some that are no longer considered achievable or even desirable. That is why MK Council has prepared a revised CMK Development Framework (also now in public consultation).

The revised Framework sets out the vision for CMK and includes general design and development principles. The Alliance Plan builds on those principles with more detailed proposals and policies.

a new plan for prosperity building on CMK's unique advantages

What do **you** think?

Public Consultation

 now until Friday, 7th December 2012 this is a statutory phase of the plan preparation process where written comments are submitted by the public giving their views and comments, and raising any gueries.

Where to read the draft CMK Alliance Plan 2026

- · online at www.cmkalliance.co.uk
- · hard-copy at Milton Keynes Central Library, CMK

Where to send your comments, views, and gueries

· Paul Cranfield, Clerk CMK Town Council 45 Stokenchurch Place Bradwell Common Milton Keynes MK13 9AU

email: consultation@cmktc.org

Responses received during consultation will be carefully reviewed and may result in changes to the Plan. At a later stage, MK Council will conduct a second public consultation on the final Plan.

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What happens next?



· Independent Examination An independent examiner will check that the Plan meets the right basic standards, as set out in the over-arching policy documents. The examiner may recommend changes.

Referendums

MK Council will organise a referendum once the Plan passes examination. For business neighbourhood development plans, two referendums will be held - one by the residents and one by the business community.

Who are the CMK Alliance?

We are an alliance of the CMK Town Council (the city centre parish council) and local business leaders, working in partnership with Milton Keynes Council (MKC). Under the Localism legislation, the CMK Town Council has overall responsibility for the CMK business neighbourhood development plan.

> we're listening your views · your vote

Our Ambitious Vision for CMK

dynamic

By 2026, CMK will be the dynamic centre of one of the fastest-growing regions in the South-East. It will support thousands of new jobs and wide-

accessible

the most accessible city centre in the UK, pioneering sustainable yet convenient transport choices for workers, visitors and residents

university
the home of an expanding university, delivering innovative approaches to higher education and nurturing new business ventures in technological and creative hubs across the centre

a vibrant and safe place, with an increasingly regional and national role, that welcomes, surprises and delights workers, visitors and residents alike, with a rich mix of shopping, leisure, sports, cultural and social facilities offering an exciting street life and diverse night life

admired an admired, prestigious city centre, celebrating its distinctive cityscape and high quality infrastructure

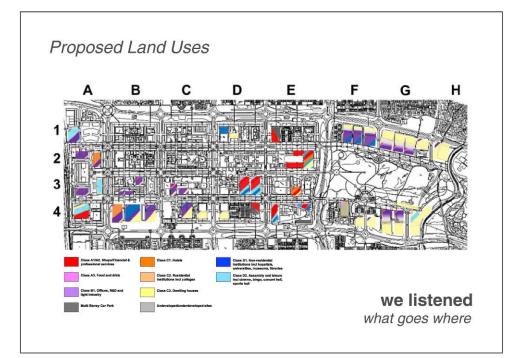
green
the home of people and organisations working to reduce their carbon footprint

inclusive an inclusive place, encouraging participation and interaction, connecting people, stimulating ideas, and inspiring future generations

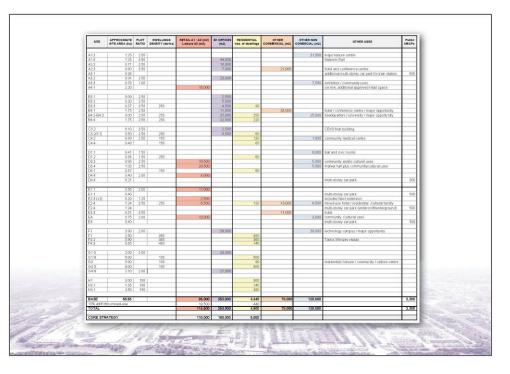
the centre of civic life for Milton Keynes.







CMK has more land to develop than any other town centre in the country an ambitious plan with space to grow and flourish











Residents asked for:

- Small, independent and specialist shops ✓
- Better lit and safer pedestrian routes
 ✓
- Places for young people, places to enjoy for free ✓
- More social, sporting and cultural activities ✓
- · Residential developments that help create stronger communities ✓
- More resident's parking around Campbell Park
 ✓
- Local school in CMK ×

The Alliance Plan proposes:

- . Covered Market Hall to enhance the outdoor market and small shops with discounted rents in larger retail developments
- · Residential developments that share high quality communal areas that residents manage together
- · Lively public spaces a new civic square
- · Expanded facilities for young people
- . More parking places for new homes in Campbell Park
- · Greater animation of street frontages
- . Major leisure facility and community medical centre.

we listened our response to residents







Businesses asked for:

- More parking ✓
- Free parking ×
- Higher skills and training for local workers ✓
- Better lit and safer pedestrian routes ✓
- Variety of office types ✓
- Better maintenance of the public realm. ❖

The Alliance Plan proposes to:

- · Provide more parking spaces with new developments, putting less pressure on existing spaces
- · Reserve prime sites for the University and other major opportunities
- · Promote a better pedestrian experience through busier ground floors and over-looking / surveillance by surrounding buildings
- . Encourage a wider mix of uses/activities across CMK
- * Proposal of an independent Land Trust to own and better maintain the public realm in CMK.

we listened our response to business









Owners, developers & investors asked for:

- Flexibility ✓
- Certainty ✓
- Positive approach to growth ✓
- Prime sites retained for special developments. ✓

The Alliance Plan proposes to:

- · Remove zoning by 'quarters' and 'districts' outside of the Primary Shopping Area
- · Allocate flexible, indicative land uses which can be altered, subject to MKC agreement
- . Provide a clear framework of principles & policies for development with buy-in of residents and businesses
- · Promote sustainable development and regional city aspirations.

we listened our response to investors









A successful regional city centre needs:

- · A wide variety of activities shopping, leisure, offices, flats, community spaces, theatres, museums, art galleries
- · Well planned and high quality infrastructure, landscaping and open spaces, providing inviting places and interesting attractions
- · Buildings and activities that face outward onto the public domain, not mainly inward onto the private domain
- · Greater accessibility by public transport or by car with easy and convenient parking.

The Alliance Plan proposes:

- . A roadmap the Plan explains where we want to go and gives directions to developers and investors on how they can help us get there - to be a prosperous regional city centre
- · But we need more than a roadmap a good Plan is a good starting point, but we also need the means to reach our destination - engine, fuel, and above all, a driving force
- . Many aspirations of the Plan from the Market Hall to the University - require the commitment, energy and effort of many people to make them a reality.

together we are creating a successful regional city centre

Access, Transport & Parking

Public Transport

The Alliance Plan's public transport strategy builds on MK Council's Local Transport Plan (LTP3). The Alliance Plan:-

- supports the creation of a second public transport 'hub' in the heart of the city centre. Development on land adjacent to the interchange should be designed to contribute shelter, cafes and toilets for passengers
- promotes the delivery of an intra-CMK shuttle service a sleek reliable and unique 'hop-on, hop-off' service circulating CMK using primarily Silbury and Avebury Boulevards
- the Shuttle routing may be extended to include adjacent residential grid squares, including Fishermead, Oldbrook, Bradwell Common and Conniburrow.

Walking and Cycling

- A key part of the Plan's strategy is to improve the pedestrian and cycling experience within CMK and through linkages to the surrounding estates
- The Plan identifies principal routes along which mixed uses at ground level are to be established, thus bringing life and animation to what would otherwise be inward-looking buildings
- There is a strong need to complete an 'east-west' redway to connect National Cycle Route 51 from Campbell Park to Station Square
- Further improvements will be sought for cyclists around the Station, such as a cycling 'hub' with dedicated changing facilities, possibly co-located with a café and visitor's information.

easy to get to better buses cycling walking



Access, Transport & Parking

Challenges

CMK was designed as the centre for a city of 250,000 and Milton Keynes is now approaching this population and is projected to reach 300,000 by 2026

So CMK is beginning to reach its originally planned capacity for car movements in and out of the city centre

MK Council has set ambitious targets for growth. The intensification of CMK increases the challenge of retaining CMK's attractiveness for car users in terms of ease of access and parking

There is a great need to make public transport, cycling and walking the superior choice for as many people as possible.

Key Objectives

- Enhance highways and car parking capacity for future growth and development
- Transform public transport to provide higher quality, greater capacity, flexibility and choice
- Encourage walking and cycling through safer and more attractive streets and redways
- Less restrictive car parking spaces to maintain good accessibility while encouraging alternative transport choices.

easy to get to

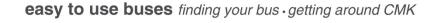
Proposed CMK Parking Standards

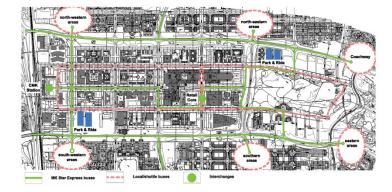
Use Class	Previous Parking Standards (Zone 1)	Proposed Parking Standards (Zone 2)	Zone 3 Parking Standards elsewhere
A1 – Shops Food Non-Food	1 per 46 m² 1 per 66 m²	1 per 23 m ² 1 per 33 m ²	1 per 14 m ² 1 per 20 m ²
A2 – Financial and Professional Services	1 per 66 m ²	1 per 33 m ²	1 per 20 m ²
A3 - Food and Drink	1 per 33 m²	1 per 16 m²	1 per 10 m ²
B1 - Business	1 per 70 m ² (1 per 50 m ² for Campbell Park)	1 per 50 m ² + units > 300 m ² 1 HGV per 500 m ² (minimum 1)	1 per 30 m ² + units > 300 m ² 1 HGV per 500 m ² (minimum 1)
C1 - Hotels and Hostels	1 per 3 bedrooms + A3 @ 1 per 33 m ² + D2 @ 1 per 16 seats	1 per 2 bedrooms + A3 @ 1 per 16 m ² + D2 @ 1 per 8 seats	1 per bedroom + A3 @ 1 per 10 m ² + D2 @ 1 per 5 seats
C2 - Residential Institutions	1 per 6 bedspaces or most appropriate D1 standard	1 per 3 bedspaces or most appropriate D1 standard	1 per 2 bedspaces or most appropriate D1 standard
C3 - Dwellings			
1 bed dwellings 2 bed dwellings 3 bed dwellings 4+ bed dwellings	1 per dwelling 1 per dwelling (flat or house) 2 per dwelling 2 per dwelling	1 per dwelling 1 per dwelling (flat or house) 2 per dwelling 2 per dwelling	1 per dwelling 1 per flat; 2 per house 2 per dwelling 2 per dwelling
Un-allocated parking, either on- or off-street: 1 bed dwellings 2 bed dwellings 3 bed dwellings	0	1 per 3 dwellings (Campbell Park grid square) 0 0	1 per 4 dwellings 1 per 2 flats; 1 per 4 house 1 per 2 dwellings
4+ bed dwellings	0	0	1 per 2 dwellings

Use Class	Previous Parking	Proposed Parking	Zone 3 Parking
	Standards (Zone 1)	Standards (Zone 2)	Standards elsewhere
D1 – Non Residential Institutions			
(a) Medical/Health	2 per Consulting Room	2 per Consulting Room	3 per Consulting Room
	+ 1 per 3 Staff	+ 1 per 2 Staff	+ 1 per Staff
(b) Crech/Nursery	1 per 3 Staff	1 per 2 Staff	1 per Staff
	+ pick-up & set-down*	+ pick-up & set-down*	+ pick-up & set-down*
(c) Schools	1 per 3 Staff	1 per 2 Staff	1 per 2 Staff
	+ pick-up & set-down*	+ pick-up & set-down*	+ pick-up & set-down*
(d) Higher Education	1 per 6 staff	1 per 3 staff	1 per 2 staff
	+ 1 per 30 students	+ 1 per 25 students	+ 1 per 15 students
(e-h) Art, Museum, Library, Hall, Place of Worship	As D2	as D2	as D2
D2 – Assembly & Leisure			No. of the control
Cinema/Theatre	1 per 16 seats	1 per 8 seats	1 per 5 seats
Other	1 per 73 m ²	1 per 36 m ²	1 per 22 m ²

Garages are not counted as a parking space
 Pervicipments in CMK where off-street parking is limited or restricted, on-site provision of un-allocated parking may be required.
 Devicipments has comprise a large proportion of 1-bed diverlings will be assessed individually.

parking for workers · visitors · residents











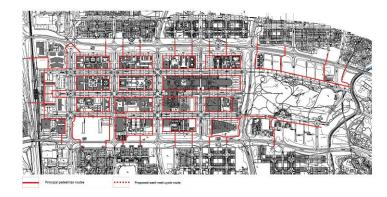












easy to use routes walking and cycling

Central Milton Keynes Alliance Plan 2026 **Public Consultation**



Comments Form

Y	our	Con	tact	Detai	<u>IS</u>

Please place your completed form in the box or return it to:

Post: CMK Alliance C/O CMK Town Council 45 Stokenchurch Place **Bradwell Common** Milton Keynes MK13 9AU

Email Address: consultation@cmktc.org

Web-Page:

www.cmkalliance.co.uk

Appendix 3: Consultation Feedback Matrix

Ref no.	Respondent
A1	Age UK Milton Keynes
A2	Arkin L
B1	Ballantyne P
B2	Bedford Borough Council
В3	Bell R
B4	Benjamin G
B5	Bevan J
В6	Bint J
В7	Bowman H
B 8	Boyd L
B 9	Bradford C
B10	Bryant S
B11	Business Environment, Milton Keynes
B12	Battista D
B13	Bucks Fire and Rescue
C1	Calcott L
C2	Canal and River Trust
C 3	Cash a cheque
C4	Castlethorpe Parish Council
C5	CMK Britel Nominees
C6	Commercial Estates Group
E1	English Heritage
E2	Environment Agency
E3	Evans M
E4	Eaton G
F1	Ferguson M
F2	Francis A
G1	Green L
G2	Griffiths P

Ref no.	Respondent	
H1	Hall P	
H2	Hammersons	
Н3	Hancock A	
H4	Henshaw F	
H5	Home Retail Group	
Н6	Hopper M	
H7	Hobbs E	
J1	Jarvis PN	
J2	Jaipur	
K1	Kybird P	
L1	Lark A	
L2	Lawrence M	
L3	Legal and General	
L4	LeRoy M	
L5	Lewis R	
M1	MK Community Foundation	
M2	MK Council	
М3	MK Forum	
M4	MK Gallery	
M5	MK Higher Education Board	
M6	MK Bus Users' Group	
M7	MK Cyclist's Touring Club	
N1	Napleton J	
N2	Nature England	
01	Old Woughton Parish	
02	Oliff J	
P1	Patel A	
P2	Perry A	
R1	Ray D	
S1	Salter B	

Ref no.	Respondent	
S2	Saunders J	
S3	Saunders D	
S4	Scott J	
S5	Sear I	
S6	Senior A	
S 7	Skelton T	
T1	Thamesway Group	
T2	Theatre District	
Т3	Thornton S	
T4	Turner S	
W1	Walker E	
W2	Walker T	
W3	Whiley K	
W4	Wiliams P	
W5	Wilson J	
X1	X Leisure	
X2	Xplain	

Table 2: List of Respondents

	TOPICS RAISED BY RESPONDENTS	FOR	AGAINST	FOR	AGAINST	TOTAL NO. OF RESPONSES TO TOPIC
1	generally supporting the overall Plan	A1 A2 B1 B4 B6 B8 B11 B12 C1 C3 C6 E1 F2 H1 H2 H3 H4 H5 J2 L2 L4 M3 M4 M7 N1 N2 O1 O2 S1 S3 S4 S6 S7 T1 T2 T3 W1 W2 W5 X2	C5 L3 T4 X1	40	4	44/76
2	protecting the classic CMK infrastructure	A2 B4 B6 B8 E1 H2 H3 H4 JI J2 K1 L4 M2 M3 M4 M7 N2 O2 P1 S1 S3 S4 S6 S7 T1 T3 W2 W3 W5 X2	C5 C6 L3	30	3	33/76
3	proposals for smaller independent retailers, the outdoor market and/or market hall	B4 B8 B10 B12 H3 H7 L2 M3 P2 S3 T3 W1 W3	C5 H2 L3 X1	13	4	17/76
4	proposals for more community and cultural facilities, including a wider range for younger and older people and the voluntary sector	A1 B3 B9 B12 H3 L1 L4 L5 M1 M3 M4 P2 S3 S4 T3 W4		16	0	16/76
5	increase the number of parking spaces	A2 B6 B10 B11 C3 H5 L2 N1 S1 T2	C5 F2 H2 M2 M6	10	5	15/76
6	proposed shuttle and transport interchange	B4 F2 L2 L4 M2 M3 M6 P2 W2 X1	B10 C5	10	2	12/76
7	advocating MK wide referendums	A1 B3 B9 F2 G2 L4 L5 M2 M3 S7 W4 X2		12	0	12/76
8	mixed use across CMK and/or the mixture of uses indicated in the proposals plan	C6 B4 H2 M4 T3 T4 X1	B11 C5 H4 L3 M2	7	5	12/76
9	supporting a university in CMK	E3 J2 M2 M3 M4 M5 P1 R1 S1 T2 W2	W1	10	1	11/76
10	creation of a civic or public square and/or public event space	B4 F1 H1 H2 M3 M4 P2 S4 T3 X2		10	0	10/76
11	design guidance for developments (weather protection for pedestrian, building heights)	B4 H2 H4 L2 M2 X2 (weather protection)	C5 M2 W2 X2 B12 (too tall)	4-6	4-5	9/76
12	seeking additional language regarding sustainability, with proposals such as extending chp	B5 F2 L4 O1 T1 X1		6	0	6/76
13	proposed housing densities too high	B6 B7 L4 M2 X2	X1	5	1	6/76
14	regeneration of exising sites, especially ageing office stock, not adequately covered by the Plan	C6 M2 S1 N1 T1		5	0	5/76
15	supporting the retention of the qualities of Campbell Park and its surroundings or expressing concerns about development within the Park	H4 G1 M4 S6 X2		5	0	5/76

Break-down of Public Consultation Respondents			
ЛК resident	44	58%	
CMK Business	15	20%	
oluntary Sector or other organisation	10	13%	
Statutory Consultee	7	9%	
otal	76	100%	

Context

CMK resident population 3,000 MK resident population 250,000 CMK Businesses 1,000

90

Statutory Consultees

Other issues receiving 3-4 comments

- confusion that indicative proposals plan = land use 'allocations'
- wording of various policies too prescriptive or confusing
- principal pedestrial routes too many or some missing
- re-instate Midsummer Blvd (route through Midsummer Place)
- Policy G1 (protecting infrastructure) not strong enough
- cycling routes & policies need re-visiting and expanding

Table 4: Consultation Feedback Matrix Responses

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
B4.7	It suggests an equation to me, thus: DIVERSITY + PROXIMITY = ACTIVITY of uses adjacent vibrancy, day & night	Comment noted.
B4.8	- "A stronger sense of PLACE, a vital and exciting HEART to the city" - yes! a timely revival of this theme	Supportive comment noted.
B4.9	- recognition of taking a chance on "major, exceptional investments", with the emphasis on 'exceptional', altho' we need to frame that with some care	Recognition for the importance of the wording in CMKAP G11 is noted.
B4.10	- the plan's proposals exceed the Core Strategy - sad that it should have to do so but how good that someone has set this down and the timing is good	Supportive comment noted.
B4.11	I do like the idea of (office) employment growth, with additional housing, hotels, INTERNATIONAL conference space and a Congress Hall.	Supportive comment noted.
B4.12	MK is so well situated between London and Birmingham, on major transport arteries, between east and west regionally and Oxford and Cambridge in particular, there should be a ready market, at least nationally, for such facilities One point of detail, however: I couldn't see reference (maybe it's in the main report?) to East-West rail, which being now commissioned and to be electrified 25kv from the start, represents another major link.	East-West rail is noted in par. 2.30 and has now been updated.
B5.1	I live in Campbell Park and have just read the CMK plan. I am very concerned there is no mention of sustainable living in the plan, and in my opinion this should be an underpinning value. The transition network community led approach are very helpful in providing a step by step plan to how to build a resilient community that is less defendant on oil www.transitionnetwork.org I am very happy to get involved in sharing these ideas with the council and I have the following points to consider, Energy-less fossil fuel and increased renewable. Reuse rather than rebuild- reduce carbon emissions by building on what we have. Reduce the amount of cars coming to the centre by carsharing schemes improving public transport links. Promote localised economy with smaller business units for more affordable start ups and social enterprises. Growing spaces for food including allotments and using the flat roofs. Public edible spaces for foraging and campaigns of how to use them. CMK is a challenge but if it became an example of transition to a fossil fuel free zone could have a real significant impact on the city. I would like to see specific CO2 emission targets in the plan. I am connected with others in the city who want to create a transition hub connecting all the projects which are committed to reducing CO2 and create greater community resilience. I believe many will not think to comment on this but if you asked the questions you would have a more positive response! Please be bold and think out of the box, think of a more sustainable future for all of us	High-level points are covered in the MKC Core Strategy to which this plan is a supplement. Valuable policy suggestions such as this are covered in the Council's document and will also be passed to the CMK Town Council.
B6.1	Can I commend the Alliance on the CMK Neighbourhood Plan as currently drafted. It is clearly the result of much hard work and wise thinking.	Supportive comment noted.
B6.2	I'd like to offer the following comments:- In Fig 9, I believe that the arrow spurs leading north of H5 should actually be black, not orange.	Comment noted, figure has been revised.
B6.3	In policy G9, I would urge you to make provision for rare, high-quality exceptions to the normal block	Note: Policy numbering has changed in the revised Plan. Policy G8 accepts the amalgamation of Blocklets across Streets for large developments on conditions: this would seem to be reasonable <i>and allows flexibility</i> . Departures from other policies are dealt with in Policy G11, in which case developments are required to be exceptional.
B6.4	In policy G 11, I would urge you to extend your range of envisaged densities downwards, to allow for greater flexibility of densities as set out in the M K CS.structure.	There are no minimum or maximum densities in the plan – the Proposals Plan and Table 3 reflect the types of densities that would be

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
		required to meet the Core Strategy's housing requirement for CMK.
B6.5	Throughout the document, I would urge you to recognise that although active frontages are generally welcomed, there are many places in CMK where having a building line in close proximity to a major road will reduce the attractiveness of any walkway as a "window, shopping" space, and it may be more appropriate not to attempt to attract pedestrians into the area with active frontages.	The Plan proposes the retention of the CMK infrastructure, which does not locate buildings in close proximity to a major road. This only occurs where the building line has been brought forward, which the Plan does not encourage.
B6.6	I recognise and support your arguments for CMK to be recategorised as Zone 2 for residential parking provision, specially those arguments culminating in para 4.20. Likewise, I welcome and support your arguments that developers should not be limited to providing only 30% of the parking spaces that their development will need.	Supportive comment noted
B6.7	Finally, I welcome and support that reasoning that huge swathes of suburban MK are ideal for providing family housing, and that CMK can best contribute to MK's overall housing aspirations (as set out in the Core Strategy) by addressing some specific categories of residents (such as young transients, including commuters, and such as empty-nesters). for whom CMK's offering may be particularly relevant. This links to my previous comment about a wider range of dwelling densities, because although some of these residents' may be entirely content within the 100-250 dph specified. some of them will only free up an underoccupied family home if they can move to a moderately spacious CMK apartment, at somewhat lower densities.	Supportive comment noted.
B6.8	For the avoidance of doubt, these comments are offered in a personal capacity, and do not represent the official views of my political party or the current MK Cabinet.	Comment noted.
B7.1	I was looking at the detailed plan and noticed that in square F1 in campbell park there were 800 dwellings proposed in addition to substantial office development. How many storeys high are these buildings proposed to be? Is there a 3D model of the proposals?	Policy G9 establishes the Plan policies for building heights which would apply to Block F1. Densities have been revised, but in general, the architectural solution to development is not prescribed in the plan.
B8.1	I do not use the town centre as there are very few independent stores. I would love to see an area for fledgling businesses (retail or other) to show what they can do and be available weekly ie barrows for traders.	Supportive comment noted - agreed plan seeks this objective within Market Square and Market Hall.
B8.2	Also to keep underpass facilities and green verges. Grid roads work for MK.	Supportive comment noted for Policy CMKAP G1, which defines the 'CMK infrastructure' as including the grid of tree-lined Boulevards, Gates, Streets etc., and the associated grid of pavements with underpasses and portecocheres.
B9.1	It is really important that there is space and offices allocated to voluntary organisations and charities in the new plan. Organisations like Shelter and AgeUK have space now but I don't see any in the plan. They play a vital role and must be there to help those who are less able than many of us or need advice, information and/or accommodation.	Policy SS4 encourages developers to bring forward proposals that provide facilities for community and voluntary organisations, being an essential part of the growth of CMK. Para. 6.37 states that existing provision for this sector should be protected and relocated when re-development occurs.
B9.2	It's a fact that there will be more older people in MK by 2030 than anywhere else in the country. There need to be accessible areas for them with good information and advice.	A key objective for the plan is to promote the city centre as a social place and one that supports community needs for MK. The Plan

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
		proposes a convenient Shuttle service to help achieve a shift to greater public transport and accessibility for everyone, including older people. However, it is beyond the scope of a Neighbourhood Plan to propose policies for public transport affecting the entire Borough. (Note: the <i>proportion</i> of older people will increase greater in MK than elsewhere by 2030 because MK has an unusually young population currently. However, the <i>number</i> of older people in MK will still be less than many other towns and cities in the country.)
B9.3	The Centre belongs to EVERYONE and we should all be able to have our say in what goes on if there is a referendum.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
B10.1	It is now 26th November and I have only just become aware of this consultation process about the future of the major part of the town I live in. The only reason I know about it is because I was notified by the clerk of our town council. If this had not happened then I would have been denied the opportunity to send in any comments for this consultation. I therefore don't believe that enough has been done to communicate and raise awareness of this process and there has been too much reliance on "technology" such as wiki and the internet rather than making efforts to reach the people in their locality and homes. There are many people in my area that do not have the internet or email or even own a computer and it is unreasonable to expect them to change to avoid being eliminated from such processes.	In April and October 2012, newsletters and pamphlets about the plan were delivered (by post and by hand) to all businesses and homes within the boundaries of the CMK Town Council (parish). All neighbouring Parish/Town Councils were notified by email to the Clerks.
B10.2	I have lived in Milton Keynes for 30 years and have seen it grow up from the basic shopping building to its current state. I have worked in CMK for several years and there has been nothing but persecution of the motorist in a city which has been designed for the motorist. It was warming to see that the new plan says that it will not "punish" the motorist yet persists with reducing parking availability and increasing park and ride, both of which have proven a failure over the past ten years. The council are effectively taxing employees and taxing shoppers and we get nothing in return. Putting a few extra buses on and having a circular route around the city centre is not going to attract me or any of my friends and family to the city centre as these strategies don't address the fundamental needs of a visit to the city centre. I need to have a place to park my car which is accessible for carrying back to and transporting home my shopping bags without having to haul them all around the city centre and then on to a "crowded" bus, then having to carry them back to the car or to my home. They are HEAVY and BULKY and if I am to go shopping I need somewhere to put them which is convenient. Although the Alliance Plan acknowledges that public transport is poor I don't think it does anything to address the situation other than putting on a shuttle bus. There needs to be significant planning for a coordinated and convenient public transport system across Milton Keynes that works for the residents and is not just paying lip service as an excuse to ban motorists. It takes far too long to travel by bus in this town as there are no fast, direct routes the buses all take the circular route and therefore it takes hours to get anywhere. There also needs to be coordination at connection points so that when I arrive at an interchange I don't have a	The Plan recognises that a number of policies are needed to ensure developments contribute to meeting the vision that by 2026 CMK will be the most accessible city centre in the UK, pioneering sustainable yet convenient transport choices for workers, visitors and residents. The plan does not just focus on big 'high street' names but also fledgling and independent businesses. It is clear that the changing expectations of retail customers is evident, and the shopping experience is becoming as important as the product. It has to be a clear point of difference in an omni channel world where services and interaction can be strong footfall drivers.
	half hour wait for the next part of the route. They need to be frequent so that if I miss one there will be another one coming along shortly. On the London Victoria tube line there is one train every minute and I can rely on it. If CMK is serious then	We have to inhabit MK Council's

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	they have to recognise an alternative method of transport has to work for us as shoppers and visitors.	transportation policies and strike the balance
		with many residents and workers who desire
	I resent being persecuted by an army of parking wardens who are constantly patrolling with their cameras and tickets who	more car parking, and the need to use more
	are out to extract more money from us when we have paid our car tax, petrol tax and our rates which have gone to	sustainable transport if we are to avoid grid-
	providing the car parking spaces in the first place. It was all FREE when I moved here and has been turned into a money	lock and congestion in future.
	making racket. I fail to understand why councils can't see that parking charges drive people away and that being unable to	
	park anywhere drives people away. That is why we go to places where parking is free. They are charging higher and higher	
	business rates to the shopkeepers while driving away their income by parking charges and hefty fines. Yes it's that obvious. It would be more reasonable if we could see the money was being reinvested in the upkeep of the infrastructure but this	
	council is neglecting their legacy of a brand new town. The landscaping has gone to pot, the roads are cracking up and	
	have potholes and the paths are uneven and not maintained. I think it is criminal the way this has been allowed to fall into	
	ruin.	
	Practically speaking the pay and display is the worst sort of charging because I have to decide how long I need to shop	
	before I get into the shopping building and then have to constantly monitor the time to make sure I get back to the car on	
	time to prevent being fined. I often don't know how long I want to be and if left to shop would spend a lot longer going	
	round the shops spending money. As it is it is a rather stressful and unpleasant experience so I go elsewhere. When I drive	
	past all I see is lots of empty spaces that would be filled with shoppers if they weren't being persecuted and robbed.	
	FACT: I will not be walking to the city centre for my shopping ever. I live in the town but it's 4 miles from CMK, uphill and down dale though the poorly maintained redways that go all round the houses. (that's a minimum of an hour each way)	
	FACT: I will not be cycling to the city centre for my shopping Ever, because there is nowhere to put my shopping once I	
	have bought it and there is nowhere secure to put my bike when I get there. Also it rains a lot in England, I don't want to	
	have a shower and change when I get to the city centre and a shower and change when I get back home.	
	FACT: I will not be shopping in the city centre a) while I have decide a finite time to be there shopping. b)I have to pay to	
	park and be at risk of a heavy fine if I take too long. c) while the choice of shops in CMK is so poor.	
	FACT: We lead very busy lives and unless CMK can provide a quality shopping experience we will continue to go elsewhere.	
	I have been to CMK twice in the last 6 months.	
	The CMK Alliance Plan needs to address these basic issues otherwise it will be spending and wasting a lot of my money for	
	nothing.	
	These comments may be dismissed as a RANT but I am part of a family of six who share similar views and have similar	
	requirements (we all live 4 miles away, have busy lives and limited funds). We also have many friends in this part of town	
	who have similar concerns and requirements (they all live 4 miles away, have busy lives and limited funds). I believe the	
	Alliance Plan needs a lot more work on the fundamentals, it needs to incorporate milestones with measures of success	
	which have to be met before moving on to the next stage.	
B10.3	I need a good range of shops that are NOT all big names that sell the same things that are sold in every other shopping	Supportive comments noted for Policy T2 and
	centre. There has been a big rise in rents over the years and so the independents have understandably gone elsewhere. If I	T4 and need for convenient parking and better
	need something from Marks & Spencer I can drive to Kingston where the parking is free and convenient to the shop. The only thing I need to go to CMK for is John Lewis which is a great shop and the only attraction. It is pointless planning to get	public transport system.
	more people into the city centre when the fundamentals are not there anymore to attract existing residents let alone the new	
	ones that are planned. I prefer to go to the local centre and use the internet for shopping. Alternatively I shop in London	
	where I now work and there is a convenient public transport system that is fast and goes where I need it to.	
B11.1	I would like to open my comments document by showing a genuine & general note of positivity & genuine excitement on	Supportive comment noted.
	some aspects of the CMK Alliance Plan for Central Milton Keynes having been resident in Milton Keynes since '1976. In my	

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	business to get their desire back to grow in this area. There are no positive assurances which ensures the plan can promise it can support or deliver business growth if matters of increased parking able to accommodate current & new office space are not developed.	
B11.3	Section 3 Implementation & monitoring 111 Proposals plan, page 78 (Figure 12 Public realm infrastructure) We see with added disappointment & concern to use a better word that 'dwellings' are earmarked for areas within our current location (C4) This is a stretch of land which I alluded to earlier which would benefit our business centre which the much needed 'parking and/or potential growth space for expansion of our office space. Q: Have the steering group behind the CMK Alliance plan considered or consulted with us (business leaders) on the potential impact to our current tenants in our business centre if the proposed 60 dwellings are erected in the land directly behind our building? (C4) I have no doubt that if the dwellings are planned in this area, they will be high density. Q: Should we as a local business not be consulted as to what major impacts this will have to the general overview and of our building and occupants? '. Q: Will this not add to the burden of the already congested parking in this area? Q: What guarantees of suitable dwellings and occupants are there to reassure businesses in our centre? Has the plan considered that the local authorities have allowed the dwellings in the vicinity of Lloyds Court I and the library to deteriorate and what 90mmitment do we have that it is a wise plan to allow and increase in residential? Q: Will there be height restrictions to any planned high density residential developments in the aforementioned areas? Q: Should the CMK Alliance Plan not be taking the opportunity to support established and local businesses in the way of identifying what such impact developments such residential dwellings like this one would have in this area?	The Alliance faces the challenge of accommodating 5,000 dwellings along with other uses to meet the aspirations of the Core Strategy. It also is wanting a mix of uses. The expansion of the business based in C4.4 would be welcomed. The Plan encourages flexibility in developing land and would welcome office as well as residential use on this site. However to use a development block for office parking only would not be acceptable, but new development can integrate parking on site.
B11.4	At this stage, I refer to the minutes of the last Steering Group meeting held on 4th October 2012: Parking - Parking is one of the key issues that business will look at when seeking a location - In my experience & discussions & experiences with local businesses originally looking into CMK as a destination to locate their business is that parking is and has always been a challenge and certain business types will not survive the inconvenience caused by this area, for example:- Business residents leaving to visit clients with a view to returning only to find there are no spaces - thus this affect their day to day business Current clients have to access CMK early enough to secure a parking space Clients with school runs to consider will not put CMK high of their list of desirable business areas due to the difficulties of parking by the time they arrive into CMK. Car-share schemes are inadequate compared to the ratio of resident employees, and office space buildings to spaces. Q: What support is there for office space providers such as Business Environment to be able to handle objections from our own occupants/tenants to the potential disruptions caused by the plan in terms of the main factors being parking and increased residential developments in our area?	Supportive comments for Policy T4 (less restrictive parking standards for businesses), but significant concerns regarding parking and transport noted. In particular, the respondent's experience indicates that businesses are leaving and/or not setting up in CMK because of parking issues, particularly professional businesses that require intra-day journeys to clients and visits by clients.
B11.5	Without the desire to make my initial interaction with the consultation process exhaustive, I close with a request to some feedback and direction on the point, questions and statements I make on this email.	Comment noted.
B12.1	I am writing to say that on the whole I agree with the above plan.	Supportive comment noted.
B12.2	There are however a few comments I would like to make as I have been unable and didn't know about the consultation meetings! I would like to see more Public Spaces, more Community Amenities and Lower buildings. Encourage creativity with more small business enterprises and fewer Multi Nationals.	Open spaces: the Plan seeks to protect the existing public spaces (e.g. Campbell Park, Fred Roche Gardens). Community Amenities: Policy SS4 and the Proposals Plan encourage the delivery of community facilities and a broader mix of land

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	suggest, warmly welcomed as a major contribution to the life of CM K. The plan refers to the need to connect communities across the grid road corridors of H5 and H6, but nowhere addresses the potential linkage from Campbell Park into Newlands and Willen Lake beyond, despite proposals not only for the BMKWaterway but the potential for further leisure development around Willen Lake. That element of connectivity and potential connection should be included. Given the importance placed by the plan on the green landscaping in the city centre, and the stated wish for the centre to be distinctive and admired. The waterway environment and opportunity at least need their own section in the text and recognition of the waterway potential in the diagrams. The SE Waterways Partnership is developing its strategic planning typology for places along the canal. distinguishing those places which embrace their waterway from those who turn their backs on it. It would be excellent if the CMK plan could help move towards the former of those two. The Canal & River Trust would be delighted to discuss how that might be achieved, and to help with suggested wording if required.	
C2.2	These comment copied to Nick Fenwick since they may in part apply to the recently consulted draft CMK Development Framework.	Comment noted.
C3.1	Thank you for the information received today. Although we are a small business, I welcome the opportunity to have an input into the future of CMK. Page 2: "Generous and convenient parking". Few people working in CMK or calling to shop/do business or leisure activities etc would agree with this statement. You only have to ask employees of Network Rail re parking to find out how difficult it is, if they can not park within their own car park. Yet much publicity has been given to the success of this new arrival. Why has parking not been properly dealt with when planned? This is at a time when many companies have shed staff in CMK, yet there is still insufficient parking. Many mid mornings cars race each other to the first available parking slot. If I go to the dentist mid morning, I sometimes find I can spend over 10 minutes looking for space on the "Purple Parking" and then about a quarter of a mile away! Why did 2 hotels (Encore/Jurys) not have specified parking (underground)? This led to more congestion in this area of Midsummer Boulevard and this also happens to some extent in the evenings. A few years ago car parking was taken away to add to that already used at Mobil House, yet many times I see free space in this section. The opening of the Pinnacle has also put further pressure on the space available for parking. Page-2:-Public Transport:Why not one bus service for all of the Bletchley; Stony Stratford, Wolverton, Newport Pagnell and the estates in MK?: Surely this would provide economies of scale, consistent service and hopefully more services. How do you hope to change people from cars to buses at present? When the new retail units open at MK Dons stadium, assuming free parking, then the retailers in CMK Shopping Centres 1 and 2 are likely to see less customers and this will lead to more empty premises. The Council will earn less in parking fees and eventually in Business Rates.	Comment noted.
C3.2	I support much of what you have outlined and wish you every success. Parking/transport is an important issue and I hope you can improve on the failures of recent years.	Supportive comment noted.
C4.1	I appreciate that the closing date for comments was 7th December but due to other business Castlethorpe Parish Council has only just now been in a position to consider the draft. At a recent general meeting of the Parish Council the following views were unanimously expressed: We are well aware that the CMK Alliance and the Development Framework are consulting at the same time about similar subjects. The conclusions on many issues (car parking for example), vary considerably and it seems to us that the respective leaders of both groups should identify these differences and work towards single recommendations which can then form a blueprint for the future of CMK.	Comment noted.

