

Representor ID: RCRP-046

UI Representor ID: 825

UI Representation ID: 892

Representor Name: SUE BROWN

Representor Organisation: MILTON KEYNES CITY COUNCIL

Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>Annex C: Open space standards - Amenity greenspace and Local Park and Pocket Park typology – states 0.7ha/1000 population of either (order of preference):</p> <ul style="list-style-type: none">- Local Park- Pocket Park- Amenity Greenspace <p>of either of the open space types to be provided Size linked to density of the surrounding area. Standard to be developed for key densities:</p> <ul style="list-style-type: none">- Low density up to 25dph- General residential 25dph-35dph- Frontage and community hubs 35dph-50dph- Hub area 50-100dph <p>The quantity needs to be measurable when a development is proposed. So, which is it, 0.7ha/1000 population OR a different standard to be developed for residential densities? How will either of these quantities be measurable in practice? Currently it is not possible as there is no method of calculation because housing developments are proposed as number of dwellings and house-types based on number of bedrooms NOT number of occupants i.e. population. Therefore, currently, this and all open space standards are not measurable in practice against the standards and frequently developers will use their open space typologies for example MK East.</p>		
Appear at examination?		
Appear at examination reason?		

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Policy: Policy GS6		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
There are 2 number 6 amend		
Appear at examination?		
Appear at examination reason?		

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Representor Name: SUE BROWN

Representor Organisation: MILTON KEYNES CITY COUNCIL

Policy: Policy GS18		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Re C.2 'Adopt a sensitive, landscape-led approach...' The harm resulting from the scale of a 1250 home development, can not be mitigated through a 'landscape-led approach' It is not ethical to imply that it can.		
Appear at examination?		
Appear at examination reason?		

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Representor Name: SUE BROWN

Representor Organisation: MILTON KEYNES CITY COUNCIL

Policy: Policy ECP6		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Re A3: 'cumulative' Omit 'cumulative' or reword to 'unacceptable impacts including cumulative impacts'. Impacts such as large developments in the wrong location can be unacceptable without being cumulative e.g. unacceptable harm to landscape, wildlife, lighting impact on dark skies etc.		
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Appear at examination reason?		

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Policy: Policy GS7		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Re objective 6 A, as shown on the policies map - Major development of solar and wind farms are not compatible within Special Landscape Areas and has not been accounted for in the selection of sites shown on the Policies Map. SLA are sensitive locally valued landscape which has high amenity value. Therefore, the conflict between Policies for the protection of SLAs and Wind and Solar Development is not legally sound. Wind turbines are particularly impactful on landscapes due to their height. However, solar can be equally impactful from the buffer landscaping needed to screen views of the solar arrays from public vantage points. This landscaping permanently alters the landscape fabric creating a legacy landscape which forever imprints the solar development into a changed landscape that detracts from the special qualities of Special Landscape Areas.		
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Policy: Policy CEA8		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>The NPPF says that existing open space should not be built on unless its criteria are met, it does not stipulate any size that would be acceptable therefore explicitly quoting a figure of 0.2ha goes against the intention of the NPPF. The new policy wording suggests that anything less than 0.2ha can be lost without consequence, the cumulative impact of many developments building on open spaces less than 0.2ha was not the intention of the NPPF which sees a value in open space delivering wider benefits for nature and supporting efforts to address climate change. All types of open space are offered protection under the NPPF regardless of size, subject to NPPF criteria.</p> <p>Regards D (Types which are set out in Annex B)</p> <p>The NPPF defines open space as ‘all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity’. The types sets out in Annex B only include publicly accessible land NOT all open space of public value! Open space which is privately owned and may or may not be accessible is of public value including as visual amenity but also other public benefits of addressing biodiversity loss and climate change etc. Limiting protection only for open space of the types set out in Annex B is not in line with the NPPF or previous Policy L3 (Change of Use of Amenity Open Space) which has simply been deleted.</p> <p>Regarding E 'loss of amenity greenspace' Amenity Greenspace is defined in Annex B as ‘Publicly accessible open greenspaces’ however, this is too limiting and should as per previous policy be described as ‘open areas, including woods, copses and ponds, where recreational use is incidental to their primary function as attractive features in otherwise built-up areas, reservoirs of biodiversity, wildlife habitat, or a combination of all three. It includes privately owned areas to which there may be no public access. Areas of amenity open space are found mostly in residential areas, but also in employment areas and district centres’. This would reflect the wider interpretation of open space under the NPPF.</p>		