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	which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities" (Paragraph 1). As you are aware, the NPPF also clearly states, at paragraph 21 that: "Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment" Given the above context, we consider that adding an additional layer of inconsistent policy will not loosen the burden on investment as the NPPF clearly intends.	every effort has been made to reduce the burden that arises.
C5.4	Community and Stakeholder Involvement In 'addition to the above, paragraph 1.8 of the CMKAP states that: "Perhaps more importantly, the CMKAP is a clear statement of intent in terms of how local people and businesses want to see out city centre to develop in the coming years, providing guidance and certainty to investors, residents and businesses alike." We consider that this statement is misleading and inaccurate, especially as it is clear that the overarching aim of the CMKAP is to retain the status quo and seeks to add an unjustified and unqualified additional burden on the planning system and therefore does not provide certainty to investors. This statement therefore runs contrary to the requirements of the NPPF (paragraph 21).	Comment is noted, but the opinion expressed is one with which we do not agree.
C5.5	Moreover, we note in paragraph 1.21 that "The draft Plan for public consultation has therefore been informed by a great deal of community and stakeholder involvement and consideration of a range of issues," Although we do not dispute this statement, we do contend that our clients have made substantial submissions to both the wiki and the 'expert panel' sessions. However, we are not aware of any instances where the comments and concerns raised have been taken into account or represented in the consultation draft of the CMKAP. Furthermore, the makeup of the CMK Alliance Steering Groups and Decision Making bodies, were not, in our view, fully representative of the business element interests in Central Milton Keynes. Indeed, we are aware that two business representatives of the Steering Group resigned as their positions were considered untenable. Given this, we therefore question the validity of statements contained in the introductory section regarding the CMKAP being wholly representative of all interests, especially business, in CMK.	This matter has now been dealt with in the Consultation Statement, which is a supplementary document to the Plan. Correction: one business representative resigned prior to final publication of the consultation draft because they found their position untenable.
C5.6	General Comments We support the vision to create a dynamic centre of one of the fastest growing regions in the southeast as set out in Policy CMKAP S1. However, the reality is, and as published by Milton Keynes' Council's latest employment figures for their administrative area, that unemployment currently stands at 3.6%, some 1.1 % higher than the south east region. In order to attract investment to Central Milton Keynes, and to create the jobs required to address the aforementioned shortfall, the CMKAP must recognise the requirements of businesses and investors, especially any viability constraints in bringing forward development. It must allow development to take place to create economic growth as advocated by the NPPF (paragraphs 18 and 19).	Comment noted.
C5.7	We consider that the aim to bring greater diversity of uses to every block or to create blanket mixed use development blocks as highlighted in Figure 14 is wholly unrealistic in commercial viability terms.	In preparing the Plan, the Alliance consulted with stakeholders and had discussions in workshops, and concluded that users of CMK welcomed the policy of mixed use across CMK. This is supported by expert opinion, for example CABE, and has been achieved already in many places across CMK. The importance of commercial viability is acknowledged.

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C5.11	In respect of the CMKAP's 'Access, Transport and Parking Strategy', we consider that paragraphs 7.8 and 7.9 contradict the aims of the CMKAP as set out in the Executive Summary of promoting public transport, cycling and walking as the preferred mode of choice. For example, paragraph 7.8 advocates maximising CMK's highways capacity to support future growth and development by retaining Gates, Boulevards, Streets etc.	Paragraph 7.8 in the Introduction to this chapter states that 'it's important to future-proof transport in CMK by protecting the movement corridors that keep options open for different transport solutions in future.'
	Paragraph 7.9 goes on to promote new development to create greater permeability- more routes for walking and cycling. It would be helpful to understand how both these objectives can be achieved, especially as the first will reinforce the status quo i.e. reliance on the private car, ease of car access and car parking. Milton Keynes' unique position as one of the few conurbations in the United Kingdom that offers such a car friendly and dominated environment can only be reversed in favour of public transport and more importantly more 'sustainable' forms of transport, once the requisite investment and infrastructure is put in place. The CMKAP unfortunately does not provide any meaningful solution and instead advocates a strategy that encourages more car use, which is a simple cut and paste of Policy CS7 of the emerging Core Strategy with the key exception that Policy CS7 does not promote maximising the capacity of the highway network. These shortfalls and inconsistencies must be addressed. Moreover, re-classifying CMK parking standards to Zone 2 (paragraph 7.39) will result in the effective doubling of car parking spaces required for any new retail development for example which will further enhance and promote the use of the car which will in turn serve to increase Milton Keynes' carbon footprint. In any event, and given our comments regarding linkages to the Development Plan earlier, it is considered that this approach is flawed and does not accord with either the NPPF or the Development Plan.	Maximising highways capacity, retaining Gates, Boulevards etc is consistent with this aim, as public transport, whether buses, trams, PRT, or 'on-demand small vehicle transport' (currently being explored by MK Council), cycling, and walking all require movement corridors and highways 'capacity'. Greater permeability for cycling and walking is supported through Policy G8 (Block Structure). The parking standards in the revised Plan now retain Zone 1 parking standards for most land uses in CMK with the exception of B1 office developments, which are Zone 2 in line with other town centres in Milton Keynes.
C5.12	We consider that the approach outlined in paragraph 7.16 is also flawed as it advocates redesigning the original concept of Central Milton Keynes by dispersing and mixing land uses across the area. This approach is not consistent with the NPPF in that it would be almost impossible to control or assess the impact of leisure, <i>office</i> and retail uses over such a wide area. The Primary Shopping Area is the designated area for retail purposes. Central Milton Keynes <i>office</i> district has broadly covered the same area since the development of Central Milton Keynes in the late 1970's to date.	Policy G6 supports and elaborates the Core Strategy for CMK, as well as Policy S5 of the adopted Local Plan (2005) which states that the key objectives for Central Milton Keynes are to: (i) Achieve a broader mix of uses, within a finer grain of development
C5.15	In respect of 7.17, it would be helpful to understand how a second transport interchange will be funded and more importantly, evidence should be provided as to the actual need for such a facility.	The need for this facility comes from <i>LTP3</i> and several transport strategy reports over the past decade, and feedback from Arriva and the MK Bus Users Group (MKBUG) for a 'bus station' in the retail core.
C5.16	The protectionist stance of the General Policies detailed in Section 8 of the CMKAP are considered unjustified given the lack of any evidential base or heritage/conservation designation. Policy CMKAP G1 for instance advocates 'Exceptional Developments' as justification for removal of streets. Moreover, Policy CMKAP G2 advocates the protection of classic CMK buildings, which, in the absence of any specific or tighter definition, presumably includes the majority of the existing building stock within Central Milton Keynes. It should be noted however, that the National Planning Policy Framework and the requisite sections of the Planning (Listed Building and Conservation Areas) Act 1990 set out the criteria for the protection of designated heritage assets and areas. Our understanding is that Central Milton Keynes contains only one listed building, being thecentre:mk shopping building. Recent proposals to list other 'classic' CMK buildings have failed i.e. Lloyds Court.	English Heritage, the national agency that advises government and others on matters of heritage and ensures that it is protected for this and future generations welcomes and supports the reference to the 'cityscape' in the Vision and Key Principles for promoting the formal geometry of the grid and its classic infrastructure and achieving high quality architecture respectively. CMKAP G2 explicitly encourages MK Council to produce a list of potential heritage assets

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		including public art.
C5.17	We also contend that the requirements of Policies CMKAP G6, 7 and G8 are flawed and unrealistic as the provision of Use Classes A1, A2, A3, C1, 01, or 02 at ground floor level of all developments along principal pedestrian routes would add unsustainable additional commercial and viability constraints to developments. Such uses only work where there is significant footfall i.e. within a Primary Shopping Area and not along car dominated thoroughfares. Moreover, providing continuous active frontages at ground floor level in design terms is difficult as back of house and access for service requirements must be taken into account.	The revised Plan has removed Principle Pedestrian Routes and Policy G7 Active Frontages has been modified.
C5.18	Moreover, the requirement of the policy to provide continuous weather protection is also unrealistic and does not reflect the design requirements of modern commercial and retail developments which require maximum visibility. Neither does it encourage exciting, innovative and ground breaking design by attempting to template for "more of the same" in this way and contradicts comments made elsewhere which promote architecture that is both nationally and internationally renowned . Notwithstanding this, although covered walkways are evident across Central Milton Keynes, these are by no means continuous. Pedestrians are subject to the weather elements when crossing streets, vast surface level car parking areas and porte cocheres to cross the vast Boulevards. The Station Square is a prime example of such an open and windswept area where natural desire lines take pedestrians directly across the open space. We contend that the original concept, although innovative in principle, in practice does not achieve the desired result.	This is a contradictory response, which acknowledges the need for weather protection but rejects the policies that would secure it.
C5.19	Policies CMKAP G9 and CMKAP G10 are considered too prescriptive and do not link with any robust evidence base, especially as they cumulatively seek to establish a detailed design guide for Central Milton Keynes. Policies should reflect and be able to absorb and react to the changing requirements of society and commercial, retail and business users and not propose to remain locked into 1970/80's design solutions if Milton Keynes is to grow and prosper into the future.	These are opinions that are not accepted. The Plan offers flexibility within the distinctive features of CMK.
C5.20	We question the evidence base supporting the allocation of Block D3 for a market hall in Policy CMKAP SS2. Indeed our Client's discussions with the present market operators show no desire or demand for such a facility from either operators or traders alike. In respect of criteria h) of the policy, commercial and logistical issues surrounding dual aspect shop fronts should be taken into account before stipulating restrictive policies.	The Portas review encourages provision for small traders to grow from market stall to commercial unit through all the steps in between. The Market Hall encouraged by this Plan provides an important link in this chain for entrepreneurs.
C5.21	As per our comments above, Policy CMKAP T1 is flawed and promotes continued unrestrictive use of the private vehicle which runs contrary to the Government's aims of achieving sustainable economic development. In addition and for the reasons already highlighted above, Policies CMKAP T2, T3 and T4 are fundamentally flawed.	The Plan keeps options open for movement by all modes of transport through the maintenance of the integrity of the existing grid structure. The respondent offers no evidence to justify changing this profound feature of the plan.
C5.22	Conclusion To surmise, we strongly object to the CMKAP on grounds of soundness given the lack of any coherent or robust evidence base. Moreover, we consider that the linkages back to the 'Development Plan' and the NPPF have not been made and the over-reliance on the emerging Core Strategy is premature.	See above.
C6.1	On behalf of our client Commercial Estates Group (CEG) we set out our views on the Consultation Draft of the CMK Alliance Plan 2026 (CMKAP), the emerging Business Neighbourhood Development Plan for Central Milton Keynes (CMK). It is recognised that the CMKAP intends to be consistent with the draft CMK Development Framework which is currently also under consultation. In some important respects it is not and it is critical that the two documents are consistent. CEG is making representations to that document in parallel with these comments on the CMKAP. Background	Comments noted. The CMKAP generally builds on the principles in MK Council's recently adopted <i>CMK Development Framework</i> , but in some cases departs from them.

Comment noted.

CEG supports the principles of the spatial and design strategy, particularly the commitment at para 6.30 to exceeding the Core Strategy's aspirations for office employment growth in CMK. However, CEG is of the view that the strategy should also

C6.6

Section 6. Spatial and Design Strategy

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	CMK. In doing so it overlooks opportunities for redevelopment, uplift and enhancement at underused/inefficient brownfield	
	sites in prominent locations at the core of CMK.	
	Mo twist that these comments will be taken into account and addressed in the sundated CMIVAD. In the more than	
	We trust that these comments will be taken into account and addressed in the updated CMKAP. In the meantime, please do not hesitate to contact me or my colleague Nick Thompson if you would like to discuss these points in greater detail.	
E1.1	English Heritage welcomes and supports the recognition throughout the Plan of the special character of Central Milton	Supportive comments are noted from the
	Keynes arising from its distinctive planned grid transport system, block development and integral landscaping framework. In	national agency that advises government and
	particular English Heritage welcomes and supports the reference to the 'distinctive cityscape' in the Vision and Key	others on matters of heritage and ensures that
	Principles 1 and 8 for promoting the formal geometry of the grid and its classic infrastructure and achieving high quality	it is protected for this and other generations.
E1.2	architecture respectively. However, it is our view that Policy CMKAP S1 should include an objective to respect and reinforce the distinctive design	Supportive comment noted – CMKAP S1 does
L1.2	and heritage of Central Milton Keynes, either as part of objective 1 or as a separate objective, particularly as the public	reference CMK's distinct cityscape.
	domain is considered the greatest achievement of Central Milton Keynes in paragraph 4.18 and there is recognition in	
	paragraph 5.2 that the unconventional grid layout and extensive landscaping proposals provide a convenience and quality	
E4.0	of life that attracts both investment and workers.	
E1.3	English Heritage welcomes and supports Policies CMKAP G1 and CMKAP G2, the former for its recognition of the classic Central Milton Keynes infrastructure as part of its heritage and the latter for its protection of the classic Central Milton	Support for CMKAP G1 and CMKAP G2 is noted.
	Keynes buildings, which will include the listed main shopping building.	noted.
E1.4	Likewise we support and welcome Policy CMKAP T1 for its protection of existing movement corridors as a grid of Gates,	Support for CMKAP T1 is noted.
	Boulevards, Streets and "slow streets".	
E2.1	Thank you for consulting us on your Business Neighbourhood Plan for Central Milton Keynes. However, we have no	Comment from national agency noted.
F0.1	comment to make.	Compart for CMICAD CC1 and University
E3.1	I have only recently viewed your strategic development plan for Central Milton Keynes. I am delighted to hear that you have the vision and foresight to reserve Block B4 for something of strategic importance. As the closing date for public	Support for CMKAP SS1 and University on Block B4 noted.
	consultation is rapidly nearing, and other views may have been aired already, I wish to inform you of our intention to build an	BIOOK BY HOLOG.
	internationally important Higher Education Institute on that site. I am currently awaiting to hear back from Councillor Andrew	
	Dransfield who is arranging a preliminary meeting with other senior members of the council on our behalf. I will only be able	
	to give you fuller details of the proposal once it is made fully public but can say that the plan includes a nationally significant	
	lecture theatre, conference facility and library, all of which will be open for public access and again emphasise that the	
	institute is of international relevance. For several reasons, including our scope in facilitating research at other universities, its centrality between Oxford,	
	Cambridge, London, Birmingham and Warwick Universities and the Northern UK Universities (and the UK's centrality	
	between America and Europe) make Central Milton Keynes an attractive site for the UK.	
E4.1	I've had a business in MK market for 12 years and am a member of the Save MK Market committee.	Agreed. The Plan's intention is to support and
	We are extremely worried about Policy SS2, on pg 65. This says that Market Square will change to demountable stalls only,	expand the market as an important contributor
	with lock-up storage units nearby.	to the variety and competition of shopping in
	It is no exaggeration to say that this policy, if carried out, will do exactly what the Primark scheme would have done. It will destroy MK market.	CMK, as well as a social/community asset. Wording of Policy SS2 revised.
	This is why:	
	1. Demountable markets are cheap, simple and fine for an occasional farmers' market. By contrast, MK Market has a	
	surprisingly rich range of products and services. It operates 5 days a week. It is a substantial, regional market, and it needs	
	a more complex, flexible model to succeed.	
	2. Over 90% of traders have invested in permanent units. These include a large cookware shop, a Thai supermarket, a second-hand bookshop, several cafes, a dressmaker, and a whole family of barbers from Venezuela. They all have	
	a second-name bookshop, several cales, a dressmaker, and a whole lamily of parpers from vehezuela. They all have	

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	different types of stands but none of them could operate in a simple, demountable market. If this policy was to go through, over 90% of existing traders would either have to move to the new Market Hall, and pay higher rents. Or give up and leave the market altogether. 3. As well as higher rents, many traders have invested thousands in permanent stalls. Only some of them could afford to set up a new unit in Market Hall. For others, no matter what the cost, it would make more sense to stay in the same, established spot. If you remove these options you would destroy a complex, varied market, leaving just a few casual traders behind. This is why we opposed the Primark plans. Not only did they want to move us to a terrible location, the switch to demountable stalls would have finished us off. Flexibility is vital. For the biggest, most vibrant market, Market Square has to be open for permanent stalls, cafes, mobile units, and of course some demountable stalls. Looking ahead: Despite paying high rents, the market is suffering from lack of investment. However, the traders have ideas about improving the lighting, painting artworks on the shutters, adding a new architectural canopy and so on.	
	We are now setting up a branch of the National Market Traders Federation. If there is a chance for us to get involved with the Alliance, representing the sole traders in CMK, please let us know. Finally, MK market has evolved over 30 years. It is a genuine, multi-cultural place and an asset to the community. If possible, we urge you to look at this policy again. Improvements are always welcome. But please don't throw out the baby with the bathwater.	
F1.1	My main observation on the proposal outlined on page 5 is the growth in dwelling houses planned around Campbell Park. This in itself is desirable creating that New York Central Park feel. However as an event organiser trying to bring the city to life there is an increasing inability to stage events in Campbell Park on the events plateau or indeed deeper into the park due to the noise restraints imposed by licensing in response to residents complaints: This will only increase in difficulty the more housing that is placed around Campbell Park unless consideration is given to the construction standards of the dwelling houses and the noise constraints which state that no resident should be able to hear the noise with their window open is addressed. Parking consideration around Campbell Park is also a concern for event organisers that is not addressed in these proposals.	The Park is an important shared space for the city and its operational use is subject to planning and environmental protections.
F1.2	In attempts to revitalise the north end of Midsummer Boulevard please give consideration to open public spaces these are a rarity in Milton Keynes and as an event organiser it is impossible to find flat open areas which are not littered with sculptures/ street furniture or tress. This makes it difficult to deliver magical large events in a central area and yet we know that there is a growing demand for spectacle - evidence Carabosse Fire Gardens during IF: Milton Keynes International Festival 2012.	New Policy SS3 added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
	If large open spaces are designated make them accessible on foot and by car and on the thoroughfare to or from retail areas not stuck on the edge. Don't surround them with housing and if you feel the need to put things in the space, make them easily demountable I temporary structures which can be moved without significant cost. Stages are easy to add but concrete plinths impossible to move if they are in the wrong place or are the wrong size. Don't try and second guess what professional artists will want to do or how they will want to use spaces. Provide the space, provide water and power and let the artists bring the rest in as required. Don't be pushed into providing 'community focussed or sized' permanent infrastructure that prohibits professional work inhabiting the space and remember that some of the best public art is temporary and ephemeral because it lives long in people's memories and imaginations and creates time-limited and drivers for the widest range of visitors.	
F2.1	V1. While many of the planning policies in the Alliance Plan are to be welcomed the transport policies proposed are a retrograde step. They appear to be dominated by 1970's thinking, but the world has moved on. MK needs to move on too	Specific points made by this respondent are dealt with below.

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	or it will be left behind, a fossilised relic.	
F2.2	2. The Alliance Plan would have significant impact on everyone in MK, not just those residents in CMK. Therefore we believe that all residents of MK should be able to take part in the referendum.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
F2.3	General comments on parking/transport aspect of CMK Alliance Plan 3. We are very disappointed with the parking/transport aspect of the plan. It proposes the undoing of what little progress there has been over the last decade and is contrary to much local and national policy. 4. The numbers just don't add up and it unlikely that an examiner would regard the plan as sound. There are many internal contradictions. 5. The thread running through the report is that cars are the only way for the majority of people to get to and from CMK and that everything else should be subservient to that demand. That is neither desirable nor achievable. It seems to take the demands of the car as a given and adjusts everything else to accommodate them. That is the wrong way round. Because there is an abundance of cheap parking, as the plan acknowledges, far more than in any equivalent town, there is very high car use and low bus use. (see tables below from TSR). Building thousands more parking spaces will exacerbate the problem, not solve it. 6. It is also incompatible with LTP3 which has an emphasis on Smarter Choices and alternatives to the car. LTP3 Vision states: "By 2031, MK will have the most sustainable transport system in the country, increasing its attractiveness as a place to live, work, visit and do business." Clearly building another 7000-16000 car parking spaces incompatible with that aim. 7. The Alliance Plan has failed to heed the message from MK Long Term Public Transport Vision (LTPTV) report.LTPTV1 Faber Maunsell "Without measures to discourage car use, the public transport system would have to be of fantastic quality to persuade car users to leave their car at home." "Restraint on parking and other measures can bring the quality requirement to within more reasonable limits." 8. Para 7.5 talks about encouraging people to switch to public transport. As any retailer knows the best way to encourage people is through pricing. As the LTPTV quote makes clear there has to be restraint on parking to encourage that mod	The Alliance wants to increase the number of people coming into CMK, and to push to the credible maximum the proportion coming in by public transport and to encourage as many people as possible to walk and cycle from surrounding areas. Following this and other responses from the Public Consultation, and further analysis of journeys required to meet expansion, Policy T4 (a) and Table 1 (CMKAP parking standards) have been revised to provide Zone 2 parking standards for B1 business use class in CMK and C3 dwellings use class in Campbell Park only. Zone 1 parking standards to be retained for other use classes in CMK. Note: The B1 parking standard in Campbell Park was already changed from Zone 1 to Zone 2 by MKC's 2009 Addendum. The CMKAP for C3 in Campbell Park provides is for un-allocated (ie. visitor) parking spaces.
F2.4	10. CMK Alliance Plan says nothing about capacity or upgrades required on roads around and approaching CMK to handle the increased volume of traffic encouraged by the plan. TSR said that they could only handle another 25% in 2007, and even then work would be required, eg signaling of more roundabouts. But the CMK Alliance Plan suggests a doubling of jobs and more than doubling of visitors, with only a small change in the modal split. That would far exceed the capacity of the road network. Just doesn't add up. 11. The increased car traffic on the approach roads to CMK would increase congestion. That would cause delays to buses, reducing punctuality, thus undermining public transport.	The Alliance plan must inhabit the Council's statutory development plans which sets the quantity of development and which will have assessed the impact on the wider transport network.
F2.5	12. No justification is provided for changing CMK to Zone 2 parking, because there isn't any. It would be quite contrary to	Please refer to comments above.

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	national and local policies. Since CMK is only area in Zone 1 currently, it would effectively abolish Zone 1	
F2.6	13. MK currently has one of the least sustainable transport systems in the country. This was confirmed again this year by the Campaign for Better Transport (CBT) car dependency scorecard report, which named MK as one of the most car dependent cities in the country. See http://www.bettertransport.org.uk/files/car_dependency_scorecard_2.pdf 14. CMK Alliance Plan would ensure that MK stayed at the bottom of the sustainable transport table.	This issue can only be addressed by MK Council on a wide scale, this is beyond the reach of the neighbourhood plan.
F2.7	15. The amount of parking in CMK should be gradually reduced. It is about 4 times that in comparable towns. (see table below from TSR) 16. The cost of parking in CMK should be gradually increased. It is about 1/4 of that in comparable towns. (see table below from TSR)	The proportion of journeys by car will significantly decrease, but the absolute number will go up as develop continues. Accessibility by all modes is CMK's competitive advantage.
F2.8	17. According to the TSR average car occupancy is just 1.11 for MK as a whole and 1.15 for CMK. This means that the majority of cars entering CMK, about 85%, have just the driver and no passengers at all. On average 20 cars entering CMK carry 20 drivers and just 3 passengers. So out of 100 seats just 23 are occupied. This is a very inefficient use of road space and parking space with more than ¾ of the capacity wasted. The plan should advocate reducing this wastage by encouraging more drivers to share cars through CarShare MK and other initiatives. Parking charges for car sharers should be reduced and those for single-occupancy cars increased.	This is beyond the reach and power of the neighbourhood plan. Note: CMK has free parking for car share.
F2.9	CITY CENTRE CAR PARKING	Table relates to comment F2.7
	City Centre Car Parking Milton Keynes Daily £0/£4 Annual £225 Northampton 5000 £5 £1140 Southampton 10000 £7 £1650 Reading 7000 £6 £935	
F2.10	18. Travel to work by bus is very low, just 4.7% in MK as a whole, and 8.7% for CMK. It is about ¼ of that in comparable towns. (see table below from TSR) It needs to be significantly increased to at least 25% for CMK. 19. In the short term public transport within MK will be dominated by buses. These will mainly be diesel-engined but electric buses are to be introduced in MK next year. In the longer term other modes of public transport may be developed, for example, light rail or PRT. We support the retention of Midsummer Blvd through Midsummer Place as route for public transport	As explained above, the Plan encourages as many people to come to CMK by public transport, and analyses assume the maximum shift to public transport that is credible within the Plan period.
F2.11		Table belongs to comment above.
	Travel To Work by Bus Milton Keynes 4.7 Reading 12 Southampton 12 Oxford 15	
F2.12	20. We support the CMK Shuttle proposal. But that only addresses intra-CMK movement, it doesn't affect movement in or	Supportive comment for Shuttle noted.

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	out of CMK.	Movement in and out of CMK is a boroughwide issue which can only be addressed by MK Council.
F2.13	21. The aim should be that public transport, bus or train or a combination of the two, offers a convenient way to make most journeys for most people at most times. If this is not the case then those who are capable of doing so will own a car to make many of their journeys. Once they own a car then most journeys are made by car, in order to spread out the fixed costs of car ownership over a larger number of miles. They are then largely lost to public transport. So it is essential that good public transport links to CMK are available at all times from all parts of MK. 22. Since many of those who work and visit CMK live outside the Borough then the public transport network also has to extend beyond the Borough boundaries. Public transport to and from CMK should be available across the whole MK Travel To Work area. 23. About half the residents of MK do not have access to a car either at all times or at any time (LTP3) and this proportion is likely to increase. It is now being suggested by academics that the UK has now passed 'Peak Car'. That is to say that car ownership and use, which has increased over recent decades, is now beginning to fall. Many young people cannot afford to take driving lessons and pass their test. And even those that do so cannot afford to own and insure a car of their own – insurance for young people costing as much as £2000 pa. They are therefore dependent upon public transport. Many older and disabled people also do not own cars for financial and/or health reasons. Better public transport helps with social equity. The Plan does not address this. It perpetuates the social exclusion of many groups of MK residents. 24. Overall the Plan should advocate far fewer single-occupancy cars and more travel by bus and blike to get the increased numbers of workers and visitors into and out of CMK using roughly the current number of parking spaces. 25. There is little attempt to tackle road transport's increasing contribution towards climate change. The government's chief scientist has described cli	Public transport outside CMK is not within the scope of the neighbourhood plan. These issues are Borough-wide. Text supporting the Plan's transport and parking policies has been revised where relevant to emphasise the data and assumptions for transport that underpin the Plan – in particular that public transport and other non-car modes of travel will increase significantly over the Plan period as a proportion of journeys to CMK.
F2.14	Comments on specific paragraphs 2.20 Incorrect. The new platform at MKC station was completed in 2008 and there are more train services calling, not fewer.	Comment noted – second half of last sentence of paragraph 2.20 to be omitted.
F2.15	3.31 4. 1st bullet recognising the historic importance of the car to the city's success; 4.11 "This planned intensification of CMK increases the challenge of retaining CMK's attractiveness for car users in terms of ease of access and parking." This presumes that retaining CMK's attractiveness for car users is a good thing. What about making it more attractive for users of other modes. 4.12 "Many workers are also commuting from outside the Borough to jobs in CMK, making public transportation even less convenient for these workers." Wrong. Harder to implement but if high quality public transport is provided it will be just as convenient for people from outside borough as those within it. 4.17 "Yet this perimeter parking and the set-back building lines are part of the spaciousness of CMK which contributes to	The Alliance sees access by car for some users and visitors as a competitive advantage for CMK, but one which has to be carefully managed as part of a plan to move more people to public transport, and the plan encourages this approach. The consultation responses generally confirm
	the quality of the place."	support for the existing infrastructure. The

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		reflect Zone 2 for office and visitor parking for residential in Campbell Park.
F2.26	10.23 delete 1st bullet	See above.
F2.27	12.25 It is essential that all local buses to and from CMK serve the station, the employment area and the retail/leisure area. Passengers must not be required to change buses at Station Square or the proposed bus station at Secklow Gate. Forced interchange for a short second bus journey would be a severe deterrent to bus use.	The Plan does not dictate routing arrangements through CMK.
G1.1	Sir, I feel very strongly about the amount of land on Campbell Park that is being used up for development. I have lived here over 25 years and when we first moved here the area designated Campbell Park was to be used for recreational purposes. We seem to have moved a long way since then. We now have loads of housing on there, and it would appear more land up for development by short sighted council officials and greedy developers who don't really care what they build on it as they won't have to live near- by. I am utterly fed up with officialdom railroading schemes through MK, against the wishes of the people who live here, which are steered through by people who don't live here and never will.	Policy CMKAP G4 makes it clear that the area designated as Campbell Park is to be retained and protected. Within the Park itself, the plan seeks to reduce development. Although largely undeveloped over the past 25 years, the intention has always been to offer the Blocks adjacent to Campbell Park for mixed use development. This was part of the original master plan.
G1.2	One example is the newish roundabout system approaching the M1 interchange on Childs Way. Sometimes I have come back here in the early hours of the morning and had to STOP at traffic lights when there is not another vehicle in sight. Even in the rush hour the lights are not properly co-ordinated so that cars cannot enter the roundabout as a "jam" has built up at the set of traffic lights. Ridiculous. I don't know who devised that one. There are many more examples but I am digressing.	The comment is noted and will be passed on to the Highways Authority.
G1.3	Can you imagine what the people who live next to Hampstead Heath or Hyde Park or Richmond Park if developers just descended there and started building blocks of flats? There would be all hell to play. But that is exactly what has happened to Campbell Park. One day everyone will wake up and realise that Campbell Park has disappeared under a sea of concrete, and the councillors who facilitated this destruction will be long gone. Milton Keynes is unique in its layout and people who live here all like the lakes, rivers, canals and verdant areas which make it such a pleasant place to live. Don't destroy what is a lovely town park in an unseemly scramble to develop an area which should never have had housing on in the first place.	As noted above, although largely undeveloped over the past 25 years, the intention has always been to offer the Blocks adjacent to Campbell Park for mixed use development. This was part of the original master plan.
G2.1	I have already submitted comments on the draft plan and was pleased that all residents of Milton Keynes have been encouraged to do so by publicising the opportunity widely through local media and in other ways. And this is as it should be as it is our city centre too. However, I am greatly concerned that the final and binding vote on the acceptance of the plan might be restricted to residents and businesses in the MK9 postcode area. This seems to go wholly against the spirit of inclusiveness and engagement that has marked the plan making process to date. Why engage the wider population in the consultation exercise if they are then going to be excluded from the final, crucial step? I live in Wolverton, where we also have a local plan in development. That plan only relates to a small area at the core of the town - but the whole of the town is being involved in the consultation and the whole of the town is going to participate in the vote. This is as it should be. And in the case of Milton Keynes it must also be right that even though the plan only directly relates to the city centre this it will affect all the residents of Milton Keynes as it is their city centre too. It is the major employment area; it is a city wide shopping centre, it is the civic and cultural heart of the town. Most people living in Milton Keynes use the city centre on a regular basis and if this is to continue it is only right that they are included in the whole plan making process and this includes being invited to participate in the vote on the final draft of the plan.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
H1.1	CMK: CIVIC SPACE As a long term user of CMK – as a place of employment in the pioneering days of he mid '70's and early '80's, as the base for my Architectural Practice from 1985 o 1999, as my home for two years and as a centre for shopping and leisure for over 30 years – I have watched and participated in the growth of CMK at first hand and have experienced the full range of	Supportive comments noted. Additional help with the Alliance is always welcome.

My suggestion, first tabled in 1998, is to create the Civic Square on the North/South centreline of the Shopping Building and the East/West centreline of Midsummer Boulevard – geometrically and organisationally at the centre of Milton Keynes. This solution necessitates the removal of the Secklow Gate elevated road South of the Shopping Building and further disruption to Midsummer Boulevard but the following benefits should be noted: · With Secklow Gate bridge removed an opportunity is created for an additional centre piece to the Shopping Building to be designed to address the new Civic Square. · The Shopping Building already has an inset in this location and the Southern Mall will overlook the Square without any alteration.	
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alteration	
with the state of	
· The Food Centre, a building which has never positively contributed to its surroundings, can be altered/extended/rebuilt	
with a better relationship to	
its surroundings and facing onto the new Civic Square.	
· Vacant site D.3.4 offers a further opportunity for major development designed to front the Square and with the removal of	
Secklow Gate can be designed to link with a redeveloped Food Centre building to enclose the Civic Square from the South.	
· With its position against the South side of the Shopping Building and new development potential to the East, West and	
South, the Square can	
benefit from good orientation, be sheltered and be large enough to accommodate all types of public use.	
· Redevelopment on three sides will offer opportunities for multi-level activity which overlooks the Civic Square giving	
grandstand coverage for	
larger events and spreading activity into the edge of the Square.	
· Site D.3.3 (the Point), which is already the subject of redevelopment speculation, will offer the opportunity for a public	
transport connection	
point immediately adjacent to the Civic Square.	
· By restricting service access to the Shopping Building to Secklow Gate North, delivery traffic through CMK will be	
removed.	
· Positioning the Civic Square on this central intersection creates a close relationship with the Theatre/Gallery and Campbell	
Park crossing thereby	
setting up an essentially pedestrian-dominated area in this axial position which can be developed as more Park than Centre	
and strengthen the	
link between CMK and the Park by bringing the landscape into the City Centre.	
· The loss of Secklow Gate to the South of the Shopping Building (the one"bitter pill") does not lead to the "wall of steel"	
referred to by some commentators – the Shopping Building was not conceived as a wall – it was intended as a permeable building allowing free	
movement throughout. Only vehicles will be "inconvenienced" and people driving into CMK – and by definition this is a finite	
number due to the developing parking situation – will largely enter by the Gates that link to the Grid roads. People wanting	
to drive from North CMK to South CMK or vice versa will still have four major roads and any number of side streets to filter	
through on.	
· Finally I am attaching an extract from the 1998 Study – it graphically illustrates the creation of a Civic Square in its context.	
It is included to assist in identifying and orientating my proposals and is not intended as a design. I believe the lack of a fully	
integrated Civic space is a fundamental weakness of the original Masterplan and none of the subsequent reviews or	
framework studies have given its absence proper consideration. A Civic Space that the citizens of Milton Keynes can relate	
to and identify as the natural focus of community response would energise and concentrate community involvement in City	
events, however, simply providing an area without putting it into the right context would be a waste of resources. The	
proposed Civic Space has to be the focus of a properly designed climax to the City Centre and could be the single most	
important addition to CMK and the City of Milton Keynes.	
H2.1 1.0 Introduction Comments noted.	

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H2.8	remains the focus for all forms of retail development. The proposed secondary shopping areas will encourage an unacceptable extension and dilution of the core retail area. 1.12 The designation of secondary shopping areas is also unnecessary because retail and other town centre uses must comply with the sequential and impact tests within the NPPF and the Core Strategy. This approach is sufficient to ensure that development that genuinely cannot be located within the PSA is directed to the most appropriate alternative location, ie. the best connected edge of centre site. 1.13 We therefore request that the secondary shopping area is deleted from the Plan, together with criteria a) of policy CMKAP SS2 and paras. 6.26, 9.5 and 9.6. Retention of the secondary shopping area will render the Alliance Plan inconsistent with the NPPF, the Core Strategy and the CMK Framework. Policy CMKAP G2 – Historic Buildings & Public Art 1.18 Hammerson supports the exclusion of reference to The Point as it is not a building of heritage for CMK. This approach is consistent with evidence contained within detail appraisals of the architectural and heritage merits of the building. The building has reached the end of its useful life and no longer meet the needs of occupiers, as such the building need to be redeveloped. 1.19 It is essential that The Point is not included on a local list of potential heritage assets in order to enable the regeneration of this part of the heart of Militon Keynes City Centre. 1.20 Built in the mid-1980s, The Point is a building of its time, designed to meet the needs of leisure operators in the 1980s. However, The Point is physically unable to respond to changing needs; it is unable to evolve due to the design constraints of the shape and fabric of a building that no longer matches the needs of today's leisure and retail operators. 1.21 Leisure and retail operators now require more flexible outward facing formats and The Point has been superseded by more recent developments (for example Xscape) which can	Support for CMKAP G2 is noted. CMKAP G2 states that it is the responsibility of MK Council to draw up a local list of potential heritage assets. It is not within the remit of the CMKAP to identify specific buildings and therefore the Plan makes no specific mention of the Point.
H2.9	1.14 Policy CMKAP SS2 also requires all new retail developments of more than 2,500 sq.m to include provision for a range of small shop units with some in prime locations at discounted rents for specialist and local retailers. Whilst this may be desirable, it is considered to be too onerous to require all developments to include such provision in all new large scale developments. The potential for smaller units must be considered on a site by site basis.	In further pursuit of widening retail choice and competitiveness, the advantages of which are evidenced by the Government's Portas Review, it is proposed that larger retail developments should be obliged to incorporate a range of smaller units, protected by legal agreement from future amalgamation. The importance of commercial viability is acknowledged.
H2.10	1.15 Hammerson support the retention of the outdoor market in Market Square.	Supportive comments noted.
H2.11	1.16 Policy CMKAP SS2 refers to the creation of a new major civic space. Hammerson does not object to the principle of creating a civic space within the city centre, however the location and space created must be deliverable and fit for purpose, and not so large that it becomes a wasted or unused space. With proper planning, a new useable public area could be created within this space that improves the public realm and landscaping. In conjunction with the redevelopment of The Point, this will achieve the objectives of enhancing the heart of the city centre, and needs to be developed further with Milton Keynes Council.	The plan acknowledges the desire for a major Civic Space and identifies a possible space on Midsummer Blvd between Midsummer Place and Secklow Gate. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of

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		Midsummer Boulevard East.
H2.12	Figures 7, 12 and 14 and Table 2 – Proposals Plan and Land Uses 1.17 Hammerson supports the identification of The Point and the adjacent HCA car park site as under-developed sites (figure 12) and suitable for new retail and mixed use development (figures 7 and 14). This approach recognises the need for The Point to be redeveloped and the contribution that this site can make towards improving the retail offer of the city centre in providing a significant amount of new retail (Classes A1-A3) floorspace (19,500 sq.m) plus community and/or cultural uses.	Supportive comment noted.
H2.13	Policy CMKAP G3 – Landscaping and Open Space 1.24 Policy CMKAP G3 requires development to make a positive contribution towards the public realm in CMK, and in terms of landscaping, the policy states that arrangements must be made for long term management and maintenance. Developers and landowners can only control landscaping within the curtilage of their ownership. Developments are currently required to contribute towards public realm improvements relating to their proposals, as set out in the Council's SPD on planning obligations. It is important that any contributions derived from future investment is realistic and does not become an impediment to that investment.	Revised Policy CMKAP G3 states that proposals for new open space must include arrangements for long-term management and maintenance.
H2.14	Policy CMKAP G7 – Active Frontages 1.25 Policy CMKAP G7 requires developments to have predominantly active frontage along their full length on the ground floors that face public pavements and the public realm. However, there needs to be a recognition that site constraints will mean that not all sides of a building can achieve active or animated frontages, and servicing requirements need to be considered.	The importance of commercial viability is acknowledged.
H2.15	Policy CMKAP G8 – Principal Pedestrian Routes 1.26 Policy CMKAP G8 requires developments facing principal pedestrian routes to provide continuous weather protection and shelter. While Hammerson does not object to this requirement, para. 8.44 states that Gate and Boulevard frontages are required to provide colonnades. This statement should be removed, as providing colonnades would not achieve the objectives of creating more outward looking retail as the frontages become less visible. Weather protection can be achieved through other means.	Principal Pedestrian Routes have been removed. Revised Policy G7 – Active Frontages – covers weather protection using colonnades, canopies or other cantilevered structures.
H2.16	Policy CMKAP G10 – Design of Buildings 1.27 Hammerson generally supports the design elements and principles set out in policy CMKAP G10, specifically promoting taller buildings on Gates and Boulevards.	Supportive comments noted.
H2.17	Section 10 – Access, Transport and Parking Policies 1.28 Hammerson is concerned that the Alliance Plan is seeking to increase the car parking requirements for development in CMK and promote a move from 'maximum' car parking standards to 'expected' car parking standards. The proposed standards set out in Table 1 double the requirement for retail (Classes A1-A3) developments in CMK and increase the requirements for all other uses. As there is unlikely to be space within the primary retail area to provide parking on-site, this will lead to a significant increase in contribution required from developers towards off-site provision, and could affect the viability of bringing sites forward. 1.29 Account should be taken of current utilisation figures held by the Council for existing parking which suggests that supply across the City Centre exceeds demand and that the focus of a strategy should be on using parking better and more intelligently rather than simply increasing the supply. Although wanting to stimulate investment, the requirement to contribute to the provision of significant numbers of offsite spaces runs contrary to these objectives. 1.30 Policy CMKAP T4 c) requires that existing parking must be replaced on a 1:1 basis and is additional to the amount of parking required by the new development itself. Hammerson consider that this could unnecessarily constrain development, and this requirement should be amended to relate to any significant loss of car parking, rather than a blanket policy applying to loss of any spaces. The acceptability of reductions in car parking should also take into consideration the existing	Following this and other responses from the Public Consultation, and further analysis of journeys required to meet expansion, Policy T4 (a) and Table 1 (CMK parking standards) have been revised to provide Zone 2 parking standards for B1 business use class in CMK and C3 dwellings use class in Campbell Park only. Zone 1 parking standards to be retained for other use classes in CMK. Policy T4 (b) references existing parking spaces that were provided as part of off-plot parking obligations from other developments – it is these parking spaces that should be replaced 1:1.

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	parking standards then this may justify some minor loss of parking.	Tany
H3.1	I promised to send a few comments by e-mail when I attended the drop-in session at Acorn House yesterday. I believe that this is an excellent initiative.	Supportive comment noted.
H3.2	Comments on CMK Alliance Plan 3.12 The University Centre Milton Keynes (UCMK) is the first step in establishing a university for Milton Keynes. A new kind of university, learning will take place throughout the city: students will be based for part of their courses in existing businesses and institutions. Comment I believe this paragraph needs to be updated. It is my understanding that the University Centre has now become University College, and is an integral part of the University of Bedfordshire (offering degree courses from October 2012). This needs to be checked, however, as my information comes from websites.	The text in the plan has been amended to be less specific and reflect that early steps are underway to establish a larger undergraduate university in CMK. The plan's wording regarding aspirations for a university has been augmented.
H3.3	9.9 The proposal in this Plan, again as envisaged in the Government's Portas Review, is to encourage the permanent stall holders to grow into a new permanent covered Market Hall nearby, thereby freeing more open market space for demountable street trading operations which in turn may help new small retail businesses to get started. Comment On the basis of experience (mostly anecdotal) in other locations, I believe that a covered market hall, offering opportunities for small specialist business, would be an important development.	Supportive comments noted.
H3.4	10.8 This routing also leaves open the option to undertake construction on Midsummer Boulevard of a mass transit system, should such a system be justified in future. Comment I believe it is important that this long-term option (e.g. for a tramway) should be retained. Current proposals for the development of Midsummer Place seem to work against it (Urban Eden should be able to comment)	Supportive comment noted.
H3.5	12.7 Experience has shown that the pressures upon local government are such that MK Council cannot realistically be expected to be the lead champion of the vision for CMK as summarised in this Plan alone. 12.8 It is evident therefore that a coalition of subscribers to the vision is needed to act as champion and to monitor progress. The CMK Alliance, gathered around the elected Town Council and local Ward Councillors, with leaders of the local business community, is seen as the kernel of such a coalition, which should be widened to include civic interest groups and amenity societies and similar organisations with a commitment to the ideas in this Plan Comment It is very important that the voluntary and NGO sector should be significantly involved, to avoid undue influence (real or perceived) being exercised by a non-representative coalition between the Council and the business community.	Supportive comment noted.
H3.6	12.19 The under-developed sector is that of small retailers, artists and crafts persons. This Plan has been explicit about the need to provide affordable accommodation to help growth, and this is to be achieved by cross subsidy from commercial development Comment I believe that the cultural sector could be better involved (e.g. by co-opting such organisations as Arts Gateway MK). I am also worried about the absence of independent cinema in Milton Keynes (the nearest Europa cinema is in Northampton). 12.29 It is proposed that a public debate should take place about the transfer of the public domain of CMK to the Parks	Supportive comment noted. The Plan encourages the cultural sector to step forward to take part in implementation. Supportive comment noted. Discussions have
H4.1	Trust or to some similar body created specifically for the purpose. This debate needs to be very public. The reputation of the Parks Trust was potentially threatened by the recent discussion on possible land sale by the Trust (even though in the end this did not go ahead). On the other hand, one does not want to see new bodies created if existing organisations can carry out the work effectively. First, a few general comments:	been initiated with MKCCM regarding future arrangements of maintenance. Supportive comment noted.
117.1	Thou, a fow gonoral communities.	Supportive comment noted.

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	- congratulations to those who have worked on this – a professional piece of work and a reminder of days gone by - thank you for educating me on the Localism Act. I must say it all seems rather `mushy` - as does so much of what passes for legislation these days. However, it's good to know that MK is setting the pace.	
H4.2	- I agree totally with your feelings on Waitrose's move out of CMK. The Master Plan, with its multicentred approach and backed by the Corporation's Retail Strategy, aimed at bringing convenience shopping within achievable reach of the whole population and the four District Centres would back this up with some opportunities for comparison shopping not too far from home. And with CMK as the undisputed main centre, this would make it easier to plan access irrespective of the means of transport.	The Plan makes no comment specifically about Waitrose. The loss of the convenience of a supermarket from the east end of CMK is regretted. The Plan affirms that one of the roles of CMK is to act as a District Centre where quality food supermarkets would be essential components.
H4.3	Now a few CMK-specific comments: - I have always been happy with zones in which certain uses predominate e.g. retailing, administration, business, professional, entertainment, civic. This would make CMK much more convenient for the public to use while making it possible to produce centres of excellence. Other uses could be more dispersed and would include such facilities as are necessary for the convenience of those living in each locality as well as some which can stand alone (e.g. health clubs).	Generally, mixed uses are to be encouraged.
H4.4	- I also remain convinced that CMK should be predominantly medium-rise, rather than high-rise, in order to maintain a human scale and be a place in which people feel comfortable. Walking around parts of London and Paris in which 6/7/8-storey buildings predominate is a far more enjoyable experience than walking in some of the deep, windy, hostile and sunless canyons of some of the high-rise downtown areas of, say, the USA, Hong Kong and Singapore. Lord Campbell, following on from his extensive involvement in the master-planning process, used to speak of 5/6 storeys as the norm, but my personal view is that 6/8 can still produce an acceptable scale. We believed that if you produce places in which people are happy to live and work, companies and other investors will follow.	Supportive comment noted for building heights generally less than 8 stories. Exceptionally taller buildings would be subject to special assessment as detailed in Policy G9.
H4.5	- I know that you are as convinced as I am of the need for long-term thinking when engaging in a project on the scale of MK and of the need to avoid grasping at transitory solutions which would compromise the long-term advantages inherent in the way MK is planned. Above all, the scope of our infrastructure and its reservations provides the best possible basis on which to meet the technological changes which will surely come in the future and these advantages must not be frittered away in the cause of short-term expedients. In preparing for a talk I gave recently I was struck again by the unique quality of the input to the MK Master Plan and by the paucity of thinking of those "little people" who in recent times have sought to indulge their own hang-ups. I was very saddened by the breach of principle caused by the development of Midsummer Place and can assure you that, had I still been in office at the time that was being considered, I would have exhausted every possibility for providing shopping continuity without closing off the Boulevard. I know that grade-separation would be costly and involve some difficult engineering problems but, having regard to the scale and lifespan of MK, I would have put every effort into finding a different solution. However, on the basis that Midsummer Place is probably here to stay, I would support the full exploitation of the area between V7 and Secklow Gate. (Incidentally, while fully appreciating what The Point brought to CMK in the early years, I am not one of those who would regret its being replaced by a more substantial development which meets present needs.)	Support comments for CMKAP G1 and SS2 are noted. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
H4.6	- Campbell Park has surprised me in remaining so undeveloped 20 years on from the Development Corporation. I would have expected there to be more takers for the mix of uses the Corporation was proposing for this `Central Park` location offering prestigious opportunities within easy reach of the facilities of the rest of CMK. Given the open outlook, I hoped that the developments on the north and south flanks would be rather more imposing than most of those which have materialized to date. I feel that the Corporation`s aspirations in terms of mix are as appropriate today as they were then.	Support for CMKAP G4 is noted
H5.1	I am responding on behalf of Home Retail Group, one of the largest employers in Central Milton Keynes, with around 2500 colleagues in the headquarters in Avebury, and a large employee base in the Argos and Homebase stores in the Milton Keynes area.	Supportive comment noted.

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	I am also a Board member of the Milton Keynes City Centre Management Committee. Following the issue of the draft plan for consultation Home Retail Group support its broad aims.	
H5.2	Our specific support relates to the traffic and parking issues it seeks to address. As an existing occupier in CMK, we believe these are strategically important matters and currently not handled well by the Council. The biggest gripe from colleagues is the cost of parking, which was not existing when we moved to Milton Keynes, and the lack of spaces. The Company would like to see firm plans being developed to implement and fund such initiatives, at an affordable level, from public funding and/or the users of the services. On a more detailed note, there has been suggestion that a discounted employee scratchcard is introduced for the premium 'red' car spaces. This would add another parking option for employees.	Parking charges are set by the Council, however, please note supportive view expressed in paragraph 12.25 'the management of CMK parking to raise revenue must give way to a management regime which is designed to serve the needs of users of CMK.' In terms of number of parking places, the Plan does seek to increase parking for office
		developments.
H6.1	Wanted to get clarification on proposed use of Taylor Wimpey re plane site which is referred to as some retail use. Also wanted to understand how parking may be affected by this new build, parking in Columbia Place, Albion Place is already quite congested.	The planning application enquired about has since been refused by MKC. The Alliance Plan supports mixed use generally. Residential parking in Campbell Park is to now include un-allocated (visitor) parking.
H7.1	I have traded in CMK market for over 20 years. Along with my colleague, we are members of an emergency committee formed to save MK market from plans to demolish Secklow Gate Bridge and build over Market Square. Unfortunately we have been so preoccupied with the campaign that we have not had chance to read the CMK Alliance Plan until now. Although the consultation period has finished, we are anxious to give you some feedback. First, we are pleased that the Alliance Plan recognises the importance of the market and makes provision for a new market hall. However there is another policy which we are very concerned about, which we fear would destroy the existing market. First, a bit of context. Despite the rise of internet shopping, the market remains a popular feature of MK life As an enclave of independent retailers, with lots of variety, it adds character to CMK and appeals to a wide range of customers. It also attracts visitors from other towns, often people who have lost their markets to unsympathetic redevelopment. But Mary Portas has spoken, and people are waking up to the value of markets to the retail economy. Sheffield City Council, for example, is now investing £18m in a new market hall, right next to the main shopping centre. Markets are still hotbeds for business start-ups. They employ twice as many people per square foot as supermarkets, and are valued community assets. This is certainly true in Milton Keynes. In just three weeks, over 20,000 people signed our petition to keep the market in Market Square, keep Secklow Gate Bridge, and prevent damage to the Listed shopping building. What makes MK market so successful? Primarily, the location. Unlike chain stores, which can succeed in various locations, markets have very specific requirements. We need to be at the crossroads – in the heart of town. * High footfall. Market Square is at the crossroads of Secklow Gate and Midsummer Boulevard, in the heart of town. * Close proximity to the shopping centre: 25 million people a year walk past the door	Agreed. Supportive comment noted for covered market hall. Information noted on the parameters of what makes a market successful in general and MK Market in particular.

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	Both the above uses I believe would put Milton Keynes on the World Map and re-enforce its credentials as a world class city. This national landmark development would be place of pride for the residents of Milton Keynes! I am thankful to Mr Lock and Mr Foster for the time they spent in answering my queries and for giving me the opportunity to put forward my thoughts on the plan. I sincerely hope are able to incorporate some of the suggestions stated in this letter. I am available, and would welcome, an opportunity to be involved in the development process in future.	
K1.1	We have lived in MK for 10 years. We value the grid roads, underpasses, open spaces which contribute to a high quality of life.	Support for CMKAP G1 and T1 is noted
L1.1	I believe Milton Keynes is a great place to live. I have worked in Milton Keynes for the past 12 years but moved to live here just 2 years ago. My husband and I moved here because of the accessibility of so many facilities, shops, restaurants, leisure facilities, parks, theatres, cinemas etc.	Support for CMKAP T1 is noted
L1.2	Milton Keynes is still referred to as a new town and great for young people which is of course true but we know there is going to be a growing number of older people especially in the next 10 to 15 years (my husband and I will be among them) and it is absolutely crucial that they are consulted and their views and needs are taken into account in any decisions and planning that will affect their city centre. I would like to point out that what works well for older people invariably works for everyone else too.	Policy SS4 encourages developers or organisations to bring forward proposals that provide facilities for community and voluntary organisations, these being an essential part of the growth of CMK
L2.1	Overall this looks a good vision and the assurance of the continued provision of adequate parking, particularly important when the new residential dwellings in the plan are developed is reassuring - previous restrictions on parking spaces per dwelling were a real concern since they would inevitably create on-street parking problems.	Supportive comments noted.
L2.2	With the increase in the number of dwellings, may I assume that some local provision will be made for families - particularly around nursery and primary education, playgrounds/spaces (eg in Campbell Park would be good, maybe on the top plateau) and more general youth provision. I cannot see anything on the plan specifically addressing this. Such local facilities will be integral to a sense of belonging within the community and to cutting down the school run, a major enironmental negative.	The Plan focuses on the needs of households that may not have children (as explained in more detail in par 8.57).
L2.3	The plan talks about higher buildings of 8 stories. Being in a four storey dwelling, it would not be great to be towered over by such a large building. May I suggest that heights are transitioned from existing buildings in a gradual manner to avoid such discordant juxtapositions.	The detailed design of a particular development proposal and its impact will be assessed at the time by MK Council, and local residents will need to be consulted.
L2.4	There is a lot about the physical infrastructure. We also need a commitment to a leading technology provision. Currently this would be fibre broadband and wi-fi hotspots, the former of which is now finally being made available, but over the next 15 years the technology is likely to change again and CMK should be looking to keep at the forefront of established technological and communications infrastructure.	The Plan sits under MK Council's Core Strategy, which covers strategic objectives such as broadband.
L2.5	The hop-on/hop-off shuttle is a great idea - I visited Denver some years ago and they had a shuttle than ran up and down the main street. It was free to jump on and off as you desired. Ideally this would also connect the railway station and coach station. More generally on transport, there is of course already a defacto interchange with the bus stops near the food centre/shopping centre. Unfortunately, a big opportunity was missed when the coach station was rebuilt on the outskirts of town, rather than more conveniently for users where the temporary coach station was.	Supportive comments noted for the Shuttle and an improved interchange in Policy T2.
L2.6	Of a more immediate tactical concern is the Food Centre now that Sainsbury's has moved out and I understand Waitrose is thinking of doing likewise. The provision of some central supermarket will be important to keep the full shopping array in the town centre and avoid all the CMK residents having to drive to Kingston or the like to do food shopping.	Whilst the Plan makes no comment specifically about Waitrose, the loss of the convenience of a supermarket from the east end of CMK is regretted. The Plan affirms that one of the roles of CMK is to act as a District Centre where quality food supermarkets

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		would be essential components.
L3.1	We write on behalf of our client Legal & General Assurance Society Limited (Legal & General), owners of Midsummer Place Shopping Centre, Central Milton Keynes to submit representations to the Business Neighbourhood Plan ("the Plan") for CMK October 2012, currently out for public consultation. The representations set out in this letter add to and build upon our original comments sent to the WIKICMK Alliance site, by email date 31 May 2012. It is noted that a significant amount of hard work has gone into producing the Alliance Plan over recent months, within a pioneering process, to reach this public Consultation Stage. Our representations are broken down into two sections. Firstly, our general overarching comments on the provisions of Plan and its appropriateness in regard to the Examiners test and secondly, points of detail within the body of the Plan.	Comment noted.
L3.2	General Overarching Comments: A. Tests at examination – the Localism Act 2011 at Schedule 10 (8(1) and 8(2)) sets out what the examiner must consider and the basic conditions that the Plan must met in order to continue forward to Referendum. Of particular note is the need to (para phased): have regard to national policies and advice; have special regard to listed buildings; have special regard to conservation areas; contribute to sustainable development; generally conform with development plan policies; be compatible with EU Obligations; and comply with prescribed conditions and matters for the order. Within the Plan itself, there is little or in some cases no reference to the evidence base that has been used to support some	This plan is required to inhabit the statutory development plans of the local authority, which are supported by their own extensive evidence base. The Alliance plan's additional evidence base includes workshops, expert sessions, stakeholder meetings and extensive public consultation.
	of the assertions and comments in the Plan. Whilst we are supportive of the level of on-going, inclusive and inter-active consultation (in a variety of forms) undertaken to inform the Plan, this process should not take precedence over factual evidence. Therefore, this is one of our over-riding concerns with the Plan as it stands to date. Further, by not basing a plan around factual and comprehensive evidence will lead to further scrutiny as to whether it's fit for purpose and potential challenges moving forward ahead of adoption	
L3.3	B. Clear relationship between the evidence base, interpretation and the Plan / policies - aligned to the comments on the examination tests listed above is the need to show a clear relationship between the evidence base relied upon and the decision-making, or interpretation, of the evidence as to how Plan policies have been articulated. At present, we consider there is an inherent weakness in the Plan in this regard. An examiner would ask, is it possible to discern from the evidence that real judgement has been used? Can it be systematically shown how judgement has been the basis for decision-making behind the assertions made in the Plan? The production of a Plan is usually covered by three stages, first, collect and analysis all the data, if there are any gaps in the base data then undertake additional research to plug the gaps, second, analyse the conclusions of evidence base to inform thirdly, the production of a final Plan directly related to the evidence. This process is not evident, in the Plan, at present.	See previous response.
L3.4	C. Underpinned by commercial reality – one of the criticisms of the EDAW plan has been its failure to deliver. For the Plan to ensure it does not meet the same fate, it is crucial that the Plan is underpinned by commercial reality. It is true that developers and investors seek clear guidance of what is achievable, but also require flexibility within parameters to enable a response to market forces, which are regularly adjusting. The Plan is for a circa 15 year trajectory and therefore, by its very nature needs to be cognisant of economic cycles, the fast-paced change in technology that is leading to changing occupier demands with a direct impact on real estate. In its current form, the Plan is too restrictive in its design for CMK. This approach could frustrate the very progress and economic wellbeing that the Plan is there to foster and achieve.	The Plan takes on board the 'Lessons Learnt' initiative carried out by MK Council and which informed the newly adopted CMK Development Framework.

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L3.15	7. Page 2, para 3 – 'what happens in CMK is of national significance.' The Plan is correct in stating that the predicted growth in CMK will contribute to the national economic recovery (sum of the national parts) as highlighted in the most recent Centre for Cities Report1. However, it does not necessarily follow that, in a planning sense, what happens in CMK is of national significance.	Not agreed.
L3.17	 Introduction Para 1.2 – the recognition that the Plan is about planning positively for development and not stopping growth is welcomed. 	Supportive comment noted.
L3.18	9. Para 1.4 – 1.9 – this section will need to be updated to take into account the latest policy position in regard to the Core Strategy, Development Framework and Plan:MK. Whilst this section refers to key planning policy documents there is no mention of additional documents reviewed or produced as part of a comprehensive evidence base into the key issues of economy, transport, design and demand for different types of land uses.	The plan has been amended to include references as appropriate, and a Consultation Statement of Community Involvement has been prepared as a supplementary document.
L3.18(a	10. Para 1.13 – the CMKAP states that the Plan has a consistent approach with and builds on the principles of the CMK Development Framework. It does in some areas but is also in direct conflict in a number of areas. Therefore, this wording should be removed or adjusted to avoid evidence being produced from the Plan later in the Consultation process to show that it is not consistent. And that elements of the Plan, are therefore, unreliable within the same.	The CMKAP generally builds on the principles in MK Council's recently adopted CMK Development Framework, but in some cases departs from them. The wording in the Plan has been amended to reflect this.
L3.19	2. Understanding CMK 11. Whole section – the historical account of Milton Keynes and CMK provides a useful background to the place-making and shaping of the New Town and uniqueness of MK to the lay reader. That said, the detail and tone of this section it is not limited to factual matter. The conjecture of matters past does not add to a forward looking, pioneering and growth led plan, which should convey a factual basis with no bias shown.	Supportive comment noted, however, the criticism is not considered justified.
L3.20	12. Para 2.31 and 2.33– the recognition of CMK as a Regional Centre is supported, together with the Plan's recognition that the focus of new (commercial) development for Milton Keynes should be concentrated in its town centre i.e. CMK and the scale of this development.	Supportive comment noted.
L3.21	3. Vision, Principles & Objectives 13. Our Vision – the vision proposed sets out how the Plan seeks to positively support a growing economy. We appreciate that the Vision represents the aspirations for CMK and is worded as such. However, there should be some ability to measure against the Vision and for the Vision to be achievable. It is a positive aspiration to be 'the most accessible city centre in the UK'but which UK city currently has that accolade and how far off is CMK from this objective, is it realistically achievable by 2026 and what actions and funding would be needed to achieve this status? In addition, how much testing of the university promotion has been undertaken, particularly given reductions and scope of the funding of the higher education sector?	Visions are necessarily aspirational and take the bigger picture and longer view, and cannot be reduced to measurable indicators.
L3.22	14. Para 3.18 – 3.19 – we agree with the conclusion that the size of CMK, significantly larger than more traditional town centres, creates a challenge to ensure the diversity, vibrancy and vitality across its whole environment. However, we fundamentally disagree that the solution to this is to diversify and increase activity away from established core locations and to dilute these areas by seeking to bring 'activity' into every Block. The impact will be to kill the existing nodes of activity and therefore we cannot support this part of the Plan. As our client's own evidence has already shown following an independent review the extensive provision of out of town retailing for instance is at the point of materially diluting the available spend and consequential draw of the town centre that this Plan is looking to consider. Further investment would have a detrimental impact on the town centre and these issues have to be addressed in the Plan.	The plan inhabits the Council's statutory planning framework and supports a sequential test for the Primary Shopping Area. However, the point is not agreed with regard to secondary retailing and the need for diversification of other uses such as offices, commercial leisure and residential.
L3.23	15. Para 3.27 – sets out the ambition for creating places that allow the 'free reign of ideas'. Having read the Plan, it is not clear how or where or what this comprises? Certainly the overall policies of the Plan are overly restrictive, as detailed above, and these ambitions do not sit comfortably together especially with seeking investment from the development industry.	In the absence of evidence to the contrary it is not accepted that the overall policies of the Plan are overly restrictive. That said, the wording of some policies has been amended

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		in response to this and other comments from respondents.
L3.24	16. Para 3.31 & 3.32 – As per our comments on the Vision, for the Key Principles to have merit and to provide 'broad benchmarks' they need to be specific, measurable, achievable, realistic and time based. In addition, for the Plan to flow throughout, the Vision, key principles, strategic objective, opportunities and challenges all need to take a specific hierarchy. As more detail is given, each layer should clearly show link back up the hierarchy that it's drawn from. At present the Vision, key principles, strategic objective, opportunities and challenges read as a series of independent statements with cross-over themes. 17. In addition, the wording of the Key Principles at para 3.31 is similar but not the same as the Business Neighbourhood Plan. This creates confusion between the Plans and should be amended.	The CMKAP generally builds on the principles in MK Council's recently adopted <i>CMK Development Framework</i> , but in some cases departs from them. The wording in the Plan has been amended to reflect this.
L3.25	18. Figure 4 – It is not clear what Figure 4 relates to nor what it's intended to illustrate. If a location is an existing magnet or desire lines how can it also be new? Is it not the same thing? Further the figure seems to stop short in many areas and doesn't pick up the likes of the connections into surrounding neighbourhoods which look to CMK as a local centre and provide important footfall and users of the facilities. The arrow to Campbell Park seems to be missing a magnet; the Grand Union Canal has not been given any consideration, despite having specific policies in the Plan. What about the office workers and CBD? Does the size of the magnet hold any relevance?	The figure for Activity Magnets has been amended as being 'illustrative.'
L3.26	4. Opportunities & Challenges 19. Section in general – the identification of Opportunities & Challenges is usually arrived at through the conclusions of the data analysis. As an example, it is not evident where the need for and site specific location of a university has come from? Is this demand or supply driven? 20. The articulation in this sub-section is strongly focused on speculation and conjecture, which is at odds with and devalues a forward thinking and pioneering process.	See comments on evidence base above.
L3.27	21. Opportunity Two – the recognition of the importance of the primary shopping area and its continue development is welcomed. The retail and leisure industry is organic and fast moving. One significant change over recent times has been the merging of traditional shopping, entertainment, food & beverage and retail as 'theatre' (Apple is a prime example). It is these functions that drive footfall, interest and for over 50 million CMK visitors per year and we would argue already does provide a location for people to socialise. If an outcome is 'to be seen' then so be it, but this will not be the driver for further investment and place-making. It is activity, events and the offer of something new and exciting that drives footfall not great public realm by itself. A quality public environment, however, does add to the overall experience and perception of a place and will affect the desire for a visitor to return and bring others.	Supportive comments noted. It is clear that the changing expectations of retail customers is evident, and the shopping experience is becoming as important as the product. There has to be a clear point of difference in an omni channel world where services and interaction can be strong footfall drivers.
L3.28	22. Para 4.6 – it is not evident in the Plan where the demand for smaller, independent shops has arisen. Not all independents require small units and there are a number of independent and successful stores in both the retail and food and drink environment that would add to a quality retail mix, but require larger units. It would be useful if 'Independent' and 'small units' could be more clearly defined.	See comments on evidence base above. Independent shops are most likely to be operated by entrepreneurs rather than chains and are believed to require smaller units and the Plan's observations on this are not considered to be controversial.
L3.29	23. Opportunity Three – this section has some mixed messages. The title seeks to leverage Localism to drive delivery, however the detailed wording relates to marketing, greater involvement in planning decisions and a monitoring role. It is not clear what this opportunity is seeking to achieve.	This comment does not appear to be related to what is written in the Plan.
L3.30	24. Challenge Two – the challenge itself is a very real concern for authorities up and down the country, which is why a robust evidence base is critical to decision and plan-making.	Agreed, but funds for Neighbourhood Plan making are extremely limited.
L3.31	25. Figure 5 - It is also not clear what the purpose of Figure 5 is. The figure indicates that all building frontages are 'principal pedestrian routes'. The use of principal indicates the foremost route, but no other routes are shown.	Principal Pedestrian Routes have been removed in the revised Plan.
L3.32	5. Economic Strategy & Quality of Place	The Plan is compliant with the MK Economic

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	any flexibility in this regard over a 15 year development period is short sighted. The size and configuration of the blockets and Blocks by their very nature restricts the size, type and scale of development that may be able to come forward or an as yet unknown investor or land use that is not of national of international profile raising but would be welcomed to CMK [note: typo to refer to G12]. The reference to specific building materials, i.e. granite, is overly specific. A more sensible approach would be to refer to a Design Guide, such as the existing MK Handbook which would be able to be updated if a more durable, cost effective and high quality material came forward.	economic growth of CMK, by seeking to provide short-term flexibility for exceptional opportunities without compromising longer-term growth potential. Note: Policy G8 Plan provides more flexibility for amalgamating Blocklets.
L3.39	35. Para 8.33 – if either vertical or horizontal mixed uses are appropriate, what is the relevance or 'added value' of including sweeping statements relating to developer preferences? The mix of horizontal land uses is a very common feature of town centre developments and often is encouraged by developers as one land use can drive footfall into another. Retain the factual description of vertical and horizontal and delete the remainder of the wording.	Comment noted. Remainder of wording in paragraph has been deleted.
L3.40	36. Para 8.36 – the principle pedestrian routes as shown on Figure 5 relates to the majority of CMK. Active ground floor uses along this entire length would dilute the existing offer and it is highly unlikely that new operators would take up this space, resulting in empty units and property.	Principal Pedestrian Routes have been removed in the revised Plan.
L3.41	37. CMKAP G6 – the direction of the Plan to open up CMK to all mixed use developments located anywhere will seriously undermine the existing pockets of activity, this policy is not realistic for an area the size of CMK. The distinction of particular land uses around CMK creates destinations and activity. The mix and location of land uses outside of designated zones such as the primary shopping area, should be left to market forces. If Policy retained, then point b) should refer to the primary shopping area only in the occasions where major retail and leisure development will take first precedence.	In looking forward to emerging city growth, mixed use developments will help guard against "ghost town" phenomena outside 9-5 or 9-8. Point b) - We do not believe so, our aim is to create a reasonable framework and boundaries for development to help reinforce the future design of MK, harmonious as well as stretching and challenging.
L3.42	38. CMKAP G7- the requirement of active frontages along their full length is an unrealistic ambition and will stifle design opportunities. The policy is overly restrictive on details of frontages. Conditions will need to meet the relevant tests and be appropriately related to the proposed development.	The Policy wording requires Blocklet frontages to be predominantly active frontages. These can already be seen throughout CMK.
L3.43	39. CMKAP G8 – the policy is overly prescriptive, contradictory and should be removed.	Policy G8 has been removed but some revised elements have been incorporated into Policy G7.
L3.44	40. CMKAP G9 – part a) is a duplication of Policy G7 and should be removed. Part b) is also overly prescriptive and should be removed. How does part d), which allows for the removal of streets, relate to other policies which prevents any changes to the 'classic CMK infrastructure' and in turn to Policy G12 if it is not or national or international standing?	Revised Policy G8 Plan provides more flexibility for amalgamating Blocklets.
L3.45	41. CMKAP G10 – the introductory text to this policy is at odds with the policy itself, which seems to overly restrict the architectural design and merit of new buildings to the status quo rather than embracing the opportunities of welcoming 'distinguished' architects. What is the definition of a 'distinguished' architect?	Policy G9 is to assist architects by providing an outline of their design brief. The aspirational reference to distinguished architects implies award winning and professionally acclaimed practitioners.
L3.46	Part g) there are currently several instances across CMK of signage at the higher level, this forms a valuable role in assisting with wayfinding and navigation around CMK and should be allowed, delete this part.	Policy G9 refers to the CMK skyline and there is no evidence presented to change policy.
L3.47	42. CMKAP G12 – the background wording to this policy refers to the need to bring 'new' offers that are currently lacking but makes no reference to the need to strengthen or enhance existing offers such as the office quarter. The reference to exceptional circumstances sets into context the need for a raised profile on national or international scale. It is not clear how this will be benchmarked. The alternative put forward by the community if not realistic as it relies on an ungoverned third party to contribute to and take part in the process. What is the definition of an independent opinion survey and well	Comments noted.