Regards' Loss of amenity greenspace' This policy wording does not offer the protection previously offered by Policy L3 Change of Use of Amenity Open Space which is proposed to be deleted. Privately owned greenspace that's contributes visual amenity to the public realm should be offered protection by including the following wording from Policy L3: 'Planning permission will only be granted for the change of use of privately owned amenity greenspace, including the incorporation of such areas into private garden land, if:

- 1.The land does not fulfil a useful purpose in terms of its appearance, landscaping, recreational use or wildlife value;
- 2.The loss of amenity greenspace would not set a precedent for other similar proposals which cumulatively would have an adverse effect on the locality or the environment;'

Re G 'Development within Linear Parks' The criteria proposed were originally included in Policy L1 and were written for ALL Parks NOT exclusively for Linear Parks. To ensure that all Parks not just Linear Parks are protected from inappropriate leisure and recreation uses, the wording for section G should be changed to 'Development in Parks' and reference to Linear omitted.

Re 'provided they do not' As originally worded in Policy L1, include: 'Have an adverse impact on any historic significance of the Park'.

As originally worded in Policy L1, include: 'Have an adverse impact upon the highway network'.

The policy wording should continue with further criteria tailored specifically to Linear Parks: 'And development proposals in Linear Parks must contribute to achieving the following objectives:

1. Protect and improve the landscape character.
2. Protect and interpret areas of archaeological interest.
3. Flood control.
4. Retain and improve public access to land and water areas for countryside recreation.
5. Protect and enhance features of nature conservation value.'

Re G2 'the primary function of the linear parks' The primary function of Linear Parks in Milton Keynes is not to provide public open space but as flood defence and storage with recreational opportunities being a secondary function. The issue with this Policy is that is has sought to delete the Linear Park Policy DS6 by combining it with Policy L1 Facilities Acceptable In The Parks.

G.2 'linear parks as publically accessible ' Delete wording to instead say: 'Detract from the primary use of the open space' as originally worded in Policy L1.

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Policy: Policy CEA7		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Regarding J 'must include appropriate mitigation measures to protect existing and future occupiers from noise and vibration impacts' Other policy elements set criteria; wording previously used in Policy NE6 has been omitted and should be added in to clarify what 'appropriate' looks like. Wording should say: 'must include appropriate mitigation measures such as setbacks and landscaping measures to provide screening and acoustic buffers'.		
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Representor Name: SUE BROWN

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Policy: Policy GS17		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Re C.2 'Adopt a sensitive, landscape-led approach...' The harm resulting from the scale of a 1300 home development, can not be mitigated through a 'landscape-led approach' It is not ethical to imply that it can.		
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Representor Name: SUE BROWN