'slow streets' within the perimeter parking

what necessary shift to public transport indicates and what restraints are currently in place on car parking?

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L3.54	 49. Para10.30 – the paragraph has indicated specific locations for a second transport interchange, the Plan does not set out the extent of feasibility and highway work that has been undertaken to support these locations nor clarification of the associated ownerships to be able to deliver this aspiration. 50. CMKAP T2 – the requirement for a second public transport hub has not been tested, nor its viability. The policy does not recognise the wider role such a shuttle services would provide outside of CMK and how this would deliver and integrate into the existing public transport network. Notwithstanding, the comments above, as an aside the terminology should be 	areas and north and south row. The necessary shift to public transport will require continued progress on key improvements to public transport, provision of a second public transport interchange and provision of an intra-CMK shuttle service. Both the Shuttle and second interchange in the retail core are proposed in LTP3. Terminology will be made consistent throughout the Plan.
L3.55	Proposals Plan 51. Figure 13 – the existing use plan is an important component of the evidence base, the findings of which do not appear to have been articulated through the Plan nor market tested to arrive at the central assumption that all of CMK should be mixed used. 52. Figure 14 – the Proposals Plan is very difficult to navigate and understand. Whilst the concept of the urban planning technique is understood, the comments made earlier about the overly prescriptive nature and detail of the Plan has resulted in an illegible Proposals Plan. This Plan should read as the centre piece to the overarching Plan and for an investor to be able recognise a targeted site and understand what policies apply to enable a development to come forward. In its current guise this is not clear. The location of the primary shopping area should also be shown on the Proposals Plan.	Consistent public comment is made about the blandness and corporate feel of CMK. Mixed use is achievable, as some developments in CMK demonstrate. All developments will be tested for viability. The Proposals Plan has been redrafted in response to this and other comments.
L3.56	11. Implementation 53. General comment – this section does not clarify how the Plan will be used or how the CMK Alliance will seek to work with investors, developers and landowners to deliver and implement its aspirations or how its "will achieve its status in practice and reality of being a regional centre"	The arrangements for implementation are outside the scope of the Plan, but some comments on implementation are made, which have been updated in light of the Council establishing MKDP.
L3.57	54. Para 12.10 – as expressed earlier planning obligations and CIL will be based on viability evidence and meet the associated tests of being necessary, directly related and in scale and kind to the proposed development.	Comment noted. Planning obligations and CIL are not specified in this Plan.
L3.58	12. Monitoring Framework 55. The Plan as a whole appears to have an over-reliance on defining the very detail of where each element of proposed floorspace should be located. It is clear that during the drafting of the Plan, concern has been raised as to whether its policies would allow for the level of development to come forward as established in the Core Strategy and thus meet one of the Neighbourhood Plan requirements. This detailed level of work is to be applauded, however the output is that instead of understanding and testing the detail to then bring the Plan up to a more strategic level, its policies and Figures have remained at the very detailed stage which as stated above sits in direct conflict with a flexible and pro-growth Plan.	Comment noted. By providing a Proposals Plan, not only does the CMKAP demonstrate that it can meet the strategic objectives set by the <i>Core Strategy</i> , it also provides a monitoring mechanism to encourage these objectives are met.
L3.59	Glossary 56. The inclusion of a Glossary is a welcome addition to the Plan, subject to some further inclusions noted above.	Suggestion noted.
L3.60	Summary: In summary, Legal & General commends the truly pioneering work undertaken by the CMK Alliance in producing such as a detailed Plan in the absence of Regulations or any clear guidance and largely based on the pro bono work provided by the Steering Group and associated Members. It is with this understanding and the understanding that, subject to a positive vote at the Referendums, this Plan will become part of the statutory Development Plan for decision-making in CMK, our review of this draft has been thorough. Accordingly, these representations bring to your attention, what we consider to be,	Previous comments cover the points made in this summary, which is noted.

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	no other. Milton Keynes is a decentralised city. It has numerous centres of employment scattered throughout. It has many district centres with considerable food shopping and other retail and leisure facilities dispersed across the city, and more planned. CMK, as the centre of Milton Keynes, will never be just like any other city centre. Attempts to over-centralise development on CMK cannot be successful. What CMK can provide is what no individual part of MK can provide: unique city-centre types of facility, the largest scale of shopping in department stores and a primus inter pares scale of other retail and leisure development; but it will not succeed in doing this at the expense of the other district and town centres in MK.	will fragment the core offer and could ultimately lead to decline in CMK. It is not inconceivable that our centre could then follow the local 'high street' decline that Mary Portas is so keen to avoid.
L4.4	B. Similarly, attempts to over-centralise public transport on CMK would be at the expense of the city as a whole and ultimately undermine attempts to increase public transport use. Consideration needs to be given to likely scenarios for the way in which transport across the city is managed. MK city is spread over an exceptionally large area: around six miles by five miles. These distances are mitigated for motorists by fast, largely uncongested roads. For public transport users, these distances severely reduce realistic length of journey because journey times are relatively long. Uninformed application of 'sustainable transport' thinking which works well in other kinds of city is unlikely to achieve the intended effects. Travel times by public transport will continue to deter switch from private transport, so that the effective draw to CMK by public transport will remain weak for journeys taking, say, over 20 minutes. On the other hand, sooner or later, deaths and injuries on the grid roads will force the hand of politicians who are likely to extend speed limits to more lengths of road which currently have maximum speeds of 70mph. An unintended effect will be to make CMK less of an attraction to MK residents living at greater distances from the centre; it will add to the attractions of district and town centres within MK, accentuating MK's dispersed pattern of shopping and services. This likely context is absent from the Council's thinking on planning, transport and CMK, thus from the context within which 'The CMK Alliance Plan 2026' has been drafted.	The Alliance acknowledges the issues with the existing public transport strategy, but the Plan needs to inhabit <i>LTP3</i> , the <i>Core Strategy</i> , and <i>NPPF</i> , all of which promote centralised public transport.
L4.5	C. The scale of transport movements required by the proposed volume of development will be unachievable without undermining inherent qualities of CMK. Optimising use of car-parking spaces – particularly through the shuttle-bus service – will help, but it is most unlikely that public transport use will be quadrupled or octupled, which is probably the scale of change needed. We know from other cities that car-drivers will gradually adapt to exceedingly high levels of congestion and still continue to use their cars. The risk all seem to be taking is to apply unachievable aims to the planning of CMK in respect of transport and movement. These are worthy aspirations but the issue is most unlikely to be resolved by yet more encouragement to walk, cycle and use public transport when we know that the required scale of change is improbable. Walking distances to CMK are too far for the vast majority of MK residents and distance is an important factor affecting cycle-to-work. Change will therefore be incremental not fundamental. Perhaps a key to this would be for the Council to pioneer establishment of a stand-alone Local Transport Authority which would attract highly skilled transport managers, visionaries and implementers who could attack these issues with informed vigour and focus?	Support for Shuttle noted and Plan's suggestion that MK Council seek the powers of a Passenger Transport Authority (paragraph 7.18)
L4.6	D. A piece of work that needs doing is a re-evaluation of the future shape of retail and workplaces. My perspective is that shops and shopping streets are already past a turning point caused by the shift to on-line shopping: we will have far fewer shops and much reduced walk-in retail floorspace nationally in the coming decade. The traditional shopping street has had three decades of attrition from out-of-town-centre retail parks and even those are now in decline (Comet, Habitat, etc), not just from the recession but because of a substantial and accelerating shift to online shopping. 'Click and collect' may moderate the pace of this change but not prevent it. Nor am I convinced that the Council's retail employment figures for CMK reflect the decentralised nature of MK, the vigour of Westcroft, Kingston and now MK1 at Denbigh North; and other district provision.	The Plan must inhabit the Core Strategy regarding the amount of floorspace for retail/leisure.
L4.7	E. As to offices, we must take account of the economic drivers towards home-working, hot-desking and reduced space needs. Businesses are striving to fit staff into far smaller spaces. Over time, we may well see far more on-line working from remote locations and many more meetings through sophisticated remote 'video-conferencing', reducing the need for office space.	The Plan must inhabit the Core Strategy regarding the amount of floorspace for offices.
L4.8	F. Housing policy for CMK should be focused on producing good places attractive to a broad range of people, even if this leads to much lower numbers than proposed in the Council's policies. Above all, housing in CMK should be about	The Plan must inhabit the Core Strategy regarding the number of dwellings.

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	mention is made anywhere in the draft Plan of the need to extend district heating.	systems, but this level of detail was
		considered beyond the scope of the Plan.
L4.19	10. Page 19: 3.31; 4 – "developing high quality public transport interchange facilities" sounds important but is relatively	Interchange similar to Station Square - within
	meaningless without further clarification. Interchange between what and what? Does this simply mean bus stops in the right	the plan period, this is likely to be buses only,
	place with shelters and information?	but in future may facilitate interchange with
		mass transit system along Midsummer
		Boulevard.
L4.20	11. Page 21: Policy CMKAP S1; 2 - " in appropriate locations" carries little meaning in the absence of criteria for what	The wording is taken from Core Strategy.
	locations would be appropriate.	
L4.21	12. Page 21: Policy CMKAP S1; 7 – "provide more pedestrian-friendly route and spaces". Provide more of them or make	Wording taken from Core Strategy. CMKAP
	the existing ones more pedestrian-friendly?	Policies G7 and G8 seek to improve existing
		ones, as well as add greater 'permeability'
1.4.00	12. Dago 20 Figure 4. Activity Magneta le they any quantitative suidence that there are the granulational that all are	through new developments.
L4.22	13. Page 22 Figure 4: Activity Magnets. Is there any quantitative evidence that these are the magnets and that others have	Comment noted. The Figure has been
	not been omitted? It seems improbable that this has captured existing desire lines some of which are as strong as those shown. Do all office workers arriving at MK Central Station have offices in Midsummer Boulevard and none in Silbury	amended to reflect that it is illustrative.
	Boulevard for instance?	
L4.23	14. Page 24: 4.12 – Park and Ride can provide an attractive service for those living outside the borough and working in	Supportive comments noted for Park & Ride.
L4.20	CMK.	Supportive comments noted for Fark & Nide.
L4.24	15. Page 26 Figure 5: Principal Pedestrian Routes and elsewhere throughout the document (e.g. 6.15-6.17) – The concept of	Principal Pedestrian Routes have been
	'Principal Pedestrian Routes' (PPR) suggests that all other routes are secondary so unimportant. In planning terms this	removed in the revised Plan.
	suggests that all but PPR are expendable. There are many other routes which have importance. I suggest that all specific	
	pedestrian routes should be protected unless the plan identifies a few that are specifically expendable.	
L4.25	16. Page 39: 7.4 – The text would benefit from making clear that achieving an increase in public transport use as a	Text has been revised.
	proportion of all journeys from 10% to 25% is not a 250% increase in public transport, but in percentage and numerical	
	terms is much more substantial. A figure more like an 800% increase in public transport use is needed for it to meet 25% of	
	overall journey needs. Clarifying this is even more important because at page 45/7.35- there is a reference to "more than	
	doubling public transport patronage within the plan period (from 10% to 25% considered to be the outer limit of what is	
	feasible)". Increasing public transport use by only 2 ½ times will barely dent the huge increase in car use which this implies.	
	This perpetuates a fundamental error from a number of Council planning documents.	
L4.26	17. Page 41: 7.7. "Transform public transport to provide attractive, high quality, greater capacity, flexibility and choice"	Comment noted.
	sounds good but lacks most of the factors needed to make public transport more attractive, particularly to get people out of	
	their cars. Public transport needs to be a high frequency service; reliable; with fast journey times; and run early and late in	
	the day as well as at core times; feel safe; run close to people's homes and near to their destinations; and much else.	
	Without these, high quality vehicles will provide little attraction. If such vehicles have large capacity this may work against	
	frequency of service. It is unclear what "flexibility and choice" mean in this context: bendy-buses and competing routes	
1.4.07	perhaps, but that sounds unlikely.	T
L4.27	18. Page 43: 7.19 – "kiss-and-ride" is misleading terminology which leads to lack of clarity over what provision it requires.	Text has been revised.
	'Pick-up and drop-off' is a more useful term as 'kiss-and-ride' suggests only dropping off one of the family to catch a train.	
	In practice, 'pick-up' can involve prolonged waiting which requires very different capacity to 'drop-off' so both need to be	
1.4.00	considered together. This term also covers private-hire vehicles and private cars, each of which has slightly different needs.	(MI/ Ctow) in the towns used in / TDO for alternation
L4.28	19. Page 43: 7.22 – "MK Star" is not a planning or transportation concept. It is an ephemeral and un-defined slogan. Surely it would be clearer to refer to 'citywide bus services'?	'MK Star' is the term used in <i>LTP3</i> for citywide bus services. Text has been revised.
L4.29	20. Page 44: 7.25 – These statistics are for MK as a whole and are not directly applicable to CMK which may well involve	Comment noted.
L4.29	20. Fage 44. 7.25 – These statistics are for Ivin as a whole and are not directly applicable to Civin which may well involve	Comment noted.

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L5.2	Although endorsing the need to enhance and encourage use of public transport, the plans focus on new transport hubs, shuttle facilities, public transport interchanges etc, and not on the need to enhance the public transport system itself. There will be little value in enhancing these proposed infrastructure elements if no effective public transport exists to enable people to take advantage of it. It is shocking that- in a city where the numbers of over 60's is anticipated to grow by over 70% by 2026, and those over 80 by 100% in the same timeframe- so little emphasis has been placed on the needs of elderly people. Great opportunities exist to reduce isolation and thereby improve health and wellbeing in this group by enhancing the CMK offering of information and advice, social and shopping opportunities reflective of the wants and needs of this key demographic- and the means of transporting older and disabled people to take advantage of these.	A key objective for the plan is to promote the city centre as a social place and one that supports community needs for MK. The Plan proposes a convenient Shuttle Service to help achieve a shift to greater public transport and accessibility for everyone, including older people. However, it is beyond the scope of a Neighbourhood Plan to propose policies for public transport affecting the entire Borough.
L5.3	The document has a much vaunted objective of making CMK a "social and inclusive place"- i.e. for everyone. However, sadly, the plan reads as though it is focussed on the able- bodied, working age cohort. This is hugely disappointing and probably highly economically unsound. The "Grey Pound" and the "Silver Vote" should at least provide some incentive to pause and reflect on how this expanding group could explicitly be catered for in the "Transformation" that the plan purports to espouse and create.	Comment noted. We do not consider the criticism justified.
L5.4	CMK does indeed fall short in community and voluntary sector facilities. It is also a shame that those that exist and currently struggle to survive in CMK are too easily abandoned to the winds of economic fortune. A planning system should support, encourage, protect, cultivate, and collaborate rather than standing back to allow these facilities to take their chances as big businesses abandon certain parts of the "Centre" in search of greener pastures. Short term action in the context of long term strategy is essential to ensuring that the existing community and voluntary sector facilities that do exist continue to thrive in order to play their part in a dynamic and inclusive CMK.	Policy SS4 encourages developers to bring forward proposals that provide facilities for community and voluntary organisations, being an essential part of the growth of CMK. Para. 6.37 states that existing provision for this sector should be protected and relocated if necessary
M1.1	I am writing in response to the CMK Alliance Plan 2026 in my capacity as Chief Executive of MK Community Foundation. The voluntary and community sector contributes significantly towards creating a vibrant, dynamic, inclusive and safe community for the people of Milton Keynes. Whilst these organisations may not want the responsibility of owning or managing premises, they want to utilise the facilities and be engaged in the development discussions. The plans for CMK need to be flexible and welcoming to enable VCS organisations to participate in the development process to allow their continued support of local people.	Policy SS4 encourages developers or organisations to bring forward proposals that provide facilities for community and voluntary organisations, these being an essential part of the growth of CMK
M2.1	Cllr David Hopkins took a delegated decision yesterday (4th December) to approve the response from Milton Keynes Council to the consultation draft CMK Alliance Plan. I have attached a word document setting out the response. In sending this response I would like to reiterate our comments in the report that as the first business neighbourhood plan in the country to reach the consultation draft stage, the CMK Town Council and the CMK Alliance Steering Group are to be congratulated for their work, resilience and considerable achievement in producing this plan. Consistent with the plan's status as a frontrunner, it has been prepared at a time when neighbourhood planning is in its infancy and in the face of a continual stream of new advice and guidance. The experience of all parties who have been involved in the business neighbourhood plan will serve as an important learning experience to be shared with other communities interested in neighbourhood planning not just in Milton Keynes but nationally. As I have discussed with Robert de Grey and Andy Thomas in particular, we will be happy to discuss these comments and work with the CMK Alliance team to address as many of them as possible.	Comment noted and the opportunity for further dialogue welcomed.
M2.2	APPENDIX A DRAFT CMK ALLIANCE BUSINESS NEIGHBORUHOOD DEVELOPMENT PLAN CONSULTATION RESPONSE FROM MILTON KEYNES COUNCIL Introduction	Comment noted

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	significantly changing or shaping the future character of this area should widely consulted on and decided through a city wide referendum.	
M2.4	General Comments A general point is that the plan is written as if it was a stand alone document; its linkages to higher documents such as the NPPF, adopted MK Local Plan and emerging MKC Core Strategy which provided the context and parameters for the CMKAP are poorly developed. Although the Business Neighbourhood Plan gives the community greater freedoms to plan their area, this is not an unfettered freedom, it is set within a context set by higher level plans and documents. The failure to adequately acknowledge that these higher level constraints exist or the limitations on what the plan can propose are among its chief weaknesses and explains why in several cases the CMKAP conflicts with national as well as local planning policies. For example, it is the council's opinion that the proposed changes to parking standards are not consistent with council policy and are outside the remit of the CMKAP. Recommendation: The plan could better acknowledge the key constraints from the NPPF and the relevant local planning policies it is set in. General Comments The CMKAP would benefit from a diagram and some wording to illustrate where it sits in relation to	The plan makes linkages to the <i>Core Strategy</i> and <i>NPPF</i> (Sustainable Development) repeatedly; the strategic objectives for CMK in the <i>Local Plan 2005</i> are acknowledged, however, the CMK-specific saved policies are to be replaced by the CMKAP policies. A table has been added to make this explicit in the revised CMKAP. A diagram illustrating where the CMKAP sits in the Local Development Framework has been added.
	higher level plans and how it fits into the development plan for the area. This is something that the Development Plans team can provide.	The Parking Proposals of the plan have been revised in response to these and other comments.
M2.5	General Comments The plan would hold more weight if it was underpinned by some kind of economic evidence/analysis carried out to prove what actually is working elsewhere and possibly to benchmark CMK against national and international cities. Understanding today's economic picture and allowing flexibility in the plan to address any future economic shift is essential therefore, a plan that is too prescriptive and detailed can become a barrier to growth later. Centre for Cities, Experian and now the Municipal Journal all highlight MK as the place to be for business therefore it is important that we actually can deliver market demand that will be required by national and international businesses. The concept of neighbourhood planning, does not necessarily fit well with a city of the scale and influence of CMK – thus the plan is rather inward focused (which would be appropriate for most neighbourhood plans) and does not take into account any outward focus on the bigger picture in relation to MK, nationally and internationally. For future economic growth the plan needs to have an element of outward facing to attract sustainable investment. The plan needs to take into account the existing and emerging policies in the MKLP and the Core Strategy especially when delivering targets. Businesses today want clarity and one point enquiry routes; what they don't want to face is uncertainty over policies as this gives the wrong message to investors and developers and will become a barrier to promoting MK.	The Plan has to inhabit the Core Strategy, which is supported by its own extensive evidence base. The economic evidence/analysis underpinning the CMKAP, for example, lies with the Core Strategy, which has set out the growth objectives for CMK which the CMKAP seeks to deliver. The Alliance plan's additional evidence base includes workshops, expert sessions, stakeholder meetings and extensive public consultation.
M2.6	The plan's message seems to be contradictory as on the one hand it encourages mixed-use across CMK and on the other it includes considerable detail and prescription as to what should be going where.	The Plan has to inhabit the Core Strategy which in general terms establishes the scale of development in CMK. The Plan shows how these aspirations can be achieved, necessarily being quite specific about how it all fits in. But the use and floor space amount for each site is negotiable, on the understanding that floor space lost on one site is gained on another. Without this guidance, we do not see how MK Council will know that the objectives of the Core Strategy are being achieved.
M2.7	General Comments As part of setting the context for the plan. It would be helpful to set out what the current planning policies for CMK are and be clear which ones this plan would replace/ supersede on adoption.	A table has been be added that sets out which policies will be replaced/superseded by the

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	Linked to this, the plan would benefit from some brief wording clarifying roles and responsibilities between the Town Council leading on the Neighbourhood plan and the role of MKC as Local Planning Authority.	CMAP on adoption.
		Wording has been added clarifying the roles and responsibilities of the CMKTC and MKC, particularly with regard to Development Control powers resting with the LPA.
M2.8	General Comments Add Aims/Objectives sentence at the start of each policy – eg as per the policies in the Milton Keynes Local Plan. The objectives would serve as a quick summary as to what each policy is seeking to achieve.	Suggestion noted.
M2.9	General Comments The Plan is very good at setting out what is wanted but no costs are given or details of how the development will be achieved. It is a menu but without any prices. MKC could work with the Alliance team to do some indicative costing of the proposals and measures proposed in the CMKAP, including infrastructure costs.	Visions are necessarily aspirational and take the bigger picture and longer view. The importance of commercial viability is acknowledged. The offer of undertaking some indicative costings of the proposals is welcomed, particularly in developing a draft table of proposed Infrastructure that could be supported by CMKTC's proportion of CIL.
M2.10	General Comments It is not evident from the document what discussions if any have taken place with major landowners; what their aspirations are for development within the city centre and how these aspirations are met or not by the proposals in the CMKAP.	Discussions have taken place with landowners; this has been noted in the Consultation Statement, which has now been prepared as a supplementary document to the Plan.
M2.11	General Comments The documents which have been used as the evidence base to justify the policies and proposals in the CMKAP should be listed and referenced.	Agreed.
M2.12	General Comments The Figures do not generally relate to the text adjacent to them. Could the plans not be more closely located to the appropriate text?	Agreed.
M2.13	General Comments There seems to be a lot of repetition between Section 4-7 and the 'pre-amble' text in section 8	The revised plan has been further edited.
M2.14	General Comments The requirement for the council to continually monitor the achievement of the core strategy target floor areas does not sit comfortably with the desire to set a flexible framework.	As noted above, the Plan has to inhabit the Core Strategy which in general terms establishes the scale of development in CMK. The Plan shows how these aspirations can be achieved, necessarily being quite specific about how it all fits in. But the use and floor space amount for each site is negotiable, on the understanding that floor space lost on one site is gained on another. Without this guidance, we do not see how MK Council will know that the objectives of the Core Strategy are being achieved.
M2.15	Associated with this, there is a concern Fig 14 could put off investors from considering CMK if the required land use in the Alliance Plan is different to what they would like to see on the site.	Please see above.
M2.16	General Comments There seems to be a contradiction in the Plan between on the one hand to increase densities and create a more vibrant and animated public realm and the intention for a dispersal of land uses which seems predicated on a transport requirement to spread uses around to not load the grid in too many concentrated places. While this transport issue is a factor, it has been overemphasised with too much reliance on this as a reason for the dispersal of land uses.	The quantity of development is set by the Core Strategy and the fundamental plan of Milton Keynes is one of dispersed access via the grid network.

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M2.17	General Comments The Plan is very focussed on the undeveloped or underdeveloped (60 ha of it). One of the constraints	Comment noted – please see paragraph 11.4
	facing the CMK AP's ability to prescribe the Core Strategy floor area targets is that there are so many unknowns about the	of the Plan.
	redevelopment likelihood of all existing development areas (and the floor area of development that these sites could deliver).	
	While there maybe 60 ha of vacant or underdeveloped land there is probably even more developed land which could be	
	redeveloped in the future and this reduces the accuracy and relevance of attempting to prescribe where all the core strategy	
	floor area targets should go as much of it could be accommodated through higher densities on existing built plots.	
M2.18	General Comments Following on from the above comment, the CMK AP could provide some direction on	Comment noted – please see paragraph 11.4
	refurbishment/conversion or demolition etc.	of the Plan.
M2.19	General comments In general, sections 7 and 10 of the Plan repeatedly refer to "transport studies" but fail to give the details	The plan has been amended to include
	of these studies. Without knowing precisely what is being quoted from and what the context of the study was it is	references as appropriate. The Alliance plan's
	impossible to determine whether the conclusion drawn is correct and whether the original study is a suitable reference	additional evidence base includes workshops,
	document.	expert sessions, stakeholder meetings and
	Where the CMKAP ascribes views, comments, challenges and goals to the Local Transport Plan (LTP3), it would be more	extensive public consultation, including bus
	helpful if the plan could quote directly from the LTP3 or include the specific reference in a footnote.	users who have indicated a long-held desire
	The third bullet in paragraph 7.4 states that "previous MK Council transport studies indicate that this (Public Transport	to have a 'bus station' in the retail core.
	usage) will need to increase to at least 25% by 2013". The context of and reference for this statement should be included in	
	the CMKAP. It should be noted that ,as with most studies and reports on transport in MK, there will be a range of scenarios,	The Alliance and MKC have worked together
	findings, recommendations and potential outcomes from the various options that could be taken forward. The achievement	to achieve convergence on these issues in the
	of 25% public transport mode share, is not Council policy or a target. This is a crucial point as it seems that much of the	revised Plan.
	transport section of the Plan is predicated on this premise.	
	A further example of the Plan citing LTP3 as a source for the Alliance's own proposals is paragraphs 7.17 and 7.20. The	
	CMK AP refers to the introduction of a second interchange in CMK. Whilst LTP3 refers to the need for improved interchange	
	facilities in CMK and there is reference to a CMK interchange in the future example 'Travelwatch 2025', there are no specific	
	locations or short term provisions for such an interchange. The focus of LTP3 is on the improvement of the existing public	
	transport infrastructure in CMK rather than the creation of new interchanges.	
	There are some unresolved issues in the CMK AP's approach to transport – the Plan's promotion of large-scale increase in	
	car parking, will create demand for additional road capacity. However, there is no mention of the delivery mechanisms for additional road capacity, how much capacity is required or how much capacity can actually physically be added. It would	
	be helpful for the CMKAP to acknowledge the need for its proposals to be set within an integrated transport programme in	
	order to deliver an effective transport solution to deal with CMK's role as a place to live, to commute to and to visit as a regional centre. CMK is not just a neighbourhood.	The Plan's transport policies acknowledge
	General comments Transport solutions must include all available options, delivered hand-in-hand and not one after the other	that additional solutions are needed:
	as suggested in the Plan. Options include:	triat additional solutions are needed.
	Wayfinding improvements including VMS;	VMS - CMKAP T4;
	Pedestrian improvements;	Cycle hire – CMKAP T3;
	Cycling improvements including cycle hire;	PT infrastructure – CMKAP T2;
	• Enhanced PT infrastructure;	Thinderdocard Own VII 12,
	Promotion of sustainable modes;	
	• Incentives for initiatives such as car-share & e-vehicles;	
	Parking management;	
	Network optimisation and management;	
	Traffic capacity improvements.	
	As noted above, there is a need to consider the implications of a large scale increase in car parking within an overall and	
	integrated transport programme, including the above options	
	anogration statiopers programme, motivating the above options	

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M2.20	General comments One of the main criticisms of the EDAW plan, certainly in retrospect, was that it was too idealistic and ambitious. Very little was ever implemented and now that the CMK Framework is being reviewed, both the Framework and the CMK AP have been advised that they should have obtainable objectives and be feasible/deliverable. Unfortunately there are some elements of the CMK AP which are not feasible under legislation or even desirable, either from an existing policy perspective or operationally where the bus contractors are concerned.	The Alliance and MKC have worked together to achieve convergence on these issues in the revised Plan.
M2.21	General comments One notable omission from the CMK AP seems to be coach parking (albeit a mention to its removal). This is an important facility, particularly for Theatre goers.	Comment noted. The Plan makes no proposal for changing Coach Parks.
M2.22	Detailed Comments Page 1, Executive Summary second paragraph sentence beginning 'Just as important is the promotion of CMK's emerging role as the centre of a prosperous and growing subregion' To avoid confusion MKC suggests that throughout the CMKAP that CMK should be referred to as a regional centre, where this is appropriate	Comment noted. 'Regional' has replaced 'sub-regional' in the text of the revised plan.
M2.23	'This will drive growth in both the day and night time economies' The day-time and night-time economies are mentioned in the executive summary and in other parts of the Plan but there is no quantification of these economies and how the Plan will bring about improvement and grow the CMK economy.	Comment noted, the growth of the CMK economy underlies all aspects of the Plan - see paragraph 6.5 for a broad description of the strategic planning approach. The quantification of the economic growth is derived from the Core Strategy, which has determined the amount of office and retail floor space that CMK is to accommodate.
M2.24	Page 1 Executive Summary third paragraph Expand and diversify the retail offer of CMK (more small and independent specialist shops and new market hall to complement outdoor market Build more offices to create new jobs Reserve key sites for major opportunities such as the expansion of the University Complete almost 5000 new dwellings Enrich its social, sporting and cultural life with new facilities If these are the objectives of the Plan they should be given more prominence.	Comment noted. We believe these objectives are given prominence in the Plan.
M2.25	How long are key sites to be reserved for major opportunities and who decides what is an appropriately major' opportunity? Has the University confirmed it wants the area reserved for it and does it have the resources to purchase and deliver the development?	The key sites are to be reserved for major opportunities during the Plan period (to 2026). MKC's Development Control Committee will decide whether a particular proposal is an appropriately 'major' opportunity based on Policy SS1 and its context. The aspiration for the expansion of the university is contained in the Core Strategy for CMK - see CS 7 (9) and the response of the MK Higher Education Board.
M2.26	Page 1, Executive Summary fourth paragraph MKC welcomes the support for building at higher densities than those assumed when CMK originally planned. However, are	The viability of different forms of development will vary during the life of the Plan.

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	speculative buildings of this size (as opposed to purpose built buildings) realistic and viable at current land values?	
M2.27	Chapter 1 – Introduction Page 5 para 1.4 'The 2001 CMK Development Framework proposed far-reaching changes to the original plan for CMK-Public participation & involvement and scrutiny of the CMK Development Framework back in 2001 were very intensive both on the original document and subsequently. Exceptionally the main elements of the Framework were incorporated into the second deposit version of the MK Local Plan and re-consulted on culminating in the examination of these proposals at the Local Plan Inquiry in 2004. '2001 CMK Development Framework no longer fit for purpose' Aspects of the work programme associated with the Development Framework have not yet been completed such as the Parameters plan indicating which areas could or could not be developed because of their impact on utilities.	The CMKAP generally builds on the principles in MK Council's recently adopted <i>CMK Development Framework</i> , but in some cases departs from them.
M2.28	This section would benefit from a few economic facts and figures on CMK to underline its importance as a regional centre and how the Plan will enhance this role.	Comment noted. Some facts and figures have been included from the Centre for Cities report.
M2.29	Page 5, para 1.5 'Removal of the Regional tier of Planning Policy' -At the time of writing these comments the South East Plan had not yet been revoked although the Government had indicated it was removing the regional tier of planning in England outside London.	The Regional Spatial Strategy of the South East Plan has now been revoked by the Sec'y of State.
M2.30	Page 5 para 1.6 'The CMK Alliance Plan takes into account lessons learnt from the implementation of the 2001 CMK Development Framework' - these are referred to but not identified. The lessons learned could be included as an appendix to the plan. Similar comments have been made in respect of the CMK Development Framework Review and this will be addressed when the SPD is revised following consultation.	Comment noted. The CMKAP generally builds on the principles in MK Council's recently adopted <i>CMK Development Framework</i> , but in some cases departs from them.
M2.31	Page 6, para 1.11 "The Plan must support the quantitative objectives of the Core Strategy has set for the number of new dwellings and additional amount of office and retail space in CMK over the plan period to 2026" While generally supporting this point, MKC would wish to point out that figures on the amount of new office and retail floorspace are indicative and subject to change. They should not be regarded as targets or limitations on the amount of development which can forward in CMK, provided the details are satisfactory in all respects.	Comments noted. The figures we have used are no more or less precise than the Core Strategy, which the Plan inhabits.
M2.32	Page 6, Para 1.12 We are concerned that the CMK AP is not in conformity with Local Plan Policy S5 (iii) specifically with reference to the requirement to reduce the influence of the car in the design and layout of the area.	The Alliance plan supports the aspiration to provide parking in multi-storey car parks (MSCPs) at gateways in the outer Blocks (paragraph 7.35) and policy CMKAP T4 seeks to minimise the visual impact of such facilities. In addition, paragraphs 4.17 and 8.6 (second bullet point) make clear that the existing surface level car parking may be re-designed and 're-purposed' in future to provide cycle hire stands, or new public transport corridors, etc. We believe the Plan is in general conformity with the LP's strategic objective S5, but note that S5 is not a saved policy.
M2.33	As discussed during the consultation period, it would be helpful if the CMKAP could clarify which policies in the adopted MKLP would be superseded on adoption of the CMKAP.	Table has been added.
M2.34	Replace second sentence with: "The 2005 Local Plan also includes a number of detailed, site specific policies for CMK in the Town Centres and Shopping	See above.

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	levels of development envisaged for CMK. The business neighbourhood plan takes those targets and identifies how they should be delivered in a more site specific approach than that taken in the Core Strategy. Also, for example, the changes that are proposed to parking policy and the proposed 'predict and provide' approach to road capacity will have significant effects on the transport network and the associated environmental impacts (CO2 production, other pollutants, noise etc.). An SEA screening for the CMKAP leads to the conclusion that an SEA is required. Responses from English Heritage and the Environment Agency concur with this conclusion and Natural England suggest that the plan should also be subject to an Appropriate Assessment screening for its impact on the Habitats Directive. From recent discussions, the need for an SEA has been acknowledged and we welcome the work that is underway to address this.	
M2.36	Chapter 2 – Understanding CMK Page 9, para 2.3 Aspects of the wording here are misleading. Although the 1946 National Insurance Act – after World War 2 introduced a contributory State pension for all. Old age pensions and unemployment pay were introduced in 1909 and 1911 before World War One.	Text has been revised.
M2.37	Page 12, para 2.16 "Space was not planned for schools in CMK" – this is not correct. Before 1997 Buckinghamshire County Council as Local Education Authority for the area, reserved a site for a primary school in Campbell Park. Additionally, proposals for a primary school form part of the outline planning permission granted for Block B4 under reference 04/00028/OUT for the Sustainable Residential Quarter.	Text has been revised.
M2.38	Pages 12-14, paras 2.16-2.31 CMK as local, district and city centre The use of these terms could be confusing as they have a particular definition in the retail hierarchy in the Core Strategy. It might be clearer to refer to CMK as having a variety of functions, serving the differing needs of those who live and work not just in CMK itself but in the wider borough and region. Throughout the CMKAP, CMK should be referred to as a regional centre.	Text has been revised along the lines proposed and references to sub-regional centre changed to regional centre.
M2.39	Page 13, para 2.26, 2nd sentence This sentence in para 2.26 needs further examination and may need to be reworded. It does not necessarily accord with the support given elsewhere in the CMKAP to building at higher densities than those assumed when CMK was originally planned, with buildings up to generally eight storeys high.	Text has been revised.
M2.40	Page 13, para 2.26 "city centre land should not be used up to build blocks of flats or residential dwellings that could be more readily accommodated elsewhere in MK. The land in CMK might be needed for regional scale activities ,such as major office development" This sentence needs further examination and rewording. MKC would point out that CMK is the most central and sustainable location for development within the Borough. It was always intended to be different from the rest of Milton Keynes and was planned to be developed at higher residential densities than other parts of the city. Residential development in the city centre provides opportunities for people to access work and facilities on foot or by means of transport other than the car. It minimises journey lengths and travel times and reduces one's carbon footprint. This sentence also fails to acknowledge if land allocated for housing is not developed in CMK any shortfall will have to be made up elsewhere. This could be on greenfield sites. Not to develop land already allocated for housing within CMK because it might be developed for offices or some other purposes would be a failure to plan properly or to acknowledge that land for offices has already been allocated for development within CMK. Page 13, para 2.27, final sentence The Core Strategy proposes an additional 28,000 dwellings within the Borough from 2010 to 2026. Plan:MK will consider the growth of the city beyond 2026 up to 2031	See above. The Plan seeks to deliver the quantum of development set out in the Core Strategy, including 5,000 dwellings.
M2.41	Page 14, para 2.32 The figure of 25,000 jobs in CMK is too low. What is the source of this figure? The CMK business neighbourhood frontrunner bid document referred to 27,000 jobs but the Office of National Statistics Business Register	Text has been revised and new figures added.

university.

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M2.45	Page 18, para 3.20 While the distinguishing feature of the public realm is the extent and layout of public realm, we would question the quality of it – much of it is just car parking – how can this be seen as 'quality'? Recommendation – delete "quality"	We disagree. 'Quality' refers to a standard of excellence, not beauty. The car parking is of a very high quality standard –the layout and functional design is excellent and the materials used are long-lasting and attractive (compared with lower-standard alternatives such as tarmac). There is also a lot of landscaping through the parking areas. Furthermore, there are no areas of 'just' parking – these areas serve multiple purposes, including slow streets, pedestrian access, as also described in the newly adopted CMK DF.
M2.46	Page 19, para 3.31 It is very good to see that there is a local appreciation that development needs to be sustainable and that there is a requirement for "developing high quality public transport interchange facilities" however, this seems to be slightly at odds with the first statement in Key principles of "recognising the importance of the car to the city's success".	With the growth of CMK there will need to be efficient use of all modes of transport.
M2.47	Page 21, Policy CMKAP S1 Please note: some of the wording of Core Strategy Policy CS7 on which this policy is based may change as a result of the Inspector's report on the Core Strategy examination. The proposed main modifications to the Core Strategy, as recommended by the Inspector following the Examination, are now available on the council's website and are making their way through the council's committee process ahead of public consultation starting in mid January.	Comment noted.
M2.48	Page 21, para 3.33 The source of the figures for office and retail floorspace should be clarified. The Core Strategy should be identified as the source of the figures for new office & retail floorspace and number of new dwellings within CMK. Although there is sufficient land for this amount of development within CMK a caveat should be added to the text that forecasts for the amount of development within CMK up to 2026 should be treated with caution. These figures are not set in stone and MKC will be monitoring development within CMK and changes to these figures could occur.	Comment noted.
M2.49	Page 21, para 3.34 Use of the word 'disproportionately 'in this context is unfortunate and should be deleted. Under the sequential approach which features in the Government's NPPF para 23, main town centre uses such as shopping developments, offices, hotels etc are supposed to be steered to town centres which in this context includes CMK. Additionally the amount of land for office development within CMK is small in relation to the total quantity of land in the city.	Text has been revised.
M2.50	Page 21, para 3.35 Have existing planning consents also been taken into account in the land use allocations in this Plan?	Additional wording to be added to note the existing planning consents – these have not been included in the land use allocations, as consents may lapse and existing consents may not reflect the Plan's desired land use allocation.
M2.51	Page 22, Figure 4 Midsummer Blvd is an existing pedestrian desire line, rather than a new one There should be new pedestrian desire lines between the Point and the adjacent temporary car park and the centre:mk The difficulty with this plan is that it only focuses on what is known – there might be some future development in an area where there is existing development that could become a magnet. This plan is very much focussed on pedestrian magnets for the undeveloped sites Are Lloyds Court and the adjacent housing really a existing pedestrian destination?	Principal Pedestrian Routes have been removed in the revised Plan.
M2.52	Chapter 4 – Opportunities & Challenges Page 23 While the stated Opportunities are supported, are they the only ones? Why were they selected? It would help to have a short introduction to this section in order to provide some context and background to the chosen Opportunities	The Plan was drawn up following intense public consultation and reflects key messages to the Alliance.
M2.53	Page 23 paras 4.1-4.3 As referred to previously is there any indication how long the plan proposes to reserve a 'strategic site 'for the University and whether the University has the means to purchase and develop such a site	see response to M2.25

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M2.54	Page 23, para 4.6, second sentence The proposal for a new public space is in line with MKLP Policy CC13 (City Core Quarter) but could conflict with the current Secklow Gate proposals yet to be determined by MKC.	The Alliance Plan does not have to conform to the individual policies of the 2005 Local Plan. It must generally conform with the Core Strategy, and strategic policy S5 of the Local Plan (although this has not been saved).
M2.55	Page 24, para 4.10 There is a danger in over simplifying the relationship between the city's population and car movements in and out of CMK. The world is a very different place from that when CMK was originally conceived – whilst car ownership has risen, increasing oil and energy prices and new ways of working and shopping all have their impacts on the demand for and capacity of road space. Page 24, para 4.12 'The long term need to establish a significant shift from cars to more sustainable public transport is complicated by the distributed low-density infrastructure of Milton Keynes as a city. Many workers are also commuting from outside the Borough to jobs in CMK, making public transportation even less convenient for those workers.' A very important point is being missed here. Although a shift from cars to more sustainable public transport is complicated by the low density spread out nature of employment areas within the city, it is precisely because CMK is different with a large number of jobs and other attractions that it offers the greatest scope to shift from the car to other means of transport. This fact is reflected in the text to Local Plan Strategic Policy S5 para 3.33. CMK also provides major opportunities for people to live close to their place of work and access facilities by means other than the car. The statement that for workers commuting into CMK from outside the borough public transport is not convenient needs to be backed up by evidence. The improvement of interchange facilities at the Central Rail Station is one initiative which could encourage more commuting journeys to be made by rail and bus. The text would also benefit from mentioning the establishment of East-West rail services from CMK to other destinations from 2017. These services create additional opportunities for people to commute to and from CMK by rail from locations where this option was not previously available.	Comment noted. Unfortunately, we do not share the view that 'it is precisely because CMK is different with a large number of jobsthat is offers the greatest scope to shift from the car to other means of transport.' The reason CMK has a large number of jobs in the first place is because it has been so convenient to get around by car. We support the view that we need a shift from cars to more sustainable public transport, but for a distributed city designed for the car, this is challenging. One of the largest employers in CMK – Home Retail Group – told us that 65% of its workforce lives outside the Borough. Comment noted.
M2.56	Page 25, para 4.16 What criteria are to be used to distinguish between 'good' and 'great' developments? There is a danger that too much subjectivity will make decision making more difficult and subject to criticism.	The Plan sets out clear policies for assessing development proposals; if in addition high standards of design are achieved, CMK will benefit.
M2.57	Page 25 para 4.17 Question: Is the plan proposing no development on surface level car spaces irrespective of the circumstances?	See policy G11, Exceptional Developments.
M2.58	Page 25, para 4.20 We would question the statement that there has been an intention to make CMK into a 'traditional city centre'. This seems to be unduly subjective; what evidence supports this?	Please note the proposals in the EDAW plan and the Lessons Learnt paper from the MKC.
M2.59	Page 25, para 4.21 Is there necessarily a problem with public space being sold into private ownership as long as it is remains clearly public space? The space in front of the Network Rail building is still publicly accessible and is of a better quality than what was there before. One of the reasons why public space is poorly maintained is simply because CMK has so much of it – probably too much, so if others can help maintain it then that should at least be considered as an alternative mechanism for its upkeep.	It is the view of the Alliance that the public realm and infrastructure should be protected for future generations. Once public space is privatised, there is always the temptation for the landowner to build over or enclose the space, and it will then be lost forever to the public (see recent Midsummer Place application).
M2.60	Page 26, Figure 5 As per the comments in the General Comments above, this figure does not relate to the adjacent text – could it be relocated? Figure 5, in our opinion shows too many principal pedestrian routes – we would question whether the gates really are more important than some of the streets? Do not agree that North and South Row are principal pedestrian routes. Where is the evidence behind this selection of routes? This is important because if the suggestion (which is a good one) is	Principal Pedestrian Routes have been removed from the revised Plan and replaced by Active Frontages.

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	that active frontages and mix of uses should be focussed on principal pedestrian routes then the Plan is demanding the	
	spread of mixed use and active frontages in an enormous area – we would question whether such an approach is viable?	
M2.61	Chapter 6 – Spatial & Design Strategy	The Plan considers the careful design of
	Section 6 Should there be a figure to reflect this strategy?	mixed use schemes a high priority.
	Page 29, Para 6.3 Existing or future residents may not agree with the benefits of mixed uses in the city centre - the type of	
	"comings and goings" that this paragraph describes could equally be described as "noisy and anti-social". It is not just the	
	night life that needs to be safe – if there is going to be an intensity of use together with a diverse mix of use then there	
	needs to be a balance that achieves safety and quiet enjoyment for residents.	
M2.62	Page 29, para 6.4 Mixed use development is encouraged within CMK. However, it needs to be recognised that among the	The Alliance Plan seeks to move away from
	great advantages of a quarters approach has been greater certainty about what is and what is not permissible at certain	zoning. Mixed use across CMK will help guard
	locations. Central Milton Keynes has benefited from focusing certain types of land use at particular locations. Office	against "ghost town" phenomena outside 9-5
	development such as the Network Rail Headquarters was attracted to CMK because a large site could be delivered in	or 9-8 and on weekends. The Expert Panel on
	walking distance of CMK Railway station. Locating bars and clubs in the Theatre district and in Xscape away from	offices did not highlight issues with broad
	residential properties has helped to minimise nuisance.	mixed use, as long as design considerations
	Recommendation: The authors of this plan should rethink their position about not identifying a Business District in CMK. It is important that CMKAP does not send out a message to inward investors that CMK is not open for business. It would be	are appropriately addressed.
	useful to highlight the existing business area as a 'character area' as it has a clearly predominant use and it would likely be	
	undesirable to build major residential or retail development there. It will of course include mixed use development though	
	along its ground floors along the boulevards and gates. Therefore, it is recommended that in addition to the Primary	
	Shopping Area, the existing CBD (blocks B2, B3 and C2) should be highlighted as a character area that will be	
	predominantly led by office development (with mixed use / fine grain of course at ground floor along principal pedestrian	
	routes). Land close to the Railway station is particularly attractive for office development, which the plan wishes to	
	encourage [although it is acknowledged at para 6.11 that part of site B4 is reserved for major developments of strategic	
	importance.] The Plan should consider swapping land with planning permission for residential development on part of Block	
	B4 for land identified for office development in Campbell Park.	
M2.63	Page 29 para 6.5 It would be useful to bring Figure 4 closer to this text to link with the text description of Magnets. The large	Figures are brought closer to the text in the
	spread of employment into Campbell Park seems to have been done to support the need to 'disperse uses to reduce peak	revised Plan. The Magnets of Activity figure
	load hotspots on the CMK grid'. Evidence is needed to back up whether there is a need in transport terms to do this. We	has been amended to reflect that it is
	would nonetheless question whether employment / office uses are spread too widely over CMK/Campbell Park	illustrative.
		The mix of diversity of uses has not been
		solely driven by transport considerations, but
N40.64	Dags 20 have 6.6 As valed before have evicting (but as yet unimplemented) planning applications also have considered in	by the quality of place we are trying to create.
M2.64	Page 29, para 6.6 As raised before, have existing (but as yet unimplemented) planning applications also been considered in proposing the broad mix of uses in the CMKAP?	Text added regarding existing planning consents – these have not been included in
	proposing the broad mix of uses in the divinar?	the indicative land use, as consents may lapse
		and existing consents may not reflect the
		Plan's desired land use allocation or policies.
M2.65	Page 30, para 6.7, 2nd sentence Are there objectives for the individual sites identified? The development sought on each	Land use objectives are tabulated for each
	site is set out in the tables at the end of the plan, but these do not include the objectives?	site, but these are not precise requirements.
		They are indicative.
M2.66	Page 30, para 6.8 MKC already monitors development in CMK and produces an Annual Monitoring Report.	Comment noted. The Annual Monitoring
		Report does not include a chapter on CMK.
		The Plan links monitoring to guiding the
		direction of development in CMK.

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	feel secure."	
	The Plan could identify specific areas in need of regeneration/improvement in CMK and say what actions could be taken to	
	revitalise them.	
M2.75	Page 32, Figure 6 There is no reference in the adjacent text to the term 'Secondary Shopping Area' yet it is mentioned in Fig	Agreed. The Secondary Shopping Area is
	6. There needs to be some supporting text.	referred to in Policy SS2. The term
		'Secondary Shopping Area' has been replaced
		with 'Edge of Centre'
M2.76	Page 32, para 6.21 Policy L13 of the adopted MKLP did permit large scale out-of-centre retail development at Denbigh	Comment noted.
	North as 'enabling development ' and as a specific exception to normal planning policy to subsidise the development of the	
	MK Dons stadium and associated facilities at Denbigh North. It has taken time for the market to absorb a development of	
	this scale. One of the main drivers for current planning applications for additional comparison (non-food) floorspace in CMK	
	is research studies undertaken both by the Council (the MKC retail capacity update report August 2011) and work by	
	shopping interests themselves. These studies suggest there is sufficient spending within the Milton Keynes catchment area	
	to support additional retail floorspace in the period up to 2026. This floorspace is in addition to existing comparison retail	
	commitments of 34,700 sq.m of floorspace with an estimated turnover of around £192 million.	
M2.77	Page 33, para 6.22 Clarify what the 2 main CMK centres are (we assume they are the Centre Mk and Midsummer Place)	Text has been revised.
M2.78	Page 34, Figure 7 There is a blue and white stripy star in Block B4 that is not in the key. The Figure should be included in an	Comment noted. Legend has been updated /
	appropriate place adjacent to supporting text on p36.	corrected.
140.70	Is there any relevance to the different sized stars? 2 blue stars have different land uses but look the same	0
M2.79	Page 35. Paras 6.27 – 6.29 Broadly support the aim to encourage housing across CMK.	Supportive comment noted.
M2.80	Para 6.29 - the density for Campbell Park seems rather high, although it is acknowledged that densities have had to be used	Delivering 5,000 dwellings, as set-out by the
	that will deliver the Core Strategy housing numbers. Unfortunately, densities as high as this in Campbell Park would seem	Core Strategy, does not permit Campbell Park to offer lower density residential
	likely to generate almost exclusively apartments which does not reflect that Campbell Park offers a different market to that in CMK?	developments. It would be an aspiration to
	III GWK!	provide high qualitity, lower density dwellings
		around Campbell Park, however, we have to
		inhabit the Core Strategy.
M2.81	Page 35, Para 6.30, final sentence	Parking will only come with development.
1412101	The focus of office development on CMK is also in line with the NPPF. The quantum of office floor space proposed creates	This plan also anticipates (to a certain extent)
	its own difficulties in terms of requiring a considerable increase in car parking provision. If a more conservative figure was	the Council's aspirations in its City Deals bid.
	chosen perhaps the existing parking stock would be closer to the overall parking requirement needed.	
M2.82	Page 36, para 6.37 Typo? – "When regeneration takes place, existing provision for the sector" – is that the voluntary	Text has been revised.
	sector?	
M2.83	Page 38, Figure 8 It would be helpful to expand the title a little to describe what the Figure shows.	Agreed.
M2.84	Chapter 7 – Access, Transport & Parking Strategy	Agreed.
	Page 39, para 7.3 As stated in the General Comments section above, the CMK AP should either quote from and/or include	
	footnotes where references are made to MKC and other documents.	
M2.85	Page 39, para 7.4 In paragraph 7.4, bullet 1, it is stated that "the grid network of city roads surrounding CMK will be	First bullet – wording has been revised to
	reaching its planned capacity for car movements". There is no evidence provided to reinforce this view and there is no	reflect all vehicle movements.
	indication of particular pressure points. It is likely that if this occurs it will happen at intersections as link capacities are very	MKC transport strategy has identified that a
	high. Additionally, it is unlikely that all intersections will be equally affected. A further point here is that "car movements" is	number of junctions surrounding CMK will
	an unfortunate phrase. Public Transport movements and HGV movements are an extremely important part of the life of CMK	require enhancement due to capacity issues.
	and would be equally affected (arguably more affected) by congestion. The second, third and fourth bullet points in	
	paragraph 7.4 do not provide a clear direction for the Plan's transport strategy. There is an inconsistency in the messages	Sustainability is a critical aspect of achieving

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M2.93	Page 43, para 7.18 In paragraph 7.18 the Plan states that MKC should seek the powers of a Passenger Transport Authority (PTA). Since 2008 it has not been possible to establish PTAs; the Transport Act permits the creation of Integrated Transport Authorities, but more importantly, this needs to be appropriate to local circumstances and the arrangements of the Local Authority and operators. Proposing the Borough of MK as a potential PTA is outside of the scope of this plan and as such, should not form part of its proposals	The Core Strategy requires radical improvements of public transport across the whole Borough. The Alliance's expert panel session on parking and transport felt that the powers of a PTA would be a 'game-changer' in the delivery of the radical improvements required.
M2.94	Through ticketing and other initiatives can be implemented within existing legislation.	Accepted – reference to through ticketing have been removed.
M2.95	Page 43, paras 7.21 & 7.22 Paragraphs 7.21 and 7.22 refer to the implementation of a "CMK shuttle service". While a shuttle or hopper service is one of the short term LTP3 interventions, the Council has not yet carried out any work to establish the precise demand for such a service, how a service would be delivered, what infrastructure support it would need (stops, shelters, signs, road markings etc.) and where the funding would come from. Although it is listed as a short term intervention in LTP3, the delivery of a shuttle service needs to go through a prioritisation process to assess it against other interventions and transport services. Inclusion as an intervention in LTP3 does not guarantee the delivery of this scheme, and, given the current financial constraints on the Council, budget pressures mean that there is a very strong likelihood that no or insufficient funding will be available from MKC in the near future. Arguably, as this type of service is more likely to benefit visitors to CMK than many Milton Keynes residents the shuttle could be subsidised by contributions from the retail, leisure and business community in CMK and, in this regard, the reference to the possibility of subsidies in para 7.22 of the CMKAP is welcome. It is right that the CMK Alliance Plan refers to and supports the CMK Shuttle, given its inclusion in LTP3, but this reference should be tempered by recognition that Council funding for such a service is going to be extremely limited for the foreseeable future.	Support for the Shuttle is noted. The CMK AP seeks to promote its high prioritisation by the Council, in line with its listing as a short term deliverable in LTP3.
M2.96	Specific response from Arriva: The principle public transport strategy appears to hinge on the provision of a high cost central shuttle service within CMK. Arriva's concern is that the structure of this service will undermine the current high frequency services which operate between Central Rail Station (CRS) and key points within CMK. Combined with the creation of a new central interchange this appears to then limit access of local services originating throughout MK to points other than the CRS & the interchange. It is important that direct access is maintained for journeys into the central area to all current stops without the necessity of interchanging with such a shuttle. The substantial additional operational costs of such provision could be utilised far more productively in enhancing services throughout an extended operating day across the MK network. The capital costs required to establish substantial numbers of new stopping sites again could deliver far more positive impact if invested in significant improvement to existing outdated infrastructure and improved provision at sites such as Xscape.	The CMK Shuttle ('hopper') service is proposed as an early intervention in the <i>LTP3</i> implementation plan.
M2.97	Arriva would agree that interchange / stop facilities need substantial improvement however it is not clear from the proposed site that access to key destinations within CMK can be attractively maintained. It is also not fully clear how access will be achieved to the site from Avebury Boulevard & Secklow Gate and what impact there will be on current traffic flows. Again significant and effective improvement to public transport interchange & infrastructure can be made at far less cost with a strategy that focuses on achievable and deliverable goals.	Supportive comment noted for interchange / stop facilities. Greatly enhanced public transport will be necessary to deliver the expansion of CMK.
M2.98	The proposal that MKC seeks to adopt 'the powers of a PTA' also needs to be viewed as an aspiration that has not been fully evaluated. Consideration should be given to the likely impact of such a move towards a compulsory agreement rather than continuing to develop the current partnership agreement in place between our organisations. Obviously consideration will also need to be given to the legal processes required to replace a voluntary partnership with a compulsory contract and how this would impact on commercial bus operation with MK.	The Core Strategy requires radical improvements of public transport across the whole Borough. The Alliance's expert panel session on parking and transport felt that the powers of a PTA would be a 'game-changer' in the delivery of the radical improvements required. The legal process requires

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M2.114	Page 59, policy CMKAP G10 Part b) Disagree with this policy wording – it is overly restrictive to expect a new building to respect the character of surrounding buildings when so many of them are very bland and unremarkable – this could have impact of lowering the overall quality if new buildings are using them as a yardstick for design. Part e) Disagree – this is far too much of a restriction. The policy needs to be clarified as there seems to be a lack of consistency between principles (e) [taller buildings acceptable if they have a specific function} and (f) criteria for testing taller building proposals. This suggests that taller buildings other than those specified in (e) might be acceptable subject to meeting the criteria. ie: clarity is needed if this policy prevents another development like the Hub: MK, which has buildings ranging between 10 and 14 stories in height from being implemented. There should be some further guidance on tall buildings eg needing to preserve the setting of the centre:mk There also needs to be flexibility on height in CMK as there have been instances of firms threatening to leave CMK altogether if they were not permitted to have buildings taller than the tallest tree. Additionally, some existing development may never have occurred in CMK with such a restriction in place.	The Alliance and MKC have worked together to achieve better wording for a number of policies in the revised Plan, including this one. The intention is to achieve high quality buildings that also complement and enhance their surroundings. The approach of design around listed buildings and their setting is set-out in statute and will be subject to consultation with English Heritage. Correction: the policy refers to taller 'structures' not buildings.
M2.115	Page 59, policy CMKAP G10 It is disappointing there is not more encouragement of the high design standards set by the Network Rail Office building in CMK Bream Excellent (yet to be confirmed) More green roofs on buildings More bat and bird boxes Rain water harvesting Other features Renewable energy features on buildings such as the PV cells installed on the old bus station. Not a design point in the strict sense of the word. Provision of public vantage points from tall buildings which may include provision of a restaurant/café on the top floor of a building.	The Alliance made a conscious decision not to repeat policies that were covered by the Core Strategy – CS 14 covers BREEAM for sustainable construction and renewable energy.
M2.116	Page 60, para 8.56 Eaton Mews is 88du/ha – it is a little misleading to say that Eaton Mews is typical of 100-150du/ha	Text has been revised.
M2.117	Page 60, Policy CMKAP G11 As raised previously, the densities proposed for Campbell Park are too high – one of the reasons for this is that so much of Campbell Park has been allocated for employment – and the reason for this seems in part seems to be because of highway needs to disperse land uses. It should not be forgotten that a percentage of the Core Strategy residential figure of 5000 can be assumed to come from existing built plots of land.	The mix of diversity of uses has not been solely driven by transport considerations, but by the quality of place we are trying to create. It does not make sense that the Core Strategy would assume a percentage of the 5,000 dwellings will come from existing built plots, when land for those displaced uses would also need to be found in CMK.
M2.118	Page 61, Policy CMKAP G12 The second paragraph could be very difficult to implement – what if the community does not put forward a proposal? The policy needs to make reference to the potential of a development to improve the public realm especially from a pedestrian experience	We have faith that the local community would bring forward alternative proposals, but have slightly amended the wording. Improvement to the public realm would be expected in a development of national or international importance.
M2.119	Page 62, Para 8.60 This could make it clear that the policies are being revised as part of the Council's Planning Obligations Policy Review project, which is already underway.	Comment noted.

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M2.120	Page 62, Para 8.62 The Alliance should remember that anything funded by S106 will need to meet the statutory tests. The Alliance will need to be able to justify anything in their list as being necessary to make the development acceptable etc. This won't be necessary for projects funded by CIL, although they will need to be sure their projects are identified in the Local Investment Plan, and understand that prioritisation of projects within the LIP might mean they will not necessarily CIL receive funding.	Comment noted regarding what facilities can and cannot be funded by S106 and CIL.
	Page 62, Para 8.63 Should make it clear that it is all CMK S106 contributions that are currently lower than adjacent estates, not just those for community facilities. Page 62, Para 8.64 Contributions for capital and revenue costs – that is okay as long as it isn't maintenance or repair work if	Par 8.66 has been revised to reflect that all S106 contributions, including for community facilities, are lower than adjacent estates.
	they are expecting such contributions under S106. Page 62, Para 8.66 The Plan should refer to "Affordable housing" rather than "Social housing". And also refer to the MKLP as being the key policy hook for those requirements. Page 63, Policy CMKAP SS1 There is a danger that the policy wording will not achieve what is intended – the way it is	We believe the wording re: affordable and social housing complies with the Core Strategy.
	worded would still allow a mediocre residential scheme so long as it is masterplanned for the entire site although such a scheme would not, we are sure, be seen as desirable on these sites.	Policy SS1 – the wording of the policy has been revised.
M2.121	Page 64, para 9.8 What is implied by the Market Square? At present it is a market and isn't really a square.	Market Square is the name of the public space under and around Secklow Gate Bridge that is occupied by the Market.
M2.122	Page 64, page 9.12 Disagree that land adjacent to the civic offices and City Church could be appropriate locations for a major civic space – they are currently parking areas and would need some development around them to make them function effectively as a proper civic space. Consider that it would be better to seek a civic square on the south side of MBE where it could be better enclosed by buildings. While supporting the need for a civic square, Midsummer Boulevard itself does not seem like the best location – it would be massive and have no enclosure.	New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
M2.123	Page 64, Policy CMKAP SS2 Part d) Is the market hall deliverable, who will fund it? This policy could stifle the delivery of an alternative exciting development on this site. Part g) This is a good aspiration but is it achievable/feasible?? Is it not too restrictive?	Land use allocations are indicative, and alternative uses are subject to approval by MK Council at the time development is brought forward. We note, however, substantial public consultation support for a covered market hall. We anticipate that a market hall could be delivered through planning obligations.
M2.124	Page 65, para 9.15 As per earlier comments, there has been an over-emphasis on the Core Strategy development quantum which has been used as the justification for the prescriptive allocation of land in the plan. More flexibility is needed.	Policy SS4 and the associated Proposals Plan show indicative land uses, not fixed allocations.
M2.125	Page 65, Policy CMKAP SS3 SS3 a) How does the proposals plan and table guide redevelopment of existing sites – if it is based on the 10% surely if more than 10% is provided the council could entertain this? SS3 b) What are these objectives – where are they stated? SS3 c) This seems to vary from the stringent requirement in para 6.7 which says that unwanted land uses (as prescribed in this plan) will have to be made up on other land?	See introduction to Chapter 11 regarding redevelopment of existing sites. The 10% figure is based on a mixed-use contribution (particularly at ground floor for A1/A2/A3) of new developments in general.
M2.126	Page 66, Policy CMKAP T1 CMKAP T1 (a) requires the protection of the extent of all existing movement corridors within CMK. The extent of these corridors is not indicated, but since the public highway extends from building face to opposite building face in most locations, one must assume that this means no development, or associated work, can take place beyond the current boundaries of the core building footprints and plots.	Correct – the Plan seeks to retain the public domain whilst promoting significant development on the 50 hectares of development plots in CMK.
M2.127	CMKAP T1 (b) requires that "the necessary shift to public transport" is achieved "before further restraining car parking". This policy is flawed in several key respects. Firstly there is a premise that car parking in CMK is currently restrained – however,	Feedback from businesses indicates that convenient parking is not sufficiently available.

Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
readily available occupancy data clearly show that car parking in CMK operates well inside current capacity: there is no restraint. Furthermore, no level of public transport usage has been defined to meet the test of "the necessary shift".	Detailed analyses of parking (recently shared with MKC) show that employee (E1) parking is constrained in Blocks A, B and C where most businesses are located. Also, the present situation for parking is being measured at a time of 20% - 30% vacancy rate in CMK office stock.
CMKAP T1 looks to maintain the street hierarchy and create a shift to public transport, although without further restraint on car parking. It is not clear from this statement whether this means that MKC could not increase car park charges, but the document clearly states in para 7.5 that there should not be charge increases or a reduction in car park numbers. Perhaps the most fundamental issue here is that the two issues cannot be chronologically isolated in this way. It is important to achieve more public transport use, but this needs to be achieved in an environment where all other transport issues are considered together as a package.	We agree that transport issues need to be considered as a package.
Page 66, paras 10.3-10.6 Paragraphs 10.3-10.6 refer to the second interchange (see earlier comments against Page 41, para 7.7) and paragraph 10.5 highlights the need for adjoining developments to contribute to such a facility. The mechanism to achieve this is not described yet integration with a "covered market hall" is mentioned.	The Plan suggests that the amenities to support a public transport interchange could be provided through the proposed covered market hall.
Paragraph 10.6 refers to establishing links between Marlborough Gate and Marlborough Street. These links were proposed as part of a CMK Public Transport Scheme but were removed from the scheme due to problems with deliverability and the amounts of benefits delivered. The likelihood of being able to provide these links is very low.	Text has been revised.
Page 67, paras 10.7-10.10 Paragraphs 10.7-10.10 refer to the CMK shuttle service. This has been covered in earlier comments	Earlier comments noted.
Page 67, paras 10.11-10.13 Taxis are part of a transport solution, but it should not be assumed that they are inherently sustainable.	We do not agree, as taxis can be shared and they also supplement more sustainable public transport services, such as buses, which are not always available at desired times and locations.
Page 68, Policy CMKAP T2 CMKAP T2 (a) requires a second public transport hub in the retail core. See comments on page 43, para 7.20 above on this issue.	Earlier comments noted.
CMKAP T2 (b) It is accepted that a Hopper service does form part of the current LTP; however, the Council would need to carry out feasibility work to resolve the issues raised above prior to implementing such a service. As this is a listed intervention in the LTP it does not need to be repeated in the Plan. See comments above for page 43, para 7.21 & 7.22	Earlier comments noted.
CMKAP T2 (c) (d) (e) require taxi provision for "large retail and leisure developments of all kinds" but there is no definition of large. The wording also requires "adequate capacity according to existing and/or anticipated customer demand" but fails to state how that will be determined or by whom. Consideration needs to be given to the appropriate location for seating and a shelter as this would not be acceptable in the public highway. Parts (d) and (e) deal with existing or 'off-site' taxi facilities but again there are no criteria for determining what is satisfactory in terms of distance and numbers. A more fundamental point here is that what is being referred to as Taxis must actually only be Hackney Carriages, which is only part of the Taxi offer. Private Hire vehicles do not have the ability to pick up onstreet (they must be booked) and therefore they cannot use 'taxi-ranks' and similar facilities. The Council's experience with taxi rank provision is that a very large number of small facilities (which this policy would create) is not what is required. It is also important to remember that each such facility would almost inevitably be provided within existing parking, thereby reducing the number of parking spaces at that location.	The Alliance and MKC have worked together to achieve better wording for a number of policies in the revised Plan, including this one. Note: Taxi ranks are provided within the public highway – it is not explained why seating or shelter would not be 'acceptable' if this provision would improve access to CMK by non-private car means. The layout of the CMK public realm requires an innovative approach to providing taxi facilities. Comment noted.
	readily available occupancy data clearly show that car parking in CMK operates well inside current capacity: there is no restraint. Furthermore, no level of public transport usage has been defined to meet the test of "the necessary shift". CMKAP T1 looks to maintain the street hierarchy and create a shift to public transport, although without further restraint on car parking. It is not clear from this statement whether this means that MKC could not increase car park charges, but the document clearly states in para 7.5 that there should not be charge increases or a reduction in car ark numbers. Perhaps the most fundamental issue here is that the two issues cannot be chronologically isolated in this way. It is important to achieve more public transport use, but this needs to be achieved in an environment where all other transport issues are considered together as a package. Page 66, paras 10.3-10.6 Paragraphs 10.3-10.6 refer to the second interchange (see earlier comments against Page 41, para 7.7) and paragraph 10.5 highlights the need for adjoining developments to contribute to such a facility. The mechanism to achieve this is not described yet integration with a "covered market hall" is mentioned. Paragraph 10.6 refers to establishing links between Mariborough Gate and Mariborough Street. These links were proposed as part of a CMK Public Transport Scheme but were removed from the scheme due to problems with deliverability and the amounts of benefits delivered. The likelihood of being able to provide these links is very low. Page 67, paras 10.7-10.10 Paragraphs 10.7-10.10 refer to the CMK shuttle service. This has been covered in earlier comments Page 68, Polras 10.11-10.13 Taxis are part of a transport solution, but it should not be assumed that they are inherently sustainable. CMKAP T2 (b) It is accepted that a Hopper service does form part of the current LTP; however, the Council would need to carry out feasibility work to resolve the issues raised above prior to implementing such a service. Sat his is

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M2.137	Page 69, para 10.19 Paragraph 10.19 sets out the Plan's objectives for car parking. It is important to remember that one benefit of the Council managing the majority of the parking stock is that it can manage supply and that almost all spaces can be used by any land-use. Similarly, Bullet 3 refers to more efficient use of parking. Bullet 4 however, proposes the change of CMK to Zone 2 with regard to parking standards. This is inconsistent with the previous bullets due to the change in proportion of publicly controlled car parking as explained below. As commented above, changes to parking standards impact an area much wider than CMK and should be considered to be strategic matters outside of the control of the neighbourhood plan. The change to Zone 2 requires a significant build of car parking, which could not be publicly funded, and therefore not publicly owned or controlled. This means that the vast majority of the 14,600 spaces resulting from a change to Zone 2 and the replacement spaces (circa 2,500) required for those lost in developments would equal those in public ownership. When added to the existing private stock, (circa 5,000) the potential non-public stock would be around 22,100 with the public stock falling to around 17,500. Page 70, Policy CMKAP T4 This is a policy that is at odds with the Council's requirements and standards for parking in CMK. Provision of parking is intricately linked to other transport policy as well as to the management and maintenance of the parking stock and has the potential to impact an area much wider than CMK. As a result this is considered to be a strategic matter beyond the remit of the neighbourhood plan. The Plan is silent on how this additional parking would be provided, where it would be provided, who would deliver and own it or how it would be maintained. If it is assumed that the council would take responsibility for the majority of new parking spaces, that would be maintained. If it is assumed that the council would take responsibility for the majority of new	Historically, increasing numbers of workers and visitors to CMK were accommodated through ample and free parking. This has been a key driver of the city's economic success. The extent of change to historic policy is dependent on the Council's ability to provide 'real and attractive transport choices to encourage more sustainable travel behaviour as Milton Keynes grows.' The Alliance and MKC have worked together to achieve better wording for a number of policies in the revised Plan, including T4.
M2.138	T4 (d) Wording should be included that where MSCPs are visible from the public realm they should be designed as a piece of architecture in their own right and contribute to the quality of building stock in CMK.	Agreed.
M2.139	Page 71, para 10.25 Paragraph 10.25 seeks to dictate where traffic operations and traffic restrictions can be applied. This is not within the gift of the Alliance, or even the Council. These are matters to be decided through making traffic orders and are subject to public consultation. That is the appropriate arena for the comments in this paragraph.	Text has been revised.
M2.140	Page 71, para 10.27 Paragraph 10.27 refers to unallocated (visitor) parking and in particular the removal of this requirement for Campbell Park. The Council is preparing to review its car parking standards and this can be taken into account; however, the point is that the Council will produce parking standards.	We believe that a plan for a city centre needs to address car parking matters.
M2.141	Page 71, para 10.29 The standards set out after paragraph 10.29 are not acceptable. They do not accord with the parking standards SPD and addendum and they are therefore not consistent with Council policy. Furthermore, for the reasons already given, such standards would undermine the council's transport strategy	Following this and other responses from the Public Consultation, and further analysis of journeys required to meet expansion, Policy T4 (a) and Table 1 (CMK parking standards) have been revised to provide Zone 2 parking standards for B1 business use class in CMK and C3 dwellings use class in Campbell Park only. Zone 1 parking standards to be retained for other use classes in CMK.
M2.142	Figures 13 and 14 The stripy boxes need further clarity – it is not clear whether the thickness of the stripes has any bearing on the amount of floors or floor area required per land use. If it does, how does a developer establish what is required. The caption for fig 13 does say 'proportional amounts' but how does this get measured from fig 14?	Comment noted. The figure and table have been revised.

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M2.143	Figure 14 is too prescriptive – if the Wyevale site, for example, comes forward for development as a hotel or conference centre, how easy is this to happen? The more important concern however is the message that this plans gives to potential investors – there is a concern that they will be put off even coming to have a discussion with the Council when the required land use in the Alliance Plan is different to what they would like to see on the site. There should be some mixed use development along the canal in Campbell Park – not just residential. Arguably, too much employment use is shown for Campbell Park and this is one of the reasons why residential densities are so high (because less land is available for residential). The location of the proposed land uses within blocks F1 and G1 are also of concern. With the residential uses tucked behind the employment uses, on weekends in particular they will be particularly isolated from Campbell Park itself – residents will have to walk down deserted streets to reach the park. By locating the residential behind the employment the values that could have been attained for the residential by fronting onto Campbell Park are largely lost. The appeal of living in Campbell Park is in effect also lost because residents won't even be able to see the Park because of the employment uses to the front. Question why there is no assumption for new office development within the existing built up part of CMK? Much of the existing building stock is now of poor quality and could be redeveloped at significantly higher densities (a principle in the core strategy). In this case the same overall proposed figure for office floorspace (253 000m2) could be provided for example without having to use so much of Campbell Park which in turn could mean more land for housing in Campbell Park and therefore reduced densities. Is this monitoring framework really so important – surely the development of CMK is market led? Yes the Council do monitor development but more just to have knowledge about wha	Land use allocations are indicative, and alternative uses are subject to approval by MK Council at the time development is brought forward. The wording in the Plan will be revised to make this clearer. Agreed. The Proposals Plan and Table now allocate floorspace to mixed use on the H3.1 and H4.1 canal sites.
M2.144	Page 82, Para 12.10 The Plan should amend reference to "Planning Gain" to say "Planning Obligations" instead. Not keen on "instituted" for when CIL "comes into effect", so that could be amended. The Alliance should be clear about us being "more realistic in setting charges to assist the development of CMK"; remember that S106 agreements and setting our CIL charge will need to be based on viability, and there isn't an endless pot that developers can be asked to pay out from. Also, what is meant by "development" in this context; planning obligations may have a negative effect on delivery if we're requiring contributions from a developer. Alternatively, if they mean "infrastructure", then there is a role that planning obligations will play here.	Text has been revised.
M2.145	Finally, the end of para 12.10, there is reference to the lack of delivery of "adequate" car parking. This is misleading and inaccurate, since there has been no proven 'need' for additional spaces.	Feedback from businesses indicates that convenient parking is not sufficiently available. Detailed analyses of parking (recently shared with MKC) show that employee (E1) parking is constrained in Blocks A, B and C where most businesses are located. Also, the present situation for parking is being measured at a time of 20% - 30% vacancy rate in CMK office stock.
M2.146	Page 84, paras 12.24 & 12.25 Paras 12.24 & 12.25 suggest that the LTP 3 won't make the necessary step change required for sustainable movement and growth in MK and somehow the CMKAP would contribute more to reaching those objectives. Criticism of the Public Transport Spine, multiple stops and the concept that MKC would be straying from the CMK infrastructure in the Super Stop proposal (details of which have yet to be published) is premature. The CMKAP comments that these LRP3 steps would cost significant money, however, it is considered that the CMKAP's proposals could have a more far reaching and detrimental impact to the public transport network and the ability to make public transport viable in what is already a difficult operational environment.	We believe the Alliance Plan generally conforms with the aims of <i>LTP3</i> .
M3.1	Milton Keynes Forum members have responded to the Central Milton Keynes Business Neighbourhood Plan, as the following comments indicate. For the majority of the proposals, the Forum agrees with the plans put forward in this	Supportive comment noted

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	document.	
M3.2	We find that the plan focusses on the future growth of Central Milton Keynes and therefore the wider area, while trying to create a vibrant interesting and creative centre, which will continue to be a pre-eminent regional centre for this area, while retaining the custom of local people. Milton Keynes is continuing to grow at a rapid rate and the centre needs to be the focus of many activities, satisfying the needs of a mixed population. While a wide range of lively retail centres is essential, the Centre also needs to offer a range of other activities, including entertainment, cultural venues, sporting activities, both for people to watch and to participate in, and educational centres, as well as market places and meeting places, and a range of residential accommodation. The Centre needs to have a varied range of choices of all of these activities and be active and welcoming to all visitors, at all times.	Supportive comment noted
M3.3	The Forum finds that the plans presented provide the basic backbone onto which this wide range of activities can be placed. It builds on the underlying core of tree-lined grid roads, pedestrian underpasses, covered walkways, generous parking and valuable landscaping, including Campbell Park which is a national treasure.	Support for CMKAP G1, G3 and G4 is noted
M3.4	Overall the plan promotes a lively and interesting city centre with mixed uses throughout, including many specialist shops and a covered market. There is still space in the city centre for many more buildings to be built, including housing as well as work spaces and shopping provision. The plan suggests that there should be areas of higher density, leading to a lively night life, and demanding activities for all ages and types.	Supportive comment noted
M3.5	While there are similarities to the Central Milton Keynes Development Framework which has been publicised in draft form, to replace the earlier Framework and SPG/SPD's pertaining to CMK, there are significant differences between that Development Framework and the CMK Alliance Neighbourhood Plan 2026. The preference of the Forum in each case is for the CMK Alliance solution. The Neighbourhood Plan stresses mixed uses in all areas, and the creation of interesting, active street level uses. Therefore the zoning of "character areas or districts" is in the opinion of the Forum no necessary, and may encourage the ghetto-like development of certain areas, and prevent the introduction of social and cultural uses to leaven the business and retail areas. It is also desirable to introduce a mix of acceptable uses into residential areas.	Supportive comment noted, however the CMKDF has now been adopted by the Council.
M3.6	The specific differences from the Development Framework which are emphasised by the Forum are the cases where the Alliance Neighbourhood plan highlights certain uses and stresses that these need to be protected in all cases, or only altered where there is a design of national or international significance to be introduced. In particular these refer to changes in or alterations to the underlying infrastructure, such as roads, footpaths, under passes, etc.; the protection to the landscaping is to be retained and enhanced in the Alliance plan; especial attention to be paid to Campbell Park, by retaining it and enhancing it with sympathetic development surrounding it; and most important, no development should be permitted to intrude over the existing landscape or the existing infrastructure unless there is an exceptional quality to the development which would raise the profile of Milton Keynes internationally as a centre of excellence.	The comments are noted and have been passed on to MK Council in relation to their CMK Development Framework.
M3.7	Another important and necessary proposal in the opinion of the Forum is that a new major Civic Space should be created, in the vicinity of Market Square which would provide a focus for the local population, and provide a much needed space for events and meeting and greeting. This is sorely lacking from Milton Keynes centre.	New Policy SS3 added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
M3.8	Further highlights of the plan which are praised by members of the Forum are the proposal that a university site should be set aside in Campbell Park, which would provide it with the necessary strong identity and could result in a striking set of buildings along the flank of the Park.	Comment noted
M3.9	A new covered Market Hall has been proposed, which would prove to be a magnet for regional shoppers and could be created as a very pleasant indoor space, as other indoor markets have proved.	Supportive comment noted
M3.10	The suggestion of a sleek new CMK shuttle service, to circulate round the centre from the station to Campbell Park, is interesting and worth investigating. The provision of a non-polluting form of transport along Midsummer Place from the Station to Campbell Park should also be investigated. Other than the ideas of rapid transit by way of a shuttle, and generous parking provision, Forum has some suggestions to make about the transport arrangements.	Supportive comment noted

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M3.11	There is no reference to Powered Two Wheelers (PTWs) the contribution they can make to a sustainable transport policy and the particular needs of PTW users (much like cyclists) for appropriate, secure parking and other facilities. This is recognised in the Council's Powered Two Wheeler Strategy, published in 2003, but its recommendations seem to have been forgotten or ignored in recent years. This method of transport is being used more and more and it should be recognised and catered for in all future development.	Policy T4 has been revised.
M3.12	The increased use of public transport is key to the future development of Central Milton Keynes and in Milton Keynes generally: more attention needs to be paid to the provision of a fast attractive and dependable bus service that will give people the option of not using their cars when they come to the centre. More generous parking provision seems to be counter to this necessity, as more car use should not be encouraged.	The amount of parking will be proportionately less and the number of public transport journeys more than currently is the case, even with the proposed more increase in B1 parking provision.
M3.13	When it comes to the referendums voting on the acceptance of the CMK Alliance Plan 2026, some Forum members are concerned that the plan should be voted on by all the residents in Milton Keynes, as the centre is for everyone. In fact the resident population in Central Milton Keynes is very small and not at all representative of the total population of the city.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6 th April 2013 regarding referendums for neighbourhood plans).
M3.14	It is to be hoped that the CMK Alliance Plan 2026 navigates the adoption process smoothly, and receives the approval of the residents of Milton Keynes and business people within Central Milton Keynes and is adopted as soon as possible, as this would encourage the further development of the centre in an harmonious and exciting way. This is sorely needed by the citizens of Milton Keynes. MK Forum: CMK Alliance Plan 2026.	Supportive comment noted
M4.1	As a lead cultural organisation in Milton Keynes, offering a world class artistic programme that bridges the local to the international, we welcome the opportunity to be a part of this public consultation and identify that we have a key role to play in delivery. We believe that the reliance of a city solely on retail leads to vulnerability. We recognise that much of the content of the BNDP is a direct response to the evolving role of CMK beyond a purely retail destination, and that the ambition is appropriate and well judged. We believe that priority weighting should be given by MK Council to help partners such as MK Gallery to deliver against this vision and ambition. In order to deliver the full vision in the BNDP, organisations such as MK Gallery have to be supported by both the business and public sector, and empowered by the development framework to thrive rather than simply survive. As you will be aware, one of our plans for achieving this is the physical expansion of MK Gallery, allowing us to enhance the city's cultural offer through the development of our facilities, and in turn the breadth, reach and diversity of our artistic programme. Broadly we see the BNDP as enabling us to progress this vision, and are pleased that many of the points we raised during the first round of consultation, around the impact that cultural venues can and do have on communities and growth, have been better reflected. We are pleased to append detailed page feedback on the second draft of the BNDP for your consideration, but would highlight the following in relation to selected aspirations contained within the plan:	Supportive comments noted for the aspirations of the plan.
M4.2	High Quality Buildings and Spaces – an expanded MK Gallery would offer a distinctive building and exceptional development that people would wish to visit in its own right, as well as for the programme within and beyond its walls. Its architecture would support the aspiration for "visibility and difference" referenced in the BNDP.	Comment noted.
M4.3	Campbell Park / Linkages - MK Gallery offers something of international significance for Milton Keynes. But it also has a role to play through its very specific location, and through its expansion it could potentially enhance the link to Campbell Park, e.g. via animation of the underpass linking with the Park, offering an alternative site for creativity and experimentation. The detail of who and where Campbell Park currently or potentially attracts pedestrians from could be better identified in the Plan, and further consideration given to how Campbell Park relates to the cluster of arts and entertainments located at the Eastern-most end of the city, together with recognition for the need for good linkages and for them to work together.	It is agreed that the linkage could be made better.

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M4.4	Promoting a high quality of life / Animation / Enjoying CMK – we wholeheartedly support the ambition for city animation and with the right partners MK Gallery can contribute to delivering a greater scale of ambition, helping the centre to remain a desirable place to live, work and visit.	Supportive comment noted
M4.5	Wider Leisure offer for Young People – a core strength of Milton Keynes is, and always has been, its leisure offer, with its particular appeal to younger people (the first multiplex, Xscape etc). MK Gallery is already part of the mix and with expanded facilities and programming has the potential to enhance the leisure offer, with targeted offers both on and off site.	The aspirations of the Plan generally and Policy SS4 and associated Proposals Plan in particular support the expansion of community, leisure and cultural facilities in CMK.
M4.6	Exchange of Knowledge & Learning - without a thriving and alternative, arts scene, Milton Keynes businesses will have difficulty in attracting the highest calibre of employees. The offer of an expanded MK Gallery will increase the attractiveness and "stickiness" of Central MK.	Comment noted.
M4.7	Pedestrian Routes & Destinations – We agree that principal pedestrian routes need to be prepared, BUT, they need to be done so on a better understanding of pedestrian movement, both current and potential, and quality of useage. Figure 5, for instance, currently leave MK Gallery and MK Theatre off these routes. Can CMK Alliance be certain that it has sufficient knowledge about how pedestrians currently use and wish to use the city, before making certain planning designations for specific locations? For example, in proposing an additional cultural space adjacent to Midsummer Place, might it be that the strongest place to develop that would be around MK Theatre and Gallery, building on the impact of an already recognised public space? In Figure 4 MK Gallery and Theatre should be identified as pedestrian magnets within the plan, as they have both temporal and seasonal "pulling power" roles to play in support of the vision for pedestrian routes and destinations.	Principal pedestrian routes have been removed in the revised Plan and replaced with an active frontages approach.
M4.8	Heart of the City – we note the aspiration to transform Midsummer Boulevard between Secklow Gate and Midsummer Place into the 'heart' of the city. We sound a word of caution in that a proposed new cultural space is not just about a physical space but about the buildings that surround and define it; a pre-requisite is to create animated life around any such space. It is worth being clear about co-located groups or organisations who have the resource and capacity to deliver and sustain animation of this new cultural space.	Comments noted that public spaces need programming to become animated cultural spaces.
M4.9	Offices: Quantity and Diversity – we note the ambition (p.35) around quality and diversity of offices. However, we believe it is less about the spaces and more about businesses and their co-location. The proximity of offices with MK Gallery, for instance, will support/promote economic goals. Also, any university presence will be reinforced by an enhanced Gallery provision - there may be advantages in co-location there, particularly in facilitating businesses in the creative industries sector.	Comments noted about facilitating creative industries.
M4.10	Monitoring and Delivery – we note the CMK Alliance role with MK Council as monitors in delivering the city vision. In pursuit of the various principles contained within the Plan, we note that some are potentially contradictory, (absolute preservation of the current public realm vs enabling buildings of distinction). In pursuit of its various principles it is essential that the Alliance works with all CMK stakeholders to establish the criteria against which planning and development decisions would be made. Overall there is a significant lack of clarity at present over the procedures or next steps in relation to both criteria and weighting / prioritisation of projects. It is essential that there is a clear protocol or mechanism identified on these points. Finally, we note that Table 4, Monitoring Land Use Allocations fails to reflect the proposal for new/refurbished gallery with a total of 1,000 square metres of floor space to accommodate galleries, educational, catering, administration, back of house technical facilities etc, and request that this is adjusted accordingly.	As explained in the introductory paragraphs to Chapter 11, it has not been possible to carry out a full 'hard and soft' analysis of all sites, so it was agreed to include only 'developed' sites in the Proposals Plan and Table which have re-development proposals that are publicly available. At the time writing, this does not include MK Gallery (nor, for example, the Food Centre).
M4.11	Appendix MK Gallery Specific Page Feedback on CMK Business Neighbourhood Development Plan (BNDP) – 2nd Draft.Section/ Page Reference Feedback/Observations/Recommendations Executive Summary Page 1: the Plan proposes to enrich its social, sporting and cultural life with new facilities. P.1, final sentence:	See below.

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
M4.12	p.2 column 3 last sentence, referencing the role of promoting growth and development whilst retaining its competitive advantage as a distinctive place with a high quality of life Facilitation of an expanded gallery supports enhanced cultural opportunities for all, and in turn supports the quality of life agenda. Recommend inclusion of 'cultural' so it now reads; Just as important is the promotion of CMK's emerging role as the centre of a prosperous and growing sub-region, through greater and more diverse development that contributes to the economic, social, cultural and environmental well-being of Milton Keynes. MK Gallery contributes to the quality of life and social "stickiness" of the city, and in this way supports inward investment / competitive advantage.	NPPF focusses on three key strands for sustainable development – economic, social and environmental. We would suggest that the term 'cultural' is generally included in 'social' well-being.
M4.13	Executive Summary references the provision of flexibility for developers, landowners and investors, bringing more animation through greater mixed use and active frontages, creating a diverse street life and safe night life. To note that the outline design for the expanded gallery supports animation, active frontages and diverse street life/ safer night life.	The Plan does not comment on specific development opportunities.
M4.14	p.17 3.9 City Centres are places where not only trade but also the exchange of knowledge and learning takes place 3.14 states that across the centre, the Plan promotes the creation of places where formal and informal learning can take place. 3.15 references interesting things to see and do that are the essential qualities that make the heart of the city 3.24 says The Plan creates more places that encourage animation and will support and expand the existing programme of cultural activities, thus enlivening the city centre's public spaces. 3.29 references social places and that the city centre has 'welcoming places in which people interact and offers ways in which ideas can be developed' – Gallery expansion will contribute to "A Learning City" We propose inclusion of a penultimate sentence 'Visitors and residents access cultural learning.' Again, an expanded Gallery will support formal and informal learning. An expanded Gallery will be an "attractor" for both city residents and business and leisure visitors. We recommend careful consideration of these additional places – working to cluster around existing strengths, avoiding dilution of offer. With enhanced facilities MK Gallery can contribute significantly to this interactivity and creativity	Comment noted.
M4.15	p.20 Principle 7 – second bullet. Suggest amending to include 'cultural', so it reads: diversifying and integrating the commercial, residential, retail, cultural and leisure offer	Text has been revised.
M4.16	p.21 Policy CMKAP S1 references cultural development in the first sentence with bullet 1 saying key objectives for CMK are to: achieve higher quality buildings and spaces around them; bullet 3: achieve growing visitor numbers from outside the city to further enhance CMK's status as a regional and national destination for shopping, culture and leisure and bullet 10 offer an attractive urban living environment for the residents of current and future dwellings. An expanded MK Gallery would help deliver against all these points, in particular the reanimation of Theatre District following the development of The Hub	Comment noted.
M4.17	p.22 Figure 4. Pedestrian Lines We note due to our location that the Gallery isn't given a colour coding to identify it as a new pedestrian destination or magnet –it is off both existing and new 'pedestrian desire lines' but we recommend that it is identified as an attractor at the end of the Boulevard.	The figure for Activity Magnets has been amended as being 'illustrative.'
M4.18	p.23 Opportunities and Challenges 4.3 references the need for wider leisure offer for young people Opportunity Two incorporates this quote about transforming the primary shopping area into the heart of MK from The Plan for Milton Keynes, 1970: A place to go and be in, to be anonymous or dress up for; to be able to watch the world go by; to see and be seen; a place to find out what is going on and to participate in events. 4.6 says expand the number and breadth of cultural facilities as a means of building on the success of the Theatre and	The Plan does not comment on specific development opportunities.

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	tempting more visitors further along Midsummer Blvd to MK Gallery and the delights of Campbell Park beyond MK Gallery	
	will be able to expand the its pilot Scratch Night/ Music/ Film programme s offer with expanded facilities – which will appeal	
	to younger people. MK Gallery's expansion plans support this, in particular its glazed ground floor cafe, and social space,	
	and the increasingly diverse programme for diverse audiences Thriving cultural organisations such as MK Theatre and MK	
	Gallery help create a stronger sense of place But also development and enhancement of the existing Gallery facility will	
	support increased footfall along the Boulevard and provide key linkage opportunities with Campbell Park.	
M4.19	p.25 4.17 states The temptation is great, both to developers and those preferring a traditional 'city street' to build over the	The Plan provides considerable flexibility to
	perimeter car parking and bring the 'building lines' forward, closer to the Boulevards and Gates. Yet this perimeter parking and the set-back building lines are part of the spaciousness of CMK which contributes to the quality of the place.	developers within building plots. Policy G11 provides guidance on exceptional
	4.20 notes The third challenge for the CMK Alliance Plan is to protect CMK's distinctive identity and quality of place, whilst	developments that would seek to build on the
	providing appropriate flexibility to future development opportunities. Who will be responsible for determining the definition of	public infrastructure.
	'flexibility' and what criteria might they use? What procedures or plans are envisaged for such situations?	public illifastructure.
M4.20	4.21 identifies the challenge of dispelling the 'misconception that economic growth and development are held back by	Supportive comment noted.
1714.20	protecting the public realm and infrastructure'. The same paragraph refers to shifting the emphasis to promoting CMK for its	Supportive comment noted.
	high quality, convenient living and working, etc and a leisure and cultural offer worthy of it ambitions as a regional city	
	centre. We support the aspiration and trust that the two concerns aren't mutually exclusive and again would welcome more	
	detail as to who and how will decide where the balance city/ public of interest lies?	
M4.21	p.26 Figure 5 note MK Gallery is not indicated as being on the principal pedestrian routes – perhaps a short spur should be	Principal pedestrian routes have been
	added to the entrance to Margaret Powell Square, supporting greater recognition of both Theatre and Gallery as being a	removed in the revised Plan and replaced with
	pedestrian 'magnet'.	an active frontages approach.
	p.28 5.5 the study quote Superior quality of life has acted as a magnet for attracting international talent and innovative	
	companies We agree	
	p.29 6.5 The Plan seeks to achieve the following objectives:- to reinforce and extend CMK's 'magnet' areas of greatest	
	attraction for people and movement -	
	6.5 bullet To create an enhanced social, cultural and civic space for public assembly which serves as the heart of the city –	
	NB currently MK Theatre and MK Gallery not marked up as being a magnet area on any of the diagrams We assume this is	
	a reference to the Figure 4 activity magnet spot to the right of Midsummer Place. We question whether this cultural space is	
	viable without cultural organisations located in the immediate vicinity.	
	p.30 6.9 the reference to the third new 'magnet' north of Campbell Park, which in 6.14 is stated as being reserved for major	
	developments of strategic importance that make a significant contribution to the life and reputation of the city, such as the	
	headquarters of international companies or pan-European institutions. It strikes us as odd that there is no mention of the	
	University in this context, although on Figure 7 there is a large blue star specifically identified as a University facility in that	
	location.	
	p.32 Figure 6 Noting that the Theatre and Gallery fall within the designated 'Primary Shopping Area'	
	p.33 6.23 The Alliance's strategy is to transform this [Primary Shopping] area to become driver of a much wider spread of	
	economic, social and cultural activity through a number of interventions. This includes the bullet to expand community and cultural facilities – Without the Theatre and Gallery being identified as magnets or for expansion are we to assume this is	
	more particularly referencing the plans for development adjacent to Midsummer Place on the Secklow Gate axis? We	
	recommend designating the Gallery and Theatre as magnets to ensure full flexibility in the BNDP.	
M4.22	p.34 Figure 7 No star over the Gallery / planned expanded gallery on planwe propose a half pink, half blue star for	The figure and stars indicate new
1717.22	Community/Cultural facilities	community/cultural uses – we have not
	Community, Calculat Idollido	included existing ones such as the City
		Church, Centrecom or indeed MK Theatre and
		Gallery.

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M4.34	p.86 Table 3 Monitoring indicator G1-We note a target of 0% as loss of items of classic CMK infrastructure including trees. Again, how does this square with the ambition to provide appropriate flexibility with design and development opportunities?	The Plan is flexible within the 50 ha of development plots but not in building over the infrastructure.
M5.1	Introduction This consultation response is sent on behalf of the Milton Keynes Higher Education Board, a partnership body which has been leading on the vision and strategy for higher education development in Milton Keynes since 2008. The Board is broadly representative of major Milton Keynes stakeholders: Milton Keynes Council; HCA/Milton Keynes Partnership until its demise; HE providers; education; business; and the voluntary sector. It complements any response from the University of Bedfordshire on behalf of University Campus Milton Keynes (UCMK) or from Milton Keynes College as the continuing provider of "HE in FE". Notes:	Comment noted.
	 The abbreviation UCMK has previously referred to University Centre Milton Keynes, a Division of Milton Keynes College; it will in future refer to University Campus Milton Keynes, a constituent of the University of Bedfordshire. (To be confirmed following UoB Governors meeting on 22nd November). It is proposed that Milton Keynes Higher Education Board should be replaced by a legal entity, the Milton Keynes University Trust, to lead on the vision and to hold capital assets provided from community sources for the beneficial use of providers of university level education in Milton Keynes. 	
M5.2	Consultation Response The Board greatly welcomes the Vision (Section 3.1) for CMK as set out in the Business Neighbourhood Development Plan: "as the dynamic centre of one of the fastest growing regions in the South-East" "as the home to an expanding university, delivering innovative approaches to higher education and nurturing new business ventures in technological and creative hubs across the centre" and the supporting comments about a university presence in CMK (Sections 3.11 to 3.13). This resonates well with the Board's own vision for a university presence in Central Milton Keynes.	Supportive comments noted.
M5.3	Under Opportunities and Challenges the Business Neighbourhood Plan identifies support for the "development of an internationally-recognised university" through the reserving of "strategic sites within the city centre for its possible expansion" (Sections 4.1 to 4.3). Again this support is most welcome but the Board urges caution in how this principle is translated into a spatial strategy. Areas B4 and F1 (the north side of Campbell Park) are identified as potential locations for university development (Section 6 Figure 7). These are indeed potential locations but for the university, synergy of this presence with associated developments in research, knowledge exchange, as well as related cultural, leisure, and business developments should be recognised and made explicit. The scope for this in north Campbell Park is not entirely clear and the potential for redevelopment within existing developed areas should not be excluded. The ultimate scope of the university cannot be forecast with any certainty but that it will develop into a substantial element of CMK infrastructure should not be doubted. For this reason, opportunities for a permanent location should be kept under review with the University of Bedfordshire and Milton Keynes College whenever major new development or redevelopment opportunities arise: they should not be limited to existing undeveloped reserve sites. In short the Board welcomes the recognition in the Plan of the importance of a university presence but urges that future options for its spatial development should be considered in a wider context of associated developments including cultural, leisure and business. The background to this response is set out below.	The Plan welcomes the development of a university, and is flexible about its location. In implementing the Plan, those responsible will need to respond to the university's evolving needs. The intention is for the Plan to enable this to happen.
M5.4	Establishment of a significant university presence in Milton Keynes The national context of higher education funding and policy has changed dramatically over the past two years. In light of this and building on the success of University Centre Milton Keynes, the Board and the Council have recently jointly agreed a new interim strategy for higher education development in Milton Keynes in consultation with Milton Keynes College which has successfully driven UCMK to date, and the University of Bedfordshire as the lead HEI for UCMK. This builds on the	Comment noted.

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	previously adopted "2020 Vision: towards a University of Milton Keynes" (adopted by the Board in 2009 following widespread consultation with a range of Milton Keynes community and sub-regional interests). At the heart of the new strategy is the continuing long term vision for a University of Milton Keynes but with recognition that this may take many years to realise (and will be subject to the vagaries of changing Government policies) and that establishment of a significant university presence is urgent if the city's economic development plans are to succeed. Accordingly, the University of Bedfordshire's proposals for major investment in higher education in Milton Keynes through the establishment of a new University Campus Milton Keynes including a flagship Faculty of Engineering and Technology have been welcomed by the Board, the Council and Milton Keynes College. It is planned that it should be operational from September 2013. Collaboration between the University of Bedfordshire, an acknowledged leader in respect of student access, teaching and graduate employability, and Milton Keynes College with its commitment to access, high student satisfaction and successful record in delivering vocational higher education in collaboration with the Milton Keynes community offers a distinctive and innovative model which will capitalise on the strengths of each party.	
M5.5	Scale of teaching provision The long term ambition is for the scale of university level education in Milton Keynes to be at least 10,000 students. The basis for this long term ambition is that the city would then no longer be a net exporter of higher education students (about 10,000 students domiciled in Milton Keynes study at HE level somewhere in the UK at present). Ultimately it should aim to match that of other like-sized centres of population but that is looking very far ahead. Having regard to likely national trends in the sector, the challenging financial context, and the continuing strict government student number controls for English and EU students, it is an optimistic planning assumption that Milton Keynes should have reached the milestone of 5000 HE level students studying locally (headcount) by about 2025 (excluding students resident in Milton Keynes of the national and international Open University).	Additional information has been included in the text of the plan noting the scale of the University aspiration.
M5.6	Research and knowledge exchange The knowledge economy is crucial to the future of Milton Keynes and already employs some 40% of its working population. In this regard the city already benefits from the presence of the world leading distance learning Open University and nearby specialist Cranfield University each wit research expertise. The ambition is for a local university presence with an internationally recognised research capacity in niche areas that will act as a key partner in: local initiatives such as Milton Keynes Gateway and the Innovation Centre (which seek to promote skills, enterprise and innovation); civic initiatives covering such matters as Low Carbon, Smart Cities and Tele-health; regional initiatives through SEMLEP; and wider national and international initiatives relevant to the needs of Milton Keynes. The University of Bedfordshire's plans for Milton Keynes respond to this need.	Comment noted.
M5.7	Estates Strategy The estates strategy to support these developments in the medium to long term will be the subject of further more detailed appraisal but the overall position of the Board and the Council is as set out in the following policy statement: "The University of Milton Keynes will have a strong, inspirational, centrally-located physical presence in the city complemented by local facilities and distributed delivery to students and businesses wherever they are located using the power of modern communication and learning technologies and partnership working under the Cloud University model pioneered by UCMK. The central physical presence will act as an intellectual focus and catalyst for innovation and ideas. It will be an exemplar of environmental sustainability. It will contribute to the civic centre vision of the city and be accessible to students by maximising public transport opportunities. The Cloud University model will ensure that higher education is delivered to the students accessibly and effectively wherever they are located. It will be a practical demonstration of the University's commitment to innovation and partnership. The estates provision will be driven by the needs of teaching and research." There are opportunities for investment in higher education infrastructure to be directly aligned with associated research and knowledge transfer activity (see above) as well as with cultural, leisure and business initiatives. It is essential	Comments noted that sites for the future expansion of the University have yet to be determined, whilst the aspiration of 5,000 by 2026 might require up to 1 ha (excluding halls of residence).