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Policy: Policy CEA10		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>300 homes would equate to considerably more than 20ha of land when taking into account the significant space needed for roads, open spaces, and amenities needed to support 300 homes. Natural England must be consulted for development proposals that are both: likely to cause the loss (or likely cumulative loss) of 20ha or more of BMV land, and not in accordance with an approved development plan. The NPPF requires significant development of agricultural land to be demonstrated to be necessary and if so, areas of poorer quality land should be preferred to those of a higher quality [i.e. grades 3b, 4 and 5]. Also, the NPPF is not specific in relating only to housing development; it covers any development impacting soils. Policy wording should be altered in line in the NPPF: 'Proposals involving development of agricultural land shall be accompanied by an assessment identifying the Grades (1 to 5) Agricultural Land Classification. Where development involving best and more versatile agricultural land (Grades 1, 2 and 3a) is proposed, those areas on site should be used as green open space and built structures avoided. Where significant development would result in the loss of best and more versatile agricultural land, planning consent will not be granted unless:</p> <ul style="list-style-type: none">a. There are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, andb. The benefits of the proposed development outweighs the harm resulting from the significant loss of agricultural land.'		
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Policy: Policy PFHP5		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>Currently it is not clear to developers or consultees if proposals have to meet Policy PFHP5 Sections A and B and C; or if proposals only have to meet A or B or C. The wording needs to be explicit and include 'AND' or 'OR'.</p> <p>Re 'B' A further criteria point should be added from Policy D2 which has been omitted: 'Allows for visual interest through the careful use of detailing, where this is appropriate to the character of the area' this is important in terms of protecting amenity and mitigating the visual impact of buildings/warehousing etc by ensuring the design or appearance is flexible enough to agree sympathetic materials.</p> <p>Re 'B.2' It is not just built form which can create a locally inspired / attractive character. Landscaping and boundary treatments are also important elements in designing locally inspired / attractive character and sense of place, and can be the main elements in designing open spaces. The design of boundary treatments are important elements e.g. in conservation areas and are typically locally inspired.</p> <p>Re 'C.7' The first word 'Provide' should be omitted as it is not just about adding landscape but also retained landscape. It should read: Soft and hard landscaping that integrates with and / or enhances....'. Also, the wording 'landscaping that continues the verdant and green character of Milton Keynes' has been omitted and should be added back in to the list. This sets MK standards of greenery above other cities in landscape quality and the wording should be retained in policy.</p>		
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Policy: Policy CEA12		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>Re A. The first sentence should begin with: 'Development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Milton Keynes Landscape Character Assessment (MKLCA), their sensitivity to change and contribution to a sense of place'. Re 'where possible, enhance the..... landscape character' add enhance the 'characteristics of' . Re 'sensitive 'DESIGN' mitigation - add in 'using a landscape-led approach' Re A. 1,2,3,4 These are out of date and are too general, replace with: 'Development should consider the characteristics of the landscape character area by meeting all of the following criteria: a. minimise impact on visual amenity; b. be located to avoid the loss of important on-site views and off-site views towards important landscape features; c. respect local character and distinctiveness in terms of settlement form and field pattern, topography and ecological value; d. carefully consider spacing, height, scale, plot shape and size, elevations, roofline and pitch, overall colour palette, texture and boundary treatment (walls, hedges, fences and gates); e. minimise the impact of lighting to avoid blurring the distinction between urban and rural areas, and in areas which are intrinsically dark and to avoid light pollution to the night sky; f. ensure that the development is not visually prominent in the landscape, and g. not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value. The first principle in mitigating impact is to avoid any identified significant adverse impact. Where it is accepted there will be harm to the landscape character, specific on-site mitigation will be required to minimise that harm and, as a last resort,</p>		

compensation may be required as part of a planning application. Development proposals must consider the enhancement opportunities identified in the MKLCA and how they apply to a specific site’.

Regards B 'with the standard method set out in the Landscape Institute guidance' - Insert: 'the Guidelines for Landscape and Visual Impact Assessment - version 3 or as amended’.

Re Special Landscape Areas C.3 'light pollution, noise and motion; Add 2 further points 'Avoid adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated'. And: 'Reinforce the sense of place and local character’.

Re D Development proposals must include appropriate measures to mitigate landscape and visual impacts - For clarification reasons add sentence here: 'Small-scale development will be supported providing that their provision preserves the openness and special qualities of the Special Landscape Area designation, and does not conflict with the purposes of including land within it’.

Re D 'visual assessments or studies' Add: 'Where permission is granted, the council will require conditions to best ensure the mitigation of any harm caused to the landscape’.