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	that these should be kept under active review by the Council and the providers of higher education. The Council's Core Strategy for the spatial development of Milton Keynes includes many potential opportunities for such synergy to be exploited and includes the willingness of the Council to modify existing planning guidance within Central Milton Keynes to assist the expansion of university activity. In the short term University Campus Milton Keynes will have to rely on existing rental accommodation in Central Milton Keynes (Milton Keynes College already has a physical presence through 200 Silbury Boulevard) and options for 2013 to 2016 are currently under urgent evaluation by the University of Bedfordshire. Longer term any opportunity for large scale new development or redevelopment of existing property in CMK should be investigated with the University of Bedfordshire, Milton Keynes College and developers in order to secure a permanent university location. It is not possible to offer any definitive statement of land and building needs but it may be helpful to refer to the Board's response to the Council's Milton Keynes Infrastructure Planning Obligation Policy Review Consultation of June 2011 when an indicative figure of 10000 to 12000 m2 gross internal area for a university of 5000 students was quoted (excluding student residential accommodation and based on other stated assumptions). This estimate was derived from work done in the period 2003/04 by consultants Drivas Jonas who estimated the need for 17000 m2 and a land take of 1 hectare for this scale of university (again excluding student residential accommodation). These tableures should be taken as being broadly indicative of magnitude rather formal estimates.	
M6.1	This response to the CMK Alliance Plan 2026 has been prepared by the MKBUG Infrastructure Working Group on behalf of MKBUG. It represents the view from the aspect of Bus Users. Overall comment The main comment, which was the strongly held unanimous view of the members of the MKBUG Infrastructure Working Group, was that the focus is too much on car users and parking space, with other users' requirements being fitted around the needs of the car, and that there was insufficient priority given to buses. The Alliance plan suggests steady growth of the whole CMK area. The level of increase in parking spaces envisaged would be likely to increase traffic congestion to a point at which it would disrupt traffic flow in CMK sufficiently to have an adverse effect on the punctuality of buses on most core routes through Milton Keynes. Milton Keynes already has more parking spaces and lower parking charges than most equivalent towns. Restraint on cars in CMK, by limiting the extension of parking spaces and/or by cost of parking, is necessary to provide an incentive for people to switch to public transport. To achieve the necessary level of switch to public transport, improvement in bus services and restraint on cars need to be simultaneous, so that people are presented with both an incentive to use buses and a disincentive for using private cars.	The wording in the transport and parking strategy section has been revised to better reflect the plan's support of LTP3's proposed transformation of public transport in MK. Following this and other responses from the Public Consultation, and further analysis of journeys required to meet expansion, Policy T4 (a) and Table 3 (CMK parking standards) have been revised to provide Zone 2 parking standards for B1 business use class in CMK and C3 dwellings use class in Campbell Park only. Zone 1 parking standards to be retained for other use classes in CMK.
M6.2	Other comments The references to bus services in the Plan focus primarily on getting around CMK, most notably by the proposed Shuttle. If a Shuttle service was introduced, core routes must continue to serve both the main shopping centre and the railway station so that bus users have direct access to both locations without needing to change to the Shuttle.	The Plan does not seek to define operational bus routes.
M6.3	There is insufficient attention to the need for significant improvement in bus services to and from CMK from other parts of Milton Keynes and from places outside MK, in terms of more routes and improved timetables and frequency. Such improvement should be at least as high a priority as the Shuttle. In the Monitoring Framework, T2 (Public Transportation) should include "Progress towards improving routes and frequency/timetables of buses to and from CMK".	Although improving MK services is essential for the growth of CMK, generally how this is done is outside the remit of the Plan.
M6.4	MKBUG welcomes the idea of a central bus interchange at an appropriate central location in CMK. The Alliance Plan does not seem to acknowledge that the road situation in the central area as it currently is laid out will not be able to take any increase of bus traffic. The current layout is a major pinch point that delays effective bus transit. It is likely other development will occur along the Midsummer Boulevard spine which will further aggravate the situation, so a central bus interchange should be seen as an important aspect of future planning of the CMK area.	Supportive comment noted.

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M6.5	The Alliance Plan outlines growth in both jobs and retail facilities which without the modal shift to greater public transport use could tip the CMK area into a gridlock of traffic. Already the central area is approaching traffic saturation and this need to be recognised in the plan.	It is more likely the case that without a modal shift to greater public transport the envisaged growth of CMK will not happen.
M6.6	It is disappointing that the references to Park and Ride facilities suggest that these would only be temporary. Even if/when a significant switch to use of public transport were achieved, Park and Ride facilities located outside the central area would still serve to reduce the number of private cars in CMK further and should therefore be a permanent feature of the Plan	The proposed temporary Park and Ride facilities are within CMK, not the permanent ones outside the centre.
M6.7	. A user-friendly infrastructure (suitable buses, kerbs, pavements, etc.) is essential to facilitate use of buses by disabled passengers, parents with buggies etc. The plan also doesn't address the importance of maintaining these areas to a reasonable standard. Over the years these facilities in CMK have received little attention and should be given more emphasis in the Plan.	Section 12 paras 26 to 29 deal with this issue.
M7.1	INTRODUCTION MKCTC welcomes the opportunity to comment on the CMK Alliance Plan 2026. We are generally fully supportive of the Plan. However, we have reservations in certain areas which are highlighted below.	Generally supportive comment noted.
M7.2	CYCLING We would like to see cycling given the same emphasis as walking, ie cycling mentioned whenever pedestrian movement is. The Plan also should emphasise that measures to help walking and cycling also help personal mobility vehicles, eg wheelchairs. The use of parking areas may not always be preferable to the use of boulevards and gates, especially with shared use bus/cycle lanes and advanced stop lines (ASL's). Privatisation of parking areas has already resulted in limited access to these areas. We are not in favour of cycle specific routes within CMK, except in the case of National Cycle Network route 51. The freedom to cycle by whatever route the cyclist chooses to various destinations is preferable.	MK Council recently adopted a new Cycling Strategy and the Plan has been revised to align with it. For example, the recommendation is to re-route Sustran NCR 51, which currently follows Midsummer Blvd, to follow the Redways along Childs Way or Port Way instead.
M7.3	UNDERPASSES The Plan needs to much more positive about the protection of existing underpasses. The closure of one of these has resulted in long delays for all – pedestrians, cyclists, bus passengers and motor vehicle drivers.	Supportive comment noted for Policy G1, which defines underpasses as part of the CMK infrastructure and as such should only be altered in exceptional cases. Wording has been added in introductory text to note the use of underpasses for cycling.
M7.4	CYCLE PARKING Cycle parking standards need to be included in the Plan as an appendix. Cycle parking needs to be provided as a condition of planning permission at all public destinations and in all residential developments. In the former case both short and long term parking is needed. In the latter case parking under cover, secure and within the curtilage of the dwelling (not out of sight next to the rubbish bins) is needed. It cannot be emphasised enough how important this in residential developments but often ignored, especially in higher density schemes.	Text has been revised.
M7.5	PRIVATISATION OF PUBLIC SPACES The CTC has always opposed the privatisation of public spaces in CMK. This not only affects 24 hour access but the use of the spaces themselves, eg as through cycling routes. In the case of car parking spaces it also reduces the control Milton Keynes Council has on the number of cars accessing CMK.	Supportive comment noted.
M7.6	GREEN SPACES AND PLANTING Green spaces and planting are important ingredients of CMK and need protection and indeed enhancement. Present levels of maintenance need a lot to be desired. The boulevards and gates and the smaller isolated green spaces are essential. Campbell Park has a crucial role to play. Movements to provide more commercial attractions should be resisted. Mammon already stalks the corridors of CMK.	Support for CMKAP G4 is noted
M7.7	SECKLOW GATE We strongly support the retention of Secklow Gate, not necessarily to help cycling movement but to provide wider circulation for motor traffic. Any further intrusions into the boulevards and gates should be strongly resisted.	Support for CMKAP G1 is noted

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M7.8	NATIONAL CYCLE NETWORK NCN routes 6 and 51 pass through CMK. In the latter case it needs improving to be a well signed and continuous cycling route with no walking sections.	MK Council recently adopted a new Cycling Strategy and the Plan has been revised to align with it. In particular, the recommendation is to re-route Sustran NCR 51, which currently follows Midsummer Blvd, to follow the Redways along Childs Way or Port Way instead.
N1.1	This is an excellent plan for the undeveloped areas of CMK but singularly lacking ideas and plans for the adaptation or redevelopment of the existing buildings.	Supportive comment noted re: plans for undeveloped areas. Regarding redevelopment of existing buildings – see paragraph 11.4 of the revised Plan.
N1.1	A recent office relocation brief on which I was employed started with the words "NOT CENTRAL MILTON KEYNES". A depressing statement arising from the fact that this company employs only highly skilled and highly paid staff from throughout the region who require allocated parking and the capability to visit clients and return to their office on a frequent basis. CMK has an urgent need for more parking spaces. Its success was based on the easy availability of free, high standard parking and the action of the Council in constantly increasing charges will drive shoppers and companies out of the Centre. Double-deck parking on North and South Rows would satisfy the requirement in an economical way through the use of steel structures. I can expand on this concept if necessary.	Supportive comment noted, as well anecdotal evidence. The Plan proposes an increase in the provision of car parking for new office developments. The proposal for North and South Rows is an option but would have a significant effect on the feel of the infrastructure.
N1.2	There are many thousands of square feet of office space in CMK in old-fashioned buildings which either need modernisation, adaptation into high quality flats or redevelopment. Some of these buildings would make ideal large apartments (1500/2000 sq. ft) which are lacking in the Centre.	The Plan encourages regeneration and does not prevent conversion of offices into residential uses - see paragraph 11.4 of the revised Plan.
N1.3	Finally we must get away from the obsession with bus public transport. Buses will never be acceptable to highly skilled and highly paid staff and the journey times in a low density city are simply unacceptable to commuters and businesses.	Bus public transport will remain an important mode, but the infrastructure is protected to provide space/movement corridors as and for when other forms of transport evolve.
N2.1	Thank you for your consultation on the above document which was received by Natural England on 26 October 2012. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England welcomes the opportunity to comment on the Business Neighbourhood Plan.	Comment noted.
N2.2	We are particularly pleased to note that one of the key principles of the plan is to recognise the importance of green and open spaces. We are also supportive of Policy CMKAP G3 on Landscaping and Open Space and CMKAP G5 Green Frame. We would however suggest that the widely used term of Green Infrastructure (GI) is used. Green Infrastructure is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. In urban areas such as Central Milton Keynes Green Infrastructure is about development going hand-in-hand with the protection and enhancement of existing environmental assets and the creation of new ones. The following linked document provides guidance on Green Infrastructure http://publicatins.naturalengland.org.uk/publication/35033?category=49002 We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.	Supportive comment note. With regard to using the term 'Green Infrastructure,' the Plan uses instead terms that refer to specific local circumstances.
01.1	Overall the draft is an extremely good attempt at a very tough assignment. It pretty well covers most of the key points that need to be included.	Supportive comment noted.

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O1.2	There are a couple of additions that you might wish to consider: 1. There should be a policy about sustainability which emphasises the minimisation of 'carbon footprint~ We realise that a sustain ability assessment is not needed but the plan should lay down requirements for energy efficiency (buildings, indoor spaces, indoor and outdoor lighting) and waste management/recycling.	An assessment/review of the plan's contribution to sustainable development is included in the Basic Conditions statement which has now been prepared as a supplementary document. We did not want to repeat the requirements for sustainability and energy efficiency which are set-out in the Core Strategy (see paragraph 1.12).
O1.3	2. The plan needs to describe a future revision procedure. This is a critical consideration give its legal status as planning policy. The draft mentions annual performance reviews but does not specify how the plan itself will be maintained. We assume, for instance, that minor changes will not require endorsement by referendum? However, stakeholders will doubtless need to be formally involved in agreeing revised versions.	The advice we have received from DCLG on this matter is that once a neighbourhood development plan has been 'made,' modifications can only be made by the Local Planning Authority (LPA) for the purpose of correcting errors. To change the policies in a neighbourhood development plan that has been 'made' or to add new policies to the NDP that is in force, those amended/ additional policies have to be subject to the same process, i.e. 6 weeks pre-submission consultation, 6 weeks publicity by the LPA, an independent examination and referendum. The evidence required, length of preparation and consultation, length of examination etc will be proportional to the nature of the amended/additional policies being brought forward.
01.4	Lastly, although the document is reasonably easy to follow, it's readability could be improved if it avoided the use of 'pseudo-planning' language and if the front half of the document was made more concise to avoid unnecessary duplication of the main concepts.	Comment noted – the revised plan has been edited, but the document structure has been kept to ensure consistency with the consultation draft.
O2.1	I suppose one should really say "if it ain't broke don't fix it". I, probably like thousands of others, moved to live near to Milton Keynes some 23 years ago because the City offered something different. No one-way systems, narrow winding roads, pedestrian crossings every few yards, expensive parking, high-rise buildings, concrete jungle. Instead, a city that was light, green, easy to get around, airy and spacious. I remember being able to see the sun rise on Midsummers's day through the shopping building - a truly awe-inspiring sight now sadly ruined by the building of Midsummer Place. Despite the best efforts of some planners and developers over recent years, the City has retained much of what attracted me in the first place. I recognise that times change and we have to move forward but the City was designed for the future and to abandon the basic design of the original planners would be criminal. I would, therefore, like to add my voice in support of your plan which (unlike the alternative) recognises that Milton Keynes original plan was good and should merely be updated, not destroyed altogether. Those who wish to live and work in surroundings designed for the past should move to Northampton or Bedford!	Supportive comments noted, particularly for retaining the original design of CMK.
P1.1	Please maintain the grid and underpasses.	Supportive comment noted (Policy G1)
P1.2	We need trams for transport.	Comment noted (see paragraph 10.6)

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P1.3	Large university in Milton Keynes.	Support for Strategic Objective S1 (9) noted
P2.1	Need to promote small units for independent retailers and charities in the city centre at affordable rents and business rates.	Support for Policy SS2 noted.
P2.2	A transport hub and shuttle bus around the centre seems positive.	Support for T2 (a) and (b) noted.
P2.3	Need social areas that are welcoming and visually interesting- not as anonymous as the hub plaza fort example-greener space with art and sculpture.	Agreed – see revised Policy G3 (d)
R1.1	Under Section 4 - Opportunities & Challenges I note in particular Opportunity One: To support the development of an internationally-recognised university., I thoroughly concur with the aspirations that lie behind the articulation of this opportunity. But I am disappointed and dismayed that the plan provides no clue as to how we might achieve international recognition in tertiary education. During the Wiki development stage of the plan I posted some suggestions as to how to really make a difference in tertiary education for Milton Keynes, which would stand us in good stead in the long term and earn us distinctive recognition. Perhaps my proposals were too radical to be taken seriously, but nothing that I contributed on this topic appears in the plan put to consultation. Nevertheless, I believe my suggestions were both well-founded and tied into the realities of Milton Keynes. We have to do something very special to make the difference. But we have precedent and example in both the wartime work of Turing, Tully and Flowers at Bletchley Park, and the enduring success of the Open University. I have therefore updated my earlier 2-pager on a 21st Century University for Milton Keynes, and this is attached. I would much appreciate comment and feedback. Please feel free to circulate my paper widely to those involved in putting the CMK Alliance Plan together, to generate that feedback. Please note that the sort of top-down intellectual-led initiative I propose in no way precludes integration with more practical bottom up delivery of application-led learning. In any case please acknowledge receipt of this communication and let me know that you are able to access my attachment and what action	The text in the plan has been amended to be less specific and reflect that early steps are underway to establish a larger undergraduate university in CMK. The plan's wording regarding aspirations for a university has been augmented.
	APPENDIX A 21st Century University for Milton Keynes Objectives Make an international impact in as short a time as possible Create an intellectual hot spot to retain our brightest young people Attract top quality students to our economy and retain them Raise the game of MK companies Attract inward investment by knowledge companies Add real value to existing University Centre Milton Keynes initiative The Attractors Invite 30 of the world's best academic communicators to spend 2 weeks in Milton Keynes each year and give a small number of plenary lectures NEVER MIND THEIR SUBJECT MATTER The aim is to stimulate students and create intellectual excitement Persuade MK companies to sponsor individual invited communicators And to ensure they use those communicators to raise their own game The Enquirers Market MK as the European destination for sabbaticals Invite those who come to give specialist lectures and mentor students informally NEVER MIND THE TOPIC We want lecturers who are burning to share their intellectual endeavours with receptive minds Encourage collaboration with UK partners	There are valuable suggestions here, but the details of setting up an international university are beyond the scope of this Plan.

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	Act as tutors to provide guided choice for intellectually excited students, helping students select personalised learning	,
	programmes and support them to carry these through	
	Intellectual journey men and women who have served their time	
	Drawn from graduate and non-tenured staff at Open and Cranfield Universities, and staff of enlightened companies	
	Become de facto editors of open source knowledge and learning material	
	The Students	
	Initially drawn from local HEIs	
	Additional qualification: have served an intellectual apprenticeship	
	Based on tutor-assisted self selection from distance learning sources of courses of their own choice	
	Some Practicalities	
	Open, Cranfield and Buckingham potential local partners	
	Based on private not public funding	
	Encourage enterprise but do not seek to own IP	
	Organised quality accommodation for Attractors and Enquirers	
	Attraction of OU capture and dissemination of speaker output	
	Attractors and Enquirers assigned personal assistant from amongst the Facilitators, for duration of visit	
	Real student accommodation required to create a real intellectual community	
	Very best of ICT facilities for students in central facility for face-to-face tutor support and access to distance learning	
	sources	
	Extend sponsorship opportunities to a wider selection of companies in the Oxford - Cambridge Arc, London and east	
	Midlands; within an hour's travel?	
	Proposed International Primary Sponsors	
	Wikipedia: with tutors becoming leading editors of open source knowledge and learning resource material, OU's	
	OpenLearning initiative faces the same issues of trustworthiness	
	BT: to exploit Kents Hill training centre	
S1.1	CMK Alliance Plan- Comments from Brian Salter, 64 Lakes lane, Newport Pagnell, MK16 8HR	Overall supportive comment noted. Concerns
	(Previously Forestry, Conservation and Recreation MKDC 1971-1992, Chief Exec Parks Trust 1992 –2003)	re: deliverability are noted.
	I am overjoyed and impressed by the coherence of the plan and congratulate all involved. On the one hand I am heartened	
	by the care that the plan is advocating but on the other I remain unconvinced that a winning formula is being championed. It	
	reads like a pre-Edaw prescription that is still looking to be fleshed out. The gems are there like the University, Conference	
	Centre, Exhibition centre etc but the economic grist of the mill is more of the same, albeit mixed use, and I challenge	
04.0	whether that's enough	
S1.2	1) The Business Migration.	The Alliance shares the concerns raised.
	Currently I perceive CMK to be on the cusp of a crisis. The migration of business, professional and retail, from CMK to free	
	car parking sites elsewhere in the City is the concern. This applies to the small professional businesses like lawyers,	
	accountants and surveyors as much as the likes of Waitrose and other Retail Sheds. Without a level playing field on car	
	parking charges across the city, the action is going to go to MK1. The competition of the other sites has to addressed. I'm	
01.0	not sure whether it's acknowledged.	Commont roted and remove to 44.4 cm
S1.3	2) Ageing office Stock.	Comment noted – see paragraph 11.4 of the
	Many existing offices are without modern amenities and require investment to meet basic criteria for relocating businesses.	Plan.
	Midsummer and Acorn House meet certain needs but they are not the grist of the future economic drive. They are not alone	
01.4	unfortunately.	Occurrent rated The Di
S1.4	3) What is the Office of the future?	Comment noted. The Plan must generally
	Are the offices of the future to be located in a city centre, given the taste for hot desking and business parks? How can	conform with the Core Strategy and its

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	CMK answer that challenge? More Network Rails but our Head office status is looking forlorn with Mobil and Santander	aspirations for a significant increase in office
	hardly locked in.	floorspace in CMK.
S1.5	Ay The Public Realm. 4) The Public Realm. The truth about the original endowment that MKDC/CNT orchestrated for the Council should be more widely known. My understanding was that much of the negotiated settlement to cover street furniture, public art, feature landscape such as the street trees, etc etc was in the form of the Food Centre which was to provide the revenue stream to ensure the necessary loving care. In 1997 the Council led by Kevin Wilson opted to ingratiate itself to the then new Labour administration in Westminster by levying a Council Tax in the forthcoming financial year 1997/8 which was 3.50% less than the year before. (ref my Council Tax demand) How was this achieved? The sale of the food centre. "The Council is here to provide services not to manage property" are Kevin's words that still ring round my head. It was expected that Central Gov would show dispensation in assessing future government grants to MK. Nobody had read the Treasury to appreciate that such beneficence is not there for grabs. In fact this step down in Council Tax has been the second millstone around our necks. Not only are the population statistics out of killer but when inflation adjustments are made Milton Keynes has been at least 3.5% behind the game ever since that date! The legacy of that debacle haunts us to this day. However, the Parks Trust model, as an alternative has problems. Please note that most of the Parks Trust original endowment was property not cash. Cash now require a multiplier of 28 so that to endow a current day average expenditure of £1,000/year would require an endowment of £28,000. This is not a ready pill to swallow for any investing party. A few years back this figure would have been circa £15,000. This was when there were proper interest rates! Another problem for the Parks Trust model is that it is ideally suited to situations where expenditure is routine and cyclical, particularly if those cycles are long term as with trees and shrubberies in non urban situations. Where expenditure cannot b	floorspace in CMK. Whilst the Alliance does not wish to comment on the history, the Plan notes the problems of maintaining CMK's public realm (paragraphs 12.26 to 12.29) and advocates a public debate on this issue.
	devices to achieve this which would get both Political and Treasury support.	
S1.6	5) Development on S.E flank of Campbell Park (Overgate/Avebury Blvd) Where and what is the compensating green which should be the quid pro quo for lost green in this area?	One 'park extension' has been built (it connects to Springfield), but the Alliance questions the need for the others, given these development blocks surround a large Park. The revised Plan now identified Common Lane, which runs through the northern Blocks, as needing to be conserved in future developments.
S2.1	Your Plan is alright as far as it goes but it Will do little to enliven your' East Ward'. Once the shops are closed, everyone goes home! This happens to shopping malls the world over and unless you can find a way to build eight floors of residential above the Shopping Building, I cannot see how this situation can be altered. Perhaps the time has come to seriously consider redevelopment of the Shopping Building in its entirety. This would probably have to be undertaken in phases, but by 2026 the building will be nearly 50 years old and: may well find itself in serious decline.	The shopping building is a Grade II Listed building, as an outstanding exemplar of 20th Century architecture. The introduction of restaurants is already extending the liveliness of the area into the evening, and mixed use developments in the surrounding blocks (cultural and residential) should further contribute to activity after the shops have

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Tierrio.	The sponses (refer to consultation brait)	encourage the Council to prepare a Local List.
S5.2	2).The existing Public Transport corridor through Midsummer Place (protect by covenant) should be formally mentioned and included in the plan.	Figure 8 shows this route as reserved. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
S6.1	I feel strongly that the infrastructure and grid system should be preserved and indeed remedied. Protect Secklow Gate Bridge, enhance it, elevate it and offer uninterrupted access to an improved food and retail complex across Midsummer Boulevard where a ghost town is threatening. Restore Midsummer Boulevard to its original status as a straight, continuous East-West access from Campbell Park to the	Supportive comments for Policy G1 noted, as well as suggestion regarding re-opening Midsummer Blvd with a new type of transport.
	rail station, using new transport technology to transit Midsummer Place.	
S6.2	Protect Campbell Park and the Green Frame by setting the bar very, very high for exceptional encroachment or fragmentation.	Support for Policies G4 and G5 noted.
S7.1	The CMK Alliance Plan is to be welcomed. It provides a shot in the arm for the development of CMK and, at last, gives the area a sense of purpose of direction for this vital part of the city. It is logical, sensible and eminently achievable. At long last we have a vision for CMK that makes sense and will help to re-establish the primacy of the area.	Supportive comments noted.
S7.2	My only concern is that, although I live in Downhead Park and am within walking distance of CMK, it would seem as though I will not be able to vote in any referendum. I therefore think that it is important that any public vote must be on a citywide scale as CMK has an importance beyond that of its residents.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
S7.3	I particularly welcome the proposal to retain Secklow Gate.	Supportive comment for Policy G1 noted.
T1.1	We welcome the CMK Alliance's ambitions to encourage new growth and investment in CMK and its vision of a prosperous, attractive place where people want to live, work and relax. Thameswey supports the Alliance's aim of broadening the diversity of uses within CMK through increasing mixed use developments and would argue this is key to achieving the economic vitality and social cohesion that are hallmarks of a modern sustainable city. We also recognise the distinctive identity of Milton Keynes and support the Plan's objectives of protecting the qualities that contribute to its identity. We particularly support the CMK Alliance Plan Vision that Milton Keynes should be an 'admired, prestigious city centre, celebrating its distinctive cityscape and high quality infrastructure'. The success of towns and cities and their ability to support growth is greatly dependent on investment in infrastructure to meet the fundamental needs of energy, water, waste, communications and transport.	Supportive comments noted.
T1.2	However, whilst noting the Plan attaches great weight to the development of the last of these (transport), we are concerned that it is silent on the matter of energy infrastructure. Furthermore, there is a disconnect in the Plan's failure to set out how it will encourage the provision of infrastructure to support its Vision that CMK should be 'the home of people and organisations working to reduce their carbon footprint.' In its Low Carbon Prospectus for Milton Keynes, Milton Keynes Council and the Zero Carbon Hub set out a shared vision for 'developing Milton Keynes as a 'showcase low carbon city'. The role of decentralised energy in the form of community heat and power networks in helping to achieve this vision is emphasised and indeed Thameswey's energy station off Avebury Boulevard is featured on the front cover of the prospectus. A commitment to promoting the use of the low community energy is also firmly established in the submission draft Core Strategy for Milton Keynes (October 2010). Policy CS 15 (Community Energy Networks and Large Scale Renewable Energy Schemes) establishes a clear presumption	To avoid repetition and confusion, the Alliance consciously chose not to repeat the requirements for sustainability and energy efficiency which are set-out in the Core Strategy (see paragraph 1.12 in the CMK AP). The Core Strategy sets the standard for development not only in CMK but the rest of the Borough as well.

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THEI HO.	and low carbon energy generation is a key requirement for sustainable growth. However, new low carbon community energy networks require significant investment. Nonetheless, many local communities are now recognising that by actively contributing to the development of this infrastructure they can leverage long term financial and environmental benefits. Since its first inception, Milton Keynes has been at the forefront of promoting forward thinking urban design and planning with the result that Central Milton Keynes is one of the most modern and carefully planned city centres in the UK. If Milton Keynes is to realise its ambition to become a regional centre, it is imperative this be achieved through sound planning that is forward-thinking and responsive to the social, economic and environmental challenges of sustainable cities. Thameswey shares this ambition and has a stake in helping to ensure CMK continues to progress as an exemplar of sustainable 21st century development. Finally, we would be very happy to provide further more detailed information, guidance and evidence in support of the enhancements to the Plan set out within this submission.	Amarice comments (refer to Examination Drait)
T2.1	I would like to voice my support on behalf of the Theatre District for this plan, though do have the following comments:	General supportive comment noted.
T2.2	I think Central Milton Keynes will be a more viable town centre for both visitors and businesses if all development, in and around the Town Centre, is looked at as an overall plan, rather than each new build / development in isolation, and hopefully the CMK Alliance will achieve that. Historically, and even to date, we have ended up with duplication and fragmentation, and consequently we have areas that once were vital and dynamic, now dead or dying. This is the case with the likes of The Point and the Leisure Plaza, for instance, and various other parts of the centre are seemingly heading that way.	Comments noted.
T2.3	Parking is obviously an issue and one I am not sure has still been addressed adequately. Maybe to encourage daytime visitors places such as the Theatre Multi Storey should not be operational until 9.30am, this would then prevent commuters to London, for instance, benefitting from this free parking facility, which is surely there to make Milton Keynes more attractive to daytime visitors? The reality is that Milton Keynes was built for the car and as much as we try to move away from this concept, it is incredibly difficult. Obviously some electric metro system that connects the station with all parts of CMK and, ideally, the coach station, would be fantastic but obviously costly and therefore feasibly at this time, unrealistic. So the situation is that we still have an increasing number of cars, and need somewhere to park them, and wondered whatever happened to the idea of the multi storey parking hubs that were suggested a couple of years ago? A central University, with students, would be fantastic and something currently much lacking in Milton Keynes. From the proposals I would love to see it located at the top end of the Town Centre, making use of the wonderful park facility.	The Plan supports the aspiration to provide parking in MSCPs (see paragraph 7.35) but like innovative public transport systems, have proved difficult to deliver. Supportive comments for SS1 and the University are noted.
T0 5	However maybe dotting different facilities around the whole of CMK could work too to create a more vibrant 24/7 culture and inject some much needed bustle and financial support into the currently struggling late night economy.	
T2.5	Central Milton Keynes is an amazing and unique Town Centre, but it isn't without problems. I am not sure within the plan the	The Plan encourages new development to

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	etc.? remembering that it will be the nearest open space for those that come to live in West CMK as well as office and shop workers. Also let us treasure and care for the little park that trickles down behind offices to the Taj restaurant as a haven for workers and odd sculptures. The city centre should be somewhere where people can find out about the history of the area – it should be easy to do so. The older towns should be celebrated and signposted; they are all part of the MK offer.	
T3.7	Working: The Plan talks about more office spaces. Yet there are empty office blocks all over the city centre. The VCS is making good use of the special offers regarding rent to help the owners with their rates bills but that is not a sustainable solution for either side. For too long MK has been vulnerable because of an over-reliance on services and warehousing and retail; all areas that get hit quickly when money is short. It is great that UCMK is set to grow and expand; the more varied the offer to support people to develop their skills the better; but what about the space and support for those wanting to manufacture, to make things? The spaces for those who want to mend, bake, display stuff made at home, the writers and poets that want to show their work? This would sit well with the technological and creative hubs, but we need them to be open and accessible and have a public side that excites the visitor.	The Plan must be in general conformity with the <i>Core Strategy</i> , which sets the amount of floorspace, including office space. The suggestions regarding diversifying employment to small scale manufacturing and artisans are noted.
T3.8	Natural environment: The trees across the city are wonderful and should be seen as an asset to be cared for and managed carefully. A proper plan for looking at how the city centre supports a variety of natural life should be developed so that residents and visitors can see wildflower beds as well as the formal planting. Wildlife corridors to Campbell Park, Linford Wood etc. should be maintained where they exist and develop where they do not (building on the work Parks Trust did some time back). Why is Midsummer Shopping Centre not fully encased? How much global warming is due to that stupid design which is open to the elements? Let's get rid of the old Oak tree and have a wonderful sculpture to replace it. The design of the mall as it stands is so energy inefficient it must add unnecessarily to the overheads of the shops. It is not something this 'green' city should be proud of.	Comment accepted regarding energy inefficiency of the Midsummer Shopping Centre due to its open roof design. Text has been added to encourage biodiversity and planting of wildflowers.
T4.1	I would like to respond to the draft Business Neighbourhood Development Plan for Central Milton Keynes that has been prepared for consultation. I have read the full document and have to admit that I have had some difficulty on deciding on how to respond. I felt there was something bothering me that I couldn't immediately put my finger on. I concluded that there is a basic problem and one that stems from what the role of the neighbourhood plan is and Whether this has really been addressed and defined? Neighbourhood plans are new and therefore do not need to slavishly comply with past conventions and practice. My concern if anything is that its being interpreted as primarily a document that serves the planning process and adopted policy, and hence limited in its positioning and one that becomes preoccupied with policy. As a result of this position in the interpretation it needs to be given to the vision principles and objectives, and the opportunity and challenges is constrained, in effect this aspect has become suppressed by the planning rhetoric. Section 1 Aspirations and Strategies makes for some interesting and comforting reading, but does the BND plan go far enough in defining the framework and the concepts supporting this, even if their status needs to be qualified? The BND plan appears to have run into a dilemma. There are two scenarios. Is this a plan that solely complies with current policy or is this a plan that goes beyond this and is setting out to inform an shape future policy? What are the parameters of the plan? While there are some rules laid down by the Localism regulations that need to be met this doesn't prevent the plan from going beyond this, surely? What is being presented is a planning document that once adopted will become part of a LPA's Local Development Framework. What is being adopted? The whole plan or those aspects of the plan that comply with existing policy. Other	There are a number of points: Neighbourhood plans have to comply with current planning policy, in the case of CMK, NPPF and the emerging Core Strategy. The Alliance considers it essential that the Plan includes planning policies that ensure that MK Council, when considering planning applications, has the policies to assess them that encapsulate the aspirations of the CMKAP. CMKAP is not just "planning rhetoric"; it sets out economic, social and cultural policies for CMK. CMKAP also adds details to the framework for future transport planning within the context of <i>LTP3</i> . Finally, it responds to the views of local

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	aspects can be included to inform that may not represent policy. The second scenario, where the plan is informing and shaping future policy seems wholly appropriate and in fact is necessary if the plan is to perform a meaningful role. Is there any reason why this distinction cannot be made by the use of separate chapters? That is, proposals bedded in policy and proposals which are not yet bedded in policies but are based on a clear evidence base established through the engagement process and the rationale behind the plan process. The BND plan set out a framework to deliver the vision. There appears to be a choice where, either take a neutral position and define a set of abstract principles such as 'Ease and choice of access for all' and let the plan evolve over time on the basis of this, or alternatively, take this principle forward and clearly show what this means and how this is interpreted. I would envisage a set of strategic design solutions that embrace key aspects like the transport interchange and a description of the rationale and how they fit into the framework.	residents and businesses, such as more parking for office developments, which it has to if it is to be successful in the referendums.
T4.2	Section 6 Spatial and Design Strategy is a pivotal section. The BND plan introduces the concept of flexible land uses and mixed uses, and explores and presents some design solutions in some detail. Is this approach consistently applied to the other structural components that represent the framework? In addition to the patterns of land uses, there are two others- the centres and activity nodes, (I see these as focal points, destinations, distinctive places or common points of interaction, lime transport interchange points), and the movement network, the routes between the nodes, and importantly, a rationale that shows how these elements interrelate. This of this as a map, part functional, part cognitive, and part navigational. The success of the city centre will depend on how these structural parts are put together, a blueprint for the future. I would expect to see a detailed justification and design solution for each of these elements. This approach is contained within the plan to a degree but is constrained, inhibited by redundant and historic policies, and not yet fully resolved. The inclusion of two possible interchange points, one at Secklow Gate location and the other at a Marlborough Gate location illustrates the point. The premise of the Secklow Gate location being 'ideally located for access to the core retail area' is questioned. The key principle is the possibility of a direct connection and hence interface with the citywide movement network. The V8 Marlborough Street etc location provides this potential.	CMAP does not set out to design the components that make up CMK as it grows; it establishes parameters within which the design of public and private developments can take place. To do so would be both prescriptive and beyond the resources of the Alliance. Both the Secklow Gate and Marlborough Gate sites for potential interchanges is noted in the
T4.3	To recap, the distinction between planning and design issues needs greater clarity and thought. If anything there needs to be a much stronger focus on the design and spatial interpretation of the planning policies, whether existing or new ones. I would like to illustrate the importance of ensuring consistency between the structural components of the framework by	Plan. Supportive comments re: flexible land use
	exploring two particular aspects of the BND plan. These are the movement and centre networks. However, before doing this, I would like to focus on what is meant by a flexible land use policy, and specifically the use of the word flexible. This is presented as an ability to 'encourage further investment and development within CMK', the key here as I understand the idea of flexibility is a measure that ensures the long-term viability and the ability of CVMK to respond to change over time. Thus flexible land uses. However this is not only about flexible land uses, this is about the ability of the framework to respond to change and growth. All aspects of the framework must demonstrate that they are able to respond to change. How receptive is the framework when we apply issues concerning movement and centre and activity nodes?	strategy are noted.
T4.4	The movement network Section2. Vision, Principles and Objectives talks of 'the most accessible city' and the principle of 'Ease and Choice of	The Alliance recognises that more work needs to be done on the development by MKC of a

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nei IIO.	access', but is this principle explored in sufficient detail and is clear interpretation provided? To consider this is a little	transport strategy that will support the
	further. Figure 5. 'Principle explored in sufficient detail and is clear interpretation provided? To consider this is a little further. Figure 5. 'Principle pedestrian routes' is inserted at the end of section4. 'Opportunities and Challenges' without any	considerable growth of CMK. The CMKAP
	apparent explanation. Later on, in the first sub section of section 7, 'Access Transport and Parking Strategy' reference is	seeks to adds some details to the general
	made to 'ease of movement and access by all modes- including walking, cycling and public transport' and the rationale to	framework of <i>LTP3</i> (for example, shuttle and
	support this that shows the interrelationship between the pedestrian routes and the interchange points?	interchange) but CMKAP's main contribution
		to this is retaining the infrastructure and thus
	The flexible land use concept supports and promotes an open framework, do we see a movement framework that is able to	maximising flexibility for future transport
	respond to change? The BND plan refers to the possibility of building upon MKC's Local Transport Plan (LTP3). Reliance on	options.
	this historic document is questioned. The document fails to provide any credible evidence base on the future of transport	
	systems and hence the CMK movement framework remains uninformed.	
T4.4	The review of LTP3 introduced the concept of a small vehicle transport system (SVTS). Is for example the BND plan	Nothing proposed in CMKAP debars such
	informed about this system and have the implications of this system been understood? An analysis of this system would	transport options being considered and
	demonstrate the demands that could be placed on the movement framework.	implemented, if viable.
	Imagine that this system was able to carry a significant number of passengers as part of a public transport system and in	As noted above, the CMKAP seeks to retain
	doing so deliver the required modal shift. In handling these small vehicles the capacity of the internal roads within CMK, the	the infrastructure and movement corridors,
	gates and boulevards would be stretched, and possibly gridlocked.	which would allow access via future transport
	gardo arra societa do rrodra so otrotorios, arra posocial, grianostica.	options like SVTS.
	The ability of the movement framework to respond to this should be considered. Access to the movement framework should	· ·
	be maximised. Take one simple thought. Why for example is access to CMK not possible from the grid roads corridors?	
	There are simply no bus stops. By providing drop off and pick up points located at each footpath crossing point on the grid	
	roads, Portway and Childs Way would mean that a percentage of the SVTS vehicles entering the internal road network of	
	CMK would be reduced. What level of analysis has been carried out on the potential impact of the SVTS?	
	Here is a measure and interpretation that responds to the 'Ease of movement and access by all modes' principle and in this	
	case fits within the existing policy, and one that represents a potential strategic element of the movement network and	
	framework. A similar point has already been made concerning the location of the second transport interchange point.	
	Importantly at a point that represents an interface the city road grid system and local CMK movement network.	
T4.5	Centres and activity nodes	The magnets indicate areas in which greater
	The significance of the centres network and how this relates to the framework have been poorly grasped. Figure 4. Present	activity exists or is encouraged. The figure has
	Activity Magnets as part of section 3. This idea is expanded on in Section 6, where the idea of 'Three Magnets of Activity'	been amended to reflect that it is 'illustrative.'
	are presented. There is some confusion here over whet the idea represents. Arte the magnets being presented as a	
	structural component of the framework or as a part of a phasing or staged implementation policy? These are an important	
	component of the framework but not in the way that they are being presented. The principle needs further development.	
	A starting point is this case is the reference tom the multi tiered roles of CMK. Section 2 states that CMK 'was designed to	
	fulfil four roles simultaneously, Local centre, District centre, City centre and sub-regional centre' These roles arte supported	
	by policy but is the concept still appropriate? Has the analysis that looks at each of the levels been carried out and clearly	All levels are supported by the Plan.
	expressed as part of the framework? Or does the BND plan if anything concentrate on the regional and city centre scale at	,
	the expense of the district and local centre scale?	
	Adopted Policy focuses on CMK as a regional centre, albeit the Core Strategy does also recognise the role of CMK as	
	acting as a district centre for the surrounding estates, something that is endorsed in the BND plan, but there is no reference	
	to local centres. Is this right? Should there be some local facilities in Campbell park for example?	

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T4.6	Centres and activity nodes are a key component of the framework, and must be addressed as such. The original CMK Plan and Master Plan presented a clear and shared relationship between CMK and the Central Area, to the extent that these two areas were between them planned to provide for local needs. The BND Plan does not recognise this principle and if anything divorces itself from the developments immediately to the south and north. In this context there is a case for looking at how the BND Plan relates to its neighbouring areas. This would not only benefit CMK in its need to retain a flexible approach to growth and change but also the adjacent areas that could then benefit from the growth of CMK rather than suffer from the impact of the growth.	We have considered the relationship of CMK to the communities north and south and have policies to improve linkages, as well as support for the Market, but the Plan has to mainly work within a defined boundary and not to start planning adjacent areas. Local centre facilities should be local to the communities they serve – one of the roles of
	A proposal that addresses the location of at least the local centre facilities and possible district centres in these areas would allow some redistribution of land uses within CMK and at the same time act as a catalyst for revitalising the economy of these areas. The idea of some key north/south movement lines, for example pedestrian routes that lead to a centre in the adjacent areas is envisaged. These could be conceived as activity nodes, such as cultural centres and recognised destinations. This is something that should be discussed with neighbouring parishes before the BND Plan is completed.	CMK is to serve as a local and district centre for all of the surrounding communities.
T4.7	Summary This response has questioned whether the BND Plan goes far enough in defining both the framework and some of the strategic concepts of the plan and whether the analysis and investigation is robust enough to demonstrate that these represent the vision, principles and objectives of the plan.	Comments noted.
	The two scenarios that were considered set out to demonstrate how some strategic concepts like new low key interchange points on the grid roads, described in the text as drop off and pick up points or the idea of some north/south movement lines that lead to new or enhanced local centres in the adjacent areas could strengthen the development framework, and ultimately deliver part of the plan's objectives.	
	CMK Alliance is asked to make note of the argument and to consider these strategic concepts as part of a review of the draft plan.	
W1.1	The ideas voiced in the proposal should help give Milton Keynes a much needed lift.	Supportive comment noted.
W1.2	An indoor market would be a great boost.	Supportive comment for SS2 and indoor market noted.
W1.3	As would introducing street culture to give a 'vibe' to the day. Street theatre, poetry and circus style events would give some colour to the grey.	Supportive comments noted for Policy G3 and increasing animation of public spaces.
W1.4	Having an area set aside for non-branded businesses would encourage more soul.	Supportive comment for independent units and shops noted.
W2.1	I'd like to make the following comments on the CMK Alliance plan: I welcome the effort to protect the Boulevards and Gates, their corridors and the underpasses and portes cochere that define the city centre. I would however note that as part of the university site development (or whatever eventually goes on site B4), the full-width Boulevard corridor should be reinstated along the south side of Avebury Boulevard. The same should also be true of the spaces east of Grafton Gate and west of Witan Gate. If B4 were developed 'Hub style' up to the edges of the roads it would worsen the damage already done by The Hub and Vizion. There is an opportunity here to complete CMK properly, in line with its original design. Seeing as you have protected all other Boulevard and Gate corridors, it makes sense to reinstate and protect these ones too	Supportive comment noted for retaining the infrastructure. The Plan shows the infrastructure around B4 laid out as elsewhere in CMK, although existing outline planning approvals permit development outside the original building lines.
W2.2	I welcome the mention of a potential future mass transit system along Midsummer Boulevard. I would suggest that more detail is gone into here; whilst an elevated PRT system is expensive and visually intrusive, and light rail also expensive, a single-rail guided Translohr system or a trolleybus system would deliver many of the benefits at much lower cost. Another idea to consider is a heritage tramway running around the city centre, acting as both transport and as a tourist attraction,	CMKAP does not promote a single futuristic or vintage mass transit system, but protects the framework within which such a system could be implemented.

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	which would stimulate the city centre economy. Vintage trams are becoming available as they are withdrawn from cities like Prague and Turin; these could be acquired cheaply to operate such a system, whilst the layout of roads and utilities in CMK would make track instillation cheaper than it has been in other British cities.	
W2.3	I would also ask that the future public transport route through Midsummer Place is protected.	Figure 8 shows this route as reserved. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
W2.4	Similarly I welcome the protection and retention of the Secklow Gate flyover. Thought should be given to trying to get the boundaries of the shopping building's grade 2 listing extended to cover the flyover as it forms an essential part of how the building was designed.	The view of English Heritage is that the listing of the Shopping Building protects this bridge. CMKAP Policy G1 retains CMK infrastructure.
W2.5	I would like to suggest that the restriction against tall buildings is relaxed a little. There are a few sites where tall, landmark structures would be appropriate. One major example is the car park site east of The Pinnacle between Lower Third and Lower Fourth; a tall, high-quality building here would complement the existing tall buildings, anchoring the skyline and helping to obscure the unattractive Witan Gate frontage of the Hub from more angles. This building would be an obvious location for a major headquarters for a large corporation.	Policy CMKAP 9 permits tall buildings if they meet a number of criteria.
W2.6	I welcome the intention to bring a university to CMK. This should be a world-class research university on a par with the best in the UK. Our location on the Oxford-Cambridge arc creates the potential for a 'corridor of high-quality learning' to be created between the universities of Oxford, Oxford Brookes, Buckingham, Milton Keynes, The OU, Cranfield, Bedfordshire and Cambridge.	Supportive comment noted: CMKAP has been amended to support the principle of a university in CMK without defining its precise nature.
W2.7	Lastly I would like to request that a passage is added to the plan stating a desire to increase tourism into the city centre. We should try to position CMK as a tourist centre and somewhere to come and sightsee. Aspirations should include a city museum, more art and leisure facilities and the provision of an open-top sightseeing bus service. CMK is completely unique in the UK and if marketed properly could turn around its national image and become a place people flock to simply to see and explore	Accepted – the Alliance supports tourism and recognises that CMK has a unique story to tell.
W3.1	MK should be kept as a free flowing city. The Hub is a dreadful decision and causes traffic to back up and pedestrian problems.	Comments noted regarding negative impact of removing original infrastructure around the Hub.
W3.2	I have lived here for 10 years and think that it is wonderful, but truly believe that it lacks heart. It needs boutique shops and market area for independent stores, to make it more accessible to all. The chain stores are good, but where is the heart of the community without independent business.	Supportive comments noted for Policy SS2 and the need for independent shops.
W4.1	I would like you consider that there will be more older people in MK by 2030 than anywhere else in the country. There needs to be accessible areas for them with good information and advice	This aspiration is covered in the revised Plan.
W4.2	PLUS, the Centre belongs to EVERYONE and we should all be able to have our say in what goes on if there is a referendum.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (which have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
W5.1	I would like to put forward the following comments concerning the above documents for consideration in the adoption of a very welcome plan for the future development of our City Centre. These comments reflect the views of both myself and my wife Thelma. [1 The CMK Development Framework seems to have some very good safeguard for the future development of our centre but it really doesn't go far enough and I can see that it could easily be undermined. It needs to state that it can only be	Supportive comments noted for retaining the infrastructure (Policy G1) and setting a high bar for changes only in exceptional circumstances (Policy G11).

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	breached in the most exceptional circumstances for the public good and never for commercial reasons.	
W5.2	[2 The draft CMK Alliance plan however ticks all the boxes. We are happy to give it our backing for what that may be worth and very much hope it is adopted.	Supportive comments noted.
W5.3	[3 Of immediate importance is the need to preserve Secklow Gate as a vehicular through route. We experienced the inconvenience when the bridge was damaged by smoke and kept closed for 18 months. Goodness knows what traffic problems will be caused in future years, by its demolition, as the population increases. This is now more important than ever with Witan Gate effectively reduced to a single lane North / South, due to vehicles delivering to the Hub parking on the inner lane and cars entering / exiting Sainsbury's car park.	Supportive comments noted for retaining the infrastructure and grid roads (Policies G1 and T1).
W5.4	[4 We also believe that Midsummer Boulevard should be reinstated. This would be a relatively simple matter of removing the glass side walls of the Midsummer Place link canopy, which has never really worked as intended, and reinstating the road with a controlled pedestrian crossing thus giving a direct route from the station to Campbell Park, as it was originally, but maybe with access restricted to public transport, taxis and pedal cycles. Item [4 is not of course part of either the framework or the plan but we wish it could be, if only as a long term intention when finances allow.	Figure 8 shows this route as reserved. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East, but ideas such as removing the roof are at a level of detail outside our remit.
X1.1	Indigo Planning acts on behalf of X-Leisure Limited, which owns ands manages Xscape, Milton Keynes, a leading entertainment destination in the south east. Xscape offers a unique combination of active leisure and retail facilities fort all age ranges including real indoor ski slopes, an indoor skydiving tunnel, rock climbing walls, bowling, multiplex cinema, health and fitness centre, bars, restaurants, nightclubs and shops and, in the near future, a casino.	Comments noted.
	Indigo Planning submitted representations on behalf of X-Leisure Limited on 9 November in relation to the CMK Development Framework (CMKDF). Many of the threads in this letter relate to those representations, and, as such, both letters should be read together.	
	The CMK Alliance, a sub committee of CMK Town Council, has published a draft 'Neighbourhood Plan' entitled 'The CMK Alliance Plan 2026' (CMKAP). This letter sets out our main comments on the draft document, which predominantly relate to the appropriate land uses in areas of CMK, and a degree of lack of consistency with the CMKDF. We also set out a series of additional comments on a separate sheet (enclosed as Appendix 1: Additional Comments.)	
	For ease of reference, our comments are made under a series of ordered sub-headings or paragraph references which correspond to those within the draft document.	
X1.2	Representations The thread running through this letter is Xscape's concern about the lack of conformity with the CMKDF, and therefore that the draft CMKAP is, in fact, unsound.	The Alliance Plan needs to be in general conformity with the <i>Core Strategy</i> and strategic policies of the Local Plan, not the <i>CMK Development Framework</i> .
X1.3	Paragraph 6.4 specifically states that, with the exception of the Primary Shopping Area, the CMKAP does not designate any special quarters or districts for main land uses. We fundamentally disagree with this approach, which could lead to a chaotic city centre with no focus, and uncertainty as to the appropriateness of development in particular locations. Furthermore, this is in direct conflict with the CMKDF, which identifies character areas for different mixes of uses. Effectively allowing any type of land use to be located anywhere in the city would result in the primary functions or uses in certain parts of the city centre being diluted which could be inappropriate in such locations. This would inevitably change the established character and function of these parts of the centre and this, in itself, would be detrimental to the character, appearance, role and function	Please see comment above regarding the <i>CMK Development Framework</i> . The Alliance is not in agreement with the designation of character areas. Other than the Primary Shopping Area (which is designated in the <i>Core Strategy</i> in accordance with the NPPF), the CMKAP promotes mixed use development throughout the city centre.

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	of different parts of the centre.	
	As stated above, this approach is wholly inconsistent with that proposed in the draft CMKDF, which identifies a series of character areas, each designated for particular uses and mixes of uses. We supported this approach to development, because development proposals are directed to those character areas depending on the use proposed. We suggested, In our previous representations, that it should be made expressly clear that applications for planning permission should be considered against the permissible types of use for each character area. Given that the CMKDF will have supplementary planning status once adopted, it is important that the CMKAP is consistent in this respect.	
X1.4	Paragraph 6.10 The Plan promotes the Station End as being suitable for a variety of land-uses, including urban sports, hotel and retail. These uses are ideally suited to the Xscape site and its environs (as envisaged under the CMKDF approach), but the CMKAP proposes that they be distributed to other areas of the centre. This is a scattergun approach to development which is inconsistent with the thrust of the CMKDF which identifies the Xscape site and its environs for retail and leisure.	See comments above. The Station Area, as well as the Xscape block, are identified as part of the 'Edge of Centre' area (this term has been to align better with the language of the NPPF).
X1.5	Page 32 'The Primary Shopping Area'	See above. The CMKAP promotes mixed use.
	The Plan identifies a Primary and Secondary Shopping Area, although the Plan's focus is undoubtedly on the former. The Plan promotes a wide variety of land uses for the Primary Shopping Area, but does not, anywhere in the Plan provide guidance for acceptable uses in the secondary Shopping Area. This approach is inconsistent with paragraph 23 of the NPPF, which requires plans to set policies that make clear which uses will be permitted in both primary and secondary shopping areas. The Plan fails to do this, and in fact is very vague on this point, in contrast to the CMKDF. The Plan should make it clear that the secondary shopping area is suitable for a mix of retail and leisure uses, whilst the primary shopping area is suitable for predominantly retail use. The primary shopping area should not be a priority location for new leisure uses as this would have negative impacts on the retailing function of that part of the centre.	
X1.6	Paragraph 6.23 The users identified for the primary shopping area are too varied for an area that should be focussed on predominantly retail uses: this is the whole basis for designating a primary shopping area. The primary shopping area is less suitable to commercial leisure uses, which should be directed towards secondary shopping areas within a mixed-use retail and leisure	The Alliance is not in agreement - the CMKAP promotes flexible mixed use.
	character area, encompassing the Xscape site.	
X1.7	Paragraph 6.27 We support the promotion of housing development across CMK. Whilst there is a cluster of housing promoted around Campbell Park, consideration should be given to providing housing in other parts of the centre. The Xscape site, and its surroundings, could accommodate housing in the form of flats, which would contribute to 'city centre living' and have the potential for strong link s with Campbell Park.	Supportive comment noted regarding the Plan's promotion of residential development throughout CMK.
X1.8	Paragraph 6.32-6.33 'Encouraging the 24 hour Economy' and policy G6 We support the Plan's promotion of a 'considerable increase in commercial leisure provision', and the proposed clustering of such uses at Xscape. This accords with the thrust of policy in the CMKDF. However, we disagree that such uses should also be clustered in the retail core, and encouraged along principal pedestrian routes and at the Station End. This would serve only to dilute those areas with an over-concentration of other uses which could change the established character of that part of the centre. It is inappropriate to disperse these uses in this way and to fragment the leisure provision. This is contrary to the distinct character areas that are proposed in the CMKDF	As noted above, the Alliance does not support character areas, but encourages mixed use throughout the city centre. We accept that there is a tendency for uses and activities to cluster together, and the Plan does not prevent this from occurring.

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X1.9	Section 8 'General Policies' The CMKDF is a framework which sets out a future vision for the development of CMK. It is essential that the CMKAP does not conflict with the CMKDF as this will provide confusion, not clarity; delay projects, increase cost and stifle development. It is imperative that the two documents are consistent in their approach towards growth and development in the central area.	As noted above, the CMKAP must be in general conformity with the <i>Core Strategy</i> and strategic policies of the Local Plan, not the CMK DF. If the CMKAP is adopted, it will supersede the CMK DF.
X1.10	Paragraph 9.6 The Primary Shopping Area has been specifically identified in the draft Core Strategy. Xscape supports mixed uses in the secondary shopping area, but does not consider it an appropriate location for just larger retail units. These could be located in the Primary Shopping Area or Secondary Shopping Area, and this should be made clear in the policy, in line with the NPPF.	CMKAP does not prevent large retail units being located outside the PSA but by definition, the PSA is given precedence and a sequential test must be followed.
X1.11	Page 63, paragraph 9.7 It is too prescriptive for larger retail developments to be obliged to incorporate a range of smaller units. This stifles flexibility and should be removed from the CMKAP.	The Alliance has responded to many public comments in favour of a mix of unit sizes and concern about the lack of independent traders.
X1.12	Summary Xscape do not support the CMKAP in its current form. It should be reviewed in light of the lack of conformity with the CMKDF and NPPF before the next round of public consultation. We trust that the above comments will be taken into account in the progression of the draft CMKAP, and we ask to be kept informed of the next stages of the process.	Comments noted, see above.
X1.13	APPENDIX 1: ADDITIONAL POINTS Page 42, paragraph 7.14 We note the porte-cocheres are to be retained. These are not safe crossing routes in their current form, and can be quite hazardous places to cross the road. Additional traffic calming and pedestrian crossings should be installed in order to create safe pedestrian routes, and increase connectivity between the grids.	The Alliance does not accept that porte cocheres create unsafe crossing routes, particularly if they are lit as intended.
X1.14	Page 43 'Increased public transport capacity, flexibility and choice' Xscape welcome the promotion of a transport interchange and the delivery of an intra-CMK shuttle system.	Supportive comments noted for Policy T2 – interchange and shuttle.
X1.15	Page 50 paragraph 8.6 It is important that the Plan is not overly prescriptive, particularly in the use of materials, as this will result in bland and unexciting public realm.	The public realm in CMK has been carefully designed as a consistent whole – with a refined and understated backdrop to city centre life.
X1.16	Page 51 'Policy CMKAP G1 Xscape support the retention of the tree lined boulevards, however, is concerned that the retention of rows of car parking as well does little to create active frontages, as development is set too far back from the Boulevard edges.	Support is noted for retention of the boulevards. With regard to the car parking and 'active frontages', we would note that frontages are relative to the pedestrian pavement, not the carriageway.
X1.17	Page 51 'Heritage Buildings and Public Art' Xscape is concerned over the willingness to list and retain buildings in the city, and is concerned that Xscape may be affected by this, which would stifle future development and growth, and limit flexibility.	Policy CMKAP G2 encourages the protection of buildings with heritage value, but it is the responsibility of MK Council to draw up and consult on a local list of potential heritage

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		assets.
X1.18	Page 55 paragraph 8.32 Xscape support the encouragement of the flexible and mixed-use approach to development.	Supportive comment noted.
X1.19	Page 57 'Policy CMKAP G7' Requiring frontages to be glazed is overly prescriptive and limiting, as it is not always achievable or desirable. This policy should be amended to make it more flexible to allow for non-glazed frontages in some cases.	Wording of the policy has been revised; however, active frontages at ground floor level are essential features in creating a vibrant and safe city centre.
X1.20	Page 57 paragraph 8.44 Colonnades are not always desirable as they can result in concealing the activity behind them. The policy should be more flexible, and not strictly require them to be incorporated in to Gate and Boulevard frontages.	Weather protection encourages pedestrian activity. If carefully designed, colonnades and canopies do not conceal activity within the building.
X1.21	Page 59 Policy CMKAP G10(g) This element of the policy should be re-worded to make it clearer. In some cases, it is necessary for advertising and corporate signage to be in obvious locations to attract visitors and enable them to easily understand what is inside a building.	The wording of the policy has been revised, but advertisements and corporate signage are not encouraged in the CMK skyline, which is considered public domain.
X1.22	Page 62 'Planning Obligations' It is important that planning obligations are proportionate and not excessive, which could lead to stifling development and the future growth of the city.	Agreed: CMKAP does not make specific proposals.
X1.23	Page 67 paragraph 10.7 Whilst Xscape support the principle of the CMK shuttle, consultation should be held on the location of the bus stops, either through the CMKAP or another source.	Agreed.
X1.24	Page 69 paragraph 10.18 Whilst Xscape appreciate the need for car parking in CMK, it is concerned that the CMKAP is proposing increasing standards that would be in conflict with the NPPF, be unsustainable and may stifle development.	The proposed parking standard has been amended, with increasing standards for residential development in Campbell Park and for office development in CMK only.
X1.25	Page 76 Figure 12 The site to the rear of Xscape is shown as white, but it should be marked 'underdeveloped site'.	Agreed.
X1.26	Page 77 Figure 13 The pink 'Class A3, Food and Drink' use is missing from the existing uses at the Xscape site.	Agreed – figure has been amended.
X1.27	Page 78 Figure 14 In support of the mixed uses that are suitable in the secondary shopping area, the Xscape site should be identified as being suitable for B1 office and C1 hotels. Parts of the site are also suitable for residential, and, as such, C2 residential should be included.	The indicative land uses are flexible and alternative uses may be proposed subject to approval of MK Council.
X1.28	Pages 79-80 Table 2 It is inappropriate and too restrictive to apply a quantum of development of additional accommodation. The Plan should have no upper limit, to avoid stifling growth and opportunity. The Xscape site has been allocated with 3,000sqm of noncommercial use, plus a multi-storey car park. This is not acceptable.	The indicative quantums of development are flexible and may be decreased or increased subject to approval of MK Council.
X1.29	Page 84, paragraph 12.29 Xscape do not favour the public realm being transferred to the Parks Trust, and would prefer the Parks Trust to transfer their land to CMK, which would ensure that CMK was in sole control of the land outside of commercial ownership within Milton Keynes. A single owner will have more chance of progressing and pushing forward the Plan rather than in fragmented ownerships. However, it is clear that the public realm maintenance is not properly funded or managed, and proper funding needs to be put in place	Comment noted, an interesting contribution to the ongoing debate promoted by the Alliance.

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X1.30	Sustainability Xscape is concerned that the plan does not mention sustainability, particularly in regard to waste recycling, energy use, efficient development etc. Xscape suggest that this is incorporated into the next version of the CMKAP.	Policies on sustainability and energy efficiency are set out in the draft Core Strategy (see paragraph 1.12).
X2.1	Following consultation with our members, many of whom attended CMKAP workshops, meetings and the recent exhibition, we are pleased to submit the following comments on the draft CMKAP 2026. Generally, we welcome the Plan as a positive move forward. In its principles and policies it reflects lessons learnt from recent, failed experiments to re-invent the unique urban plan of CMK. It also shows timely and much-needed commitment to protect the infrastructure, and other strengths of CMK, which is essential for sustainable growth and to keep the centre attractive to investors, residents and visitors. We also commend the work that has gone into creating a fresh, joined-up plan with site specific recommendations. Piecemeal development is inimical to a master-planned city such as MK, and many of the delays in local planning applications stem from piecemeal proposals that create opposition and difficulty for all parties. Rather than refer to aspects of the plan we agree with or support, the following notes cover aspects that we wish to reinforce, query or amend, in a constructive spirit.	Supportive comments noted.
X2.2	Referendum We suggest that, since the future of CMK affects all parts of MK, at least neighbouring district and ideally all residents of MK should be able to take part in the referendum.	Areas to be included in the referendum(s) are determined by legislation – the Localism Act and associated Regulations (have recently been published by DCLG and came into force on 6th April 2013 regarding referendums for neighbourhood plans).
X2.3	Pg 25, 4.16 Please delete the qualifier 'some might say false hope' in the last sentence. This sounds defeatist, and could be seized upon by opportunistic developers to promote mediocre proposals.	Text has been revised.
X2.4	Pg 27, 5.2 Accessibility Why limit description to cars? Suggest "and its grid road network makes it the most accessible city by car, long distance PT, HGVs and all emerging and future forms of transport, in the UK."	Text has been revised.
X2.5	Pg 51, policy G1 The definition of infrastructure is very important. Although listing the planters, for example, might seem too much detail in reality these details are important. The structuring elements, large and small, not only contribute to CMK's distinctive character, but are also functional. The quadrant planters, for example, guide vehicles using or turning into the slow streets, and indicate pedestrian routes and crossings. Indeed, where such details have been taken away, for example behind some office buildings on Silbury Boulevard, to provide private car parking, their loss is very noticeable and the quality of the whole public realm is damaged.	Supportive comments noted for Policy G1.
X2.6	Pg 52, Landscaping & Open Space 8.21 Suggest adding something about use of open space for more sustainable lifestyles. Eg, "These are spaces for busy workersfor informal sports and recreation, community events and local resources for more sustainable living, eg via community gardens, orchards etc. Roof spaces can also provide valuable landscapes for people and wildlife."	Text has been revised.
X2.7	Pg 54, policy G4, Campbell Park As well as requiring high quality design for buildings in Campbell Park the policy should spell out the need to limit the quantity of buildings within the park. We feel the park should remain, primarily, a park for rest and relaxation. We should not be in a hurry to build activities that require buildings within the park: once green space has gone it's gone forever. Nor do we see any urgency about attracting more people into the park. There are already plenty of popular events, thanks to the Parks Trust, the Stables arts events and so on. More regular, daily visitors to the park will come in good time, as vacant development sites are completed nearby. In recent years development has occurred within the park that people never imagined would take place. From letters in the press, it is clear that numbers of people continue to worry about Campbell Park turning into an over-commercialised, over-developed space. We urge you to acknowledge these concerns, and protect the original character of this exceptional landscape. Pg 55, 8.30 "South of Block B4 (suggest adding 'and along Grafton Gate') the Green Frame has been destroyed. This should be reinstated when the Block is developed."	Policy has been revised.

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X2.8	8.31 Please qualify the 'welcoming' of interventions in the Green Frame for civic purposes, by explaining that they should be limited, in number and scale, and extremely sympathetic to the landscape.	Text has been revised.
X2.9	Pg 55, Policy G5 a) Please delete 'ideally' from this sentence, as in "and can occur on both the CMK and adjoining grid square sides." What is the point of attempting to improve pedestrian safety on one side and not on the other?	Not agreed – improvement on one side is still an improvement and neighbouring estates are outside the CMKAP area.
X2.10	Pg 59, policy G10, Building heights We question "encouraging" building heights up to eight stories. There is still a lot of land to be developed along the park stretches of Silbury and Avebury Boulevards. Why encourage rows of high-rise buildings in the setting of Campbell Park? This seems to contradict other statements and policies (eg the character of the area, respect for 'classic CMK' urban design). Please substitute "encouraged" for something like "possible, as long as they are sympathetic to the setting, and achieve high design standards".	The quantum of development, including the associated car parking spaces, which the <i>Core Strategy</i> and therefore the CMK AP aims to deliver, will not be possible without building higher. Building heights are in relation to original building lines.
X2.11	Pg 61, Exceptional Developments 8.57 last sentence, please reflect reality and lessons learnt, eg at the Hub, by deleting 'seem', as in "sometimes to good effect, sometimes in ways that bring no benefit to CMK."	Text has been revised.
X2.12	Pg 61, policy G12 The bar should be placed as high as possible in order to protect the valuable asset that is the classic CMK infrastructure. We are concerned that the wording in policy G12 (referred to as G13, on pg 51 of our copy of the draft), does not go far enough, especially in relation to major infrastructure such as the grid road network, landscaping and open spaces including Campbell Park. We would like to add a further proviso: that for an exceptional development to be considered, in breach of major public realm elements such as the grid road network and major landscaping elements, the development should be of a social or cultural nature, and not a purely commercial venture.	Agreed that 'social' should be included.
X2.13	Pg 66, Policy T1 The clarity and weight of policies are weakened by repeated reference to policy G12, Exceptional Developments. Please delete this reference in T1 a) ('but see also exceptional developments Policy G13) Pg 66, 10.4 Restoration of Midsummer Boulevard We fully support the Plan's aim of improving public transport, cycling and pedestrian routes but feel it should go further by firmly recommending the restoration of Midsummer Boulevard at Midsummer Place. Given the statement on pg 24, 41.3 (the most important challenge for the CMK Alliance Plan is transition to sustainable transport), the Plan should aim to restore access along the full length of MSB. The current compromise, where protected PT and public walkways run through a privately-owned building, satisfies neither party and should be resolved if at all possible, in a spirit of cooperation. Currently all traffic is forced to take a 'dog-leg' detour around Midsummer Place. This can add up to 20 minutes to a journey through CMK, increasing fuel consumption and CO2 emissions and discouraging people from getting out of their cars and onto PT. The roof over the atrium could stay or go but it is perfectly feasible to restore the highway. The owners could benefit from a better use of space, lower maintenance costs, and possibly a oneoff agreement to build new retail units to the edge of the boulevard, at this point only. With CMK highways approaching peak demand, and the need to shift towards PT in particular, it makes sense to restore the city spine between the Station and Campbell Park and thereby restore the smooth functioning of the grid road network as a whole. It is important to correct mistakes such as this before moving forward and trying to implement the Plan. Otherwise people are constantly trying to mitigate the negative impact of misguided, ad hoc interventions in an otherwise highly efficient public infrastructure.	Unnecessary repetition has been amended. Figure 8 shows this route as reserved. New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.
X2.14	New civic square One consequence of restoring MSB is that the proposed new civic square somewhere near or possibly over MSB east, between the Point and Secklow Gate Bridge, would either have to be designed to accommodate traffic or not go over the boulevard. If space permits, a new square could be created south of MSB where the new covered Market Hall and transport interchange is proposed. Alternative sites include at the back of the Library/Civic Offices, or at E3, D3 or the possible, improved 'Green Bridge' connecting Midsummer Boulevard from CMK to Campbell Park. If the MK Rose does not proceed, for whatever reason, it could also be sited near the circular pond and 'events' areas in Campbell Park, offering a pleasing continuity of line following the Boulevard, Bridge and Belvedere. However finding a place for one now at this advanced stage of CMK's development is difficult, without the benefit of some re-planning and demolitions to make way for	New Policy SS3 has been added which proposes further neighbourhood planning work to be undertaken on the area of Midsummer Boulevard East.

Ref no.	Responses (refer to Consultation Draft)	Alliance comments (refer to Examination Draft)
	it. We would like more clarity on what size the new square needs to be and how often people will want to use it. For example, does it need to be the size of the original Queens Court, or Station Square? Interestingly, the Red Bull homecoming event, as well as the International Arts Festival, both show how well the spacious boulevards and existing open spaces come into their own for special events.	
X2.15	Residential/density of development in Campbell Park While the Core Strategy fixes requirements, we would encourage the Plan, as far as possible, to resist too much residential development in Campbell Park grid square, and stick to the aim of creating jobs and prosperity in this exceptional setting which is likely to attract knowledge based and creative industries.	The indicative land uses show a mix of uses around Cambell Park, not dominated by residential. (See proposals plan). The Campbell Park grid square needs a qualitative different approach from the rest of CMK
X2.16	Building lines: the Plan's policy is to keep with the original, set-back building lines, allowing space for footpaths, limited surface level parking, slow streets etc. which we fully support. However on fig 12 & fig 14, 'back of kerb' building lines are shown on development sites near the Grand Union Canal. Is this correct?	Figures have been amended.
X2.17	Pg 68, Cycling 10.17 As well as at Station Square, it is important to provide cycle parking in other convenient, safe and overlooked locations. Cycle stands should not be relegated to odd or gloomy corners.	Agreed
X2.18	Pg 81, chapter 12. Implementation Is it possible for the Plan to indicate, if not within its remit to include, a procurement method and process to secure the aims of the Plan and deliver high quality architecture and urban design? This might involve a more specific and well defined Development Control Plan, the preparation of site-specific Development Briefs.	This Plan is designed to equip the decision makers (DCC) with the necessary tools to promote architecture and very high quality design set-out.
X2.19	Architectural Panel In order to improve the quality of new development we suggest a new, independent architectural panel is created to provide advice on plans at an early stage in their evolution.	The Alliance believes a clear process for the consideration of development proposals will help drive up quality, but has not taken a view on exactly what these processes should be. An architectural panel, or a placemaking group, could form a part of this. Early engagement is very important.
X2.20	Conclusion: It is encouraging to see some imaginative proposals in the Plan and signs that the ambition to become 'a city for all horizons of history' is still alive. Xplain hopes that when the Plan goes to referendum it reflects the strong desire of local people for Milton Keynes to keep growing in a way that builds on its unique strengths and remains true to itself.	Supportive comments noted.