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Policy: Policy GS10		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
<p>Re F 'such as telecommunication cabinets and energy storage boxes' Policy D8 (Mains and Telecommunications Services) has been deleted and there is nothing robust in place within the new policies to protect amenity. Policy wording in GS10 only relates to infrastructure such as telecommunication cabinets and energy storage boxes ON THE HIGHWAY NETWORK. However, similar wording would be appropriate included elsewhere such as Policy PFHP9 Amenity for healthy buildings and spaces or ideally a standalone Policy to avoid repetition.</p> <p>Re H: 'Where major development proposals would provide opportunities for new public access to the canal' Policy D7 (Canalside Development) has been deleted and it placed greater emphasis on development proposals adjacent to canals using the word 'SHOULD help to deliver improved public access to enjoy the waterway'.</p>		
Modification Comment		
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Policy: Policy PFHP6		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>Regarding A.3 The NPPF goes further than this Policy wording and states that 'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies should ensure that new streets are tree-lined, except where there are clear, justifiable and compelling reasons why this would be inappropriate'. It also states 'that existing trees are retained wherever possible'. This clause needs rewording to better reflect NPPF.</p> <p>Regards 'A.4' This wording has changed requiring boundary treatments to be both secure and attractive. However, not all boundary treatments need to be secure such as front gardens and privately owned but publicly accessible plazas. Instead the wording should say 'through the use of attractive boundary treatments, which are secure and robust where appropriate'.</p> <p>Re 'B.11' List is missing 'boundary treatments' which also need to be fit for purpose, durable and sustainable i.e. not just those listed.</p>		
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Policy:		
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Paragraph		
Compliance Comment		
Modification Comment		
'Landscape Led Approach' should be added to the glossary to be clear what is meant by the heavily used statement Also Landscape Visual Impact Assessment, Heritage, Townscape and Visual Impact Assessments to confirm what these studies are and their purpose.		
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Policy: Policy GS19		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
Re C.3 'Adopt a sensitive, landscape-led approach...' The harm resulting from the scale of a 1000 home development, can not be mitigated through a 'landscape-led approach' It is not ethical to imply that it can.		
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Policy: Policy PFHP9		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
Compliance Comment		
Modification Comment		
<p>Section A: The Policy D7 Canalside Development has been deleted. The following text should be incorporated as an additional point under this Policy in Section A 'New buildings should present active frontages to the canal and be in keeping with local character in terms of scale, design and materials'.</p> <p>Re A.1: 'on existing properties or buildings' This Policy is about amenity for buildings and spaces and yet the wording 'and open spaces' has been omitted and should be added back in as 'and external amenity spaces' in order for the Policy to function as intended and for consistency across the Policy wording.</p> <p>A.2: 'amenity spaces' Amenity spaces is not defined it could be interpreted as internal or external and is therefore open to arguments between developers and consultees. The words 'open spaces and garden areas' has been omitted, which did offer definition and should be added back in as 'external amenity spaces' in line with the NRDG SPD and for consistency across the Policy wording.</p> <p>A.4: 'External space' Wording has been omitted which gave definition and purpose and should be added back in as 'external amenity space' in line with the NRDG SPD and for consistency across the Policy wording.</p> <p>A.5: 'new communal area' Communal areas are not defined, it could be interpreted as internal or external and is therefore open to arguments between developers and consultees. The word 'garden' has been omitted, which did offer definition and should be added back in as 'new communal external amenity spaces' in line with the NRDG SPD and for consistency across the Policy wording.</p> <p>A.6: 'Private / communal areas' Communal areas are not defined, it could be interpreted as internal or external and is therefore open to arguments between developers and consultees. The word 'garden' has been omitted, which did offer definition and should be added back in as 'private/communal external amenity spaces' in line with the NRDG SPD and for consistency across the Policy wording.</p> <p>Also 'taking account of the relationship with neighbouring buildings and the wider street scene' Important elements which help to define and influence good/poor</p>		

outlook have been omitted and should be added back in as 'including the design of parking, boundary treatments and landscaping'.

B 'servicing and refuse storage and collection areas' -needs to include 'and utility infrastructure'. 'Such areas' add in 'and infrastructure'

Re: ' To ensure they' Policy D8 (Mains and Telecommunications Services) is deleted and there is nothing robust in policy wording to replace it.

Add the following text to the list: 'Appropriately detail the design of infrastructure such as telecommunication equipment and energy storage boxes including landscaping and external finishes to optimise screening and mitigate visual impacts.'

Amenity for Homes: 'As a minimum. all new homes must meet the Nationally Described Space Standard' - There is no Space Standard for Amenity! The national standards only cover the internal floor area (Gross Internal Area), bedrooms, storage, and ceiling heights of new dwellings. Requirements for gardens, balconies, terraces and communal gardens are determined by local planning policies, but none are included in MK City Plan 2050 and should be as this Policy is about Amenity for healthy buildings and spaces.

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Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
The Shenley Dens Strategic City Extension will provide a significant supply of homes within the plan period to help meet our housing needs by 2050, and help to meet our needs for Gypsy and Traveller pitches in the early part of the plan period. The alloca		
Compliance Comment		
Modification Comment		
Policy CEA12 Conserving and enhancing landscape character/Special Landscape Areas states that 'Development proposals affecting Special Landscape Areas will only be permitted where they: 'Conserve and, where possible, enhance the special character and key landscape qualities of the area'. Proposing major residential development in areas assessed as locally sensitive is not compatible and legally unsound. Only small scale development could be integrated within the SLAs if small sites are designed using a landscape-led approach, informed by a full detailed landscape and visual impact assessment (LVIA) with robust mitigation measures. Major development should only be considered outside of those areas already assessed and proposed as Special Landscape Areas.		
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Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
The South of Bow Brickhill and Levante Gate Strategic City Extensions will provide a significant supply of homes within the plan period to help meet our housing needs by 2050. Both allocations are located within the Brickhills Special Landscape Area. Whil		
Compliance Comment		
Policy CEA12 Conserving and enhancing landscape character/Special Landscape Areas states that 'Development proposals affecting Special Landscape Areas will only be permitted where they: 'Conserve and, where possible, enhance the special character and key landscape qualities of the area'. Proposing major residential development in areas assessed as locally sensitive is not compatible and legally unsound. Only small scale development could be integrated within the SLAs if small sites are designed using a landscape-led approach, informed by a full detailed landscape and visual impact assessment (LVIA) with robust mitigation measures. Major development should only be considered outside of those areas already assessed and proposed as Special Landscape Areas.		
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Policy:		
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Paragraph		
Successful placemaking for this allocation, and its relationship with the surrounding area, will require further detailed consideration including its immediate sensitive environs and notable heritage and ecological assets. To do so successfully will requi		
Compliance Comment		
Modification Comment		
Just highlighting significant weight has been given to Heritage assets / man made parkland (a golf course structural landscape) in the creation of this policy concept plan. Concept plans for policies GS17,18 and 19 should afford 'natural' landscape when identified as 'special' (SLA) with the same respect,		
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Policy:		
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To measure if a new building would be overbearing, applicants must assess a proposals size and proximity to neighbours to determine if it negatively impacts their privacy, natural light or outlook. This is typically done by a professional surveyor who wil		
Compliance Comment		
Modification Comment		
Re ' Proximity to neighbours' Should be replaced with 'neighbouring buildings and external amenity spaces'. Especially for tall buildings the impact on public and private gardens needs to be assessed. Re 'privacy, natural light or outlook' Add in 'micro-climate' as shadowing can negatively impact on user experience and existing planting can suddenly be placed in shade or a wind tunnel or a tall building.		
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Policy:		
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The privacy and amenity standard expected within areas where a compact form of development is encouraged may need to be managed, to enable densities that support local town centres and the public transport network. A more creative approach to the design a		
Compliancy Comment		
Modification Comment		
Re: 'an acceptable level of amenity is achieved' This paragraph relates to high density development where access to external amenity spaces is essential to create healthy homes and places. There are no standards of external amenity spaces for apartment blocks except those in the NRDG SPD and they can be a point of dispute between developers and consultees on the need for both private external amenity and communal external amenity. Crystal clearer standards are needed, both private and communal external amenity are required for high density high-rise living and apartment blocks.		
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The amenity afforded by new development and the protection of amenity within existing developments are also critical to ensuring the creation of people-friendly and healthy places. Buildings must be carefully designed to ensure adequate privacy, sun light		
Compliance Comment		
Re 'Building must be carefully designed' No mention of the Amenity for Spaces, and should be about both not just buildings. Change to Buildings and amenity spaces'		
Modification Comment		
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Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Paragraph		
We will also require other good design practices to ensure that the living environment of homes, buildings and external spaces supports peoples' quality of life, as well as creating flexibility to accommodate changes in circumstances. As such, we require		
Compliance Comment		
Re: 'External Spaces' Amend to 'external amenity spaces' in line with NRDG SPD and for consistency across the Policy. Re ' Nationally Described Space Standards' The national standards only cover the internal floor area (Gross Internal Area), bedrooms, storage, and ceiling heights of new dwellings. Requirements for gardens, balconies, and terraces are determined by local planning policies, but none are included in MK City Plan 2050 and should be as this Policy is about Amenity for healthy buildings and spaces.		
Modification Comment		
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